

Help plan our future
Options for the new
Waveney Local Plan

Summary of responses to the consultation

Part 1
Responses to Questions

August 2016





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Introduction

This document provides a summary of the responses to each question received during the consultation on the 'Options for the new Waveney Local Plan'.

The consultation marked the first stage of consultation on the new Local Plan and invited comments from statutory local plan consultees, parish and town councils, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public.

The consultation took place between 22nd April and the 17th June 2016. In total 525 individuals and organisations responded to the consultation. Between them they made 3,428 comments. 2,210 of these comments were made on the questions in consultation document. The other 1,218 comments were made on the potential sites for development which were also part of the consultation. A summary of the responses to the sites can be found in Part 2 of this document.

Full copies of the responses can be viewed by question/site at www.eastsuffolk.gov.uk/newlocalplan.

The Council also engaged with students at workshops at the Sir John Leman High School and the Lowestoft Sixth Form College. A summary of the feedback from these workshops can be found in Appendices 2 and 3.

Following the close of the consultation the Council also received results of a survey conducted by Brampton and Stoven Parish Council to get residents views on some of the issues and questions raised during the consultation. The results of this survey are included in Appendix 4.



Summary of Responses to Questions

Key Issues

2 respondents

Statutory Consultees

The Broads Authority stated that the Area of Outstanding Natural Beauty and the Broads are not necessarily issues. They argued that the term issue implies a negative. They stated that the chapter could be renamed 'Key Considerations'.

The Environment Agency stated that they were pleased to see that environmental issues have been included in the key issues section and they fully agree with the points currently made. They suggested the inclusion of water resources could be included into this section as a key environmental issue for the area. They noted there was no mention supporting the protection of groundwater and aquifers.



Vision

Q01 a) What is good about living or working in Waveney now? b) What is good about living or working in the town or village you live in?

56 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council mentioned the semi-rural aspect.

Frostenden, Uggeshall & South Cove Parish Council noted the lovely countryside.

Ilketshall St Margaret Parish Meeting noted the low crime levels, natural environment and local facilities in Bungay.

Lound Parish Council noted that residents agreed that it was a peaceful and friendly place to live with good community spirit.

Southwold Town Council mentioned the following qualities; nature and landscape; picturesque villages and market towns; the sea; good quality local food; strong sense of community and independent businesses.

Three Saints Parish Council noted the largely unspoilt rural environment and that the area is generally friendly and tolerant. They noted good access to the coast and countryside, thriving market towns, local produce, access to Norwich, cultural and leisure activities, voluntary sector, safe, low crime rate. In respect of the Parish area they noted low density housing, lots of space, rural, peaceful, good community spirit and concern for the environment.

Other Organisations

Southwold and Reydon Society noted that we live in an area of great beauty with a varied and outstanding natural environment.

Developers/Landowners

Badger Building stated that the District provides an attractive and relatively cheap location to live in. There is easy access to Norwich or to open countryside and the Broads. They mentioned that Lowestoft is a compact town and provides a good range of services. Bungay, Beccles and Halesworth have all retained a degree of local character and charm.



Larkfleet homes stated that primary aspects which are valued by many local residents are the rural character of the area including its coastline, the Broads and the special landscape in particular of the Waveney and Blyth river valleys. They also mentioned the rich built heritage.

Rentplus recommend that the following wording be included in the Local Plan vision to reflect the intention of the NPPF and Government agenda focused on extending opportunities for home ownership: *“Enable the delivery of an appropriate mix of market, affordable housing and rent to buy homes that are suitable in tenure, type, size and location to meet identified housing need.”*

Members of the Public

Members of the public mentioned the following qualities about the District and their local place:

- Balanced mix of urban and rural places
- Tranquillity and scenery of the countryside
- Area of Outstanding Natural Beauty
- Favourable climate
- Market towns
- Country lanes
- Pretty villages
- Low crime rates / safe places
- Sense of community
- Friendly people
- Employment opportunities
- Good variety of shops
- Low population density
- Adequate infrastructure
- Parks
- Cycle paths
- Local theatres
- Access to Hospital
- Train services to London
- Barnby – attractive, affluent, semi-rural, low crime.
- Beccles – self sufficient and adequate infrastructure for the population, comprehensive range of shops, planned southern relief road.
- Lound – quiet rural village with good views of the countryside, good community spirit, active church, garden entre, pub and café, nearby nature reserve, no crime, public footpaths, horse riding, safe to cycle, wildlife.
- Lowestoft – seaside, Lake Lothing, lifting bridges, Broads, church, nearby countryside, two railways serving the town.
- Reydon – coastline, heathland, near to Southwold,
- Rumburgh – active community life, local pub and village hall.



- Worlingham – close to Beccles, low crime, community feel, pleasant public realm, low density.

Q02 a) What is not so good about living and working in Waveney now? b) What is not so good about living or working in the town or village you live in?

47 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Beccles Town Council stated that road infrastructure in the area is poor and not fit for purpose. There is inadequate pedestrian and cycle access to the existing Ellough employment areas and no bus service at all.

Carlton Colville Town Council mentioned the continual building of new estates without a corresponding increase in infrastructure or jobs or social facilities.

Corton Parish Council mentioned disjointed approach to the Lowestoft area due to a lack of Parish Council. They stated that Ness Point is an embarrassment with dreadful access and dogs mess. They raised concern about major shops closing.

Frostenden, Uggeshall & South Cove Parish Council noted house price inflation and lack of facilities locally in the Parish.

Ilketshall St Margaret Parish Meeting noted the lack of job opportunities for young people, coastal erosion and flood risk. They also noted the removal of public transport from the Parish and the speed and availability of Broadband.

Kessingland Parish Council noted the loss of young families which leave for better employment opportunities, the lack of public transport, the lack of community facilities, and the lack of affordable housing.

Lound Parish Council noted the lack of shops, and poor public transport provision in the village.

Southwold Town Council noted the following issues with respect to the District:

- Poor public transport connecting villages and towns and London;
- Broadband is not as good as it should be for working purposes;
- Discouraged from using Lowestoft because of bridge access issues;
- Lack of well paid jobs – overdependence on tourism;
- Lack of facilities for knowledge based businesses;



- In Waveney, especially Lowestoft, state education is not as good as it should and could be;
- Lack of maintenance of footpaths, green spaces, including litter;
- Loss of community hospital provision.

With respect to Southwold they noted the following:

- Lack of facilities for knowledge based businesses and community assets
- High rents which discourage independent businesses, small businesses and start-up businesses
- Lack of affordable homes
- Lack of rental accommodation at a reasonable price for people whose income does not qualify them for affordable social housing.
- 57% of housing is second homes/holiday lets
- Declining and elderly/very elderly population
- Lack of volunteers undermining essential services and civic life
- Inadequate parking system – too many cars in town during high season. Pavements and streets not safe for pedestrians/cyclists.
- Over-dependence on tourism
- Too many people using the town in the summer without the physical facilities and resources to service them and maintain the town.
- Difficulty of recruiting employees because of lack of affordable housing and poor public transport system.

Three Saints Parish Council noted the lack of good quality jobs and lack of affordable housing. They noted increasing traffic and a growing number of second home owners. They also mentioned an over reliance on car use and poor public transport.

Other Organisations

Southwold and Reydon Society noted the significant deprivation in the District, particularly in Lowestoft. They noted the low pay sectors of tourism which many people in Southwold and Reydon are employed in. They also noted that local people are priced out of the local housing market.

Developers/Landowners

Badger Building stated that parts of the District are unaffordable (e.g. Southwold) and the problem is spreading to market towns due to restrictive planning policies. They also stated that parts of the District are very remote and that jobs growth has been slow employment opportunities are limited and educational aspiration and achievement are low.

Larkfleet Homes stated that residents' primary concerns were the availability of both jobs and homes, of issues of social deprivation and the lack of community facilities and infrastructure. They went on to state that particular concerns exist for 'first time buyers', young families and elderly residents seeking to 'downsize'.



Members of the Public

Members of the public mentioned the following issues about the District and their local place:

- Limited healthcare facilities
- Obesity
- Ongoing threat from large-scale development
- Poor infrastructure
- Poor transport links
- Lack of restaurants and bars
- Too many cars and traffic congestion
- Poor public transport in villages
- Poor internet and phone connection
- Lack of aspiration and poor educational attainment
- Low economic growth and low wages
- Offshore wind could blight coastal views a future grid transmission could impact on the landscape.
- Lack of care of historic assets
- Lack of investment in tourist infrastructure
- Too many supermarkets
- Beccles, transport within the town is becoming an issue, lack of indoor swimming pool.
- Lound – threat of new housing, few passing places on small country roads, traffic through the main street, litter near college(former Lothingland Middle School)
- Lowestoft - parts around London Road South and Station Square that are dilapidated, the state of Ness Point , traffic congestion, shopping is poor, deprivation, less welcoming feel and yobbish behaviour in town centre.
- Rumburgh – poor local provision of some services such as health care. Limited sports facilities in Halesworth, limited local employment, poor broadband, unsafe rural roads, no cycle paths and limited public transport.

Q03 a) What is your vision for Waveney by 2036 and what are the key priorities that need to have been addressed by 2036? b) What are your vision and priorities for your town or village?

57 respondents

Statutory Consultees

The Broads Authority stated that the Broads should be mentioned in the vision.

The Environment Agency state that their focus over the plan period is to protect, maintain and enhance the natural environment in Waveney and the surrounding area; and, ensure environmentally sustainable development. Their key priorities will be to improve biodiversity, protect and improve the regeneration of groundwater, support good waste management, ensure new developments are resilient to climate change, and improve water quality.



Historic England stated that the vision for the district should make reference to the rich historic environment of the District and the need to develop a strategy for the conservation and enjoyment of this environment. In particular the vision should relate to the distinctiveness of the district, including that of its historic environment.

Natural England advised that the Plan's vision and emerging development strategy should address impacts and opportunities for the natural environment with particular emphasis on designated environmental assets. They advised that where relevant there should be linkages with the Biodiversity Action Plan, Nature Improvement Area, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies.

Parish and Town Councils

Frostenden, Uggheshall & South Cove Parish Council stated the key priorities should be the regeneration of Lowestoft and Great Yarmouth and the third river crossing for Lowestoft. For the Parish, their vision is to create a better sense of community.

Ilketshall St Margaret Parish Meeting stated that there should be a variety of businesses offering job opportunities and a secure protected environment. For their Parish, their vision is a community that continues to thrive, where the residents feel safe and there are transport links into the town. Also where those businesses located in the village can function effectively on-line.

Kessingland Parish Council stated that their vision is for Kessingland to be an easily accessible village, a place with improved inclusivity, a place where young people can stay when they grow up, has more affordable housing, improved infrastructure and new businesses.

Lound Parish Council stated that the general expressed vision for the village is that it should remain as it is now, with only organic growth that doesn't change the character of the village.

Southwold Town Council stated their vision for Waveney is for more knowledge based industry, more affordable housing, better education, better public transport, better broadband, third crossing, better protection of the environment, and better design. For Southwold they stated their vision is to integrate knowledge based business in the town centre, more affordable homes, restrict and discourage second homes, affordable retail and businesses uses, new community facilities, high quality design, extend the conservation area to parts of North Road, more off-road parking, better cycling routes, better public transport and better management of parking and traffic.

Three Saints Parish Council stated that their vision for Waveney was to protect the rural character of the area and ensure market towns continue to thrive. They stated a need to provide affordable housing and jobs and have more concern for the environment and sustainability. They stated that



the reliance on car should be reduced and local services and facilities should be as local as possible. For the Three Saints area, the Parish Council stated that their vision is to protect the rural, unspoilt character of the villages with scattered housing. They stated that development should be limited and sympathetic to the environment and community involvement should be improved, roads should be safe with greater protection for the environment and wildlife.

Other Organisations

The Halesworth & Blyth Valley Partnership stated they would welcome an increase in affordable housing and industrial development, together with improved infrastructure including health care and education.

Southwold & District Chamber of Trade & Commerce stated the vision should reflect the value of Southwold and Reydon to the wider area. They stated that in formulating the plan, it will be important to gain a balance between the needs of residents and the needs of the economy and that it is essential to retain the character of the area. They stated that if the right balance is achieved, Southwold and Reydon will be a vibrant community to live in, to work in and to visit.

Southwold and Reydon Society stated they want to see a more vibrant local economy, taking full advantage of the opportunities arising from off-shore wind but also seeking to expand knowledge-based businesses in the area, including in small towns and villages like Southwold and Reydon. They stated the need for more housing, particularly, affordable housing, is needed in Southwold and Reydon in order to maintain a balanced and sustainable community. The Society stated that their vision is to preserve and protect the character and amenity of the community and environment but acknowledging that cannot be achieved by allowing it to stand still. They acknowledged there are challenges to be faced in balancing the needs and interests of visitors and temporary residents with that of the resident population, ensuring that enough younger people and families live in our area to support the needs of the ageing population, opportunities for employment including in the knowledge economy, and provision of infrastructure. They stated that the protection of our natural environment, including managing the risks and consequences of coastal erosion, must be balanced with the need to accommodate a growing population and the creation of a wider range of employment. Failure to meet these challenges will result in an unsustainable community and thus undermine the features of our area that we wish to preserve.

Developers/Landowners

Badger Building stated that the housing market would benefit from a number of allocations around the district – not a highly concentrated allocation in Lowestoft and with proper consideration given to the likelihood of delivery.

Larkfleet Homes stated that the Vision should state clearly what the aspirations for the District are and lead to clearly defined objectives to achieve this. They stated that the vision for the Local Plan must seek to support both a substantial level of new housing growth and support and encourage



significant economic growth in the area. With respect to Beccles, they state that the aspiration must be to maintain the vitality and character of the historic market town which is highly valued by its residents and visitors alike.

Rentplus stated that the vision should include reference to mix of housing to be provided including the following wording: *“Enable the delivery of an appropriate mix of market, affordable housing and rent to buy homes that are suitable in tenure, type, size and location to meet identified housing need.”*

St John's Hall Farms stated their vision for Waveney in 2036 is that it should be an economically prosperous place, with opportunities for businesses to thrive and grow, supported by infrastructure such as housing, transport, education and communication networks. Each of the main towns should operate as far as possible, as self-sustaining communities, but acknowledging that jobs may not always be in the same town; and people will always have to travel to access certain types of jobs and facilities such as health, leisure and further education. They suggested the key priorities that need to be addressed are; providing opportunities for job growth, access to new housing, high attaining education establishments; and ensuring infrastructure keep pace with job and housing growth. For Bungay they stated that their vision is that it will, as far as possible, be a self-sustaining town, with a range of job opportunities; top rated education facilities; first class health and social services facilities; a thriving town centre and other retail facilities such as medium scale; good quality transport links and a range of housing.

Members of the Public

Members of the public expressed many different visions for both Waveney and their local towns or villages. Waveney visions included improving educational attainment and aspiration, more jobs and more diverse employment, increased tourist provision, more affordable housing and new and improved infrastructure. In terms of infrastructure members of the public noted they would like to see improved public transport, improved cycle routes including longer distance links to Norwich, duelling of the A12 and village bypasses. Visions also included the need to protect wildlife, habitats and open spaces, reducing car use and less new road infrastructure. It was also noted that design quality needed to improve and that there should be local architectural prizes.

For Lowestoft, visions included the need for more businesses and homes, making use of brownfield sites and the need to attract more wealthy people to the town. It was noted that the town should benefit from offshore wind energy and that the town should have new high quality tourist attractions.

For Beccles, visions outlined the need for more houses, improved retail facilities, diverse industries, improved transport (including cycle routes), a wildlife area on the quay, a new pub on the quay and a pop-up café on the Common.



For Southwold and Reydon it was noted there was little need for further housing apart from affordable and one/two bedroom houses for younger people and those wishing to downsize.

In Lound there was a consensus that the village should continue to be a small, quiet, pleasant village unspoilt by new development. It was noted that any development should be natural growth necessary for the needs of the village.

For Somerleyton it was noted that the character of the village should be preserved whilst not ruling out small scale development.

For Worlingham it was note that the village should retain its identity and protect the public realm.



How Much Growth?

**Q04 a) Which scenario best represents the 'objectively assessed need' for housing and jobs growth?
b) Do you have any evidence to suggest that an alternative figure may be more appropriate?**

55 respondents

Statutory Consultees

The Broads Authority recommended that the housing need of the Broads part of Waveney is explained. They stated that this is calculated as 51 dwellings between 2012 and 2036 using the jobs led growth scenario and that this is not additional to, but part of the Waveney objectively assessed need.

The Greater Norwich Local Plan Team suggested that the High Economic Growth Projections scenario (381 houses per year and 5500 new jobs) is the most appropriate for the Local Plan to consider, given that the growth associated with the expansion in the offshore industry seems likely to occur.

Natural England stated that they do not have any specific comments on the three growth scenarios although they raised a general concern about an increased population leading to increased recreational disturbance to designated sites. They stated that Residential developments within 8km driving distance or c.1.5 Km walking distance from designated sites have been shown to attract significant recreational pressure, particularly regular dog walking. It is also likely that an overall increase in population will result in increased recreational impact on sites further afield, including into neighbouring districts. They advised that other authorities locally in Norfolk and Suffolk have and are producing studies on this. They advised that mitigation approaches included the provision of a new country park (to attract general recreation away from designated sites), the provision of green infrastructure within developments (to provide convenient local recreational dog walking facilities), and introducing wardens, monitoring and visitor management schemes for designated sites, funded by developer contributions.

Parish and Town Councils

Ilketshall St Margaret Parish Council stated that Scenario 1 was the most appropriate.

Kessingland Parish Council stated that Scenario 2 was the most appropriate.

Oulton Parish Council stated that Scenario 2 was the most appropriate. They did not consider that Scenario 3 is achievable due to the high expectancy of growth.

Other Organisations

The Lowestoft and Waveney Chamber of Commerce stated that Scenario 3 'High Growth Economic Projections' most accurately reflects Waveney District's ambition and capacity for growth although



the employment projections should be subject to robust examination so that the housing numbers are driven by local economic growth rather than commuter demands.

Southwold and Reydon Society stated that 4000 new jobs seems an ambitious target so would favour Scenario 1 or 2.

Developers/Landowners

Badger Building stated that In the event that the estimate of additional jobs in the wind farm industry are generated at the rate proposed, then option 3 has to be selected, as it is the only option which is capable of absorbing the growth. They noted that failure to select this option coupled with the jobs growth forecast would see insufficient land allocated for housing and upward pressure on prices. They noted that in the event that the additional jobs are not generated that no harm is done by over allocation as any unused sites can be carried forward to the next review.

Lawson Planning Partnership on behalf of Frostdrive Ltd and the Norfolk & Suffolk NHS Foundation Trust stated that Scenario 3 best represents the objectively assessed need as the National Planning Policy Framework states that planning should 'proactively drive and support sustainable economic development'.

Gladman Developments advised that the preliminary work undertaken by the Council on objectively assessed needs is reviewed by a qualified demographer. They raised concern that the assumption that Waveney is a self-contained Housing Market Area is overstated as self containment may have been underestimated and only based on migratory flows from 2014-2015 without assessing longer term migratory trends over a longer time period. Gladman raised concern with the use of the 2012 Sub-National Population Projections which do not represent the most up-to-date data. They also raised concern that in applying economic-led population forecasts why the brief was to 'constrain' the forecast to the East of England Forecasting Model total and working age populations. They stated that in determining the level of housing and economic need, it is important that these figures are not constrained so that they identify the Council's full needs. Gladman also raised concern that no upward adjustment has been made to the housing need due to affordability problems in the District. Gladman conclude by stating the housing scenarios consulted upon cannot be considered to be based on appropriate evidence at this time.

Larkfleet Homes stated that the level of housing growth which the Plan seeks to provide for should be significantly higher than the proposed options in order to support economic growth, address issues of previous undersupply and to increase choice, availability and affordability of housing. They also stated that the Council should make more information available as to how their preliminary assessment of objectively assessed need has been arrived at and consider the issues highlighted in their own report on needs. Larkfleet advised that their own assessment undertaken by DLP Planning's Strategic Planning Research Unit (SPRU) indicates an objectively assessed need of 606 dwellings per annum over the period to 2036. This need is based on jobs growth modelled by



Cambridge Econometrics. Larkfleet also noted the following issues with the objectively assessed need:

- There is strong evidence to support a wider housing market area (HMA) which contains both Waveney and Great Yarmouth districts as the migration and travel to work links between Waveney and Great Yarmouth are strong and support the use of a single 'Gold Standard' HMA. The ambitions for the New Anglia LEP are only likely to strengthen the links and therefore the case for a combined HMA.
- There has been no allowance made for vacant or second homes in the household projections calculation
- The 2012 sub-national population projections (SNPP) on which household projections were based are now out of date following the publication of the 2014-based SNPP in May 2016
- Neither of the alternative population forecast scenario applied by the Council runs to 2036 which is the full period for the Local Plan
- In the Cambridge Research Group (CRG) Economy-Led Population forecast scenario, the forecast population shows a decrease in working age population despite being economy led with no explanation for how economic growth can be supported by a decreasing population
- In the Waveney Offshore Economic Scenario, no breakdown of population by working age group is provided so it is not known how economic growth will be supported
- It is not clear if implications of Unattributable Population Change (UPC) has been taken into consideration
- The 2012 SNPP uses migration trends from the previous 5 years (2007 to 2012), which are trends experienced in a recessionary period and the Council have not made appropriate adjustments to take into consideration migration levels in more prosperous periods.
- The 2012 SNPP assume that the present situation of more under 35s staying at home and a greater number of unrelated adults living together (shared housing) will continue.
- There is evidence to support an uplift to OAN in response to market signals of between 11 and 28% which has not been applied

Savills, on behalf of landowners in South Lowestoft and the Benacre Estate, stated that they considered Scenario 3 as the most appropriate. They stated that the National Planning Practice Guidance advises plan makers to take into account employment trends and market signals. They do not consider that scenario 1 is appropriate as employment trends and market signals will not have been fully assessed. They went onto state the importance of considering the impact of investment in offshore wind and other economic developments, noting the significant investment in off-shore wind from both public and private sectors over the last couple of years.

Somerleyton and Sotterley Estates stated that scenario 3 best matches the preliminary objectively assessed need.

St John's Hall Farms stated that Scenario 3 represents an appropriate growth strategy. They stated by setting an ambitious high growth target, it is a clear statement of intent that Waveney is 'open for



business' and a forward looking place, which welcomes investment and growth. They went on to state that the Local Plan should plan for more than objectively assessed housing needs; that way should growth exceed expectations, the planning strategy will be robust enough to accommodate it.

Wellington Construction stated that Scenario 3 would cover all the bases and if it turns out to be an overestimate, presumably the next review can be adjusted downwards accordingly.

Members of the Public

The views from members of the public were mixed. 47% felt scenario 1 was most appropriate, 29% felt scenario 2 was most appropriate and 24% felt scenario 3 was most appropriate. Concerns that were raised included:

- Scenario 3 is 'futurist' and contains no useable data to support assumptions
- Even scenario 1 seems to overstate the need for housing. House prices will remain high regardless of supply and it is absurd to spoil an area of relative tranquillity for an unproven theory.
- Scenario 3 might overstate the growth needed as the highest level of jobs associated with wind turbines will only be temporary during construction.
- In assessing the number of jobs there is a need to take into account more efficient production processes and employees extending their working life.
- The jobs estimates are too optimistic.
- Better to use ONS than hoped for economic growth. The plan could always be reviewed if more houses are needed to support uncertain economic growth.
- With only 150 houses completed in recent years, a target of over 300 seems very ambitious.
- Scenario 3 should be married with a plan to attract outside investment and make Waveney a destination for young aspirational families.
- It was questioned whether the potential for housing associated with Sizewell been considered.
- If much of the expected population is expected to be of retirement age it should surely be based mainly on population trends.
- Counting on work in the wind power sector is placing all the eggs in one basket.
- Scenario 1 is best because there is so much uncertainty about the impact of the EU vote.
- One respondent states that a need of 2,500 new homes would be appropriate.

Q05 *Should we be planning for more or less development than the objectively assessed need?*

24 respondents

Statutory Consultees

The Greater Norwich Local Plan Team recommended that the Plan should aim to meet the full objectively assessed need as there is no suggestion that Waveney cannot accommodate it. They also stated that there is no evidence that the three Greater Norwich authorities will not be able to



accommodate their own (combined) housing need as identified through the Central Norfolk Strategic Housing Market Assessment.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting stated that probably less than objectively assessed need should be planned for.

North Cove Parish Council stated that Waveney has lost 1000s of jobs in the past 3 decades yet housing has grown hugely. They stated that more emphasis on employment should be given. They also stated that Length of time living in Waveney before going on housing list should be increased considerably over the present 6 months.

Southwold Town Council said they had no comments on the growth scenarios.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Lawson Planning Partnership on behalf of Frostdrive Ltd and the Norfolk & Suffolk NHS Foundation stated that development should be planned for more than the objectively assessed needs to account for any sites that may not come forward as intended and to ensure that the required level of housing and jobs are delivered.

The Somerleyton and the Sotterley Estate stated that at this early stage in the preparation of the plan it would be prudent to aim high and plan positively. They recommend the highest objectively assessed need scenario and a comfortable margin.

Southwold and Reydon Society stated that the Council should be planning for growth which meets the objectively assessed need.

Members of the Public

Most members of the public agreed that the Council should only be meeting objectively assessed needs, not more. Three members of the public stated that the Council should plan for less and one stated the Council should plan for more. One respondent stated that the Council should plan for the type of housing required by local people not the sort which will attract more people into the area. The need for infrastructure and jobs to keep pace with new homes was also mentioned.



Q06 Do the figures presented above with respect to retail and leisure needs represent the 'objectively assessed need' for these uses?

17 respondents

Statutory Consultees

Greater Norwich Local Plan Team stated that they assumed the figures disclosed in the Waveney Retail and Leisure Needs Assessment 2016 are the best available and do not have any alternative evidence.

Parish and Town Councils

Carlton Colville Town Council stated that there aren't enough facilities for the existing population.

Ilketshall St Margaret Parish Meeting stated that with the increase in on-line retail and the existing vacant units, the estimated retail need may be in excess of that required, but with the increase in older population, affordable leisure and recreational facilities may need to grow.

Other Organisations

The Southwold and Reydon Society stated that in Southwold and Reydon policies which protect the variety of the retail offer in Southwold High Street are needed. They stated that the attractiveness of the High Street is a significant draw for the tourism on which our local economy depends.

Developers/Landowners

Badger Building stated that retail assessments have continually overestimated the requirement for retail space based on assumptions about population growth and increased spending and have justified out of town shopping on this basis, to the detriment of town centres. They state that part of this justification is on the basis of existing stores overtrading, which shouldn't be a problem unless there is undue pressure on car parking or the environment. They went on to state that a multiplex cinema would be a great idea, but the population spread criteria to support one is unlikely to be met, due to the location of the Lowestoft as a coastal town.

Larkfleet Homes stated that the Council's Retail Needs Assessment is based on the 2012-based SNPP projections. However, this has no regard to the need to plan for economic growth in the District and to support the creation of new jobs, in particular in the off-shore energy sector. Larkfleet's own evidence suggests much greater population growth and as such follows that the quantitative retail and leisure needs are also likely to be proportionately greater.

Members of the Public

Members of public raised a number of qualitative concerns about retail need including:

- With respect to non-food retailing there are already signs that there are too many shops.
- New cafes and restaurants should include public toilets
- Need for vibrant independent shops and restaurants in Beccles.



- Too many charity shops in Beccles at present.
- Need for an independent health club in Beccles
- Need for a niche supermarket in Beccles.
- A multiplex will make existing cinemas struggle.



Where should the growth go?

Q07 Which option for the distribution of new development presented on the following pages do you think is the best?

146 respondents

Statutory Consultees

The Greater Norwich Local Plan Team stated they have no preferred view on the growth options but noted that growth in Beccles and Bungay will help in meeting some of the service needs to current and future residents of South Norfolk residents in the Waveney valley. They advise that a new settlement should be considered for potential for beyond the plan period given the long lead in times and high infrastructure costs.

Suffolk County Council stated they intend to continue to work with the District Council to understand the traffic implications of different scenarios. They raised concern that dispersed patterns of growth do not tend to encourage sustainable travel and put greater emphasis on subsidised public transport services. They also raised concern that a new settlement of 2,000 homes is unlikely to generate viable demand for public transport services or adequate transport infrastructure including, amongst others, new rail connections. They inform under all of the options the planned third crossing would offer very good value for money. They stated that growth in Southwold and Reydon should be limited to meeting immediate local needs as there are no rail connections and road access is poor. Growth options for Beccles, Bungay and Halesworth should be acceptable from a transport perspective.

Parish and Town Councils

Beccles Town Council stated that Beccles and Worlingham should not be expected to take more than 10% of future housing needs due to the severe constraints on infrastructure. They stated that Beccles is constrained from any expansion by the River Waveney on one side and the common/marshes on the other and has almost no available land within it. They felt that the other market towns and rural areas should take a bigger share of new development and an attempt made to re-balance the District with more development to the south away from Lowestoft and Beccles. They stated the benefits of the railway and A12 links to Saxmundham to the south and the need to look beyond the Waveney District border when planning over the next 20 years.

Carlton Colville Town Council supported development of brownfield sites and development in Halesworth due to road and rail access. They strongly objected to more development in Carlton Colville as they argue it has already had significant levels of development and suffers from flood risk due to drainage systems unable to cope with increased housing.

Halesworth Town Council favoured Option 3 as it spreads development evenly across the market towns. They state that option 4 is not acceptable as it would be detrimental to the market towns.



They go on to state that in order for Halesworth to not become a retirement town considerable investment is needed to attract industry and a younger demographic.

Ilketshall St. Lawrence Parish Council supported Option 3.

Ilketshall St. Margaret Parish Meeting supported Option 2.

North Cove Parish Council stated that development should be located wherever good employment can be created.

Oulton Parish Council supported Option 3 as Lowestoft and specifically Oulton does not have the road infrastructure, medical facilities, or schools to take 75% of growth over the next 20 years. They add that the development at Woods Meadow will only add to these problems. They state that Southwold needs more homes for local people as too many existing homes are second homes or holiday homes.

Reydon Parish Council favoured the majority of development to be located in Lowestoft and Beccles where it would be aligned with growth in the offshore renewables sector and would deliver regeneration. The Parish Council suggested that for Southwold and Reydon the housing targets should be at the lower end of the ranges suggested. They stated that they would oppose widespread new growth in the locality due to the Area of Outstanding Natural Beauty, the fact that new homes could become second homes, the lack of infrastructure and problems with the sewerage network and traffic issues.

St James South Elmham Parish Meeting believed that Option 2 is the most appropriate. They state that the option allows the focus to be retained on Lowestoft but allowing a proportionate amount of development in the market towns. They stated that Option 3 would require extensive improvements to the District's infrastructure and unnecessarily provide for a significant increase in rural housing. They stated that Option 4 would unlikely succeed without major investment in infrastructure.

Southwold Town Council stated that Option 3 is not viable due to inadequate infrastructure, lack of land in Southwold, and lack of suitable land in Reydon. They state that the Area of Outstanding Natural Beauty needs to be taken into account.

Worlingham Neighbourhood Planning Team stated that they wish for Worlingham to be considered separately to Beccles as an independent village. They stated that the majority of the development should be where the facilities and infrastructure currently are, i.e. Lowestoft. However, they feel that the other market towns of Bungay and Halesworth should take a more proportionate share of the development as they have similar or better amenities than Beccles. They provide the example of the Campus Project in Halesworth and that Halesworth has rail connections with Ipswich and onward to London and other places.



Other Organisations

The Beccles Society supported Option 3 out of the four options presented as it shares the benefits across the market towns. However, they were concerned that this option provided for too much growth in Beccles. They presented a useful overview of the strengths and weaknesses of the main towns. The Society outlined the positives of Beccles in terms of location and availability of employment. They raised concern about options 1, 2 and 4 was that they limited scope for development in other areas and created an imbalance. They added that a further difficulty with Option 4 was the difficulty in finding a suitable location for a new settlement.

The Halesworth & Blyth Valley Partnership supported Option 3 to distribute development more evenly across the market towns. They reject options 1, 2 and 4 as they would undermine the existing market towns and be counterproductive to the balance of the Waveney economy.

The Lowestoft and Waveney Chamber of Commerce favoured Option 2 which, whilst focusing most growth on Lowestoft, also allows for significant growth in Beccles and Worlingham although they would not want to see new housing in those towns developed simply to service employment outside the District.

The Lowestoft & Yarmouth Regional Astronomers group state that Option 3 is preferable to reduce urban sprawl in North Lowestoft.

The Southwold & District Chamber of Trade & Commerce support more development being directed to Lowestoft and Beccles. They favour 3% of development being directed at Southwold and Reydon. They state that building significant number of homes in Southwold and Reydon will not tackle the housing shortage as many of them will be purchased as second homes. The society favours 3% of development being directed at Southwold and Reydon.

The Southwold and Reydon Society strongly support the options directing development to Lowestoft and Beccles. They state that development in Lowestoft which is the key driver of the local economy will continue to support regeneration of the town. They state they would oppose widespread new growth in the locality due to the Area of Outstanding Natural Beauty, the fact that new homes could become second homes, the lack of infrastructure and problems with the sewerage network and traffic issues.

Suffolk Wildlife Trust state that the consideration of options should take into account ecologically sensitive areas.

Developers/Landowners

Benacre Estates Company supported Option 3 stating that it is essential that the Council recognises that development in smaller settlements is necessary and sometimes more appropriate. They stated



that options 1, 2 and 4 are contrary to the National Planning Policy Framework as they fail to promote sustainable development in the rural area. They stated that villages play an integral part in the servicing the local community and it is vital provision is made for their growth to ensure their continued contribution to their local communities. They considered the village of Wrentham is suitable for providing and supporting new housing development.

Badger Building concluded that they believed Option 3 provided the best distribution of development across the District. They stated they believed that the previous strategy of concentrating on regeneration of Lake Lothing had failed. They stated that any strategy for the allocation of new housing needed to provide a range of smaller sites reducing the likely infrastructure costs for each site to a level manageable by a single developer and provides a range of locational options for purchasers. They stated that this in turn should increase development rates. They support allocations in the market towns.

Lawson Planning Partnership on behalf Frostdrive and Norfolk & Suffolk NHS Foundation Trust supported the support by each option for focusing most development in Lowestoft.

Gladman Developments supported the consideration of a new settlement although they stated that caution should be applied in establishing expected build rates and infrastructure requirements. They also advice that the Council should maximise the number of sites allocated to ensure delivery. They advised that a variety of sites in a range of locations will ensure a flexible and responsive supply of housing land.

Larkfleet Homes supported Option 2. They referenced the initial sustainability appraisal and suggested it is most likely to deliver the objectively assessed need for housing in full. They suggested Option 1 is the least likely to deliver the objectively assessed need for housing in full. They also referenced the sustainability appraisal and argue that option 2 will have preferable environmental impacts over other options. They stated that the landscape around Beccles is less sensitive to development and that the option is sequentially preferable in flood risk terms given the high number of properties at risk from flooding in Lowestoft. They argued that option 2 could also have economic benefits given employment potential at the Ellough Enterprise Zone. Larkfleet Homes state that option 2 will support the vitality and viability of Beccles town centre.

M J Edwards & Partners supported option 3 so that development isn't solely concentrated in larger settlements balancing deliverability and sustainability. They stated that more growth in rural areas should result in an increase in the provision of services and facilities. They stated the option would allow settlements like Corton to receive a proportion of development commensurate with their size.

Savills on behalf of a consortium of landowners south of Lowestoft supported Option 1 so that growth takes place close to a large urban area with existing and potential job opportunities. They



also believed that Option 4 could be suitable providing any new settlement is located close to an existing settlement in order to not impact upon the rural landscape.

The Somerleyton Estate and the Sotterley Estate stated that Option 3 best responds to the guidance in the National Planning Practice Guidance.

St John's Hall Farms stated that none of the options allow Bungay to properly thrive and prosper.

Wellington Construction supported a combination of Options 1, 3 and 4 taking into account potential growth in Halesworth and the provision of a new settlement.

Members of the Public

Members of the public generally accepted the need for new development. The main concerns, common through most of the responses, were infrastructure, transport, employment and impact on the local environment. Members of the public were divided in their preference for the different options presented. A majority preferred Option 3. Approximately a third of responses supported Option 4. There was less support for Option 1 and Option 2 had the least support with less than 10% of respondents supporting it. The issues raised with respect to each option are summarised below:

Option 1 – In support of this option, members of the public noted the job opportunities available in Lowestoft to support growth and the fact that Lowestoft is close to the planned offshore wind developments. It was highlighted that Lowestoft needs better jobs and professional people to help off set and transform existing deprivation. It was stated that development in Lowestoft will benefit the rest of the District and there was plenty of available land to build on and infrastructure to support more people. It was also noted that there was more potential to use brownfield land from this option. It was raised that Lowestoft was better able to absorb new development and the town already has the infrastructure to support new development. Those who objected to this option mentioned that there had been too much growth in Lowestoft in recent years resulting in frequent traffic congestion. It was also noted that Lowestoft is seen as a downmarket area.

Option 2 – In support of this option, members of the public noted that Beccles seemed to be thriving and that infrastructure is already in place to accommodate growth. Those who objected to this option mentioned that there was a risk that development could damage the unique character of the market towns. Concern was raised that infrastructure such as schools, doctors and dentists in Beccles and Worlingham would not be able to cope with this level of development. Concern was also raised about traffic impacts on the towns roads, which some of them medieval are in character.

Option 3 – in support of this option, members of the public stated that it would help support market towns to thrive. It was stated that the option would stop the exodus of younger people from market towns and stop them from becoming dormitory towns or areas of deprivation. It was stated that this option will better support an ageing population by giving more choice for older people to live close



to their families. It was suggested that the option would encourage better transport links in rural areas and support shops and pubs and small schools. Those who objected to this option raised concern that too much housing in small towns will change the character and spoil their appeal. Concern was raised about there being too much traffic congestion. It was suggested that new development in rural areas would not support local services as people who live in them will continue to shop and work in towns. Concern was raised that the option would mean too much growth for Bungay which, without a bypass, will create traffic congestion. Concern was also raised that market towns do not have the infrastructure to absorb new residents.

Option 4 – in support of this option, members of the public stated that a new settlement could be built with the infrastructure to support it and avoids overloading existing infrastructure. It was stated that there would be less traffic congestion. It was also noted that with an ageing population a new settlement between Lowestoft and Great Yarmouth would enable better access to health facilities at the James Paget Hospital. Those objecting to this option raised concern about the amount of infrastructure that would need to be provided, the impact on existing towns and the fact that a new settlement could spoil the rural character of the area.

Q08 *Are there any other approaches to distributing development across the District that we should consider?*

45 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council stated that an alternative option would mean fewer houses in Carlton Colville which has become a commuter town.

Corton Parish Council commented that massively increasing the size of villages can only be a bad thing. They argue that many new homes get sold on to second home owners or landlords resulting in an increased need for more housing. They stated that derelict and disused buildings should be used for housing before building new. They stated that infrastructure needs to be considered and thought of in the long term.

Ilketshall St Margaret Parish Meeting stated that development should be spread across the market towns but not the rural areas.

Kessingland Parish Council acknowledged that the village is expected to accommodate some growth to meet its needs and to prosper. They note that this must be balanced against the need to preserve



its role as a rural settlement which does not encroach unduly on the open countryside that surrounds it.

Southwold Town Council stated that they were not in a position to comment on alternative scenarios other than urging that new homes should be built in close proximity to where jobs are located in order to cut down on car use and enhance a sense of connection to local communities.

Other Organisations

The Beccles Society presented a further option as a variant of Option 3 as follows:

- Lowestoft 60%
- Beccles 12%
- Halesworth 8%
- Southwold 6%
- Bungay 4%
- Rural Areas 10%

They consider it has the benefits of Option 3 with slightly less development allocated to Beccles.

Developers/Landowners

Lawson Planning Partnership on behalf of Frostdrive Ltd and Norfolk and Suffolk NHS Foundation Trust stated that the key consideration when identifying the approach to distributing development across the District is to ensure that development is focussed in sustainable locations, that are well connected to existing services and facilities.

Larkfleet Homes commented that the strategy should focus more growth in Beccles to support the vitality and viability of the market town. They stated that more significant growth at Beccles would also support and complement the development of the Enterprise Zone and Ellough Industrial Estate. They argue that the percentage of growth for Beccles could be expressed as a range from 25-35% with a corresponding reduction in Lowestoft.

St Johns Hall Farms stated that 8% of growth (750 new homes) should be allocated to Bungay in order for it to be a self-sustaining community.

Members of the Public

Suggestions for alternative options from members of the public included the following:

- 95% in Lowestoft.
- Option 3 but with 60% in Lowestoft and 10% in Beccles.
- More development in Bungay as the place is moving towards becoming a ghost town.
- Significantly more social housing in Southwold to deter second homes.
- Increased development in Halesworth due to its railway station.
- Growth based on capacity of infrastructure to cope with development.



- Every village should be allowed some development say 1 property per year to allow the next generation to remain.
- All four options allocate too much development to Beccles which will not be appropriate without better links to Lowestoft and Norwich. Less than 10% growth allocated to Beccles.
- Regeneration of existing housing and infrastructure.
- Allow the market to decide with some areas protected from development.
- No largescale housing in Southwold and Reydon due to lack of employment opportunities and the Area of Outstanding Natural Beauty.
- Focus development on brownfield land rather than greenfield land.

Q09 *If we were to consider planning for a new settlement in the new Local Plan where should that settlement be located? Options could include somewhere between Lowestoft and Great Yarmouth, between Lowestoft and Beccles or somewhere else close to existing railway lines and A roads.*

53 respondents

Statutory Consultees

The Environment Agency stated that any new settlements should positively improve the environment. They state there should be a robust application of the National Planning Policy Framework's Sequential and Exception Tests at the Local Plan level when considering site allocations for new strategic housing developments in the District.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting stated that a new settlement could be located between Lowestoft and Beccles.

Oulton Parish Council suggested that any new settlement should be easily accessible from the main trunk roads A12 or A146.

Southwold Town Council stated that developing a new "garden" town could be an exciting option and should be placed close to a rail line with direct access to Norwich to reduce the need to travel by car.

St James South Elmham Parish Meeting stated that they believe a major new settlement is inappropriate and unlikely to succeed given the lack of infrastructure anywhere in the district.

Other Organisations

The Halesworth & Blyth Valley Partnership stated that any new settlement would be to the detriment of the Market Towns and rural areas and dilute their importance in community life.



Developers/Landowners

Badger Building stated that the upfront infrastructure costs, the likely take-up and build rates mean that a new settlement would be a non-starter.

Larkfleet Homes stated that a new settlement does not seem a viable or realistic proposition in this instance. They stated that it is apparent from the published 'Call for Sites' responses that no suitable site has been put forward for such a development and that if there are no deliverable new settlements then Option 4 should not be further progressed. They argue that continuing to assess the option would be contrary to the SEA regulations and various guidance documents as it would not be realistic alternative.

Members of the Public

Suggestions for the location of a new settlement by members of the public included:

- Halesworth
- In the Mutford area between Barnby and Gisleham with a new link road to bypass the Barnby Bends.
- Brampton
- Lound
- Blundeston
- Between Lowestoft and Great Yarmouth
- Between Carlton Colville/Lowestoft and Beccles. Although other comments raised concern about this option as it could lead to Beccles losing its identity by becoming joined to Carlton Colville.
- South side of Lowestoft
- Around Beccles
- Between Halesworth and Beccles on the train line
- North of Wrentham

Q10 Which option for the distribution of new retail development presented do you think is the best?
57 respondents

Statutory Consultees

Greater Norwich Local Plan Team stated that growth option 2 would be preferable because it would aid the sustainability of small settlements. However the appropriateness of this option will be decided by the market.

Parish and Town Councils

Carlton Colville Parish Council stated that option 2 would be the best distribution for retail and leisure development. Emphasis should be placed on developing brownfield sites in waterfront



locations (such as the Boulton and Paul site) and older parts of Lowestoft, such as the Town Hall area.

Southwold Town Council stated that Southwold does not require another food store and has sufficient space for other retail uses: the King's Head public house has permission to be converted into three retail units and the Fat Face store will be converted into three retail units.

Ilketchall St. Margaret Parish Council favoured option 2 for retail and leisure distribution.

St. James South Elmham Parish Meeting stated that with the shift towards internet retailing it was questionable whether additional space was needed for retail floor space. The future success of retail will depend on quality and service and investment should be focused on existing town centres. Leisure development (except in the two coastal resorts) should be sensitively controlled and enable people to enjoy the natural environment.

North Cove Parish Council stated that development and regeneration should be focused on town centres.

Oulton Parish Council preferred option 2 on the grounds that development should be located where it serves a proven need in a residential area. Development should be easily accessible from major roads. Adequate parking facilities must be provided to prevent the problems experienced at the Water Lane leisure centre in Lowestoft, which suffers from grossly inadequate car parking.

Other Organisations

Halesworth and Blyth Valley Partnership supported modest development in all town centres. Halesworth needs a new food store and leisure facilities. The town is a hub for surrounding villages and should be the focus of retail and leisure development. This is a pattern to be repeated across the rural areas.

The Beccles Society stated that retail development should be located within large housing developments. This is to discourage residents from visiting town centres and neighbouring areas for their daily shopping, leisure and health needs.

Developers/Landowners

Badger Building stated that if option 3 is selected for housing distribution then option 2 should be selected for the distribution of retail and leisure development.

Larkfleet Homes stated that option 1 would not be sustainable or help to meet the needs of the wider area. It would not deliver the development needed to support the vitality of market towns. Services in Lowestoft are not easily accessible and would encourage unsustainable modes of transport. Option 2 is more sustainable and would enable market towns to serve their surrounding



areas. A hierarchical approach is required to ensure that there is an emphasis on key service centres and that development is of an appropriate scale.

St. John's Hall Farms favoured option 2 as a pattern for future development. Development should be focused in town centres except for certain larger food stores, where a sequential test may be necessary. Larger food stores that cannot be located inside town centres may need to be located in out of town areas.

Members of the Public

Members of the public favoured retail and leisure development in Lowestoft but also that some development takes place in the market towns. Retail and leisure development would help to regenerate town centres. However there was also concern that town centres were hamstrung by lack of parking and, in the case of Lowestoft, were inconvenient to drive to. These two problems made town centres vulnerable to competition from out of town shopping. Internet retail was seen as further increasing pressure on town centres and there was concern that increasing the amount of retail in town centres might be misguided at a time when traditional retailing of this sort appeared to be contracting.

Q11 *Are there any other approaches to distributing development across the district that we should consider?*

16 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council stated that it was essential to locate new retail development in town centres and leisure centres as close to town centres as possible. This was needed to increase town centre vitality and discourage car use.

Ilketshall St. Margaret Parish Meeting did not think there was another approach to distributing development.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building stated that there are no other approaches to distributing development across the District that should be considered.



Members of the Public

Members of the public favoured some further development in the market towns. Bungay and Halesworth were identified as towns that were falling behind competing centres and needed investment to improve their competitive position. Town centre development should be accompanied by improved transport infrastructure. The mix of shops should include a range of retailers which serve practical needs, for example, iron mongers and fresh food retailers. Leisure development should be more broadly defined so that it includes more than just pubs and bars. High density town centre development was thought necessary to prevent urban sprawl and protect the countryside.

Q12 *Are there any town centre or edge of centre sites available that would be suitable for retail and leisure development?*

18 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Parish Council stated that development should be located in vacant town centre retail plots.

Halesworth Town Council stated that the town served as a hub for the surrounding area and that retail facilities are heavily used. There is potential for another supermarket on the town centre site. This site has been available for a number of years. Halesworth Town Council understands that there has been interest in purchasing the site but there are no details available. Development of the town centre site would increase footfall and would serve a large rural hinterland. Similar development in other town centres can only increase their vibrancy.

Ilkeshall St. Margaret stated that they were not aware of any suitable sites for retail development.

Southwold Town Council stated that the town's single most important leisure facility was the library. Residents expressed strong support for relocating this facility to the former Southwold Hospital site. There was also strong support for using the former hospital as an innovation centre to encourage new businesses. The Chamber of Trade strongly supported using the former hospital as a community hub and business centre to increase year round footfall in the town centre. Many shops are barely viable because of the loss of year round footfall. Visitor numbers have risen to a point where the attractiveness of the town is threatened: Southwold's ability to provide litter bins, clear away litter, clean toilets and repair infrastructure has become strained. There are significant issues with traffic congestion and parking – during the tourist season the pavements are so crowded that people have to walk in the High Street, which is the town's one major traffic artery.



Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building drew attention to significant areas of vacant land on Peto Road and Commercial Road, which could be used for commercial development. There was also a lot of unused railway land. Subject to flood risk issues being resolved these sites should be developed for commercial use as they form a gateway into the town centre and in the case of Peto Road is part of the link to the retail park.

Larkfleet Homes identified its own proposed development to the south of Beccles as a potential location for further retail development. Retail development would help to address the weakness in convenience retail identified in the Retail and Leisure Needs Assessment and would provide retail development to the south of the town. The forthcoming Beccles relief road would increase access to retail development in this area.

Members of the Public

Members of the public suggested various potential sites for future development:

- Site 16 in Beccles for indoor sports provision.
- The Loaves and Fishes site at Beccles Marina.
- Land to the south of Beccles.
- Shops along London Road South.
- Lake Lothing Waterfront – this should be linked to Lowestoft South Beach and The Broads.
- Vacant town centre retail plots.

More generally there was concern to protect town centres and to ensure that people living outside of Lowestoft had access to an adequate range of services.

Q13a) Should we prioritise development in villages which have: i) the best provision of services and facilities (or accessibility to services and facilities);ii) the greatest housing need;iii) community ambitions for more growth;iv) the best opportunities for development?

26 respondents

Statutory Consultees

The Greater Norwich Local Plan team suggested option (i) would be the most appropriate to support access to services and facilities. Additionally, it was suggested that limited development should take place in smaller villages and hamlets where access to services and facilities is difficult.



Parish and Town Councils

Beccles Town Council supported option (i) suggesting there was a need for villages to be able to access services and facilities in nearby villages and larger service centres.

Ilkeshall St Margaret Parish Meeting suggested option (i) saying people should have access to a mix of services and facilities.

Carlton Colville Town Council suggested option (iii) saying development should be distributed where it is wanted.

North Cove Parish Council suggested option (iv) stating that development should have access to employment.

Southwold Town Council suggested option (iv) saying new development should be concentrated around market towns with infilling permitted in villages to protect their character and the setting of these settlements. An exception to infill sites should be made for affordable housing. New development should be well linked to the town centre by walking and cycling routes. Development should be supported with the necessary infrastructure. Examples of poorly designed development that should be avoided include Carlton Hall in Carlton Colville and the development in Saxmundham adjacent the A12.

Other Organisations

The Southwold and Reydon Society suggested option (ii) saying development is best located where it is needed and option (iii) where there are ambitions for growth.

Developers/Landowners

AR Hall & Sons suggested a mix of all elements set out was required adding that to support option (iv) villages in the context of their wider networks needs to be considered in accordance with the National Planning Policy Framework.

Badger Building suggested option (iv) saying development should be of a scale that reflects the size of the settlement to protect its character and setting. Identifying a settlement hierarchy which set out how much development could be acceptable in these settlements could support this approach. The sustainability of small villages is further undermined without new housing.

Benacre Estates Company suggested all four options should be considered as this is a more sustainable option in line with the NPPF. The need for a settlement to contain services and facilities is inflexible and it is more appropriate to consider how development in one settlement can support, or be supported by existing facilities in another nearby.



Gladman Developments Limited suggested option (ii) saying that housing should be delivered in the rural areas where it is needed.

MJ Edwards & Partners suggested option (ii) saying housing should be delivered where it is needed and option (iv) where opportunities arise.

The Somerleyton Estate and the Sotterley Estate suggested option (i) stating development is most appropriately located where there are a mix of services and facilities available and that development should seek to protect the character and setting of a settlement. It was also suggested that approaches should be mindful of blanket policies that could permit or not permit development that is appropriate for particular locations.

Members of the Public

Fourteen members of the public responded. It was suggested that development should take place where there were existing facilities available and additional development could help support these facilities (option i). It was also cited that new development should be supported by improvements to the existing infrastructure.

Members of the public highlighted the need to protect the character of rural villages suggesting this could be done by allowing infill development rather than allocating greenfield land for new development suggesting support for option (iv). Such development could help revitalise small communities. Concerns were raised that development in rural areas with no facilities would be detrimental to the area.

There was a suggestion that development was needed across the rural areas of the District to support these communities suggesting option (iv) was appropriate. This would help reduce the impact of new development on the market towns. However, it was emphasised these opportunities should respect the character of the existing settlement.

It was noted that development should be considered in the context of community networks and understand how these networks function. Without access to services and facilities in the area these small communities will fade away. It was suggested that development in villages nearest large service centres where a variety of services and facilities were available would be appropriate.

Q13b) If we prioritise development based on services and facilities provision, what services and facilities do you think are the most important for a community to have so it could accommodate further development?

13 respondents



Statutory Consultees

Parish and Town Councils

Beccles Town Council stated that access to public transport, a shop and community facilities for young people were important.

Southwold Town Council suggested that infrastructure and development should take place which is in keeping with the character of the settlement and the landscape.

Other Organisations

The Southwold and Reydon Society suggested that access to a shop and public transport to access of services and facilities was important.

Developers/Landowners

Badger Building suggested that new development should have access to a shop and education facilities.

The Somerleyton Estate and the Sotterley Estate suggested new development should be located where there is access to a mix of facilities.

Members of the Public

Fourteen members of the public responded and a majority of respondents suggested a variety of services and facilities that people living in rural areas should have access to. The most frequently cited provision is as follows (in order of most to least):

- education;
- health facilities (doctor, dentist);
- community facilities (leisure, village hall, public house);
- good infrastructure (road network, drainage);
- public transport;
- shop;
- broadband;
- library.

Q14 *Should we limit development in rural areas to a small number of villages or ensure all villages and hamlets receive some development?*

22 respondents



Statutory Consultees

The Environment Agency would welcome early discussion on a new settlement is moved forward. There should be a robust application of the Sequential and Exception Tests set out in the NPPF when housing allocations are considered. Any new settlement should improve the environment in a positive manner.

Greater Norwich Local Plan team suggested new development should be focussed on villages with services and facilities but some development in smaller villages and hamlets could increase delivery through choice and competition.

Parish and Town Councils

Carlton Colville Town Council suggested all villages should have some development.

Ilketshall St Margaret Parish Meeting said that new development should be focused on the larger villages will minimal development in smaller settlements.

Other Organisations

No comments were submitted in response to this question.

Developers/Landowners

MJ Edwards & Partners suggested development in rural areas should be limited to a small number of villages (larger villages) except where small developments would meet local need.

The Somerleyton and the Sotterley Estate suggested that a settlement hierarchy could be devised to deliver housing in the better serviced villages with limited development in smaller settlements.

Wellington Construction Limited stated that without some development in smaller villages they could decline therefore flexibility was required.

Members of the Public

Fourteen people responded with and there was a general consensus that new development should take into account access to services and facilities whether these are located within the settlement or there was public transport.

It was suggested that housing in all rural villages would help people to stay in the settlements they are connected to. These should include dwellings that are affordable with a proportion of social housing for rent. A flexible approach is required to deliver housing in rural settlements as they arise and where there is a need for housing. Such housing should be in proportion to the scale of the settlement.



There were comments that development in locations where there are no services or facilities should be considered unsustainable therefore the focus should be the larger villages where these exist. It was stated there was a need to protect services as they have been protected in the past.

There was a suggestion that development should be focussed on Lowestoft where there is the greatest access to services and facilities.

The need to protect the landscape and wildlife was highlighted.

Q15 *What villages do you think are suitable for new housing and economic development over the next 20 years and what should be the scale of growth?*

75 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ashby, Herringfleet & Somerleyton Parish Council stated they are preparing a Neighbourhood Plan.

Barnby Parish Council was in agreement with the housing distribution strategy set out in the Core Strategy. Concern was raised that sites proposed in the village document would treble the size of the settlement, are located outside of the physical limits and have access problems.

Blundeston & Flixton (East) Parish Council stated the development of the Blundeston Prison site would be enough to meet the needs of the community therefore further development in the village is not necessary.

Carlton Colville Town Council suggested all villages should receive some development but not at the expense of their character.

Ilketshall St Margaret Parish Meeting suggested development was more appropriate in larger villages and should be limited in smaller settlements.

Kessingland Parish Council has allocated sites for housing development in their Neighbourhood Plan therefore no further sites should be required.

Oulton Parish Council suggested Southwold & Reydon.

St James South Elmham Parish Meeting suggested that all rural settlements required a limited amount of development that is proportionate to their size and character.



Other Organisations

No comments were made in response to this question.

Developers/Landowners

AR Hall & Sons suggested development was appropriate in Reydon as it has a variety of services and facilities, has access to public transport and has good links to Lowestoft and the A12.

Benacre Estates Company suggested Wrentham was suitable for housing development with a limited number of facilities, public transport and is located on the A12.

MJ Edwards & Partners suggested Corton was an appropriate location for housing development as it is a larger village with services and facilities. There is also access to employment and the wider area of Lowestoft.

Somerleyton Estate suggested the villages of Blundeston, Lound and Somerleyton were appropriate for development. Somerleyton has a greater number of services and facilities than many other larger villages in the District and these make it a sustainable location. Such development could help deliver a new village hall. Blundeston has a number of community facilities available and the sites submitted will have good access to these. There are limited facilities in Lound by the community has access to facilities in nearby settlements. Development in these areas could help maintain the balance of the communities in terms of population structure. All of the submitted sites are available, achievable and deliverable. Community engagement has taken place.

Sotterley Estate suggested that villages with a good range of services and facilities were suitable for development that is proportionate to their size and could help support the wider network of settlements. Such a network is Willingham St Mary and Shadingfield with other villages of Sotterley, Ellough and Weston. A mix of tenure and housing types could be delivered. Willingham St Mary and Shadingfield have a pub, a meeting place, a playing field and access to public transport therefore limited community facilities are available.

Members of the Public

Fifty five members of the public commented and it was recognised that new development in rural locations could help support local facilities such as schools, pubs, village halls and churches but this development should reflect the character of the settlement. It would help if these communities had access to public transport. New development would also help enable young people to purchase homes in rural communities. A limited amount of development where needed and wanted could help revitalise communities.

Concern was raised that new development will not be affordable and will be used as second homes.



Infill development should be enough to meet the needs of small rural communities.

Several respondents stated that development in rural areas should not take place until the lack of infrastructure was addressed.

Areas subject to flood risk and coastal erosion should be avoided.

Specific areas suggested for development include:

- Blundeston (towards Lowestoft) and the area north of Parkhill (Lowestoft);
- Bungay as it has seen little development and has services and facilities;
- Brampton has had no development for a long time, it has an aging population and has lost services and facilities. It has access to the train station and the A145 and development could revitalise the community.

Networks of communities should be considered where facilities in one village could help serve the needs of another.

It was highlighted that Lound with Ashby, Herringfleet & Somerleyton were preparing a Neighbourhood Plan with input from the community to inform an approach to development in the future.

There was significant objection to the housing sites identified in Blundeston citing a lack of infrastructure, services, drainage issues and potential impact on the character of the village. It was suggested that the redevelopment of the Blundeston Prison site should suffice during the next plan.

Concerns were raised about development in the Beccles area.



Settlement Boundaries

Q16 *Should we retain physical limits for Lowestoft, the market towns and larger villages and continue to focus development within them and on sites allocated for development?*

38 respondents

Statutory Consultees

Greater Norwich Local Plan Team recommended that development boundaries should be retained, but they suggested that they should be drawn with some limited potential for small-scale development.

Parish and Town Councils

Ashby, Herringfleet and Somerleyton Parish Council stated that they wish to continue without settlement boundaries in the form of physical limits in order that the villages of Ashby Herringfleet & Somerleyton continue to be regarded as open countryside when looking at housing and other development. They noted that when the current LDF was created it was identified that the developed area of Somerleyton is attractive because of the widespread nature of the development with large spaces between.

Carlton Colville Town Council stated that the physical limits should be retained and development should take place on brownfield sites within boundaries.

Ilkeshall St Margaret Parish Meeting and North Cove Parish Council stated that physical limits should be retained.

Oulton Parish Council stated that physical limits should remain as a safety facility to ensure that the already overstretched infrastructure is not made any worse.

Southwold Town Council stated that physical limits should be retained because they serve the very function of preventing sprawl, car dependency, and soulless communities. They stated that brownfield sites should remain prioritised. They raised concern that the business model of high volume house builders is based on delivering maximum profit to shareholders. They noted that there is little incentive to build more houses faster; indeed, they are incentivised to build slowly as this maintains high house prices.

Other Organisations

The Southwold and Reydon Society stated that physical limits should be retained, especially around settlements in the AONB.



Developers/Landowners

Badger Building stated that the existing physical limits defined for Lowestoft work well and prevent sprawl but contain ambiguities which should be removed. They gave the example of Corton Long Lane and where housing in Camps Heath adjoins the new Woods Meadow development. The Camps Heath anomaly was also pointed out by another agent for a recent planning application in the area.

Frostdrive Ltd stated that settlement boundaries can be an effective tool in guiding development to the right locations within the District. However, they stated that the existing boundaries have been drawn tightly and are considered to be too restrictive and in places are limiting to development in sustainable locations. They stated that the boundary at Leisure Way to be out of date.

Gladman Developments raised concern with continuing the approach that defines 'physical limits' around the built up areas of Lowestoft, the market towns and the larger villages of the District. They considered that such an approach will act to contain the physical growth of each settlement and will not allow the Council to react to changing market conditions. Gladman Developments stated that the following wording should replace the existing settlement boundary policy: *"When considering development proposals, the Local plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Development proposals adjacent to existing settlements will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development."*

The Norfolk & Suffolk NHS Foundation Trust stated that physical limits boundaries can be an effective tool in guiding development to the right locations within the District and it is considered appropriate that the notion of physical limits boundaries within the District is retained. They noted that their site at Lothingland Hospital was within the Lowestoft physical limits.

The Somerleyton Estate and the Sotterley Estate stated that the Council needs to reflect current national planning guidance and avoid the use of blanket policies restricting development in some villages and preventing others from expanding unless evidence supports their use. The estates suggested using settlement boundaries and land allocations for Lowestoft and the market towns because the developments likely to come forward in those locations are larger and need to be properly planned to link to infrastructure etc. In the rural areas (formerly the 'larger villages' and other) the local planning authority should take a criteria based approach and allow development where it can be shown to be proportionate, sustainable and well related to the existing built form.

Wellington Construction stated that the physical limits approach is sensible for larger settlements whilst being flexible when promoting new sites.

Members of the Public

The majority of members of public who responded to this question thought that physical limits should be retained. It was noted that they help protect the countryside, the area of outstanding



natural beauty and natural resources and prevent sprawl. It was noted that the approach provides a clear boundary for all planners/builders/developers to work within and limits the opportunity for uncontrolled and speculative proposals that increase workload and cost on existing scarce council resources and minimises adverse impact on developers. One member of the public stated we should not be limiting the boundaries of possible growth for Lowestoft.

Q17 *Should physical limits be tightly defined around existing built development or more loosely to allow for more small scale development around settlement edges?*

31 respondents

Statutory Consultees

The Greater Norwich Local Plan Team stated that limits should be drawn allowing for limited potential for small-scale developments.

Parish and Town Councils

Carlton Colville Town Council stated that the limits should be defined tightly.

Ilketshall St Margaret Parish Meeting commented that the limits should remain as they are.

Kessingland Parish Council stated that it is particularly important that development is directed to appropriate locations and that sprawl is avoided and the physical limits policy provides that direction. They noted that Kessingland does have clear restraints as to where growth can take place. To the east are the North Sea and a site of Special Scientific Interest, to the south there is the Area of Outstanding Natural Beauty.

Reydon Parish Council stated that with regard to housing, the remaining target for Southwold and Reydon could be met by the development of infill sites and modest expansion of the Reydon village envelope on the lines already allowed for affordable housing under the Rural Exceptions policy (DM22).

Southwold Town Council stated that tightly defined physical limits should be retained with clearly defined exceptions that address car dependency, design, protection of green space, etc.

Other Organisations

The Southwold and Reydon Society stated that physical limits should be tightly defined, with any areas for small-scale development around settlement edges identified within the Local plan.

Developers/Landowners

Badger Building stated that the limits need relaxing in areas where small sites i.e. 10 or less, might create opportunities for SME builders or those wanting to self-build.



Frostdrive Ltd stated that defining physical limits tightly around existing built development is restrictive and out-of-date and is not encouraging of sustainable housing growth. They stated that physical limits should be defined appropriately for each settlement in the District, allowing the greatest flexibility for development on settlement edges in the most sustainable locations, such as Lowestoft.

M J Edwards & Partners stated that the physical limits of settlements should be more loosely defined to allow for the small scale development. They stated that edge of settlement sites allow for the logical extension of villages.

The Somerleyton Estate commented that if the Council were to apply a settlement boundary to Somerleyton it should be applied tightly. They suggested that loosely defined limits could allow small scale sites to come forward but could undermine larger proportionally sized developments which could contribute to the village's infrastructure.

The Sotterley Estate commented that if the Council were to apply a settlement boundary to Shadingfield/Willingham it should be applied tightly. They suggested that loosely defined limits could allow small scale sites to come forward but could undermine larger proportionally sized developments which could contribute to the village's infrastructure.

Members of the Public

Most members of public who responded to this question believed that the physical limits should be tightly defined to avoid coalescence of settlements and protect the environment. Some members of the public stated that exceptions could be made for affordable housing and other developments which produce community benefits. It was also suggested that larger developments would be preferable to small scale development as they would incorporate new services, facilities, roads and communications causing less disruption to existing communities. One member of the public stated that physical limits should not extend beyond the Beccles Southern Relief Road.

Q18 *If we remove physical limits, what criteria should be put in place to address the issues discussed above?*

12 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilkeshall St Margaret Parish Meeting stated that the countryside and natural resources should not be adversely affected.



Kessingland Parish Council stated that following engagement as part of their Neighbourhood Plan that they came up with the following policy in their Plan: *“Development in Kessingland parish shall be focused within the physical limits boundary of Kessingland village as identified on the proposal map. Development proposals will be supported within the physical limits boundary subject to compliance with other policies in the development plan. Development proposals outside the physical limits will not be permitted unless*

- *They represent proposals to deliver the site allocations (policies SA1,SA2,SA3,C13 and C14)*
- *It is infill development or another exception such as affordable housing, barn conversion, or agricultural workers dwelling required to support the rural economy*
- *Any review of the Waveney Core Strategy requires additional housing or the identified housing site allocations do not proceed ; or*
- *They relate to necessary utilities infrastructure and where no reasonable alternative location is available“*

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building stated that a criteria based approach to physical limits would lead to endless disputed sites around the perimeter of the settlement.

Lawson Planning Partnership on behalf of Frostdrive Ltd and Norfolk & Suffolk NHS Foundation Trust stated that removing the physical limits boundaries could set a precedent for development in unsustainable locations and therefore it is considered that the principal of physical limits should be retained.

The Somerleyton and Sotterley Estates stated that they believe that Lowestoft and the market towns would benefit from settlement boundaries and site allocations to allow for large scale development to come forward in a planned and integrated fashion. For rural areas they stated that such blanket policy approaches should be avoided. They suggested a policy approach whereby ‘well provisioned villages’ and ‘part provisioned’ villages allow for development subject to the following criterion:

- Landscape, environmental and heritage impacts
- Location context and relationship to settlement
- Responsive to local needs including affordable housing
- The cumulative impact of development in respect of social, physical and environmental impacts.
- Supports local services and facilities and/or creates or expands employment opportunities.



Members of the Public

A member of the public stated that clear zones should be required to prevent existing estates from feeling subsumed and that developers should use computer modelling to assess traffic impact. Another member of the public stated that development proposals should be carefully scrutinised to make sure that there is not a more suitable, non green field, site available for development. They noted it would be cheaper for developers to build on fields rather than on derelict sites.



Infrastructure and Transport

Q19 *Is the Community Infrastructure Levy (CIL) the most appropriate way of securing new and improved infrastructure? Are the existing rates of the levy appropriate?*

25 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council commented that they have not seen any recent positive benefits in infrastructure and highlighted the difficulty in getting a doctor's appointment and lack of a dentist or post office. New roads do not appear to enhance the area and Carlton Colville has become an area of three distinct parts and no centre. Open spaces appear to have been provided on land which is not fit suitable for construction such as former tips.

Ilketshall St Margaret Parish Meeting stated that CIL seems the best way to support infrastructure for new development but existing settlements need support too.

Kessingland Parish Council highlighted that CIL should be worked up and tested alongside the Local Plan and it should support and incentivise development. It should place control of a meaningful proportion of the funds with the neighbourhood where the development has taken place. They stated that Kessingland has lost out on additional funds for Parish Councils who have a Neighbourhood Plan in place and highlighted the Kessingland Neighbourhood Plan contains proposals from the community which would generate CIL which should be passed to Kessingland Parish Council.

North Cove Parish Council stated the money raised won't be enough.

Southwold Town Council highlighted a lack of investment in waste water reticulation and treatment and sustainable transport infrastructure in Southwold and Reydon. They view a difficulty with CIL in the generation of an ad hoc approach and failing to take account of incremental and cumulative impacts of development and the strain on infrastructure such as wastewater treatment. They highlighted that the cost of upgrading infrastructure may exceed the amount of CIL raised by development and the need for housing can mean that development will go ahead and increase strain on infrastructure. They stated that infrastructure should be put in place before development takes place. Project planning and financial modelling need to encompass incremental development and infrastructure requirements which may be physically separated from the development site (e.g. development of St Felix playing fields using wastewater treatment plant in Southwold).



Developers/Landowners

Badger Building commented that CIL is the only system available at present but it has shortcomings. Paperwork is unnecessarily complicated and repetitive. Rates must be set carefully to make development of sites viable. The existing rates seem to be appropriate but increases may change this. It will take many years to build sufficient funds to achieve worthwhile infrastructure. Prudential borrowing against the income stream might be a way forward to fund larger projects.

Gladman Developments stated that since 2013 CIL rates have increased by 19.8% due to the inflation index. The Council should review its charging schedule to ensure viability of development proposals is not threatened in the future.

Larkfleet Homes recommended the Council should consider a bespoke approach to infrastructure contributions where on-site provision achieves greater public benefits. They have no objection in principle to a CIL but comment that it is not necessarily appropriate to apply CIL rigidly or without exception where on-site provision can deliver greater benefits. They stated their development proposal at Beccles seeks to provide a comprehensive sustainable new community which will make provision for community facilities on site which would benefit future residents of the development as well as existing communities. Proposed community facilities include a school, community/indoor sports building, playing pitches, allotments, public open spaces and a possible doctors/dentist surgery which will provide significant wider public benefits. Larkfleet stated the proposal would not generate any significant detrimental impacts on existing infrastructure which would require mitigation. They consider that a CIL would not be appropriate in this instance due to its inflexibility and that a bespoke approach to planning obligations tailored to the specific needs and opportunities from the development should be considered as more appropriate for the development.

Wellington Construction commented that it is early days for CIL but in a largely rural area it is the worst of all worlds. CIL is inflexible, too long term in accruing funding for projects, there is likely to be a gap in funding and there are unfulfilled delivery issues.

Other Organisations

No comments were made in response to this question.

Members of the Public

There have been mixed responses to this question from members of the public.

One person has said that CIL is a disincentive for developers to build houses. Another person has said that CIL doesn't appear to be the most appropriate way of securing new infrastructure based on the current state of infrastructure. Infrastructure should be guaranteed before development is granted planning permission. For example, development in Lowestoft should take place to the north of Lake Lothing until the third crossing is guaranteed. One member of the public commented that CIL



may help progress unsuitable development adding that CIL is not high enough and also too haphazard to be a reliable funding source. Another person is not supportive of CIL as it is non-negotiable and is not tailored to actual needs for a site or area. They suggested that some areas should be excluded from CIL such as poorer areas in order to encourage growth and rates should not be any higher.

Two people commented that CIL amounts are very small compared to the strain development places on infrastructure and CIL may not be sufficient by itself.

There was some support for CIL. Several members of the public stated that CIL is an appropriate mechanism but also added the rate needs to be regularly assessed against market conditions, development costs and values etc. to ensure development remains viable. The Council needs to remain responsive to requests to vary levels of Affordable Housing where viability is an issue. Members of the public highlighted the need for developers to contribute to infrastructure and one person stated that CIL must be applied to all developers equally. Another member of the public commented that CIL is probably the only method but adds significant costs onto free market housing along with Affordable Housing.

Some comments said the CIL rate is sufficient and there was support for distributing CIL funds more evenly around towns and villages and not concentrated on Lowestoft. Another person commented that the rate of CIL should reflect how well the development meets the identified needs of the community (i.e. if the housing mix reflects local needs the rate should be lower and if not a higher rate should apply). Consideration should also be given to including green and/or leisure spaces that make provision for the wider community. One member of the public highlighted the need for a bus shelter opposite Lowestoft railway station to encourage joined up public transport. The railway station requires updating to reflect its historic and iconic status.

Q20 How can sustainable modes of transport be encouraged?

27 respondents

Statutory Consultees

The Environment Agency encouraged strategically planned green and blue infrastructure in development which encourages walking, cycling and general well being improvements. Blue infrastructure also encourages urban water system interaction. Green infrastructure, green spaces and other environmental features can be designed into and managed as a multifunctional resource capable of delivering ecological services and quality of life benefits required by communities and to underpin sustainability. They encouraged the setting out of opportunities to create new habitats that will provide multiple benefits for example as part of green infrastructure, flood alleviation or Sustainable urban Drainage Systems as the first method of surface water disposal and green infrastructure as part of this. Reference to the Biodiversity Planning Toolkit was recommended. It



was highlighted that green infrastructure that contributes to protecting and enhancing water bodies (and the mechanisms required to deliver this) should form an integral part of the plan. The Environment Agency encourage inclusion of a policy to promote appropriate green and blue infrastructure in new development which could include de-culverting, creation and management of ecological buffer strips and corridors, new wetland areas to help manage flood risk and reduce diffuse pollution whilst re-connecting people with nature.

Parish and Town Councils

Carlton Colville Town Council recommended provision of cycle paths and the widening of pavements.

Ilketshall St Margaret Parish Council recommended improving the provision of safe cycling routes and public transport serving smaller settlements where residents don't have or want vehicles.

North Cove Parish Council stated that housing should only be built where there are employment opportunities.

Oulton Parish Council stated the cost of a bus journey into the town centre is too high and encourages people to use their cars instead. Making all journeys one set amount would encourage people to use buses.

Southwold Town Council stated that Southwold could have an environmentally sensitive car park on the Millennium Trust Field. Better signage, an integrated approach to discourage car use, safe walking and cycling routes, more cycle racks, and more cycle hire facilities should all be provided. In Southwold and Reydon a cycle/footpath linking St Felix to Blyth Road and Southwold town centre is a priority. More all-weather mixed pedestrian/cycle routes link development with popular destinations should be created with the involvement of Sustrans and landowners.

Southwold Town Council commented that new development should respond to best practice urban design guidance and be configured and designed to encourage walking and cycling. Streetscapes should be diverse and interesting with landscapes, trees and space for individual front gardens. Development should be located near to shops and small shopping areas should be provided as part of developments. There should be more public sector support for an integrated rural bus and rail service that can transport bicycles and supports travel to places of work, education and leisure.

Other Organisations

Beccles and Bungay Cycle Strategy recommended a 20 mph speed limit in residential streets and reduced speeds limit on rural roads. Cycle routes should be direct, continuous, attractive and safe. Sustainable modes of transport should be put first in planning new developments in terms of access and parking. Reduce the need to travel and promote "active travel". Manage demand by restricting access and parking for motorised vehicles. Encourage car-free development in town centres.



Developers/Landowners

Badger Building Ltd commented that Lowestoft has above average cycling rates and connectivity is generally good. Links between Harbour Road, over the railway, to Normanston Park should be improved along with better signage. Consideration should be given to electric car charging points in future development.

Bourne Leisure endorsed the proposed approach to increase sustainable modes of transport, however, they emphasise that some land uses, such as tourism, there is often no feasible alternative to the private car for reaching more remote areas. This should be supported with policy and supporting text in the Local Plan.

Larkfleet Homes highlighted that a development strategy which provides for significant growth at Beccles supports the promotion of sustainable modes of transport by ensuring services and facilities would be available to new developments within walking or cycling distance and/or by extending or enhancing existing bus services. The proposed development (site 82) would provide cycle routes to connect with the existing cycle network and would enable improved connections between the town and Ellough Industrial Estate and Enterprise Zone thereby helping to promote more sustainable options for travelling to work. Similarly, pedestrian routes within and adjoining the site would be enhanced. In addition, the development would make provision for enhancing and improving bus services to provide public transport service to/from the site and connecting to Beccles town centre, Ellough Industrial Estate and surrounding towns and villages. Furthermore, the proposed development offers on-site community facilities which would benefit future residents of the site as well as existing nearby residents, promoting walkable services.

Lawson Planning Partnership commented that development needs to be situated where it is well located to public transport networks in order to encourage sustainable transport choices over private and single occupancy car journeys. Allocating new development in sustainable locations within walking and cycling distance of key services and facilities is important to encouraging more sustainable transport choices, minimising the need to travel and is in accordance with nation planning policy in the National Planning Policy Framework.

Members of the Public

There was support for putting sustainable modes of transport first in all new developments. New development is one of the best ways to provide cycling infrastructure as it can be built in from the concept stage. Members of the public said that sustainable modes of transport should be promoted and encouraged by making it safe, convenient and affordable and new developments must improve cycle routes. Development should be located close to Lowestoft or the market towns rather than more remote villages. Development on a public transport route or within cycling distance is preferable.



It was highlighted that storage and parking of bicycles is very important and cyclists should be included in discussions. Residential developments should have safe, weatherproof storage with easy access to the highway for each dwelling and preferably not communal. Places of work and visitor attractions should provide secure, weatherproof parking. The parking compound at Lowestoft station is a good example of high quality visitor cycle parking. One person added that increasing cycling requires political will and courage.

Several people commented that trains and buses should be better co-ordinated, more frequent and cheaper and access to railway stations should be improved. Public transport could be made more affordable through subsidies raised through congestion charging and increased car parking charges. There were suggestions to regenerate the rail link with Lowestoft port to take freight off the roads and resolve delays from rail services in Oulton Broad. It was stated that buses are good for pensioners who don't pay for tickets but expensive for those who do. People's behaviour on public transport needs to improve as this can put people off using public transport. A Park and Ride scheme in Beccles would help link the town centre and development to the southeast of the town.

There was support from members of the public for cycle paths such as multi-use pathways alongside roads, particularly linking schools and connecting outlying villages with market towns. Several people have stated that these should be genuine cycle paths and not just taken from existing roads using white markings. It was recommended that they should be direct, safe, attractive and ideally traffic-free. Contra-flow lanes on one-way streets, the introduction of 20 mph limits on residential streets, reduced speed limits on rural lanes and inclusion of cycle lanes on the Lowestoft third crossing have also been suggested.

One person queried the need to create entirely separate cycle lanes and remove cyclists from roads and commented that cycling safety is not improved if cyclists are removed from roads where traffic levels are not intolerably high. There cannot be off-road facilities everywhere and more cyclists on the roads create safer cycling. Several people commented that Beccles lacks safe cycle routes serving the town centre and the primary and high schools creating higher car use. Near the industrial estate Ellough Rd is fast and narrow and unsafe for cyclists and pedestrians.

There was support for direct, safe, attractive and ideally traffic-free routes for pedestrians including pedestrianised areas in towns and villages. One person recommended that traffic management should be improved in town centres and footpaths should be widened in town centres so that pedestrians dominate rather than traffic and quality of Conservation Areas will be maintained. Another person commented that private vehicles should be restricted in urban areas. This will improve people's health and well-being and improve footfall for shops. Charges for on-street parking should be introduced to control parking. One member of the public highlighted that there seems to be little cycling or walking provision when roads are upgraded.



Q21 What infrastructure is required in your area?

66 respondents

Statutory Consultees

The Environment Agency stated they have a focus on the provision of waste water infrastructure and this should be considered as a strategic priority in the Local Plan. In considering the Local Plan the LPA should take into account the ability of existing wastewater treatment works and sewerage network to accommodate additional growth having regard to both quality and capacity. Additional capacity may be required to serve the increased housing numbers. The LPA should assess the impact on the receiving water environment and practicalities of water companies providing necessary upgrades where this is the case. They would like to see a policy that encourages all developments to connect to the public sewerage system rather than allowing a proliferation of private treatment plants.

The Environment Agency stated that in several of the scenarios, water recycling centres (WRC) will need to be upgraded and will need new environmental permits to operate at the higher volumes and meet tighter water quality standards. WRC will require an upgrade under option 2 with higher development for Beccles and Worlingham. Lowestoft will require a new permit and possible upgrade for all of the growth scenarios. If rural development is undertaken around Worlingham this will need a new permit and works upgrade. Some other smaller works may need revised permits in response to rural development.

The Environment Agency would expect the Local Plan to consider the existing water and wastewater infrastructure and whether there is capacity for housing growth. The Local Plan will need to take in to account phasing of infrastructure or capacity which should be addressed by policies in affected settlements. The planned Water Cycle Study will help address these issues and identify areas of concern and capacities. It was suggested that all areas of proposed development are assessed as part of the Water Cycle Strategy for the proposed numbers.

The Environment Agency continued to comment on Catchment Delivery. They stated that the Local Plan will need to consider the impacts of growth on the Water Framework Directive (WFD). The WFD, through the River Basin Management Plans, sets out environmental objectives which will need to be met for surface and ground water bodies. Waveney will need to ensure that all plans and policies comply with the objectives of the WFD which means there must be no deterioration in WFD status from the 2009 baseline. Achieving a Good Ecological Status by 2027 or before must also not be compromised. The river Waveney is currently at Moderate Ecological Status. A cost-benefit analysis of achieving a Good status revealed the measures required to achieve this.

The Environment Agency provided comments on some of the settlements as follows:



Lowestoft: The Lowestoft Flood Risk Management Strategy is investigating ways of reducing the tidal, fluvial and surface water flood risk. It will be important to utilise the modelling and evidence base when understanding flood risk to the town to ensure consistency. It will also be important to ensure that opportunities to reduce flood risk through future development sites are pursued. Carlton Colville and Kirkley Stream are known to suffer from surface water flooding and flooding from the Stream. Sites 34 and 35 as well as the large proposal between the A12 and A146 could offer the opportunity to reduce existing flood risk and implement some early concepts from the Lowestoft Flood Risk Management Strategy. Surface water drainage for future developments in this area will need to be strictly controlled in consultation with Suffolk County Council as Lead Local Flood Authority. If a tidal barrier were to be constructed in Lowestoft the Local Plan would need to consider residual risk (e.g. were there to be a flood greater than designed for or if the barrier failed to close what would the risk be and how will planning policies address this?).

Halesworth: A site in the town centre was identified to be located on a flow pathway during times of flood. Development of this site could offer the potential to reduce existing flood risk. It is not currently shown as land for potential development.

Beccles: Sites to the south of Beccles all appear to drain through the town to the north. The management of surface water will be needed to ensure there is no increase to risk but ideally improvements would assist. Discussions with Suffolk County Council will therefore be important.

Parish and Town Councils

Carlton Colville Town Council stated that it would be difficult to expand the road infrastructure as houses are in the way and add that there is a problem with the road system leading to the primary school. Drainage needs to be greatly improved to stop flooding that has been exacerbated by housing over the past twenty years. Facilities for young adults should be provided. Housing developments have too little space for children and young adults to get fresh air. Open spaces in Carlton Colville have run down and have poorly maintained equipment and serve mainly dog walkers.

Halesworth Town Council commented that infrastructure is a serious impediment to development in the town. Development of employment opportunities is needed and there needs to be a strategy to attract business to the town led by District and County Councils. Both primary schools are at capacity and there is no secondary school so pupils have to be bussed to Bungay. A new medical facility with hospital level facilities is needed. The sewerage system needs updating and there are flooding issues which need addressing.

Ilkeshall St Margaret Parish Council commented that a bus link a couple of times a week to Bungay and Beccles is needed and a re-think of the Bungay one-way system.



Kessingland Parish Council commented they currently have poor roads, health and education facilities, sewerage/foul water drainage, transport and retail outlets. The Kessingland Neighbourhood Plan contains policies to address housing, transport, business and employment, leisure facilities, environment, tourism and flooding/drainage.

North Cove Parish Council stated that doctors, dentists, teachers, more police, better roads and rail services are needed.

Oulton Parish Council wanted to see improvements at the following junctions which will see more traffic with the Woods Meadow development:

- Gorleston Road/Dunston Drive;
- Gorleston Road/Sands Lane;
- Gorleston Road/Hall Road;
- Gorleston Road/Mobbs Way.

Traffic heading south will suffer delays due to the level crossing and Mutford Lock Bridge in Oulton Broad. Promised improvements to traffic waiting times at Oulton Broad are long overdue. Signs should be erected to direct HGVs away from Oulton Street which is too narrow for large vehicles. Oulton needs a medical centre with the closure of the Oulton Medical Centre and progression of the Woods Meadow development. The proposed primary school on the Woods Meadow development will not arrive in time to accommodate the children on the development. The Community Centre in Oulton is almost full and will not be able to accommodate residents from the new development. Oulton Parish Council request the highway review bond which is part of the Woods Meadow section 106 agreement should be called in now and improvements should proceed as soon as possible.

Southwold Town Council commented that the Local Planning Authority should liaise with private sector infrastructure providers to ensure that development does not exceed infrastructure capacity. They highlighted the most pressing need is for improved waste water drainage and treatment along with sustainable transport infrastructure to reduce car use. An additional safe cycling route linking Southwold and Reydon and parking and cycling infrastructure in Southwold and Reydon is required. Recent developments in Reydon and Southwold have put strain on the waste water treatment system and there have been examples of flooding, drainage and sewerage problems reported. Future growth should not take place without improvements to the waste water treatment works. They highlighted the need to incorporate 'hidden' infrastructure needs into plans and policies in the new Local Plan.

St James South Elmham Parish Council stated that high-speed broadband is of high importance. They also highlighted that repairs to potholes and provision of more passing places is more important than new roads.



Other Organisations

Beccles and Bungay Cycle Strategy stated there is a particular need to connect Beccles with the Ellough Industrial Estate via Ellough Road. They commented that the Beccles Southern Relief Road will provide some cycling infrastructure but it will not continue alongside Benacre Road to the Industrial Estate and it does not help the connection to Beccles along Ellough Road. They stated this is perhaps the single most needed piece of cycling infrastructure in the Beccles area. They also highlighted that in Bungay site 45 provides the opportunity to link Kings Road with Meadow Road and Joyce Road which is a much needed link.

The Halesworth and Blyth Valley Partnership commented there is a need for increased educational provision following the loss of the Middle School. Green Infrastructure is needed. A new health care facility will be needed if Patrick Stead hospital closes. Phase 2 of the relief road should be reviewed and revisited before designation of new development. A strategy to bring new businesses to the town is needed. The sewerage system should be expanded to contend with new housing and flood remediation work up-stream of Halesworth should take place.

The Lowestoft and Waveney Chamber of Commerce stated the following infrastructure requirements:

- Remove the constraints to economic and employment development within the areas designated through; the Lowestoft Lake Lothing & Outer Harbour Area Action Plan; and the Gt Yarmouth and Lowestoft Enterprise Zone.
- As a matter of high priority, widen the port access channel in the vicinity of the existing bascule bridge in order to stimulate offshore and marine-based economic activity on the allocated land to its west.
- Support improvements to the A146 between Barnby and Carlton Colville to improve access to the section of the Enterprise Zone at Ellough Business Park.
- Support the proposed Lowestoft flood defence scheme aimed at protecting the built, road and rail infrastructure from the adverse effects of tidal, pluvial and fluvial flooding.
- Ensure that services to all employment sites are adequate for present and future needs, to include electrical supplies, broadband and access to mobile technologies.

Southwold & District Chamber of Trade & Commerce commented that introduction of parking restrictions to provide spaces for residents should be carefully managed. Resources should provide maximum benefit for both residents and visitors who are important to the local economy. Introducing resident's parking bays may exacerbate parking problems in the town causing significant economic damage. Careful consideration should be given to proposals to pedestrianise the High Street. This could be effective in summer but loss of parking spaces and lack of vitality could be an issue at quieter times.

Southwold and Reydon Society commented the road network around Southwold and Reydon is currently adequate but not suitable for significant growth. The sewerage infrastructure is at or



beyond capacity which should restrict major development in the area. Parking is out of control in Southwold and planning policies must seek adequate off-street parking and better management of parking.

Developers/Landowners

Larkfleet Homes commented that their public and stakeholder engagement showed that a primary school, playing fields and public open space would be appropriate as part of their development proposal (site 82) and would be welcomed by local residents. Discussions with healthcare providers are ongoing and provision could be made arising from the projected needs identified by the Clinical Commissioning Group. Beccles is considered to benefit from good existing infrastructure and a strategy promoting growth at Beccles is deliverable and achievable. Focussing a substantial proportion of development in Lowestoft could be constrained, both in financial and delivery timescale terms, by the need to deliver significant infrastructure improvements (i.e. a new link road between the A12 and A146).

Lawson Planning Partnership commented that their site is well located to existing infrastructure and no new significant infrastructure would be required.

Members of the Public

Members of the public have put forward the following responses (divided into sub areas):

All of Waveney:

- Leisure facilities;
- Hospital;
- Larger/more doctor's surgeries;
- Provision for elderly people;
- Dentists;
- More Schools;
- More police;
- No charging for first hour of car parking;
- More 20mph speed limits;
- Measures to discourage car use;
- More off-street parking;
- More roads;
- Improved bus network and public transport;
- Improved junctions on main roads;
- Dualling of the A12;
- More parking for householders;
- Improved cycleways;
- Upgraded sewerage system;
- Improved broadband;



- Better sports facilities including hockey pitches, swimming pool and indoor facilities;
- Light industrial development;
- Increase infrastructure spending outside of Lowestoft.

Beccles and Worlingham

- Medical centre;
- Beccles Southern Relief Road with good cycle links and a link for traffic going west on the A143;
- Indoor and outdoor sports facilities;
- Leisure facilities including swimming pool;
- Indoor children's play area;
- A multi-use path alongside the B1062 between Beccles and Bungay;
- A safe cycling route between Beccles and Ellough Industrial Estate including Benacre Road and Southern Relief Road;
- More cycle paths;
- Flood defences.

Bungay

- New and expanded schools;
- Leisure facilities;
- Expanded doctor's surgeries;
- Housing for the younger generation;
- A multi-use path alongside the B1062 between Beccles and Bungay;
- Parking for residential areas;
- A link from site 45 across St Johns Rd to Kings Rd.

Halesworth

- A secondary school;
- Hospital facilities;
- Swimming pool;
- Leisure centre;
- Better buses and trains;
- Off-road bus stop in town centre;
- Rehabilitation and convalescence facilities;
- Roundabout or traffic lights in Old Station Road to support development.

Lowestoft

- No more traffic lights;
- Bigger shop brands;
- More industry and employment;



- Cycle bridge of Lake Lothing and railway line along with links to Harbour Road;
- A new bridge near Wickes;
- Improvements to the level crossing in Oulton Broad;
- Flooding improvements at Nicholas Everitt Park, Bridge Road and Mutford Lock.

Redisham

- None required.

Somerleyton

- New village hall.

Southwold and Reydon

- Improved roads;
- Improved car parking;
- Network of cycle paths;
- No cuts to bus services;
- Improvements to sewerage and surface water drainage systems;
- Improved access to the A12;
- Modern street furniture is not wanted;
- High speed broadband.

Q22 What infrastructure do you think would be needed to support the growth scenarios?

57 respondents

Statutory Consultees

Essex and Suffolk Water stated they have a statutory duty to prepare and maintain a Water Resources Management Plan (WRMP). The WRMP shows how they intend to maintain the balance between supply and demand over the next 25 years. Beccles with Worlingham, Bungay, Halesworth, Southwold with Reydon, Kessingland, Barnby/North Cove, Blundeston, Corton, Holton, Wangford and Wrentham are all located within the Suffolk Northern Central Water Resource Zone. The WRMP shows a supply surplus over the extent of the planning horizon.

NHS Great Yarmouth and Waveney Clinical Commissioning Group (NHSGY&WCCG) commented these is good and proportionate healthcare coverage and the Local Plan must take into account the capacity and locations of existing healthcare infrastructure when considering options for growth. The proposed growth across the region will have a significant impact upon future healthcare provision. Existing primary care capacity is constantly under review and capacity will be reviewed to accommodate growth in the medium to long term. The Clinical Commissioning Group (CCG) are working on an overarching Strategic Estates Plan and are bidding for funding to support Primary Care capacity. Existing health infrastructure will require investment and improvement to meet the



needs for the growth options in the Local Plan consultation. If unmitigated, the impact of the proposed developments would be unsustainable.

The NHS Great Yarmouth and Waveney Clinical Commissioning Group go on to say that care should be taken to ensure the four strategic outcomes of the Suffolk Health and Wellbeing Plan are taken into consideration throughout the Plan process. Where development is planned in locations where healthcare service capacity cannot meet its needs mitigation must be considered and policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development's sustainability with regard to continued healthcare provision. The exact nature and scale of the contribution will be calculated at an appropriate time when schemes come forward over the plan period. The Local Planning Authority should have reference to up-to-date strategy documents from NHS England and the CCG which currently include: the Sustainability and Transformation Plan, the Five Year Forward View, the GP Forward View, and the Local NHS Great Yarmouth and NMSGY&WCCG Strategic Estates Plan. The Local Plan documents should not commit the CCG or NHS England to carry out certain development within a set timeframe and should not give undue commitment to projects. There should be a reasonably worded policy within the Local Plan that indicates a supportive approach from the Local Planning Authority to the improvement, reconfiguration, extension or relocation of existing medical/health facilities. This positive approach should also be applied to schemes for new bespoke medical facilities where such facilities are agreed in writing by the NMSGY&WCCG and NHS England.

The NMSGY&WCCG identified the anticipated impact on health infrastructure arising from the Local Plan proposals. The exact nature and mitigation required will be calculated at an appropriate time when schemes come forward. The NMSGY&WCCG would welcome future details of the Local Plan so that they can respond. NMSGY&WCCG support the growth required for the Waveney area, however, further consultation and dialogue is required when further details are available.

Suffolk County Council (SCC) commented they have a legal duty to ensure provision of education from ages 2 to 16. The National Planning Policy Framework (NPPF) paragraphs 38, 72 and 203-204 sets out the role for the planning system to provide education facilities and minimise travel. Safe routes to school are necessary, otherwise the education authority must bear the cost of school transport.

SCC continued to say the scale and distribution of housing growth can be managed in relation to school places. There are implications arising from the different options for funding additional school places through development. The actual need will depend upon the location of development, forecast pupil numbers, and available capacity. Further detail will be provided as the Local Plan review progresses. SCC provided broad early years and school place requirements for the district.



SCC commented on library provision and stated they will identify library provision required to support growth as the Local Plan review progresses. Existing libraries may be improved or libraries may be required on site in some cases.

SCC highlighted they are the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea.

SCC commented on infrastructure provision around some of the sites. Sites 63, 42 and 129 around Blundeston have limited amenities and services within reasonable distance and some of the road network may not be of sufficient standard or capacity. If this scale of development is to be brought forward a comprehensive review of transport issues will need to be undertaken. They added that growth in Southwold and Reydon should be limited to meeting immediate local needs as there are no rail connections and the vehicle access is limited to one road into and out of the area which is subject to flooding. The resilience of local infrastructure will need to be considered and the County Council will assist with this. Site 6 does not appear to be connected to the highway. The proposed level of development in Bungay is accepted in principle. However, access constraints are likely on site 39 as any proposed access onto Annis Hill would require widening the road. This site should provide its main access from B1062. SCC welcomed the reference to the Southern Relief Road in Beccles and commented that (subject to further studies) the proposed level of growth around Beccles is generally acceptable with the exception of sites 124, 50, 71 and 77 since these are further out from the town centre and less likely to encourage sustainable travel choices. The proposed developments at Halesworth and Holton are acceptable in principle, subject to further assessments through the planning process.

Parish and Town Councils

Ashby, Herringfleet and Somerleyton Parish Council raised concerns about safety on the B1074. Safety should be improved before more houses are completed at Woods Meadow or north Lowestoft. They suggested the B1074 should retain rural characteristics and heavy goods vehicles should be prohibited. There is little employment or public transport in the three parishes.

Carlton Colville Town Council stated that improved drainage, roads and facilities for young people would be needed along with retention of the character of the place.

Ilketshall St Margaret Parish Meeting commented that public transport should be improved including the rail link from Norwich to London.

North Cove Parish Council commented the Third Crossing, doctors, dentists, teachers and tourists are needed.

Oulton Parish Council stated they do not believe Oulton can grow any further after the 800 homes at Woods Meadow. Road infrastructure is inadequate and even with improvements it would be unable



to accommodate further housing. Improvements to Oulton Broad North rail crossing to reduce the amount of time the line gates are down would help reduce traffic queues significantly. The Third Crossing would reduce journey times and traffic queues and may help attract businesses to the area.

Southwold Town Council stated that improved broadband, mobile phone reception, and public transport links to Norwich, Ipswich and London are needed. Better road networks, sewerage infrastructure and parking are required.

St James South Elmham Parish Council commented that it is unlikely additional infrastructure would be needed to support the options for growth.

Other Organisations

Beccles and Bungay Cycle Strategy highlighted that a link between Beccles and Ellough Industrial Estate is vital to connect pedestrians and cyclists with residential and employment areas.

The Beccles Society suggested a mini park and ride scheme to serve growth in Beccles as there will be insufficient car parking in the town centre. There is no land in the centre of Beccles for more car parks. New supermarkets, leisure and health facilities should be provided in significant housing developments. The existing highway network and car parks would be difficult to improve.

The Halesworth and Blyth Valley Partnership commented there is a need for increased educational provision following the loss of the Middle School. Green Infrastructure is needed. A new health care facility will be needed if Patrick Stead hospital closes. Phase 2 of the relief road should be reviewed and revisited before designation of new development. A strategy to bring new businesses to the town is needed. The sewerage system should be expanded to contend with new housing and flood remediation work up-stream of Halesworth should take place.

Southwold & District Chamber of Trade & Commerce commented that current infrastructure in the area will struggle to accommodate increased housing stock. Schools, healthcare and sewerage should meet the needs of an expanding population. Any growth in Reydon is likely to increase pressure on already stretched parking in Southwold.

UK Power Networks commented they can support some further growth (residential and industrial) but there are constraints in terms of total increase in power demand. In the short to medium term UK Power Networks should be able to work with stakeholders to resolve reasonably sized developments and their power demands. There is a significant obstacle in getting power from Beccles town centre across the Network Rail infrastructure. If this can be achieved then it could unlock the door for the 1,000 new residential properties in Worlingham as well as further employment expansion. A copy of the Regional Development Plan was supplied with their comments.



Developers/Landowners

Badger Building commented there are doubts over the ability of the waste water infrastructure for Beccles and Bungay to cope with significant additional development. Early investigation is essential, identifying the cost of any upgrade. School planning will need careful thought. Significant development around the south of Beccles should include shopping and community facilities.

Members of the Public

General comments about what infrastructure is needed:

- Leisure facilities;
- Sport facilities including hockey pitches and a swimming pool;
- New/larger hospitals;
- More doctor's surgery provision;
- More dental facilities;
- Provision for elderly people;
- Open spaces, landscaping with trees, parks;
- More schools;
- Greater sewerage capacity;
- Better drainage;
- Flood defences;
- Improved water supply;
- Better electricity supply;
- Jobs;
- Shops;
- More cycle paths/routes;
- Improved bus network and support for sustainable transport, particularly between housing and retail/employment centres;
- Careful planning on brownfield sites;
- Road improvements;
- More parking;
- More passing places on the roads;
- More traffic speed restrictions;
- High speed broadband;
- Services;
- Free parking for 1st hour;
- No cuts to NHS and public sector.

Beccles and Worlingham

- Medical services;
- Dentists;
- Drainage;



- Improved cycle routes;
- A safe cycle/pedestrian route between Beccles and employment areas in Ellough and cycle links for the Southern Relief Road;
- Upgraded utilities;
- A pub;
- Improved road junctions;
- More parking;
- No development on flood plains;
- More facilities to the southeast of Beccles and Worlingham which would compliment and reduce pressure on the town centre.

Bungay

- Leisure facilities;
- Doctors;
- School access;
- More roads;
- More car parks.

Oulton

- Sites in Oulton are unsuitable due to Woods Meadow development and high volumes of traffic.

Halesworth

- More health care;
- Education including a secondary school;
- Off road bus stop in town centre;
- Improved cycle connections;
- Leisure facilities including a swimming pool;
- More parking;
- Improved road network.

Lowestoft

- Development to the north of Lake Lothing if there is no third crossing;
- Re-opening of the Lowestoft to Yarmouth railway line.

Redisham

- Sewage treatment works;
- Extra school places;
- Access to health services;
- Improved roads;



- Public transport;
- Local shop.

Somerleyton

- Buses;
- Expanded school;
- Mobile phone reception.

Southwold and Reydon

- Improved main and local roads;
- Improved parking;
- Improved sewage treatment facilities;
- Consideration of the impact of growth on schools, medical facilities and transport;
- Widen the Wrentham to Southwold road.

Q23 *What are the new development and regeneration opportunities in and around Lowestoft arising from a new crossing over Lake Lothing?*

13 respondents

Statutory Consultees

No responses.

Parish and Town Councils

Carlton Colville Town Council commented there is very little existing industry and this is not enough to sustain the local population.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building commented the Third Crossing may provide a solution to current traffic problems but they fail to see how it opens up regeneration opportunities unless it can also serve as access for Brooke Peninsular. If so it may assist in bringing forward housing development provided any contributions for the development are minimal.

Members of the Public

Members of the public identified a number of benefits which could arise from the Third Crossing. People commented the Third crossing would improve existing traffic problems and the area around the crossing will become more attractive to business users. This could lead to regeneration opportunities around the centre of Lowestoft, especially brownfield sites around Waveney Drive.



Furthermore, with traffic moved away London Road South the Kirkley shopping area and the South Beach would be open for redevelopment and possible pedestrianisation. North Quay retail site and Oulton Broad could both benefit from better and more diverse retail options and improved civic options such as an improved library would be good.

One person suggested the Third Crossing will create more traffic and discourage people from coming to Lowestoft. Another person added that development should be focussed to the north of Lowestoft and only takes place to the south once the crossing is guaranteed. With the crossing in place further development would be possible to the south of Lake Lothing and on the A12 south of Lowestoft.

There was a suggestion for the existing harbour bridge should be closed to cars once the Third Crossing is built, with Lorries using it for access. This would encourage people to walk, cycle or use buses. Another suggestion was to use places such as Manchester, Liverpool or Rotterdam for inspiration. Publishing a timetable of bridge closures could help people to plan around the bridge closures.

Q24 *What are the opportunities arising from the Beccles Southern Relief Road for development in and around Beccles?*

22 respondents

Statutory Consultees

No responses.

Parish and Town Councils

Carlton Colville Town Council stated there is very little existing industry and not enough to sustain the local population.

Ilketshall St Margaret Parish Meeting commented the relief road looks like it will increase opportunities for both commercial and residential development whilst enhancing the town.

Other Organisations

Beccles and Bungay Cycle Strategy commented that development between Beccles and the Southern Relief Road should only allow motor vehicle access from the Southern Relief Road and not via existing residential roads. These should only be used for pedestrian and cycle access. A 20mph speed limit on all residential roads, a 30mph limit on strategic routes through the town and weight limits should be applied to roads in Beccles. The A145 must be diverted along the Southern Relief Road and Copland Way.



Developers/Landowners

Badger Building commented the Southern Relief Road provides an opportunity to service additional housing land to the south of Beccles as well as providing a link for lorries. The reduction in traffic in the town centre should be welcomed.

BKW's agents commented that access to their site at Ellough Airfield (site 61) will be improved with the delivery of the Southern Relief Road and allow 20 new companies to move to the site creating over 1200 jobs and a boost to the local economy expected to be worth millions of pounds. It also means less congestion for Beccles as traffic will no longer need to travel through the town centre.

Larkfleet Homes commented that the forthcoming Southern Relief Road presents an opportunity to enhance the southern side of the town and the Ellough Enterprise Zone by improving access to and from the area, reducing traffic congestion through the town and removing heavy goods vehicles from the town centre. It promotes the prospect of improvements to accessibility between the town and the Ellough Industrial Estate by enabling improved cycle/pedestrian connections along Ellough Road. Larkfleet's proposed development (site 82) would complement and supplement these connections and promote accessibility from the proposed development and the wider town beyond. Furthermore, the relief road would provide a physical and visual element of containment to the south of the town such that any development in this area would be clearly confined from the wider landscape and countryside beyond.

Members of the Public

Members of the public have identified benefits from the construction of the Southern Relief Road in that it would remove Heavy Goods Vehicles from the centre of Beccles, make the centre of Beccles more pedestrian and cyclist friendly, ease traffic issues in the town centre and in the surrounds, support jobs growth around the Ellough Industrial Estate, provide better access around the south of Beccles, provide more cycling routes and improve sustainable transport options such as cycling and buses. It has been commented that tourism could improve and a leisure centre would be well accessed here.

Members of the public identified that the area between the Southern Relief Road and the edge of Beccles would be beneficial due to good road access and no areas of special habitat or landscape interest. Although comments identified that development should not extend beyond the relief road. People said that vehicular access to new development in this area must be on the Southern Relief Road and the existing residential roads should be used for pedestrian and cycle access only. Residential streets in Beccles should have a 20mph speed limit and 30mph limit and weight restrictions on other routes through the town. The A145 must be diverted along the Southern Relief Road and Copland Way. Community facilities, infrastructure, a park and ride, retail, leisure, green spaces and sports facilities should be provided as part of large scale development.



Some people raised concerns over the amount of development that construction of the relief road may lead to and commented that growth should not exceed 20% of the existing population/housing stock of Beccles. Construction of the Southern Relief Road should not provide a reason to encourage large scale development. Concerns were raised the entire area between the Beccles and the relief road may be developed. One person commented that industrial smells may be an issue with development around Ellough.

Q25 *What are the new development and regeneration opportunities in and around Lowestoft arising from increased flood protection?*

8 respondents

Statutory Consultees

The Environment Agency identified the Strategic Flood Risk Assessment (SFRA) and Shoreline Management Plan are fundamental in providing the evidence base to make site level or community based assessments of issues relating to future flood risk management. The SFRA helps to demonstrate the potential change in flood risk over the next 100 years.

Parish and Town Councils

Carlton Colville Town Council commented that flooding will increase if there is more housing and queried what increased flood protection has there been in Carlton Colville.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building commented that flood protection for the town opens up the possibilities of development of both Commercial Road and Peto Road and this will be of benefit to the town. In addition it will reduce the cost of regeneration of the Brooke Peninsular and make construction on the site easier and less expensive.

Members of the Public

Members of the public commented that flood protection should help businesses in Lowestoft be more confident for the future and make Lowestoft more attractive for businesses. It could improve Station Square and make the town centre more attractive for visitors. There are opportunities to integrate some of the history of the town into the flood protection and make the past of Lowestoft an integral element rather giving the appearance of a decaying town and suggested a competition for imaginative schemes. One member of the public stated that Lowestoft will take a long time to recover from the last flood and it could happen again before improvements are made. The beach is in a poor state and more coastline would be lost were it not for private investments at Corton and Hopton.



Help plan our future: Options for the new Waveney Local Plan
Summary of Responses to Questions
August 2016



Regeneration of Central Lowestoft

Q26 a) Should the Local Plan contain a detailed regeneration strategy for central Lowestoft? B) Should such a strategy be focused on the remaining Area Action Plan proposals or should it be wider to cover areas of the Town Centre, South Beach and Kirkley?

41 respondents

Statutory Consultees

The Environment Agency supported Area Action Plan (2010) policies and wished to see this level of detail retained in future policy making. The Environment Agency welcomed further consultation on specific details if these were to be changed in the New Local Plan.

Parish and Town Councils

St. James South Elmham Parish Meeting supported the inclusion of a regeneration strategy for Central Lowestoft, which should be widened to include the town centre.

Oulton Parish Council supported a strategy which focused on delivering the remaining Area Action Plan proposals.

Carlton Colville Town Council supported the inclusion of a regeneration strategy for Central Lowestoft, which should be broadened in scope to link the town centre, South Beach and Kirkley together.

Other Organisations

The Southwold and Reydon Society supported the inclusion of a regeneration strategy for Central Lowestoft but which was broader in scope to include areas of the town centre, South Beach and Kirkley.

The Lowestoft and Waveney Chamber of Commerce stated that they support the inclusion in the Local Plan of a detailed regeneration strategy for Lowestoft which should deliver the remaining Area Action Plan proposals but widened to cover all of the Town Centre, South Beach and South Quay.

Suffolk Wildlife Trust stated that any regeneration strategy for Central Lowestoft should ensure that the County Wildlife Sites are properly protected and managed.

Developers/Landowners

Badger Building stated that the regeneration strategy should focus on wider areas.

Members of the Public

Members of the public overwhelmingly supported the Local Plan containing a detailed regeneration strategy for Central Lowestoft. However opinion was divided between those who favoured



concentrating on delivering sites included in the existing Area Action Plan and those who wanted to see the strategy broadened to include the town centre, Kirkley and South Beach.

Q27 *Should we continue to promote the development of a renewable energy and offshore engineering cluster at the PowerPark?*

13 respondents

Statutory Consultees

The Environment Agency supported the promotion of the offshore energy sector. However it cautioned that the development of offshore wind can have environmental impacts which will require careful consideration. Landward infrastructure for offshore wind often required mitigation measures and therefore early engagement with the Environment Agency was recommended.

The Broads Authority questioned whether there was the potential for offshore wind proposals to affect The Broads. For example would power cables carrying electricity onshore pass through The Broads area? Policies concerning offshore wind infrastructure should take account of The Broads.

Parish and Town Councils

Carlton Colville Town Council supported the continued promotion of the PowerPark but also cautioned that it might not develop into a long term asset.

North Cove Parish Council stated the PowerPark was one of the few remaining sources of economic growth.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building supported the continued promotion of renewable energy and offshore engineering at the PowerPark.

Members of the Public

Members of the public supported continued promotion of the PowerPark provided that it was feasible to do so and that it was undertaken in cooperation with Great Yarmouth. Development of the PowerPark should be broadened to include different types of engineering and manufacturing. The benefits of offshore energy provision may dwindle in significance once the wind turbines are installed.



Q28 *Should we continue to promote retail and leisure development at Peto Square or should we promote a wider range of uses or a more leisure focused option?*

10 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council supported promoting retail and leisure development as well as a wider range of uses.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building stated that a wider range of development is needed because there are not enough developers in the market to support a narrow focus.

Members of the Public

Members of the public favoured redevelopment of Peto Square for leisure uses and questioned expansion of the town centre into Peto Square at a time when town centre shops were closing. Redevelopment of the railway station was regarded as preferable, in particular, it was thought sensible for the bus and railway stations to be located next to one another. One respondent favoured a wider range of uses, given the location of Peto Square and thought that South Beach and Kirkley shops would be a better focus for leisure activities. However another cautioned that Peto Square should not be committed to a particular type of use until the impact upon other parts of the town centre was understood. For them Peto Square would best be developed for leisure uses with some retail, provided that it did not impact upon the town centre or Kirkley district shopping Centre. Another response favoured retail and leisure development on the site and identified it as the gateway in to the town. Accessibility will need to be improved, in particular the road access to the site.

Q29 *The former Jeld Wen Factory Site, which forms part of the Sustainable Urban Neighbourhood and Kirkley Waterfront site is currently proposed for waterfront employment and housing adjacent to Waveney Drive. Is this still the most appropriate use for this site?*

13 respondents

Statutory Consultees

The Environment Agency has identified this site as being at risk from flooding and recommends that the sequential test is followed when designing the layout of the site. Commenting in any detail is



difficult as a full flood risk assessment has not yet been completed. The Environment Agency advised the Council to revisit the sequential and exceptions work that was undertaken as part of preparation of the Area Action Plan and to be aware that site availability and circumstances will have changed in the last six or seven years. The Environment Agency welcomed further consultation about the site selection process once the strategic flood risk assessment is completed and site specific allocations are put forward in order to understand possible scenarios for employment and residential development and design layout for the area.

Parish and Town Councils

Carlton Colville Town Council supported the redevelopment of the former Jeld Wen factory for waterfront employment and housing uses.

Other Organisations

Suffolk Wildlife Trust stated that any regeneration of Central Lowestoft should ensure the County Wildlife Sites are adequately protected and managed.

Developers/Landowners

Badger Building stated that the site is an eyesore and that the Council should approach redevelopment of the site with an open mind.

Wellington Construction stated that delivery of large scale housing schemes in the Lake Lothing area appears unrealistic given the previous lack of progress.

Members of the Public

Members of the public expressed frustration that the site remained undeveloped and there was suggestion of focusing on other uses besides housing, such as employment and leisure uses. This site could be developed so as to enhance The Broads experience. 1380 houses on this site was considered excessive and it was thought best to provide open space and community facilities, notably nursery and educational facilities, community facilities and a landscaped park or play area. Respondents who did favour housing suggested either homes for the elderly or starter homes. One respondent suggested that high value homes would help to kick start regeneration in the area.



Housing

Q30 *Should we continue to have a policy that requires a mix and type of housing based on assessment of local need, or should the housing market dictate what mix and type of housing is built?*

36 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council commented there should continue to be a policy that required a mix and type of housing based on assessment of local need.

Ilketshall St Margaret Parish Meeting stated that housing should be market led but include a proportion of affordable housing.

Kessingland Parish Council acknowledged that if development is of a different mix to the area then densities may differ. However, it is vital that the design of such developments does not have a negative impact on the area and its surroundings.

Oulton Parish Council commented that housing should be based on local need. Oulton needs housing for retired people wishing to downsize from large houses to small bungalows. If this type of housing was available for retired people it would release larger homes for families.

Southwold Town Council commented that for reasons outside the scope of this response the market does not deliver what is needed in housing. This necessitates retaining a policy that requires a mix of housing and types of housing based on assessments of local need.

Other Organisations

Southwold and Reydon Society commented that planning policies should continue to require a mix and type of housing based on assessment of local need.

Suffolk County Council commented that they are working closely with Local Authorities in order to meet the requirement set out in paragraph 162 of the NPPF ensuring that local need for adequate care and health provision is addressed. The reference to the ageing population is welcomed and the County Council will work further with the district to define what this may mean in terms of additional needs for housing and facilities for older people. As well as the size and type of dwellings, the growth in older households may also influence the spatial distribution. While the number of older people and older people with specialist housing needs is projected to increase significantly, there are also other groups that have housing needs such as adults and young adults that have to be considered. The County Council would favour a continuation of a mix of supply being required based



on assessed local need and would specifically encourage that assessment of need to include both the needs of an ageing population and other supported housing needs. The assessment of the mix of supply should also incorporate location – with access to services and the availability of public transport being a vital component.

Developers/Landowners

Badger Building commented the market should decide this otherwise housing delivery will be held up.

Gladman Developments Ltd stated the starting point should be an assessment of local need in the Strategic Housing Market Assessment. However, this evidence will only take into consideration the housing need at a single point in time and is subject to changes in the demographic profile of the area over time. Therefore, any policy relating to the mix and type of housing will need to allow for a sufficient degree of flexibility so that it is able to react to changing circumstances. This should not limit the ability of a developer to put forward a scheme which contains an alternative mix such as instances where existing need is not being met, issues relating to viability or in circumstances where updated evidence identifies the need to divert from existing policy.

Larkfleet Homes commented the Council should avoid any prescriptive policy on housing mix. It should set a percentage target for affordable housing but recognise viability concerns, particularly given the lack of flexibility with CIL. The requirement to deliver a mix of housing based on need is consistent with national policy. Paragraph 50 of the NPPF requires Local Authorities to “plan for a mix of housing based on current and future demographic trends, market trends, the needs of different groups in the community and identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand.”

The NPPF therefore recognises that although Local Authorities should understand the need for particular types and sizes of home, and take steps to plan to meet this need, market trends and the type of product being demanded locally are also important considerations. Equally, different sites are more suitable for different types of property. For instance, town centre locations near to facilities may be more suitable for flatted developments with 1 or 2 bedroom units, whilst certain village locations may be more suitable for a mix with larger properties reflecting the character of the location. Therefore, the Council should avoid any policy which is over prescriptive in terms of the mix of dwellings required across all sites, allowing the market response to market demand and for schemes to be developed which are sensitive to their particular context.

Lawson Planning Partnership Ltd commented that the existing Local Plan policy sets requirements for housing type and mix based upon local need from the Housing Market Assessment and applies to developments throughout the district. They considered that there are different housing requirements across the district. On small-scale sites up to 25 units it is appropriate for the market to dictate and for housing to be market led with developers commissioning and undertaking market



research to identify the most appropriate housing mix and type of housing to be included in any development proposal. On smaller sites it can be restrictive to enforce policy on mix and type of housing that relies on district-wide assessment of local need. Market research has been undertaken to identify the market demand in Lowestoft near to our client's site (site 33) and any residential development will be developed to reflect these identified housing market requirements.

Rentplus commented the NPPF requires Local Planning Authorities to deliver a wide choice of homes. The mix and unit type proposed should be informed by the Council's SHMA and other documents such as the Housing Register and Local Housing Needs Surveys ensuring that the needs of the District are met through provisions in the Local Plan. It is useful for the Local Plan to set out the general needs of the district rather than relying solely on market forces. The tenure mix should be strongly influenced by an understanding of local need, including aspirations towards home ownership that can not currently be met due to poor affordability in Waveney. Rent to buy housing has significant capacity to assist households into home ownership by bridging the deposit gap. This not only helps those living in private rented accommodation but also those currently living in other affordable homes which no longer suit their needs.

Wellington Construction commented there is no harm providing that a degree of common sense is applied taking into account changing market conditions.

Members of the Public

There was significant support for a policy that requires a mix and type of housing based on assessment of local need. People highlighted the shortcomings of the market-led approach and said that developers will build for maximum profit resulting in executive type houses, the market has not delivered what is needed and is unlikely to meet the needs of lower income households in the future. People stated that:

- The type of housing required should relate to the overall aims of the plan and be specified in the plan;
- New housing sprawl will make the district less attractive and could cause the district to deteriorate;
- We should try to keep young people in the area and not attract more retired couples who are selling their homes in more affluent areas;
- Housing should be affordable for local residents;
- Housing Associations and local self build groups should be given priorities over sites;
- There should be a housing focus on affordable family homes to attract people to the area;
- Housing mix should reflect local need and character of the built and natural environment.

Members of the public identified housing for an older population as an issue and commented that housing should be provided for elderly people including those living alone. High quality housing



should be planned for over-65s which would encourage them to move from their current homes freeing up housing for others. Low rise flats with gardens and access to a range of facilities might work well.

There were a number of comments in relation to second homes, especially in Reydon and Southwold. These highlighted the adverse impact the high number of second homes is having on the local communities. One person queried if new homes could be prevented from becoming second homes and another person recommended that Waveney takes an aggressive approach to restricting the purchase of all new housing to local people. Members of the public supported maximising the use of current building stocks and adopting a more imaginative approach to housing such as taxes on empty properties, prevention of the loss of affordable homes and measures to encourage self builders.

There were supporters of a market-led approach with members of the public stating that housing market should dictate what is required and this would allow sustainable finance. Investors will have to be allowed to decide what types of housing will be profitable otherwise nothing will get built. Attempts to get developers to build social housing and infrastructure have been bypassed.

Q31 a) How should plots for self build be provided? b) Should self build plots be provided as part of larger housing developments, or as separate sites?

18 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council stated self build plots should be provided as part of separate sites.

Ilkeshall St Margaret Parish Meeting commented that a) plots for self build should be available on the market and b) separate sites.

North Cove Parish Council answered yes to question b.

Southwold Town Council commented that to achieve self build a mechanism is needed whereby land is provided at below market cost. The cost of land is the chief inhibitor. Incorporating self builds within larger commercial developments is a way to dilute the 'sameness' of commercially developed estates.

Other Organisations

No responses.



Developers/Landowners

Badger Building commented that self-build is difficult to incorporate into larger housing developments unless sold as serviced plots. Where does this happen there needs to be an element of 'design coding' with the plots to ensure some sort of compatibility. Self builders are often trying to build dream houses on very tight budgets and often over extended timescales. This can lead to proposals which are overdevelopment of plots and where construction takes 2-3 years. Such schemes need careful control. They are not convinced that the demand is as large as the government makes out and should not be forced to sell land into this marked as a result of allocation. From a practical point of view self build plots are best suited to sites with an existing road frontage. As such, they are more often found in the more rural areas.

Gladman Developments Ltd commented that evidence identifies there is low demand for self build and those who wish to build their own homes indicated they would like individual plots in the countryside. Gladman would not support a policy that would require all housing developments of a certain size to deliver a percentage of self build housing. This would not reflect the current demand for self build development. Any policies relating to self build development will need to be flexible and take into account viability issues to ensure the deliverability of housing is not compromised. Those who are interested in building their own homes will unlikely wish to live on larger scale sites and may result in self build plots on larger strategic sites failing to be implemented.

Wellington Construction commented there would be more chance of promoting self build if they are part of larger sites but question if there is sufficient demand.

Members of the Public

Several members of the public supported self build on separate sites. Comments included:

- Self build should be encouraged (particularly eco homes) in small numbers and not as part of a wider development;
- Self build should not form part of bigger residential sites due to timeliness and lack of cohesion and good urban design;
- Self build could be located on the outskirts of small villages or market towns beyond the usual physical limits;
- Encourage self build co-operatives for small developments of more than one household;
- If developers are against self build this should be taken in to account as obtaining investment is difficult.

Other people took a different view and commented:

- Self build plots should be provided on both individual sites and on larger developments under local authority planning control;



- There should continue to be a mix. There are plenty of developers that have left sites derelict for a considerable time so their concerns about timely completion are not entirely valid.

One person recommended strict design codes should be applied. Another person added that large and insensitive housing estates should be avoided in rural areas and one person was opposed to any self builds.

Q32 *Do you think we should continue with the existing policy to require that 35% of new homes are affordable homes for rent or shared ownership? Or should we set a different percentage?*

28 respondents

Statutory Consultees

The Broads Authority commented the Broads Authority Local Plan will defer to the district's policy on affordable housing as is currently the case.

Parish and Town Councils

Carlton Colville Town Council commented they do not have the expertise to suggest otherwise.

Ilketshall St Margaret Parish Meeting commented that 35% is ok.

Kessingland Parish Council stated that Affordable Housing is one of the main priorities in Kessingland. In June 2015 a Housing Needs Survey was undertaken by Community Action Suffolk on behalf of the Neighbourhood Planning Team. 89% of those taking part were in favour of an affordable housing scheme and 42 households (totalling 70 people) have a current housing need and 16 households (30 people) have a need to return to Kessingland. In August 2014 the Waveney Housing Register showed 101 people with a local connection to Kessingland by virtue of living or working there or having close family there. The housing register does not give a complete picture but there are considerable needs in Kessingland from people with a local connection. The Neighbourhood Plan showed nearly 75% of 31-63 year olds were looking to stay in Kessingland but nearly half would not be able to afford the cost of housing. It is considered important that when new development is brought forward in Kessingland which delivers affordable housing these units are where possible offered to people with a local connection to Kessingland. Three sites in Kessingland are expected to deliver 45 affordable units.

Reydon Parish Council commented that they believe the priority for any new housing needs to be the development of smaller or low cost units suited to the needs of younger people/families and older people/couples needing smaller and accessible accommodation. A 35% quota for affordable housing in all new developments should be retained in the Local Plan. However, achieving long-term affordable housing for local people in Southwold and Reydon is very difficult. Around 50% of new



housing in this area, including a significant proportion of new affordable housing, in the last 10 years has quickly ended up as second homes or holiday lets. Therefore, building new houses in the locality may frequently fail to meet the needs of the local community.

Southwold Town Council stated 35% should be retained and consideration should be given to increasing the percentage depending on local conditions. For example, in Southwold over 90% of new development is bought by the second home/holiday let/buy to invest market. New development is not satisfying the need for primary residences.

Other Organisations

The Southwold and Reydon Society stated the existing policy of 35% of new homes to be affordable for rent or shared ownership should be continued.

Developers/Landowners

Badger Building commented that any increase in this percentage will see development falter or more viability submissions with planning applications.

Larkfleet Homes suggested the Council should set a policy requirement based on the requirement established through the Strategic Housing Market Assessment. It should be acknowledged the delivery of this target is subject to viability, particularly given the introduction of non-negotiable CIL which limits the scope for other contributions to be negotiated when sites are subject to abnormal costs.

Lawson Planning Partnership commented the current requirement for a minimum of 35% of new dwellings to be affordable is high and is likely to impact on the ability of developers to provide policy compliant affordable housing on many sites. To identify an appropriate target the Council need to prepare the necessary evidence. This should be published as part of the evidence base of the new Local Plan and made available for public consultation. When preparing the evidence, the Council should have regard to the NPPF and the requirement for affordable housing policies to be sufficiently flexible to take account of changing market conditions (para. 50).

Lawson Planning Partnership added that any affordable housing thresholds should be subject to financial viability considerations to ensure all suitable sites can be developed without affordable housing requirements rendering them unviable. Viability considerations should take account of affordable housing tenures and the associated splits that developers are required to provide. Whatever the Council considers to be an appropriate percentage of affordable housing this should be set as a target rather than a minimum requirement. This will allow for viability considerations and prevent restricting development on constrained but otherwise highly sustainable sites. When considering a new policy on affordable housing the Council will need to incorporate the addition to the National Planning Practice Guidance published on 19 May 2016 relating to Vacant Building Credit. The policy has been introduced to incentivise brownfield development and enables a credit



to be applied against the floorspace of any vacant buildings on the site which should be used as a relief against affordable housing.

Rentplus commented that they can help meet the needs of households aspiring to home ownership but currently they are locked out of both affordable and market housing, extending the opportunity of home ownership to those otherwise trapped in expensive private rented accommodation or inappropriately housed in social rented housing. This model enables those not currently able to save to rent at an affordable level, whilst living in a Housing Association maintained home to save for the deposit to purchase the home. This helps move households out of private rented accommodation, those living with parents, and also to make the move from social rented housing where this no longer suits their needs. They added that to ensure that the Local Plan is compliant with existing and emerging planning policy it is important that any proposed policies concerning definitions of affordable take into account rent-to-buy affordable housing. Policies should be drafted to ensure developments provide an appropriate mix of housing that suitably responds to both housing needs and aspirations.

Wellington Construction commented that 35% is optimistic given the Government's Starter Home initiative and suggest the level needs to be reduced and viability taken in to account.

Members of the Public

Members of the public provided a mix of comments. Some were supportive of retaining the 35% policy, some recommended an increase to the percentage, some thought it should be lower and some thought it should vary according to local need. Comments included:

- The percentage should reflect local needs;
- The percentage should reflect local circumstances including land values, house prices, demand and wages;
- Housing Associations should be the one exception to building outside of physical development limits;
- Get developers to build social housing on a separate site nearby and it would probably be best if these were built first;
- The basis should be the number of homes needed to house everyone currently on the housing list. A figure of 70% was suggested;
- The Council should focus more on affordable housing and part-ownership to attract the right type of people from other areas to generate growth;
- Affordable homes in Reydon have been sold on the open market as holiday homes;
- Affordable housing policy seems to push through a development that is not meeting any real need for growth in the area;
- Investors do not want to be involved with affordable housing and the Council should accept this if it wants the private sector to build;



- Affordable housing is a priority but they should not be built on top of each other creating car parking issues;
- Affordable homes should be for purchase and not for rent;
- A higher proportion is needed given "House prices in Waveney are more than 6 times average annual earnings...;
- The percentage should be increased but this should be determined by local need. To maintain a balanced community future developments should primarily benefit the community and not the developers;
- 35% is too high and is stopping development. Sensible and sustainable figures needed.

Q33 *What size site should provide affordable housing? Should we continue with the current threshold of 5 homes or set a different threshold?*

20 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council supported a threshold of 5 homes.

Ilketshall St Margaret Parish Meeting supported a threshold of 5 homes.

Southwold Town Council commented that the current threshold of five homes should be kept. In places like Southwold where there is limited land for development a lower threshold should be permitted. This should not only be done through Neighbourhood Plans which may have been enacted before the new Local Plan is in place.

Other Organisations

Southwold and Reydon Society responded "yes".

Developers/Landowners

Badger Building commented that a recent Court of Appeal decision has resolved this in favour of sites over 10.

Benacre Estates Company commented that in accordance with National Planning Practice Guidance affordable housing contributions should not be sought on developments of 10 units or less and have a maximum combined gross floorspace of no more than 1000sqm. The threshold for affordable housing should be increased to 11 homes to comply with national policy.



Lawson Planning Partnership commented that the current threshold for 35% of affordable housing to be provided on schemes of 5 units or more is too low and is restricting to small-scale development. When the Council are preparing their evidence on the appropriate percentage of affordable housing to be provided consideration should be given to the appropriate threshold of dwellings to trigger affordable housing provision. The revision to National Planning Practice Guidance on 19 May 2016 identified small-scale and self build developments of 10 units or less (can be 5 units in rural areas) should be exempt from including affordable housing provided that they have a maximum combined gross floorspace of less than 1000sqm (Ref ID: 23b-031-20160519). As a starting point the threshold should be changed to only require affordable housing to apply to schemes comprising 10 dwellings or more.

Rentplus commented that following the Court of Appeal judgement in the case of CLG v West Berkshire and Reading Councils (2016) the Government's guidance in the PPG was reinstated; this sets national thresholds below which affordable housing should no longer be required. It is particularly important at this stage of reviewing the Local Plan for the Council to consider whether it has local evidence that justifies a lower threshold (as with the existing adopted Local Plan) at which it will require affordable housing delivery, or whether to simply adopt the national guideline threshold. No matter what the evidence suggests it will remain important for the Council to prioritise delivery of affordable housing in all its forms.

Members of the Public

A range of responses were received from members of the public. Some were supportive of the current threshold of five homes and others sought a different threshold. Comments included:

- A higher threshold is desirable;
- The current threshold is too low and puts unreasonable extra costs on market housing;
- Retain the current threshold of 5;
- The current threshold of 5 is in breach of the Government's recent appeal;
- It is important any new developments include some low cost houses;
- Affordable homes should be built where they are needed and desired and not as a matter of site size;
- A mix of both affordable and private homes is desirable;
- Some affordable housing should be provided in villages and market towns but the main focus should be in Lowestoft;
- If sites are predominantly under the threshold or site sizes are being manipulated to avoid affordable housing then there is a strong case for reducing the threshold;
- Affordable housing should be sympathetically designed.



Some general comments around affordable housing were received from members of the public and included:

- There is a gap between supply and demand and the solution lies with 1930's style national investment in social housing;
- Affordable housing should mean starter homes which are affordable and not social housing;
- Current policy does not address the current lack of affordable housing. This should be addressed by building a greater number of smaller properties to reduce the demand and hence the rents achieved. There should also be more schemes to prioritise properties for local buyers rather than investors;
- Affordable housing usually means low standard homes. Property ownership should be encouraged for individuals and not landlords.

Q34 *Should 'Starter Homes' be part of the overall affordable housing requirement? Or should starter homes be an additional requirement above affordable housing provision?*

22 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council commented that starter homes should be in addition to affordable housing.

Ilkeshall St Margaret Parish Meeting commented that starter homes should be part of the overall affordable housing provision.

North Cove Parish Council commented that starter homes should be part of the affordable housing requirement.

Southwold Town Council commented that they are strongly of the view that Local Authorities should not be required to build starter homes in place of other types of social housing. Local communities, community land trusts and housing associations should be able to determine what type of affordable housing is needed locally.

Other Organisations

Southwold and Reydon Society commented that starter homes should be an additional requirement to the 35% affordable housing requirement.



Developers/Landowners

Badger Building commented that it is likely that forthcoming changes to the National Planning Policy Framework will make this the case when the definition of affordable housing is amended. The Act and the technical guidance are likely to make it clear that Starter Homes have priority over other forms of affordable housing.

Larkfleet Homes commented that it is apparent from the Department of Communities and Local Government's ongoing 'Starter Homes Regulations' technical consultation that it is the Government's intention for starter homes to be considered a new type of affordable housing provision. They noted they would support this view on the basis that starter homes present an attractive form of affordable home ownership which can be readily and more viably delivered than other affordable housing products. Affordability is a significant constraint to home ownership in the area. During their public exhibition the possibility of providing starter homes to enable local people to own their own home was well-received. The provision of starter homes, which Larkfleet's development (site 82) would propose to deliver, forms a significant element is considered highly desirable. This should not be supplanted by other affordable housing products.

Lawson Planning Partnership commented that when deciding upon an appropriate affordable housing requirement it is essential for the Council to give consideration to the inclusion of Starter Homes. Should the Council decide to include Starter Homes as part of the overall affordable housing requirement it is important the affordable housing threshold is not increased to account for these. This would render developments unviable. Starter Homes should form part of the mix of the identified affordable housing requirement.

If the Council decide that Starter Homes should be provided in addition to affordable housing and not as part of the affordable housing mix then the affordable housing threshold should be reduced to ensure developments remain viable.

The preferred approach is for Starter Homes to comprise a proportion of the overall affordable housing requirement. Evidence on the requirement for Starter Homes should be prepared by the Council and should be subject to consultation as part of the Local Plan process.

Rentplus commented the Housing and Planning Act 2016 allows for a tapering of the discount that may be received upon sale of a Starter Home. The Regulations are expected to be produced this summer when there will be greater certainty for the Council in developing its policy. For the Local Plan to be in line with existing policy it needs to explicitly recognise the introduction of Starter Homes as part of the overall affordable housing requirement. Rent to buy affordable housing should be recognised. It was recommended to include wording that would indicate the adoption of a flexible approach to tenure mix that responds to local circumstances.



Members of the Public

Members of the public commented in favour of having starter homes both as part of the *overall* affordable housing requirement and with starter homes being *in addition* to provision affordable housing. Comments received included:

- Starter homes should be an additional requirement to affordable housing requirements;
- Starter homes should be part of the overall affordable housing requirement;
- The percentage of affordable housing should be set according to local needs and not prescribed at district level;
- If smaller starter homes are built at a genuinely affordable value there is a case for including these within the affordable housing provision;
- Greater focus should be on Social Housing first and then affordable housing second;
- Starter homes are important and should be mixed with other types of housing with adequate parking facilities;
- Starter homes should be part of any housing requirement scheme provided quality of build and longevity of structure is maintained;
- Starter homes should replace properties for rent wherever possible.

Q35 Should some sites be allocated specifically for starter homes?

14 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council commented that starter homes should be integrated.

Ilketshall St Margaret Parish Meeting were not in favour.

Southwold Town Council commented that starter homes should be discouraged in areas where they are likely to be sold off to become second homes or holiday lets.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building commented that this is a possibility but on a small scale and not on sites of more than 10 as this creates a very unbalanced community.



Rentplus commented that the Housing and Planning Act 2016 allows for a tapering of the discount that may be received upon sale of a Starter Home. The Regulations are expected to be produced this summer when there will be greater certainty for the Council in developing its policy. For the Local Plan to be in line with existing policy it needs to explicitly recognise the introduction of Starter Homes as part of the overall affordable housing requirement. Rent to buy affordable housing should be recognised. It was recommended to include wording indicating the adoption of a flexible approach to tenure mix that responds to local circumstances.

Wellington Construction Ltd were not in favour.

Members of the Public

One person was in favour of allocating sites specifically for starter homes and seven were opposed. One person commented that starter homes should be exempt from the Community Infrastructure Levy.

Q36 *Do you think that the current criteria based policy should continue to be used to determine planning applications for new gypsy and traveller sites or should we allocate sites for gypsy and traveller sites taking account of the criteria in the current?*

16 respondents

Statutory Consultees

The Environment Agency commented that it is important to consider flood risk for these sites and to apply the sequential and exception tests. The Local Plan is a good opportunity to encourage these sites to register with our Flood Warning Direct (FWD) service and encourage them to have flood plans where they are at risk. A policy on waste water disposal would also be beneficial to prevent harm to the environment.

The Greater Norwich Local Plan Team commented that Gypsies and Traveller's needs will be assessed through the Greater Norwich Local Plan and Greater Norwich officers think there could be some benefits in having a meeting to discuss the matter with Waveney officers to ensure any wider strategic issues (any potential new transit site, for example) are considered. The greater certainty of meeting the identified need for additional gypsy and traveller pitches through a specific allocation probably militates slightly in favour of this approach rather than relying solely on the criteria-based policy.

Parish and Town Councils

Carlton Colville Town Council recommended using planning policies rather than site allocations.

Ilkeshall St Margaret Parish Meeting commented that current policy criteria are appropriate.



Southwold Town Council supported the continuation of existing criteria which gives appropriate flexibility.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building responded “yes”.

Members of the Public

A variety of responses were received. The greatest support was given to continuation of the current policy (4 responses). Two people supported the allocation of sites in the Local Plan, two people thought no sites should be provided and one person commented that sites should not be allocated in advance.

Q37 *Do you think we should continue to identify areas where the conversion of properties to flats will be controlled by planning policy?*

15 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

North Cove Parish Council supported continuing with the policy.

Southwold Town Council identified an incentive to convert larger older properties into flats for use as holiday lets rather than low cost housing. Southwold residents identified detrimental impacts from parking, noise and disturbance. They urged the concept of flat saturation to be applied to conversions of larger homes in to holiday lets and future Local Plan consultations should be invited to identify ‘holiday let’ saturation areas.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building supported continuing with the policy.



Members of the Public

Eight members of the public supported the continuation of the policy and three were against. One person commented that conversion of flats helps meet a housing need.

Q38 *What areas should be identified as 'Flat Saturation Area' where further flat conversions will be controlled?*

3 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

North Cove Parish Council identified Lowestoft town centre, Marine Parade and London Road South areas.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

One member of the public commented that anywhere the housing stock is densely packed and/or where parking and services might come under pressure should be considered. Another member of the public was not in favour of any areas and stated each case should be decided on its merits.

Q39 *What criteria should we use to determine planning applications for conversion of properties to flats?*

5 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

No comments were made in response to this question.

Other Organisations

No comments were made in response to this question.



Developers/Landowners

No comments were made in response to this question.

Members of the Public

The following criteria were identified by members of the public:

- Size and suitability of property;
- Environment;
- Availability of vehicle and cycle parking;
- Noise impacts;
- Flood risk;
- Local need;
- Availability of low cost or affordable housing or starter homes.

One person felt no more flat conversions should be allowed.

Q40 *Should we allow market housing on rural affordable housing exception sites?*

14 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilkeshall St Margaret Parish Meeting and North Cove Parish Council opposed this idea.

Southwold Town Council were supportive but only if the ratio of affordable to market housing is 50% or more, the primary purpose of providing market housing is to cross-subsidise the affordable homes and the market homes will be used for full time residents.

Other Organisations

Southwold and Reydon Society were not in favour.

Developers/Landowners

Badger Building commented this should be allowed if it can be used as a way of cross funding local housing needs.

Rentplus commented the NPPF allows for the direct cross-subsidy of affordable housing delivery on rural exception sites. The Council should ensure its policy on these sites allows for this where a site has viability constraints. The Council should permit the delivery of affordable housing wherever this



will meet local affordable housing need and is within a sustainable location. Restricting the delivery of any tenure of affordable housing is unhelpful to those seeking to meet local needs.

Wellington Construction commented this is a sensible strategy to facilitate affordable housing.

Members of the Public

Members of the public were largely opposed to this idea. One person said they would support this idea if the market housing was starter homes and another person commented this should only happen where infrastructure is present, especially public transport.

Q41 *Should we only allow rural affordable housing exception sites next to villages with good accessibility to services and facilities?*

13 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting supported this idea.

Kessingland Parish Council highlighted the local need for affordable housing and local issues with infill development in Kessingland. The draft Kessingland Neighbourhood Plan has policies to deal with these issues.

Southwold Town Council supported this idea.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building said ideally yes.

Wellington Construction opposed the idea and commented that advances in technology in motor car fuel consumption and energy efficiency means that reliance on motor vehicles will become less problematic in the future. The Local Planning Authority could become pro active rather than reactive when considering development sites in areas where a range of facilities may be spread over several villages or where there is a need to travel to towns for such facilities.

Members of the Public

Members of the public were all in support of this idea.



Q42 a) Should we continue to allow small scale development within gaps in the built up frontages in the rural areas? b) If so should this type of development only be allowed where there is access to public transport or local services and facilities?

13 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting supported both ideas.

North Cove Parish Council commented that villages are being ruined by infill of large houses in small gardens without regard for the street scene. Public transport is rarely used and it means more car use.

Southwold Town Council commented that infill in the built-up frontages of villages should be permitted subject to sympathetic design that takes advantage of opportunities to improve the character of the area and providing there is access to public transport, local services and facilities.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building was supportive but commented that the policy needs to be applied more consistently.

Wellington Construction were supportive of both ideas.

Members of the Public

Members of the public unanimously supported the notion to allow small scale development within gaps in built up frontages in rural areas. Responses to the second part of the question were more divided. There were fairly even numbers supporting and opposing restricting such development unless there is access to public transport or local services and facilities. Respondents commented there was flexibility needed and housing development can help to support facilities such as shops, pubs and buses.



Q43 a) Should we set out detailed criteria for establishing whether a new agricultural workers dwellings is needed? b) If so what should this criteria include?

9 respondents

Statutory Consultees

The Broads Authority intends to bring in some parts of PPS7 into policy as there are some improvements to their current policy DP26. They provided a link to a draft topic paper.

Parish and Town Councils

Barnby Parish Council recognised the value of re-purposing buildings that have become redundant due to changes in farming methods or type but examples are occurring of applications for conversion to holiday lets of buildings which have never been used for their permitted agricultural purpose. The Parish Council requested the conversion of redundant buildings be limited to those that have actually been used for the purpose for some time.

Ilketshall St Margaret Parish Meeting supported setting out detailed criteria for this matter. They suggested that evidence of an ongoing (not just seasonal) requirement should be included.

Other Organisations

No responses.

Developers/Landowners

Badger Building supported the idea but said there needs to be a proper assessment of need and viability of the enterprise first and perhaps a requirement to have lived on the site in temporary accommodation for at least three years before an application will be considered.

Members of the Public

Responses from the public were mixed. Two people supported the use of detailed criteria. Suggested criteria included:

- The land should be in freehold ownership;
- Whether the worker is needed on the site full time;
- Security needs should not be sufficient on its own to justify a dwelling;
- There should be evidence of three years profitable operation;
- New businesses should have mobile home accommodation until profitability has been demonstrated;
- Factor in a living wage for those working in the business when assessing profitability.

Three people opposed the use of detailed criteria. One member of the public suggested the Council should be sympathetic to low impact or 'one planet development' principles as is the case in Wales. Such operations should be:



- Hyper-local;
- Aim to support, develop or sustain a resilient local economy;
- Engage in organic/low carbon horticultural/agricultural production or forestry;
- Sustainable in their methods;
- Promote biodiversity;
- Support traditional rural skills;
- Aiming to provide full or part time employment for local people.

Q44 a) Should we continue to restrict the size of extensions to dwellings and the size of replacement dwellings in the countryside? b) If not are there any other approaches which could conserve the stock of smaller properties in the countryside?

14 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting and Oulton Parish Council supported the continuation of use of restrictions.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building opposed the use of restrictions. The stock of smaller dwellings in the countryside is already unaffordable for local needs so the policy serves no useful purpose.

Wellington Construction Ltd were not supportive of a restrictive policy and commented that design or amenity grounds should provide sufficient control. A flexible approach to rural housing should be employed and smaller starter homes encouraged.

Members of the Public

Six people supported the continuation of restrictions to the size of extensions and replacement dwellings in the countryside. Concerns were raised that extended homes could become second homes or holiday homes which can deprive single people or smaller families of an affordable home.

There was also opposition from three people to continuing the use of this type of policy. One person commented that in the light of the recent Blundeston appeal only homes which are affordable in the first place should be included in the policy. However, they also suggested that where new smaller homes are created these should be subject to the restrictive policy so the stock of smaller cheaper



homes are not gentrified. Another person commented that small scale starter style homes should be allowed.



Employment

Q45 *Should we continue to identify 'Existing Employment Areas' and protect premises in these areas from redevelopment/conversion to other uses unless marketing evidence demonstrates there is no demand for employment use?*

19 respondents

Statutory Consultees

The Environment Agency noted that prior approval of light industrial units to flats through change of use means that the development would not have to go through the sequential test process for flood risk and the Environment Agency would not be able to provide comments. They advised that the Council may wish to consider this to strengthen the case to retain employment areas and potentially include policy to prevent residential conversions in areas of high flood risk.

The Greater Norwich Local Plan Team stated that existing and allocated employment areas should continue to be protected, and such a policy of protection should be a strategic policy, that Neighbourhood Plans would have to be in conformity with.

Norfolk County Council supported the identification of 'Existing Employment Areas'.

Parish and Town Councils

Ilkeshall St Margaret Parish Meeting supported the identification of 'Existing Employment Areas'.

Kessingland Parish Council noted that they are not included in "Existing Employment Areas" as defined in the current Waveney Local Plan. The Parish Council highlighted policies in their Neighbourhood Plan which will protect and provide for employment uses.

North Cove Parish Council stated that housing on employment sites will just lead to more unemployment ghettos.

Southwold Town Council supported the identification of 'Existing Employment Areas'. They stated a need the industrial/warehouse/workshop area off St Edmunds Road should be designated and protected. They stated their desire to encourage more knowledge based industries and diversify the town's economy. They advised the Council to look at the Fortune Green and West Hampstead Neighbourhood Plan in London and encourage Business Innovation Centres in Market Towns. They stated that the Local Plan economic policies should be flexible enough to enable Neighbourhood Plans to develop specific sites and policies that promote knowledge based businesses and other economic development outcomes identified by local communities.



Other Organisations

The Beccles Society stated that the Enterprise Zone should be continued in order to maintain wealth creation companies.

Developers/Landowners

Badger Building stated that a flexible and pragmatic approach is needed. They raised concern about protecting outdated employment uses and referred to the latest permitted development rights which allow conversion of some employment spaces to housing which undermine blanket protection policies. They suggested policies should be more criteria based and less absolute.

St John's Hall Farms agreed that the Local Plan should still identify employment areas for employment use for a period of time (3 years) but include provisions for alternative uses should employment uses not be delivered with the timescales.

Members of the Public

Most members of the public supported the identification of 'Existing Employment Areas'. One respondent went on to state that there needs to be greater effort in unlocking employment sites and bringing them forward with more proactive marketing and incentives to encourage businesses to relocate and expand. They also suggested investment in broadband and incubator/start up units. One respondent suggested that conversions should be considered on a case by case basis if there is no demand for commercial use.

Q46 *If we continue to identify 'Existing Employment Areas', which areas should be identified?*

6 respondents

Statutory Consultees

Norfolk County Council stated that those identified in the current plan should continue to be protected unless circumstances have changed.

Parish and Town Councils

Ilkeshall St Margaret Parish Meeting stated that at least the current list of sites should be protected.

Other Organisations

The Lowestoft and Waveney Chamber of Commerce stated that they understood there was currently a significant over allocation of employment land in the District which is not helpful to overall development. They stated they would therefore support a reduction in the allocation of employment land and at the same time urge the Council to be mindful of the new opportunities that will arise in both north and south Lowestoft following the opening of the new crossing over Lake Lothing.



Developers/Landowners

BKW Ltd supported a 9 hectare site adjacent to Ellough Airfield to be considered as an 'Existing Employment Area'. They suggested the existing allocation of BEC1 should be unallocated as it has not already been developed. They advised that Paragraph 22 of the National Planning Policy Framework which states the long term protection of employment sites should be avoided.

Members of the Public

Two members of the public responded to this question. One suggested land around Lowestoft quay and Lake Lothing should be identified and the other said sites with suitable infrastructure, public transport, adequate roads, cycle access, power, etc.

***Q47** If we continue to identify 'Existing Employment Areas' should we also continue to allow uses such as car showrooms, tyre and exhaust centres and building material stores to be located on the main road frontages of existing employment areas.*

11 respondents

Statutory Consultees

Norfolk County Council suggested a flexible approach should be taken.

Parish and Town Councils

Ilkeshall St Margaret Parish Meeting stated the Local Plan should continue to allow uses such as car showrooms, tyre and exhaust centres and building material stores to be located on the main road frontages of existing employment areas.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

St John's Hall Farms suggested the Council should allow car showrooms to be located on road frontages of employment land.

Members of the Public

Four members of the public supported the existing approach of allowing these uses on the frontages of employment land. Two respondents opposed the approach. One respondent suggested it should depend on the type of employment area as the uses described would not be so compatible with a higher quality business park. One respondent stated that at present there is an unusual concentration of car dealerships on central sites in the town (Halesworth) which cover large areas with stationary vehicles to no general benefit. They stated that businesses should be encouraged to relocate to employment areas to the north of the town.



Q48 *Should the protection of existing employment premises be in a Strategic Policy, requiring proposals in Neighbourhood Plans to be in conformity with the policy?*

7 respondents

Statutory Consultees

The Greater Norwich Local Plan Team stated that existing and allocated employment areas should continue to be protected, and such a policy of protection should be a strategic policy, that Neighbourhood Plans would have to be in conformity with.

Norfolk County Council stated that the protection should be in a strategic policy

Parish and Town Councils

Carlton Colville Town Council stated that the protection should be in a strategic policy.

Ilkeshall St Margaret Parish Meeting stated that the protection should be in a strategic policy.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Three members of the public responded who all agreed protection should be in a strategic policy.

Q49 *Should we allocate more than enough land to meet needs to enable more choice in the market and give flexibility to deal with changing circumstances. Or, should the Council allocate only enough land to meet needs, but apply a flexible approach, where new development is supported outside allocated areas if additional need is proven?*

17 respondents

Statutory Consultees

Greater Norwich Local Plan Team recommended allocating sufficient land and having a flexible approach to other schemes coming forward. They identified a danger of over allocating which could lead to pressure to convert some of this to residential land if it did not come forward within a few years.

Norfolk County Council stated that allocating more than enough land to meet needs would seem to enable more choice in the market and give flexibility to deal with changing circumstances, particularly if the Oil and Gas industry recovers.



Parish and Town Councils

Carlton Colville Town Council stated the Council should allocate only enough land to meet needs, but apply a flexible approach, where new development is supported, outside allocated areas, if additional need is proven.

Ilkeshall St Margaret Parish Meeting stated the Council should allocate enough land with a flexible approach.

Reydon Parish Council stated that they believe more consideration should be given to higher value employment such as IT and design. They stated that this would not require major encroachment into the countryside but small-scale development/re-use, such as completing Reydon Business Park, re-designating Southwold Hospital or establishing mixed use of sites such as that of the former temporary Reydon Pharmacy.

Southwold Town Council stated allocating land for business should be flexible. They noted a need to accommodate businesses and employees relocating from London and advised the need for shared office space (co-working) closer to the town centre.

Other Organisations

Southwold & District Chamber of Trade & Commerce stated that whilst tourism should continue to be developed and promoted diversification should also be encouraged. They stated that consideration should be given to promoting small scale service based business. They stated opportunities to develop small, flexible, service based premises should therefore be encouraged. They referenced a recent report by Centre for Entrepreneurs – “From ebb to flow: how entrepreneurs can turn the tide for seaside towns”.

Developers/Landowners

Badger Building stated that the Local Plan should allocate sufficient and be flexible around the edges as required. They noted that not every employment use will or can go to a dedicated industrial park.

BKW Ltd. stated that the local planning authority will need to be cautious of the long term protection of employment land if more employment land is allocated than needed. However, they stated this will need to be balanced with the economic benefits that are anticipated through the opening of the Beccles relief road which should not be stifled. They suggested their site at Ellough should be allocated as it is capable of being developed, is already partly developed and has less risk of converting to residential use due to its proximity to the anaerobic digester.

Wellington Construction supported a flexible approach.



Members of the Public

All members of the public who responded supported allocating enough land to meet needs and a flexible approach, where new development is supported outside allocated areas if additional need is proven.

Q50 *In order to address viability issues, should we allocate sites for mixed-use housing and employment developments where the housing development subsidises the delivery of employment land?*

15 respondents

Statutory Consultees

The Greater Norwich Local Plan Team stated that cross-subsidising employment land with some market housing is supported but added the need for safeguards to ensure that the employment land actually comes forward at the same time as the housing element.

Norfolk County Council supported the option of using housing to cross-subsidise employment sites.

Parish and Town Councils

Carlton Colville Town Council stated that housing should not be used to cross-subsidise employment sites.

Ilketshall St Margaret Parish Meeting supported the option of using housing to cross-subsidise employment sites.

Other Organisations

The Southwold and Reydon Society stated that more consideration should be given in the Local Plan to the promotion of higher value employment locally, such as IT/design, in order to extend the range of employment available locally and strengthen the balance and sustainability of the community. They added this would reduce the need for encroachment into the countryside. They stated that in general they prefer mixed uses with small-scale business units developed alongside housing.

Developers/Landowners

Badger Building stated that they had looked into the viability of this as part of looking at the proposals for a former nurseries site in Kessingland in the Kessingland Neighbourhood Plan. They stated that unless there is a lot of space to keep the uses separate then there are compatibility problems. They added that presently the difference between capital value and construction cost on small units is such that they are very difficult to fund.

Wellington Construction supported the option of using housing to cross-subsidise employment sites.



Members of the Public

Four members of the public supported the use of housing to cross-subsidise employment land. Three members of the public did not support the approach. Concern was raised about possible conflicts between employers and residents.



Tourism

Q51 *Should we continue to restrict the development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast or should it take a more flexible approach based on impact on the landscape?*

20 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council stated that the plan should take a more flexible approach based on impact on the landscape. They raised concern that housing development can also impact on the landscape and should be restricted in areas bordering the Area of Outstanding Natural Beauty. They added that any increase of housing along Beccles Road in Carlton Colville would impinge on the Carlton Marshes and on the viability of wild life due to increased recreational pressure.

Corton Parish Council stated that development should be restricted otherwise the whole area will be built on and there will be nothing of interest left for tourists to visit.

Ilketshall St Margaret Parish Meeting stated that development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast should continue to be restricted.

North Cove Parish Council stated that development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast should continue to be restricted.

Southwold Town Council stated that that development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast should continue to be restricted. They added that further tourist development in Southwold should not be permitted as it is not sustainable.

Other Organisations

Southwold and Reydon Society that development of new tourist accommodation in the Area of Outstanding Natural Beauty should continue to be restricted.

Developers/Landowners

Bourne Leisure stated that policies for the natural environment should include reference to balance, and the consideration of the social and economic benefits potentially arising from tourism developments. They added that recognition should be given to the scope for appropriate tourism development, including the expansion of existing holiday accommodation, in areas within or adjacent to sensitive landscape sites and designated nature conservation sites, provided that



mitigation measures, such as the inclusion of a buffer zone and appropriate landscaping, can be implemented in order to minimise both direct and indirect impacts.

The Caravan Club Limited supported the existing approach that development of new tourist accommodation in the Area of Outstanding Natural Beauty should continue to be restricted. However, they stated that the diversification of existing sites into new forms of tourist accommodation should be supported.

Wellington Construction suggested that there should be a more flexible approach to benefit the local economy.

Members of the Public

The majority of members of the public who responded to this question thought that development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast should continue to be restricted. It was noted that the natural environment including the Area of Outstanding Natural Beauty and the Heritage Coast was a valuable asset and one of the reasons tourists visited the area. It was suggested that conversion of existing buildings to tourist use would limit the impact on the countryside.

Q52 *Should we continue to focus new tourist development in or close to Lowestoft, the Market Towns and Corton and Kessingland or should we take a more flexible approach?*

16 respondents

Statutory Consultees

The Environment Agency stated that there are a number of links that can be made between the benefits that a good environment can bring to the area and tourism. They added they would work with the Council to encourage environmental enhancements which could promote tourism.

The Greater Norwich Local Plans Team stated that having the main focus for new tourism development on the main settlements and the coast is appropriate, but some more flexibility on new tourism accommodation in the Waveney valley could be helpful. They mentioned that Local Tourism Action Groups are being set up along the valley as a single entity for tourism purposes.

Parish and Town Councils

Barnby Parish Council stated that applications for new equine tourist accommodation should be supported by a business case. They added that the area around Barnby is not suitable for equine tourism as there are almost no bridle paths in this area and many footpaths are used as bridle paths to their detriment. They suggested that such related accommodation should be in the form of a log cabin which would be less attractive for full residential use.



Beccles Town Council stated that a new hotel on the site at the junction of the Beccles by pass A146 and George Westwood Way (opposite Morrison's) would be of enormous benefit to the town and bring a considerable increase in tourism and subsequent revenue.

Carlton Colville Town Council suggested there should be a more flexible approach.

Corton Parish Council stated that the Council should not continue to focus new tourist development on Corton and Kessingland. They stated that Corton is already overcrowded with tourist development, with the whole shoreline taken up by holiday accommodation with only limited access points to the coast for residents of the village.

Ilkeshall St Margaret Parish Meeting commented that the current focus should continue.

Kessingland Parish Council stated that tourism is an important part of the economy of Kessingland and a significant number of properties close to the seafront are used for tourist accommodation. They raised concern about the potential loss of these properties to residential uses. They stated that they should be protected as tourist accommodation and if any such change is to occur then it must be demonstrated that the tourist use is no longer viable through a 12 month marketing campaign.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Most members of the public stated that a flexible approach is required whilst some stated the existing focus on the Lowestoft and the market towns should continue. One respondent stated there should be an even stronger focus on supporting the market towns which are located more inland, i.e. Halesworth, Bungay and Beccles. They suggested working with neighbouring districts to promote tourism in places such as the Waveney Valley to attract visitors away from the overcrowded coastal areas. It was suggested there should be a greater focus on arts and culture to define a higher quality local tourism product. One respondent suggested that tourism uses should be placed near where people live to reduce the need to travel to work.



Q53 *Should we continue to protect existing tourist accommodation from conversion and redevelopment to other uses?*

12 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Parish Council stated that the Council should continue to protect existing tourist accommodation from conversion and redevelopment to other uses.

Ilkeshall St Margaret Parish Meeting stated that the Council should continue to protect existing tourist accommodation from conversion and redevelopment to other uses.

North Cove Parish Council stated that the Council should continue to protect existing tourist accommodation from conversion and redevelopment to other uses.

Kessingland Parish Council stated that tourism is an important part of the economy of Kessingland and a significant number of properties close to the seafront are used for tourist accommodation. They raised concern about the potential loss of these properties to residential uses. They stated that they should be protected as tourist accommodation and if any such change is to occur then it must be demonstrated that the tourist use is no longer viable through a 12 month marketing campaign.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Bourne Leisure strongly supported the need to protect existing tourist accommodation within Waveney from conversion and redevelopment in order to continue to support the tourism sector within Waveney.

The Caravan Club stated that tourism policies must be sufficiently flexible to allow businesses to adapt to changing economic trends and changes in the demands of tourists, and they wish to ensure that under these policies that the potential diversification of this site would be permitted.

Wellington Construction stated that there shouldn't be protection of tourist accommodation. They suggested that a flexible policy which allowed for conversion through the demonstration of unviability and lack of market interest.



Members of the Public

The majority of members of the public stated that tourist accommodation should be protected. One respondent suggested there should be a flexible approach.

Q54 *How should tourism accommodation be effectively restricted for tourism use and not full time residential use?*

8 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilkeshall St Margaret Parish Meeting suggested that the period of occupancy should be limited.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Bourne Leisure stated that a policy should be introduced to ensure that any planning permission for tourism accommodation such as caravans, chalets or similar is restricted to holiday use only. Where necessary, local plan policy should state that conditions are to be imposed on planning permissions to ensure that tourism accommodation cannot be used for residential purposes.

Members of the Public

One respondent suggested there should be legal agreements or covenants to make it impossible for tourist accommodation to be converted to full-time residential use. One respondent suggested limiting the time a tourist can reside in a property. Another respondent suggested caravan sites should not be static full time use such as that which prevails on the North Denes. Another respondent suggested the Council should enforce planning conditions.

Q55 *Should we continue to restrict the conversion of residential properties to guest houses and hotels in residential streets where further conversion to flats would also not be permitted, or should a more flexible approach to be used?*

11 respondents

Statutory Consultees

No comments were made in response to this question.



Parish and Town Councils

Carlton Colville Town Council suggested a flexible approach should be applied.

Ilketshall St Margaret Parish Meeting suggested a flexible approach should be applied.

Southwold Town Council suggested the policy should be extended to residences being converted into holiday lets. They noted that in Southwold there has been a stark decline in visitors using bed and breakfast, which have been supplanted by holiday lets.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Members of the public were split as to whether a more flexible approach should be applied. One respondent suggested a more flexible approach could be considered if noise and transport/parking criteria are met.



Town, District and Local Centres

Q56 *Do you agree with the town centre boundaries for Lowestoft and the Market Towns as shown in Appendix 2?*

14 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council agreed with the town centre boundaries as shown in appendix 2.

Ilketshall St. Margaret Parish Meeting agreed with the town centre boundaries as shown in appendix 2.

Southwold Town Council stated that the Southwold Town Centre Boundary should include the Adnams Brewery building, including the brewery, engineering workshop, the office, Sole Bay Pub, the sweet shop opposite the pub and the Swan Hotel annex. The town centre boundary should also be used to prevent conversions to residential uses. Southwold Town Centre contains a unique mix of uses, including B1, B2, C1, D1 and D2 and these should be protected. This approach involves attracting knowledge based businesses, which seek town centre locations, to Southwold. Multiple use classes attract visitors, which supports local retailers. The Local Plan should not stop Southwold or any other market town from preparing a neighbourhood plan which encourages a range of different uses which support and complement one another. The Town Council supported the introduction of a 350 metre threshold for impact tests.

Other Organisations

Southwold and District Chamber of Trade and Commerce stated that demand for premises in Southwold has consistently outstripped supply. For this reason the town centre should be expanded to include the following: Red Lion and Nelson pubs; High tide (36 East Street); Arcanthus (Trinity Street); all properties between Adnams Cellar and Kitchen and Fromus vets; John Bennett Architects; Electric Picture Palace; Spring Design; Sole Bay Inn and Number One St. James's Green.

In terms of the mix of shops there need to be more retailers that cater for people's everyday needs and premises must be made available to support this. Southwold has a high proportion of independent retailers, which is one of the town's strengths, although the proportion has decreased over time. It was felt that the Retail and Leisure Needs Assessment prepared by Carter Jonas misinterpreted survey data to indicate that a higher percentage of respondents wanted to see more national or multiple retailers in the town – in fact a greater percentage preferred local independent retailers. Furthermore the Southwold Town Plan indicated that a large majority of residents (78%) and second home (87%) owners thought the character of the High Street was very important.



However, 95% of visitors also thought that the character of the Highs Street was important. Visitors' views were not considered in the Retail and Leisure Needs Assessment. It was felt that the Retail and Leisure Needs Assessment placed too great an emphasis on the needs of national multiple retailers and ignored those of small independent retailers, which are a real strength for the town. The Local Plan should improve the town for residents and businesses rather than increase rents in an area where occupancy rates are already low.

Retaining smaller retail units enables independent retailers to continue trading with affordable levels of rent. These smaller units should therefore be protected from development. Developing units to attract national retailers will erase the unique character of the town, which will in turn dissuade national retailers from locating here. Once the reputation of a town is lost it is hard to rebuild.

The loss of the hospital and relocation of the health centre has reduced the number of people visiting the town centre on linked trips. Without these visits it is increasingly likely that they will visit out of town locations instead. As a result the town will become increasingly empty, particularly outside of the tourist season, which will in turn impact upon its atmosphere.

The idea of development of an out of town supermarket accompanying new development in Reydon was not supported by local residents and should be opposed. It would have an adverse impact upon Southwold town centre. This should be taken into account when planning new residential developments in Reydon.

The Southwold and Reydon Society stated that the town centre needs to be expanded to include all existing shops and businesses. Southwold's strength lies in the high proportion of independent shops. The Local Plan should extend the town centre to include all commercial properties and protect them from the extensions and conversions that makes them suitable for occupation by national retailers. Such measures are proposed for the Southwold Neighbourhood Plan and should also appear in the Local Plan. Policies that currently protect Lowestoft town centre could also apply to Southwold, together with measures to protect courtyards and gardens from development.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Members of the public were generally supportive of retaining the town centre boundaries in their existing form. However one responded stated that the town centre should be expanded to include Waveney Drive and the London Road South and South Beach areas.



Q57 *Should we define primary and secondary shopping frontages within each town centre and prioritise retail uses within primary frontages?*

7 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council agreed that primary and secondary frontages should be defined within town centres.

Ilkeshall St. Margaret Parish Meeting stated that primary and secondary frontages should not be defined within town centres.

Other Organisations

The Southwold and Reydon Society agreed that primary and secondary shopping frontages should be defined inside two centres and added that town centre locations should be protected from extensions into gardens and courtyards, which will retain smaller units that are of a suitable size for local retailers.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Members of the public were supportive of defining primary and secondary shopping frontages. One respondent stated that Peto Square, Commercial Road and a redeveloped Lake Lothing/Waveney Drive should be designated as primary shopping frontages and London Road South should be designated as a secondary shopping frontage. One respondent stated that more information was required.

Q58 *Do you agree with the primary shopping area and primary and secondary shopping frontages shown in appendix 2?*

6 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council agreed with the primary and secondary shopping frontages and primary shopping area shown in appendix 2.



Ilketshall St. Margaret Parish Meeting suggested that the primary shopping area in Bungay could be extended along Earsham Street.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Members of the public supported the primary and secondary shopping frontage and primary shopping area shown in appendix 2. One responded stated that more information was required.

***Q59** Should town centre boundaries and associated policies be set out in a Strategic Policy requiring proposals in Neighbourhood Plans to be in conformity with the policy?*

6 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council did not agree that strategic policy should require neighbourhood plans to be in conformity with the policy.

Ilketshall St. Margaret Parish Meeting agreed that strategic policy should require neighbourhood plans to be in conformity with the policy.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Members of the public were generally supportive of this policy but one responded stated that it required consultation. Another thought that some form of guidance was necessary and suggested a decision tree which would require neighbourhood plans to justify any deviations in terms of local or wider district retail needs versus leisure or other commercial opportunities.



Q60 *Should we continue to prioritise retail use in the District centres of Oulton Broad and Kirkley and other local shopping centres or take a more flexible approach?*

11 respondents

Statutory Consultees

The Broads Authority stated that it had discussed with Waveney District officers the potential for a common policy and mapping approach for Oulton Broad, which is a shared centre between the two authorities and it looked forward to developing this further.

Parish and Town Councils

Carlton Colville Town Council stated that retail uses should continue to be prioritised in these areas.

Ilketshall St. Margaret Parish Meeting stated that retail uses should continue to be prioritised in these areas.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building stated that a more flexible approach was needed or that properties would remain vacant.

Wellington Construction stated that retail should not continue to be prioritised in the District centres.

Members of the Public

Members of the public supported the continued prioritisation of retail in the District centres. One respondent stated that it was important to understand how alternative uses would avoid impact upon the viability and vitality of the District centres, perhaps through the use of a decision tree. Another stated that greater flexibility was needed because cafes and restaurants would increase footfall in these centres.

Q61 *Should we require an impact assessment on all retail proposals with a net retail floor space greater than 350 sqm or rely on the national threshold?*

12 respondents

Statutory Consultees

No comments were made in response to this question.



Parish and Town Councils

Ilketshall St. Margaret Parish Meeting stated that 350 sqm was an appropriate threshold for requiring a retail impact assessment.

Developers/Landowners

Badger Building supported the 350sqm threshold but added that any impact assessment should be subject to rigorous review.

Other Organisations

No comments were made in response to this question.

Members of the Public

Members of the public were supportive of the 350sqm threshold to focus development into existing retail areas with one respondent arguing that 350 sqm was too high. One respondent argued that impact assessments should also be broader in scope to include implications for transport, parking, accessibility, supply chain movements, public realm, environment, noise and pollution. One respondent thought the threshold was much too low and would increase the amount of paperwork when submitting a planning application.



Community services and facilities

Q62 *Should we continue to protect all existing community services and facilities as far as it is possible to do so?*

17 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council suggested a broad definition of community facilities to include anything that is of value to the community, used by the community and necessary for the community to function. This could include, sheltered homes, care homes, Post Office, healthcare facilities, banks, pubs, theatres, meeting places, church halls, churches, libraries, etc. The Neighbourhood Plan Focus Group regarded local independent businesses as community facilities because the owners looked after local needs. This might be a way of protecting local businesses.

The Local Plan should protect community facilities and investigate alternative uses on a site prior to its conversion to residential use. Business use should be given priority over residential uses in Southwold because there is a shortage of space for knowledge based businesses. As a minimum the Local Plan should not seek to undermine the Neighbourhood Plan which seeks to convert redundant buildings to business uses. Neighbourhood Plan research has revealed that 31 community facilities have been lost to the town and all converted to residential uses. Residential development is suffocating economic development because of the lack of space for the latter.

The local community should decide what services and facilities are important to them and this should be acknowledged in the Local Plan. Protection should not be limited to buildings that have been designated as assets of community value.

Ilkeshall St. Margaret Parish Meeting agreed that services and facilities should be protected as far as possible.

Oulton Parish Council agreed that services and facilities should be protected as far as possible.

Kessingland Parish Council stated that it was essential for it to protect its community services and facilities. Shops in Kessingland have come under pressure in recent years due to construction of the bypass and development at South Lowestoft Industrial Estate. Remaining shops need to be protected as part of the community. Kessingland has one primary school which has been granted academy status. It has a roll of 250 pupils and capacity for 300. It is therefore important that the school is retained as part of the community.



There is one doctor's surgery covering Kessingland, Wangford and Wrentham and pressure on it will increase if there is further development. Adequate primary care will become even more important as the population becomes older. East Suffolk Community has identified a need to provide affordable, sustainable and high quality areas across Suffolk and Norfolk. This would include early years care and wrap around care (in the form of after school and holiday clubs). This will provide childcare that enables parents to access employment and will also generate jobs for local people. Kessingland Neighbourhood Plan allocated land at Francis Road for an early years centre plus car parking. It is essential that the early years centre does not impact upon the amenity of local people.

The Manor Farm Care Home also contacted the Neighbourhood Plan team stating that it cannot cope with increasing demand for its services in its existing building. The care home has asked if land next to its existing facility could be allocated for development so that it could offer a wider range of services than just dementia and old age care. This could include respite, end of life, assisted living, day care and short term breaks. It is supported by the community.

Other Organisations

Sport England stated that community facilities (including sports pitches and indoor sports facilities) should be protected in order to increase levels of participation in sports and reduce obesity. It is particularly important to protect key sites for sport as identified in the Playing Pitch Strategy and Sports Facilities Strategy.

The Theatres Trust stated that planning policies should recognise the importance of community facilities and cultural infrastructure. Paragraph 70 of the NPPF states that valued cultural facilities should be protected and that established facilities are retained and are able to develop for the benefit of the community. The following wording is suggested to support and protect cultural and community facilities:

Cultural and community facilities

The Council will resist the loss or change of use of existing community or cultural facilities unless replacement facilities are provided on site or within the vicinity which meet the needs of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.

Policies should also contain criteria for encouraging new facilities in the District to serve the growing population. To ensure clarity and consistency it is recommended that community and cultural facilities area defined in the glossary. A suggested definition is: *community and cultural facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure, and cultural needs of the community.*



The Beccles Society stated that a swimming pool and leisure complex that could be converted into a theatre or meeting room would be useful in addition to the infrastructure in Beccles either now or in the future and could be located in one of the locations put forward for housing just outside the town centre.

Developers/Landowners

Wellington Construction stated that protecting community services and facilities was reliant on funding.

Badger Building did not agree that community services and facilities should be protected because the market has changed significantly in the last few years, particularly in regard to public houses, and the planning system has not kept up with this. Use it or lose it is the correct approach. There is a disproportionate focus on pubs within the planning system, probably because of the influence of CAMRA. Other facilities are just as valuable.

Members of the Public

Members of the public were supportive of protecting community services and facilities. This is unless equally accessible replacements can be provided locally. Waveney District Council has failed to maintain community facilities properly (the example being given was Beccles Public Hall as well as the Lido, the Quay and its moorings, and the meadow). Poor maintenance of sports facilities also means they are not available during their respective sports seasons.

Q63 *Where it is not viable or possible to retain the existing community use should we require an alternative community use to be investigated prior to allowing redevelopment or conversion to residential or commercial use?*

13 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use.

Ilketshall St. Margaret Parish Meeting agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use.

Oulton Parish Council agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use.



Other Organisations

The Southwold and Reydon Society agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use.

Developers/Landowners

Badger Building did not agree with investigating alternative community uses prior to residential or commercial conversion or development for the same reason as given response to question 62 (Badger Building did not agree that community services and facilities should be protected because the market has changed significantly in the last few years, particularly in regard to public houses, and the planning system has not kept up with this. Use it or lose it is the correct approach. There is a disproportionate focus on pubs within the planning system, probably because of the influence of CAMRA. Other facilities are just as valuable.).

Members of the Public

Members of the public agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use. One respondent stated that failure to undertake this would result in the loss of facilities over time, which will not be replaced.

Membership of sports organisations tends to be cyclical and the Council should be aware of this when supporting voluntary organisations that provide sports and leisure services.

Q64 Should some types of services and facilities be given more protection than others?

10 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council stated that some uses should be given greater protection than others.

Ilketshall St. Margret Parish Meeting stated that some uses should be given greater protection than others.

Other Organisations

Sport England stated that playing fields require specific protection in line with Sport England's policy and NPPF paragraph 74.

Developers/Landowners

Badger Building stated that once a service or facility has closed protecting the site will not preserve the service or facility. If a service is relaunched it will find its own appropriate premises.



Members of the Public

Members of the public mostly favoured protecting some uses over others. One respondent highlighted services that required greater travelling distances should receive greater protection, as should those where there were no alternative providers, such as public transport. Only one respondent disagreed that some types of facilities should be given more protection than others.

Q65 Should we only protect services and facilities listed as 'Assets of Community Value'?

12 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

Ilketshall St. Margaret Parish Meeting stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

Other Organisations

The Southwold and Reydon Society stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

Developers/Landowners

Badger Building stated that planning policies should only protect services and facilities that are listed as Assets of Community Value.

Members of the Public

Members of the public disagreed with this proposal, with one stating that the Council needed to protect a broader range of facilities and that once lost these are difficult to replace. Respondents stated that all services and facilities that were used by the community should receive protection.



Climate Change

Q66 *Are there any areas in the District at risk from flooding where development should be promoted to deliver regeneration?*

11 respondents

Statutory Consultees

The Environment Agency stated that any sites put forward in the Local Plan at risk of flooding will need to have the Sequential Test, and if necessary, the Exception Test applied. All sites are best considered as part of an SFRA. Policies should aim to prevent development in the flood plain and new development should be resilient to flooding and improve river environments.

The Environment Agency added that it could be useful to consider a specific flood risk policy that could manage development in flood risk areas. If there is sufficient supply of land in flood zone one this should be acknowledged in the Local Plan and set out any exceptions. A policy setting how planning applications will be determined to ensure they are safe could include details about floor levels, safe access, emergency flood plan, flood resilience and resistance measures, improvements to flood risk in the wider area, increases of built footprint. It was noted an environmental permit for flood risk activities may be required for work related to river and sea defences.

Parish and Town Councils

Carlton Colville noted the Kirkley Stream area is prone to flooding. Regeneration should not be promoted in these areas.

Southwold Town Council stated Millennium Green opposite the Millennium Hall is a flood risk area which should be developed as an environmentally sensitive car park.

Other Organisations

No comments submitted in response to this question.

Developers/Landowners

Badger Building stated that area around Commercial Road and Peto Square would aid regeneration subject to mitigation. They noted that if a flood protection scheme is delivered this will help facilitate delivery of the Brooke Peninsula area.

Wellington Construction Limited noted the Lake Lothing area.

Members of the Public

It was commented that development should not go ahead in flood risk areas. It was also suggested that development could be acceptable if the risk was mitigated and did not put other areas at risk. The Lake Lothing area was identified.



Q67 a) Should we continue to identify a Coastal Change Management Area based on the land predicted to be at risk from erosion over the next 100 years? b) If so should residential development continue to be restricted and other types of development only allowed where they can be proven to be safe for the lifetime of the development and support the local community?

17 respondents

Statutory Consultees

In response to part (a) the Environment Agency stated the 2012 Shoreline Management Plan for Lowestoft to Landguard Point is the agreed way forward for the next 100 years. The National Coastal Erosion Risk Mapping service (NCERM) should be available at the end of 2016 and can be used to update local Coastal Change Management Areas and inform development opportunities and the public. Planning for increased erosion associated with climate change can make communities more resilient, improve biodiversity, water quality and recreation.

In response to part (b) the Environment Agency stated that it is essential to produce risk maps to inform and control development opportunities in areas at risk of erosion in the next 100 years. The current policy of only allowing limited safe development in at risk areas is appropriate.

Natural England expects the Plan to identify a Coastal Change Management Area and set out the type of policies and developments that would be appropriate in it. This should follow guidance set out in National Planning Policy Guidance. The Local Plan should consider the marine environment and apply an Integrated Coastal Zone Management approach and take account of any marine plans in place. The Local Plan should refer to the local Shoreline Management Plan and provide an approach that can respond to changes and help facilitate the relocation of valued environmental assets away from areas of risk.

Parish and Town Councils

Kessingland Parish Council commented a multi-agency group has been set up to monitor the situation at Benacre Pumping Station saying the Environment Agency has described this 'as one of the most vulnerable parts of the Suffolk coastline'. A coastal study is being undertaken by Halcro to be completed in the summer 2016. They noted that at a multi-agency meeting, everyone agreed the plan should protect Benacre Estate farmland, the Kessingland Levels up to the A12 and beyond, the southern edge of Kessingland village around Coopers Drive, the Anglian Water Sewerage Treatment works, and the commercial businesses like Kessingland Beach Holiday Park and Africa Alive.

Southwold Town Council agreed.

Other Organisations

The Southwold and Reydon Society agreed with both (a) and (b).



Developers/Landowners

Badger Building agreed.

Members of the Public

Nine members of the public agreed to the continued approach and restricting development in these areas. One person suggested no development should be allowed.

Q68 *Should we permit new coastal defence schemes contrary to the approach outlined in the current Shoreline Management Plan or any future Coastal Strategy if wider benefits for the area can be demonstrated?*

11 respondents

Statutory Consultees

The Environment Agency stated that in some cases this may be acceptable if the defence design is low key 'soft' defence with a limited design life. Hard engineered sea defences should be avoided where there is a potential to negatively impact the sustainability of adjacent coastal frontages citing guidance set out in paragraph 168 of the NPPF. The affordability and future policies for managing, maintaining and improving flood defences should be considered during the preparation of the Local Plan. The SFRA, SMP, Catchment Flood Management Plan and DEFRA's 'Flood and Coastal Resilience Partnership Funding - DEFRA policy statement on an outcome-focused, partnership approach to funding flood and coastal erosion risk management' should be used as an evidence base for the Local Plan and CIL.

Parish and Town Councils

Southwold Town Council stated a tight definition of wider benefits would be required to justify the cost of new coastal defence schemes.

Other Organisations

The Southwold and Reydon Society suggested yes adding that protection measures are needed for the Blyth estuary and Southwold Harbour as identified by the Blyth Estuary group.

Developers/Landowners

Badger Building suggested yes if they sustainable and self funded.

Bourne Leisure stated the Local Plan should include policies to support tourism development within existing site boundaries or for proposals to expand onto adjoining land not affected by coastal erosion. Policies should allow owners and operators to implement and maintain coastal defences. The Shoreline Management Plan states that no active intervention is intended for the coastline in



the area but it is important that planning policies recognise the role of existing land uses and their development potential when determining the approach to coastal defences.

Wellington Construction Limited stated yes.

Members of the Public

Five members of the public said yes.

Q69 *Should we continue to allow for the relocation of residential properties and commercial and community properties at risk from coastal change to areas not at risk?*

12 respondents

Statutory Consultees

The Environment Agency suggested this should be determined by the Local Planning Authority citing paragraph 94 of the NPPF 'you should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations'. It was added there could be wider social, economic and environmental benefits from such relocation.

Parish and Town Councils

Southwold Town Council supported the suggestion.

Other Organisations

The Southwold and Reydon Society supported the suggestion.

Developers/Landowners

Badger Building suggested yes but subject to environmental and landscape considerations.

Members of the Public

Eight members of the public supported the suggestion.

Q70 *a) Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan? b) If so which areas of the district would be appropriate and for which types of technology (e.g. wind turbines, solar photovoltaic panels)?*

19 respondents

Statutory Consultees

The Broads Authority requested the Broads Landscape Sensitivity Study for Renewables and Infrastructure (2012) be considered when the Local Plan is considered.



Parish and Town Councils

Corton Parish Council suggested that all new builds should have solar panels installed. Wind turbines were not supported.

Ilketshall St Margaret Parish Meeting suggested that sites should be identified but these should be for solar panels where alternative forms of development would adversely affect the community.

Kessingland Parish Council noted the adverse impact the two large turbines have had on the village. They noted measures to minimise water and energy use in new development in the Kessingland area are set out in the Kessingland Neighbourhood Plan.

Southwold Town Council supported to identification of sites and suggested Blyth Road in Southwold could support a small-scale community solar farm.

Other Organisations

No comments submitted in response to this question.

Developers/Landowners

Badger Building suggested this is best left to the market.

Members of the Public

Four members of the public supported the identification of sites. Suggestions included locations that were not subject to landscape designations or of any particular landscape merit, areas that would not affect residents, industrial areas which are often unattractive and the more remote areas would lead to lesser impacts.

It was suggested that solar panels were more suitable than onshore wind turbines. One person suggested onshore turbines should not be permitted and there have been enough solar panels installed.

One person suggested small solar installations were most appropriate while one person suggested only solar panels on roofs should be permitted.

Q71a) How can we encourage new residential developments to reduce their carbon emissions? b) Would a sustainable show home policy as described above be appropriate?

20 respondents

Statutory Consultees

No comments were made in response to this question.



Parish and Town Councils

Southwold Town Council stated that in reply to parts a) and b) it was necessary to encourage new build to contain solar panels and SUDs, including rainwater harvesting in larger developments and water butts in smaller developments. The Local Plan should discourage development that paves over gardens and creates impermeable driveways.

North Cove Parish Council stated that residential development should only be built close to employment areas.

Ilketshall St. Margaret Parish Meeting stated that:

- a) Performance levels should be included in planning approvals.
- b) It was agreed that a sustainable show homes policy would be appropriate.

Other Organisations

Southwold and Reydon Society stated that restrictions on renewable energy devices in conservation areas should be reviewed.

Developers/Landowners

Badger Building stated that a show home would become out of date too quickly and would not show all of the options available. In this area very few spec built homes are sold off plan and so this approach will have no effect. It is necessary to educate both developers and the public about the options available. Providing a Community Infrastructure Levy discount on energy efficient buildings would help to encourage renewable energy and promoting renewable energy to the public would encourage homebuyers to seek out these products when making purchasing decisions.

Lawson Planning Partnership stated that it was necessary to locate development in sustainable locations (close to shops and services) to encourage sustainable transport.

Wellington Construction argued that it was necessary to offer incentives to promote energy efficiency and to reintroduce food waste recycling.

Members of the Public

- a) Members of the public were strongly supportive of reducing carbon emissions in new homes with some arguing that low carbon development should become mandatory. Creating low carbon new development was viewed as important because older Victorian houses were too expensive to convert to low carbon use. Others were more cautious, stating that developers should be incentivised to create low carbon homes. Planning policy should only permit sites and developments that are sustainable. It was acknowledged that carbon development should be balanced against the increased costs to developers and the potential environmental impact of any new equipment that is needed. Homes should be well served



by cycle and pedestrian links to discourage car use. Council policy should be flexible to allow for parish and neighbourhood schemes that promote sustainable developments and reduce carbon emissions.

- b) Members of the public were supportive of introducing sustainable show homes but it was thought that these would only really be applicable to larger developments. Virtual show homes were suggested as an alternative and it was thought that these could include measures to conserve and enhance wildlife habitat, such as swift bricks and bat boxes.

Q72 *Should we still require new school and office development to meet higher standards of energy efficiency?*

17 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council agreed that the Council should still require new school and office developments to meet higher standards of energy efficiency.

Ilketshall St. Margaret Parish Meeting agreed that the Council should still require new school and office developments to meet higher standards of energy efficiency.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building agreed that the Council should still require higher standards energy efficiency in new school and office development subject to viability.

Wellington Construction stated that higher standards of energy efficiency should be fundamental to new school and office development.

Members of the Public

Members of the public were supportive of requiring higher standards of energy efficiency in new school and office buildings. However there was concern that these higher standards should not cause sick building syndrome or reduce cost effectiveness.



Design

Q73 *What makes a well designed development? Can you give any examples of new developments which you think are well designed?*

12 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council stated that good design responds to and is in keeping with the character of the landscape. There should be careful attention to detailing and the use of materials that soften with age. Visual balance and simplicity are very important in creating harmony. Pastiche buildings do not work because of the use of modern materials. Careful attention should be paid to the size and location of windows, which are 'the eyes of the building'. Each street should be distinctive so that a person gains a sense of place. Trees should be planted along wide verges and these should be spaced so that they do not look stunted. Landscaping should be designed to encourage wildlife habitat and biodiversity. Two examples of good design in Southwold are on East Street and the new service station.

Kessingland Parish Council stated that development should demonstrate high quality and sustainable design. In particular it should:

- Create places and spaces for people.
- Reflect local character and distinctiveness.
- Protect local amenity.
- Create safe, healthy and accessible environments.
- Make good provision for access by all transport modes.
- Ensure adequate vehicle parking facilities are provided in line with Neighbourhood Plan policies TM1 and TM2, with off road spaces designed so that they will be used for parking.
- Ensure accessible environments that prioritise cycle and pedestrian access and provide linkages with surrounding housing, employment services, facilities and spaces.
- Provide, conserve and enhance biodiversity and create linkages between greenspaces and wildlife corridors.
- Incorporate Sustainable Drainage Schemes unless following adequate assessment, soil conditions and/or engineering feasibility demonstrates this method is inappropriate.
- Incorporate measure to minimise water and energy consumption, through carefully considered design, layout, and orientation to make provision for recycling waste, in particular ensuring that an adequate bin storage area is provided.



Carlton Colville Parish Council stated that open space should be consolidated into larger areas. However there should be enough space to maintain privacy as well as adequate sound insulation and parking.

Other Organisations

Southwold and Reydon Society identified some distinctly quirky architectural styles in both Southwold and Reydon. The society was keen to preserve architectural heritage but was not opposed to new buildings styles, which were generally favourable to pastiche. Parking standards must ensure that streets are kept free from excessive parking to ease congestion and improve the streetscape.

Suffolk Police stated that good design incorporated good architectural design with the principles of Secured by Design. Previous developments have too often increased the risk of crime and the fear of crime. Once established these problems are hard to eradicate. Designing out crime in public areas includes natural surveillance over public areas, careful design of parking areas and the provision of defensible space.

Developers/Landowners

Badger Building in response to questions 73 and 74 drew attention to its Pegasus Boatyard Scheme, which is due for commencement in September. Design in Lowestoft has emerged as 'safe' and 'cheap' owing to a lack of buoyancy in the market. Good design does not cost more but the materials needed to achieve it add to construction costs. Lowestoft is not a premium market and so it is unlikely that purchasers will pay more for additional costs. Simple lessons include proportions, ratios of windows to wall space and roof detailing can all improve the appearance of a building. The Essex Design Guide of 1973 remains the best design guidance. Design guidance should stress that good design adds value not cost rather than espousing the views of officers or detailing design policies.

Wellington Construction stated that the design of new build development is a matter of personal taste.

Members of the Public

Members of the public stated that good design should combine provision of open spaces and realistic recognition of parking needs. Good design should include solar roof panels and permeable parking spaces. Saberton developments were identified as being of a high quality. Contemporary designs were favoured and there was a suggestion that good examples of continental design should be used. A well designed development needs to meet the needs of its occupants and contribute to the community. Another respondent favoured more traditional designs for a mixture of 2, 3 and 4 bedroom houses. The Persimmon development on the eastern side of Beccles was identified as a good example. Taylor and Green designed Council houses are cited as good developments that site well within the landscape.



Q74 How can we improve design quality through planning policy?

8 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council draws attention to the importance of strict validation requirements because many applications lack adequate detail. The Town Council cited examples of poor design and stated that it was important for applicants to consult the Suffolk Design Guidance and to hold pre application discussions with the Town Council and the Suffolk Design and Review Panel as well as the design and conservation officer. There should be greater dialogue with parish councils and communities who have to live with the consequences of bad design. It needs to be recognised that poor design impacts upon communities and people's quality of life. Waveney District Council should heed NPPF guidance that development provides the opportunity to enhance design. Planning provides the opportunity to replace mediocre design with high quality design so in the case of conversions there should be a requirement to fix past mistakes.

Other Organisations

Southwold and Reydon Society stated that the Council must encourage innovative and sustainable design and discourage pastiche. Renewable energy systems must be used in new housing wherever possible, including in Conservation Areas.

Suffolk Police emphasised the importance of creating designs that minimised crime. Council policies should ensure that new designs comply with recommendations in Secured by Design and Homes 16, which are both cited as evidence based guidance about using building design to reduce crime. Too often this aspect of development is ignored. Police Designing Out Crime Officers are experts in reducing crime through good design and ensure that Secured by Design principles are incorporated into new developments. Developments of 10 dwellings or greater should be required to meet Secure by Design Bronze standard or higher. Designers and developers should seek early consultation with the Police Designing Out Crime Officer to ensure that crime reduction considerations can be incorporated.

Developers/Landowners

Badger Building in response to questions 73 and 74 drew attention to its Pegasus Boatyard Scheme, which is due for commencement in September. Design in Lowestoft has emerged as 'safe' and 'cheap' owing to a lack of buoyancy in the market. Good design does not cost more but the materials needed to achieve it add to construction costs. Lowestoft is not a premium market and so it is unlikely that purchasers will pay more for additional costs. Simple lessons include proportions, ratios of windows to wall space and roof detailing can all improve the appearance of a building. The Essex



Design Guide of 1973 remains the best design guidance. Design guidance should stress that good design adds value not cost rather than espousing the views of officers or detailing design policies.

Members of the Public

Members of the public stated that design should incorporate features such as the Passivhaus standard and sustainable transport links. Realistic levels of storage space, gardens and parking spaces need to be provided as well as some diversity in design. It will also be necessary to prevent parking on pavements and parking by commercial vehicles. Extensions to starter homes should be prevented. One respondent stated that design should be based on eras when quality of design was important.

***Q75** Should we provide detailed design guidance in the Local Plan applicable to all sites or should detailed design guidance be prepared just for larger sites specifically identified in the Local Plan?*

16 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council stated that detailed design guidance should be applicable to all sites.

Reydon Parish Council stated that Council policies should encourage innovative, sustainable design that is in keeping with the landscape and avoids pastiche. Renewable energy systems should be encouraged wherever possible, including in conservation areas. Parking policies should prevent on street parking to reduce congestion and improve the streetscape.

Other Organisations

Suffolk Police supported policies that encouraged crime reduction measures at the earliest stages of the design process. Recommendations are inexpensive and can reduce the management burden for landlords and fewer problems for owner occupiers.

The Southwold and Reydon Society stated that the Local Plan should include design principles that were applicable to all sites.

Developers/Landowners

Badger Building did not agree that detailed planning policies should be provided for every site but agreed that design briefs for the larger sites would be useful.

Lawson Planning Partnership stated that design guidance was a good way of ensuring high quality design provided that it does not become restricting. Design guidance should only be prepared for



larger sites. For smaller sites a general design policy will be adequate. Excessive guidance will stifle innovative development.

St. John's Hall Farms suggested that the Local Plan should only include key design principles. Detailed design guidance would delay development and should be confined to supplementary planning documents.

Members of the Public

Members of the public generally believed that detailed guidance should be applicable to all sites. One applicant stated that new development should comply with Building for Life 12. For developments of greater than 20 dwellings it will be necessary for transport modelling to take place, which will be proportionate to the scale of the development. Another stated that the Local Plan should not include detailed design guidance which would be onerous and delay the planning application process. The Local Plan should include design principles with detailed guidance confined to supplementary documents. One applicant stated that there should be more guidance for larger developments that will have greater impact. One applicant stated that design will vary from site to site and so guidance on all sites is inappropriate.

Q76 Should Building for Life 12 be used as a tool to improve the quality of new development?

11 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St. Margaret Parish Meeting agreed that Building for Life 12 should be used as a tool to improve the quality of new development.

Southwold Town Council agreed that Building for Life 12 should be used as a tool to improve the quality of new development.

Other Organisations

Suffolk Police supported the objective of Building for Life 12 to create development that is safe and provides everything that is expected of a new community. They encouraged developers to make contact with the police to ensure that new designs promote safety.

Developers/Landowners

Lawson Planning Partnership recognised the ability of Building for Life 12 to improve design quality but added that it should be included in the Local Plan as guidance not policy.



Badger Building opposed the inclusion of Building for Life 12 if it was applied subjectively.

Members of the Public

Members of the public supported the inclusion of Building for Life 12 as a planning tool provided it did not increase prices beyond the reach of homebuyers.

Q77 *Should large scale developments in the form of new settlements or urban extensions be required to follow 'garden city' principles?*

11 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St. Margaret Parish Council agreed that large scale developments and urban extensions should follow 'garden city' principles.

North Cove Parish Council agreed that large scale developments and urban extensions should follow 'garden city' principles.

Southwold Town Council agreed that large scale developments and urban extensions should follow 'garden city' principles.

Other Organisations

Suffolk Police criticised 'garden cities' for their singular focus on aesthetics at the expense of safety and other issues that face modern communities. Garden city principles have been altered over the years and it is no longer clear what they are. However providing spaces for play and social interaction, which are also subject to surveillance from occupied ground floor windows, together with well designed parking, are all positive design attributes.

Developers/Landowners

Wellington Construction stated that 'garden city' principles were tried and tested.

Badger Building cautioned that 'garden city' principles may be at odds with the Councils' aspirations for housing density. New development must maximise physical features and provide good connectivity and open spaces. Parking and road access tends to dictate layout and regard must be had to this.



Members of the Public

Members of the public were mostly supportive of garden city principles for new settlements or urban extensions. However there was some confusion about what the term meant and one respondent stated that if large scale development was needed then local needs should outweigh garden city principles.

**Q78 a) Should we set a minimum housing density for new developments? b) If so what should it be?
20 respondents**

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council suggested no minimum housing standards because this will depend on the quality and setting of the design. Density should be a factor in applying Building for Life 12.

Carlton Colville Town Council supported a maximum density of 30 dwellings per hectare.

Oulton Parish Council stated that there should be no minimum density but rather a maximum density. A maximum density of 50 dwellings per hectare was considered too many and could cause problems with excessive on street car parking.

Ilketshall St. Margaret Parish Meeting agreed with the question and suggested a minimum density of 30 dwellings per hectare.

Other Organisations

The Southwold and Reydon Society stated that housing density should be maximised to reduce the encroachment into the countryside. However this should also be judged on context.

Developers/Landowners

Badger Building disagreed with the question on the grounds that this is a market issue.

Lawson Planning Partnership agreed that there should be a minimum density but added that this would vary from place to place. Policies should be flexible to ensure that suitable sites should not be left undeveloped because the minimum housing density cannot be met on a site that could be developed. In some cases enforcing minimum housing densities may be too restrictive and unnecessarily compromise design.



St. John's Hall Farms suggested that the Local Plan should not set minimum housing densities. This approach fails to take account of local character or the housing market which will change over the life of the Local Plan.

Wellington Construction stated that housing densities should be based on local character unless circumstances dictated otherwise.

Members of the Public

Members of the public were divided about whether there should be a minimum density for developments across the District. However there was a general consensus that housing densities should be sensitive to the site and its surrounding area. One respondent suggested that maximum densities were likely to increase on street parking. Another suggested that imposing a common approach could restrict open space and car parking provision.

Q79 *Should different design principles be applied to housing development at high/low densities? (For example, avoid using detached housing at higher densities in order to maintain sufficient space between buildings)*

16 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council replied that different design principles should possibly be applied at different densities.

Ilketshall St. Margaret Parish Meeting agreed that different design principles should be applied at different densities.

North Cove Parish Council strongly agreed that different design principles should be applied at different densities.

Developers/Landowners

Badger Building stated that a principle of good design is sufficient. If there is insufficient space between properties then the site is being overdeveloped and planning permission can be refused.

Lawson Planning Partnership stated that it is inevitable that design will vary according to density. Detailed design guidance should be contained in an accompanying supplementary planning document. Design principles should focus on providing high quality design while not stifling innovative development. Therefore they should take the form of guidance rather than policy.



Wellington Construction stated that different design principles should not necessarily be applied to housing developments at different densities.

Members of the Public

Members of the public were generally agreed that design guidance should change according to housing density. Design guidance was felt to be important to help maintain privacy but that it needed to be appropriate to the size of dwelling. Two respondents favoured terraced housing but one of them added that it could create issues with car parking. Another stated that design will vary from site to site and that developers should not incur any further costs.

***Q80** Should we adopt additional optional technical housing standards in respect of water, access and national space standards for new residential development?*

14 respondents

Statutory Consultees

The Environment Agency strongly encouraged the Council to include policies requiring higher standards of water efficiency than those currently required by building regulations. However this should not threaten the viability of development. New buildings must meet the Buildings regulations standards of 125 litres per person per day. Where necessary this can be 110 litres. Evidence to support tighter water use regulations includes the Water Stressed Areas classification, River Basin Management Plans or Water Cycle Strategies. Water efficient buildings carry many benefits, including: energy savings; meeting Water Framework Directive requirements; Reducing stress on watercourses; increasing resilience to climate change; contributing towards sustainable growth.

Parish and Town Councils

Southwold Town Council agreed that additional technical standards were necessary, stating that some new homes in Southwold had less than the national internal minimum requirement for floor space standards and that this affected their amenity. The Town Council does not agree that providing less than national standards of floor space is essential to viability. Importing national standards into the Local Plan is the only way to maintain choice and protect the consumer at a time of chronic undersupply. With regard to social housing, public sector housing should meet the standards set by the Government.

Ilketshall St. Margaret Parish Meeting stated that additional technical standards should only be adopted in regard to water.

Carlton Colville Town Council agreed that additional technical standards in respect of water, access and national space standards should be adopted.



Developers/Landowners

Badger Building disagreed that additional optional standards were required, stating that these were not justified by local circumstances.

Lawson Planning Partnership stated that the Council should not adopt technical housing standards because this will impact upon viability. National space standards would also restrict the variety of housing that could be provided and create additional burdens in an already weak market. Adoption of space standards could compromise other elements of schemes.

Rentplus stated that the Council should assess the viability impacts and local need for the national space or accessibility standards. Both of these aspects are requirements for the introduction of these standards. The Council should ensure that the introduction of these standards will not impact upon the ability to deliver housing that meets local needs.

St. John's Hall Farms suggested that the Local Plan should not include national space standards unless there is a very good reason to do so. To do so could affect the viability of some schemes and the affordability of some homes. Building Regulations will change to achieve the same outcomes and this is a more effective way of securing high building standards.

Other Organisations

No comments were made in response to this question.

Members of the Public

Members of the Public supported the introduction of optional technical standards in terms of space arguing it was critical to provide high quality housing in both the private and public sectors. The mix of housing should be appropriate to the needs of local people and not set by developers.

However one respondent stated that the Local Plan should not include national space standards unless there is a very good reason to do so. To do so could affect the viability of some schemes and the affordability of some homes. Building Regulations will change to achieve the same outcomes and this is a more effective way of securing high building standards. Another respondent favoured the introduction of technical standards for water and access but not space.

Q81 When would development of residential gardens be inappropriate?

14 respondents

Statutory Consultees

No comments were made in response to this question.



Parish and Town Councils

North Cove Parish Council stated that development in residential gardens would be inappropriate if it results in large houses on small plots.

Carlton Colville Town Council stated that development of residential gardens was inappropriate when it increased housing density beyond an acceptable level and creates overcrowding.

Ilketshall St. Margaret Parish Council stated that development of residential gardens would very rarely be inappropriate.

Kessingland Parish Council drew attention to National Planning Policy Framework paragraph 53. The Parish Council stated that development should not impact upon the appearance or existing pattern of development. Kessingland Neighbourhood Plan contains a section on infill development to prevent overdevelopment and protect the existing character of the street.

Southwold Town Council supported preventing development in back gardens and yards because the town is already densely developed and such spaces lighten the fabric of the town. There are very few properties with large gardens in Southwold and these should be maintained because they are attractive to families. Small buildings of a high quality may be acceptable in gardens in other communities. Elsewhere small buildings of high architectural quality could be acceptable in large gardens. Where a building is described as a studio or workspace planning conditions should be attached to prevent its future use as a holiday let.

Other Organisations

Southwold and Reydon Society stated that proposals to develop in back gardens should require special justification, especially in Southwold which is already densely developed and this should rarely, if ever, be permitted.

Developers/Landowners

Badger Building stated that when there was sufficient access and there is sufficient space left for the donor property with a good relationship between the two then garden development is not necessarily bad.

Wellington Construction stated that garden developments should only be restricted if residential amenity is significantly affected.

Members of the Public

Members of the public felt that development in residential gardens was inappropriate if it harmed the amenity of a neighbouring property, made housing densities too high, resulted in overlooking, or created access issues. Issues could be further exacerbated by large extensions made at a later date. Reducing the size of the garden below that which would be appropriate for the size of the property



was also viewed as unacceptable. One respondent stated that gardens were valued as havens for wildlife and sources of food which should not be developed. One respondent stated that residential development might be acceptable in a larger space (such as a paddock) with good road access. In these cases the new houses should be of a high standard and relate well to the surrounding area. Another respondent stated that decisions should be made on a case by case basis.



Healthy communities

Q82 *What size residential development should provide on-site recreational open space?*

14 respondents

Parish and Town Councils

Carlton Colville Town Council suggested that on-site open space should be calculated per dwelling.

Ilkeshall St Margaret Parish Meeting stated the existing policy approach is appropriate.

Kessingland Parish Council stated that open space provision in the village was being addressed in the Neighbourhood Plan and was based on the Waveney Green Infrastructure Strategy.

Developers/Landowners

Badger Building suggested that open space should be provided on-site for development larger than 30 dwellings unless there is provision within 1000m that could be upgraded. This could be addressed through commuted sums.

Lawson Planning Partnership Limited stated that open space provision should take into account the surroundings of the development and open spaces that may be located nearby.

Wellington Construction Limited suggested developments larger than 10 dwellings should provide open space but maintenance would be an ongoing issue.

Members of the Public

Six members of the public commented on the provision of open space:

- existing standards appear appropriate;
- all development should provide open space;
- sites larger than 10 dwellings should provide open space;
- nearby open spaces should be taken into account;
- maintenance is an ongoing issue.

Statutory Consultees, other organisations

No comments were submitted in response to this question.

Q83 *Should we continue to set a per dwelling or per hectare standard for recreational open space provision on residential development? or, should the Council require the provision of recreational open space on residential developments to be based on the needs set out in the Green Infrastructure*



Strategy?

9 respondents

Statutory Consultees

No comments were submitted in response to this question.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting suggested a 'per dwelling' standard.

North Cove Parish Council referred to existing shortfalls and the need to consider the open space in the wider context of green infrastructure.

Oulton Parish Council stated that open space should be provided by all developments.

Other Organisations

No comments were submitted in response to this question.

Developers/Landowners

Badger Building suggested the policy requirement should be based on need rather than a fixed standard.

Members of the Public

Four people provided comments and suggested that small open spaces should serve new development but larger developments should provide open space that will meet the needs of the wider community taking into account existing facilities while such provision should be delivered to meet the needs set out in the Green Infrastructure Strategy.

Q84 If we continue to set a standard, what should the standard be?

6 respondents

Parish council

Ilketshall St Margaret Parish Meeting suggested a standard per 20 dwellings.

Statutory Consultees

No comments were submitted in response to this question.

Other Organisations

No comments were submitted in response to this question.



Parish and Town Councils

No comments were submitted in response to this question.

Developers/Landowners

Badger Building suggested the NFPA Six Acre Standard should be used.

Members of the Public

Three people provided comments and suggested the standard should follow the recommendations in the Green Infrastructure Strategy while standards should be flexible to take into account existing provision. If there was a standard it should not be less than a specific amount of open space per individual dwelling.

Q85 *Should we identify and designate Local Green Spaces? If so are there any areas which you think would qualify?*

21 respondents

Statutory Consultees

The Environment Agency supported the designation of Local Green Spaces. They can contribute towards higher soil quality, improving the ecosystem flood mitigation and climate regulation.

The Broads Authority noted that Norfolk authorities are working together on the health infrastructure requirements generated as a result of the Objectively Assessed Needs work carried out in each of the Districts.

Parish and Town Councils

Carlton Colville Town Council supported the designation of Local Green Spaces specifically identifying:

- the field between Church Lane and Chapel Road which forms a triangle opposite St Peter's Church as it preserves views of the church and contributes towards the semi-rural character of Carlton Colville; and
- the green space along Beccles Road between the housing and Carlton Marshes which is important for wildlife and the open character of the area.

Ilketshall St Margaret Parish Meeting supported the designation of Local Green Spaces.

Oulton Parish Council suggested the site identified previously identified for a primary school located at Fallowfields in Oulton should be designated as a Local Green Space and provide with play equipment and an area designed to be semi-natural in character.



Southwold Town Council supported the designation of Local Green Spaces and identified:

- Tibby's Green; and
- the allotments located on Blyth Road.

Other Organisations

The Suffolk Wildlife Trust supported the provision of high quality green spaces and the designation of Local Green Spaces.

Developers/Landowners

Badger Building supported the designation of Local Green Spaces.

Members of the Public

There was a general consensus among the thirteen members of the public who commented that Local Green Spaces should be designated. It was suggested that Local Green Spaces should be large enough to make a difference including the creation of wildlife corridors between new and existing development.

The following are existing open spaces put forward for consideration:

- Meadow Gardens between Beccles cemetery and the shared-use path (Beccles);
- Meadows at Puddingmoor (Beccles);
- North Denes from Links Road to the existing caravan site (Lowestoft);
- Cricket field, Station Road (Somerleyton);
- all existing open spaces including allotments, parks, sports fields and play areas.

Q86 *Should we restrict the development of fast food outlets within 400 metres of nurseries, schools and colleges?*

16 respondents

Statutory Consultees

No comments were submitted in response to this question.

Parish and Town Councils

Such a restriction was supported by:

- Carlton Colville Town Council;
- Ilketshall St Margaret Parish Meeting; and
- Southwold Town Council.

Other Organisations

Such a restriction was supported by Southwold and Reydon Society.



Developers/Landowners

Badger Building supported such a restriction.

Members of the Public

Ten members of the public commented with eight of these supporting the restriction. One respondent who did not support the proposal and it was suggested that it would not be practical in Beccles.

Q87 *Within town centres should we restrict the number of fast food outlets in shop frontages?*

14 respondents

Statutory Consultees

There were no submissions made in response to this question.

Parish and Town Councils

Such as restriction was supported by:

- Carlton Colville Town Council;
- Ilketshall St Margaret Parish Meeting; and
- Southwold Town Council.

Other Organisations

Such as restriction was supported by the Southwold & Reydon Society.

Developers/Landowners

Badger Building supported such a restriction.

Members of the Public

Six people supported the restriction. With two stating it was not practical and that new outlets, including healthy options, could add to the existing offer in a retail area while another did not support the proposed restriction.



Biodiversity

Q88 *Should development be required to deliver the recommendations of the Green Infrastructure Strategy with respect to networks of biodiversity?*

24 respondents

Statutory Consultees

The Broads Authority noted that there are early conversations about preparing a Norfolk-wide green infrastructure map. The Broads Authority could consider recommendations in the Green Infrastructure Strategy and how these could be brought forward as part of the Broads Local Plan as appropriate.

The Environment Agency supported the designation of Local Green Spaces. They can contribute towards higher soil quality, improving the ecosystem flood mitigation and climate regulation.

Greater Norwich Local Plan team supported delivery of the Green Infrastructure Strategy through new development. The Greater Norwich Green Infrastructure Plan is held up as national good practice and they would be happy to work with Waveney officers to ensure that any cross-boundary ecological network connections are taken.

Natural England stated that new development should incorporate opportunities to enhance biodiversity wherever possible. A key principle is to maintain connectivity. Land of least environmental value should be used in accordance with paragraph 165 of the NPPF. Where a plan area contains irreplaceable habits there should be policies in place to ensure their protection. Provision for green infrastructure should be included within a specific policy in the Local Plan or integrated into relevant other policies such as biodiversity, green space, flood risk and climate change.

Parish and Town Councils

Delivery of the Strategy through new development was supported by:

- Carlton Colville Town Council;
- Ilketshall St Margaret Parish Meeting;
- North Cove Parish Council;
- Southwold Town Council.

Kessingland Parish Council noted they had used the Green Infrastructure Strategy to inform their Neighbourhood Plan.

Other Organisations

Suffolk Wildlife Trust supported delivery of the Strategy through new development.



Developers/Landowners

Badger Building supported delivery of the Strategy through new development.

Members of the Public

All thirteen responses by members of the public supported the delivery of the Green Infrastructure Strategy through new development.

Q89 What level of protection should be given to locally designated sites of biodiversity value?

20 respondents

Statutory Consultees

Natural England stated the Local Plan should set out criteria based policies for the protection of biodiversity and geological sites reflecting the level of protection they have. SSSIs European sites and Ramsar sites should be identified on the Proposals Map. It was stated the Local Plan should be subject to a Habitat Screening Report under Regulation 102 of the Conservation of Habitats and Species Regulations (2010) at an early stage. It may be necessary to outline avoidance and/or mitigation measures in the Local Plan, including a clear direction for project level HRA work to ensure no adverse effect on internationally designated sites. Cross-boundary policies may be need to be considered.

Parish and Town Councils

Carlton Colville suggested the highest protection possible.

Ilketshall St Margaret Parish Meeting suggested these areas should be protected as per national policy.

Oulton Parish Council said that where sites are supported by voluntary organisations these groups should be supported.

Southwold Town Council said these areas should have enhanced protection. They would like to see greater restrictions on the paving of garden land and the benefits this can have for biodiversity. An approach set out by the Royal Horticulture Society could be considered in Local and Neighbourhood Plans. The Fortune Green and West Hampstead Neighbourhood Plan was cited as an example to protect trees and planting (policy 18).

Other Organisations

The Southwold and Reydon Society stated the strongest protection possible should be given to designated sites of biodiversity value.



Suffolk Wildlife Trust stated that County Wildlife Sites (CWS) should be strongly protected from the impacts of new development. CWS should not be allocated for new development and any allocations near a CWS should be carefully assessed to ensure they would not result in any adverse impact on the ecological value of the site.

Developers/Landowners

Badger Building suggested sufficient protection to prevent them from being lost.

Members of the Public

Twelve people responded and there was strong support for high levels of protection to be given to biodiversity sites. Additional comments included the need to raise the standard higher than what we currently have and that local designated sites should have the same protection as nationally protected sites.



Landscape

Q90 *What landscapes in Waveney do you think are the most valuable and worthy of protection in the Local Plan?*

24 respondents

Statutory Consultees

The Broads Authority suggested the Local Plan should set out how the setting of the Broads will be considered, protected and enhanced.

Natural England stated the plan should have strategic policies to protect and enhance valued landscapes along with criteria based policies to guide development. They stated that the Council should take into account the AONB Management Plan and views of the AONB Partnership. Development proposals should avoid significant impacts on protected landscapes and consider the development tests set out in paragraph 116 of the NPPF.

Suffolk County Council suggested the new Local Plan will need to protect and enhance the diverse landscape and ecology features in the District by minimising recreational disturbance to designated wildlife sites and delivering a coordinated approach to green infrastructure. More specifically:

- there are two sites north of Lowestoft used to mitigate the impact on skylarks by two large infrastructure projects and development in this area should consider this;
- a strategic approach to development south of Lowestoft would be welcomed;
- development along the Beccles Southern Relief Road is unlikely to be affected by ecological and biodiversity constraints;
- a buffer zone between development proposed in the north of Beccles and the Beccles Marshes is essential;
- in Southwold and Reydon there is likely to be the need for additional provision of open space and green infrastructure for the scale of development to minimise recreational impact on protected sites.

Parish and Town Councils

Carlton Colville Town Council suggested the Broads and the Carlton Marshes should be protected.

Ilketshall St Margaret Parish Meeting stated that the current level of protection should be continued for the rural river valleys and tributary farmland areas.

Kessingland Parish Council stated the beach and heathland areas along the coast are part of the AONB and Heritage Coast. This area is also designated as a Special Protection Area (SPA) and a Special Area of Conservation (SAC).



North Cove Parish Council suggested Beccles Common, the area around Carlton Nature Reserve and existing breaks between villages to be protected.

Oulton Parish Council suggested Oulton Marshes and Carlton Marshes for protection.

Southwold Town Council suggested that Neighbourhood Plans are best positioned to identify landscapes that are important to them that should have extra protection. New development should be required to fit in with the character of the landscape.

Other Organisations

Southwold and Reydon Society suggested the protection of the AONB should be reiterated in the Local Plan. There should be little or no development in the countryside situated within AONB.

Developers/Landowners

Badger Building stated there were landscapes to value in the District with the river valleys being one of the most important.

Members of the Public

Areas that were identified and should be considered for protection include:

- land on Lowestoft Road between Park Drive and Old Farm Road for views across the Common and the Waveney Valley (Beccles/Worlingham);
- Beccles Quay and Beccles Common (Beccles);
- the gap between Reydon and Southwold which is part of the AONB and important for flora and fauna;
- coastal areas;
- Waveney Valley;
- woodlands;
- areas with long vistas across the open countryside.

Ten people responded and have suggested that protection be afforded to landscapes as they are at present. It was also stated that areas should be considered on their own merits and not prioritised. It was recognised that important landscapes are important for attracting people to the area and amenity for people who live locally.

Q91 *Should we continue the strong protection given to rural river valleys and tributary valley farmlands?*

23 respondents

Statutory Consultees

No comments were submitted in response to this question.



Parish and Town Councils

This was supported by:

- Carlton Colville Parish Council;
- Ilketshall St Margaret Parish Meeting;
- North Cove Parish Council;
- Southwold Town Council.

Other Organisations

This was supported by the Southwold and Reydon Society.

Developers/Landowners

Badger Building stated there were landscapes to value in the District with the river valleys being one of the most important.

Gladman Developments Limited suggested the current requirements requiring an applicant to demonstrate there is an overriding national need for a development and that no alternatives sites are available is too onerous and not consistent with paragraph 113 of the NPPF. To be considered a valued landscape their value must be a demonstrable physical attribute rather than just a popular landscape. The Waveney Landscape Character Assessment will likely need to be updated.

Members of the Public

Fourteen people responded and all supported the continuation of this approach. It was suggested there could be some flexibility where the development was of a very high environmental standard with a minimal impact on the landscape.

***Q92** Should we continue to identify 'Strategic Gaps' between Lowestoft and Kessingland, Lowestoft and Hopton and Halesworth and Holton? Or, should we instead have a more general policy which aims to avoid the coalescence of settlements)?*

24 respondents

Statutory Consultees

No comments were submitted in response to this question.

Parish and Town Councils

The continued use of Strategic Gaps was supported by:

- Carlton Colville Parish Council;
- Ilketshall St Margaret Parish Meeting;
- Kessingland Parish Council;
- North Cove Parish Council;



- Oulton Parish Council;

Southwold Town Council supported the strategic gaps and added that they should all be enhanced with Local Green Space designation.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building stated the Strategic Gaps have an important part in separating settlements but these should be reassessed on the ground (e.g. coherent boundaries).

Gladman Developments Limited stated that development could be located in Strategic Gaps without the merging of settlements and suggest this approach may not be consistent with the NPPF. Criteria based policies may be more appropriate.

Wellington Construction Limited stated that a suggestion of a new settlement near Corton is not consistent with this approach.

Members of the Public

Fourteen people responded and it was suggested there should be a policy to stop the coalescence of settlements regardless of their size in order to retain their character. There was support for retaining Strategic Gaps, however, as Strategic Gaps fill in over time, green corridors for wildlife should be protected. It was suggested that a Strategic Gap policy was not consistent with the NPPF.

Q93 *If we retain the 'Strategic Gap' policy, are there any other gaps between existing settlements which would benefit from a 'Strategic Gap' policy?*

12 respondents

Statutory Consultees

No comments were submitted in response to this question.

Parish and Town Councils

Carlton Colville Town Council suggested Strategic Gaps should be identified between:

- Carlton Colville and Gisleham;
- Carlton Colville and Mutford;
- Chapel Road and Church Lane in Carlton Colville;
- Beccles Road and Carlton Marshes.



North Cove Parish Council suggested the open views in Barnby as one enters the village and the gap between North Cove and Barnby.

Southwold Town Council suggested retaining the existing Strategic Gaps, identify more, and enhance them all with the Local Green Space designation.

Other Organisations

No comments were submitted in response to this question.

Developers/Landowners

No comments were made in response to this question

Members of the Public

Eight people responded and suggested potential Strategic Gaps between the following settlements:

- Beccles and Worlingham;
- Beccles and Ringsfield;
- Beccles and Carlton Colville;
- Beccles and villages to the south, east and west;
- Between Barnby and Mutford;
- Mutford and Carlton Colville;
- Kessingland and Blythburgh;
- Blythburgh and Holton;
- all communities should be delineated by some for of gap.

Q94 *If we retain the 'Strategic Gap' policy, should it be a Strategic Policy requiring proposals in Neighbourhood Plans to be in conformity with the policy?*

11 respondents

Statutory Consultees

No comments were submitted in response to this question.

Parish and Town Councils

Carlton Colville Town Council did not support a strategic policy.

A strategic policy approach was supported by:

- Ilketshall St Margaret Parish Meeting;
- North Cove Parish Council;
- Oulton Parish Council.



Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building stated that the Council should take account of Neighbourhood Plans that support some development in the Strategic Gap.

Members of the Public

Six people responded and five supported the measure. It was also commented that the content of Neighbourhood Plans should be considered.

Q95 Should we continue to identify 'Open Breaks' at Lowestoft Road, Carlton Colville, Dip Farm, Gunton and Ollands Plantation and Meadows, Bungay? Are there other areas that could be identified as open breaks?

22 comments

Statutory Consultees

No comments were submitted in response to this question.

Parish and Town Councils

Carlton Colville Town Council suggested the following be retained as open breaks:

- Triangle of land between Chapel Road and Church Lane in Carlton Colville;
- Land between Beccles Road and Carlton Marshes in Carlton Colville.

Oulton Parish Council suggested continuing with the open break designation.

Other organisations

No comments were submitted in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Eighteen people responded and it was overwhelmingly suggested that all open breaks should be retained.

The importance of the open break located on Lowestoft Road in Beccles /Worlingham was repeated commented upon and is consistent with the Green Infrastructure Strategy.

Open breaks should be provided where they would separate Beccles from surrounding villages and should be retained between Corton – Hopton and Lowestoft –Kessingland.



Q96 *Are the above 'Open Breaks' demonstrably special to the local community and should they be designated as Local Green Spaces which will give them greater protection?*

21 respondents

Statutory Consultees

No comments were submitted in response to this question.

Parish and Town Councils

Carlton Colville suggested sites 7, 21 and 80 should be classified as open breaks.

Ilketshall St Margaret Parish Meeting suggested all of the existing open breaks be continued with their designation.

North Cove suggested all of the existing open breaks be continued with their designation.

Oulton Parish Council suggested all of the existing open breaks be continued with their designation.

Other Organisations

No comments were submitted in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Sixteen people responded and it was overwhelmingly suggested that all open breaks should be retained as they are important for wildlife, green corridors and the communities near them.

The importance of the open break located on Lowestoft Road in Beccles /Worlingham was repeated commented upon and is consistent with the Green Infrastructure Strategy.

Q97 *Are there any areas of Waveney which could be considered areas of tranquillity?*

23 respondents

Statutory Consultees

The Broads Authority has recently completed a dark skies study which found the skies were particularly dark around Galveston. The Authority is preparing a policy on light pollution and would welcome WDC considering dark skies near sensitive areas.



Natural England suggested areas of tranquillity should be identified and provided appropriate policy protection as set out in paragraph 123 of the NPPF. The Campaign to Protect Rural England (CPRE) has mapped areas of tranquillity which are available and could be used as an evidence base for the Local Plan and Sustainability Appraisals.

Parish and Town Councils

Carlton Colville suggested the Carlton Marshes should be protected to reasons related to tranquillity.

Ilkeshall St Margaret Parish Meeting suggested areas between rural settlements meet the definition of tranquillity.

North Cove Parish Council suggested the Carlton Nature Reserve should be protected from housing development.

Southwold Town Council suggested the AONB and Heritage Coast should be identified for reasons of tranquillity. Additionally, Neighbourhood Plans should have the opportunity to identify areas of tranquillity.

Other Organisations

The Lowestoft & Yarmouth Regional Astronomers Society suggested sites 164, 165 and 166 north of Lowestoft should be considered in the context of tranquillity. Light pollution results from light nuisance (the unwelcome intrusion of light from nearby premises), sky-glow (damage to the night sky) and glare which causes discomfort and can be a hazard to road users and pedestrians. The increasing impact of sky-glow has been the result of poorly aimed street light and floodlights, overpowered and poorly mounted household security lights and over the top sports lighting. It was stated the best method for dealing with light pollution in the case of new developments is at the planning stage by pre-empting any light waste by influencing design of lighting schemes and the insertion of planning conditions. Citing recommendations by the CPRE which has suggested planning policies should specifically require detailed consideration of lighting schemes and impacts and reflect guidance set out in paragraph 125 of the NPPF. Green belts have the potential to contribute towards the tranquillity of an area and reduce the impact of light pollution. Photos provided to demonstrate the impact of light pollution over time.

The Southwold and Reydon Society suggested the area around Southwold and Reydon, the surrounding cliffs beaches and countryside should be considered as areas of tranquillity.

Developers/Landowners

Badger Building suggested the area of The Saints was remote and relatively undisturbed and the landscape should be preserved from all forms of unnecessary development.



Members of the Public

Fourteen people responded and supported the identification of areas of tranquillity. Suggested areas included:

- all of Waveney District;
- all green spaces;
- Coastal areas;
- The Broads;
- Beccles Common;
- The Quay in Beccles;
- The Broads west of Beccles;
- land south of Beccles away from major roads;
- between Beccles and Ringsfield;
- between Ellough and Worlingham (dark skies);
- Southwold and Reydon marshes;
- area between Reydon and Southwold;
- Pakefield Cliffs;
- Marshes around Oulton Broad;
- far western edges of Oulton Broad and Carlton Colville;
- Snakes Lane in Lound (a bridle path from Lound to Ashby Church and Somerleyton);
- The Saints.



Historic Environment

Q98 *What could be included in a positive strategy in the local plan for protecting and enhancing Heritage Assets? Examples could include maintaining a list of assets and supporting development which enhances assets. How could such a strategy support and influence Neighbourhood Plans?*

10 respondents

Statutory Consultees

Historic England wished to ensure that the historic environment is protected at all stages of the planning process. Waveney has numerous nationally and locally listed buildings and is rich in archaeological content. The New Local Plan will be important in the conservation and enhancement of this historic environment. There are four heritage assets in Waveney District that are listed on the Heritage at Risk Register.

Historic England drew attention to publications it has produced about protecting the historic environment in the plan making process and devising strategies for the protection of the historic environment. Historic England welcomed the identification of the historic environment as a key environmental issue in the Issues and Options document.

Historic England drew attention to National Planning Policy Framework paragraph 126, which requires Local Plans to provide a positive strategy for the conservation and enjoyment of the historic environment. This requires a plan for the use and maintenance of historic assets and for the delivery of development that will conserve and enhance them. This positive strategy will need to include policies that are specific to the historic environment and a thread that runs throughout the Local Plan and applies to all stages of its preparation. Policies may need to be tailored to achieve positive improvements in the historic environment that the NPPF.

With regard to neighbourhood plans it is critical to remember that they are only required to be in conformity with the strategic policies of a Local Plan. Conservation of the historic environment is therefore best achieved through clear strategic policies for heritage.

Parish and Town Councils

Carlton Colville Town Council stated that open land that enhances view of historic buildings should be included as an asset, for example, the triangle opposite St. Peter's Church, Carlton Colville.

Ilketshall St. Margaret Parish Meeting stated that thought should be given to the reuse of historic buildings to ensure that they remain in use and protected.

Southwold Town Council suggested drawing up a list of buildings of local townscape interest. This has already been undertaken in Suffolk Coastal and Ipswich and would increase public participation and involvement. Historic England has just revised its guidance on Local Lists. WDC needs to revisit



its own local list in the light of these new documents. For local lists to be effective at appeal they need to be subject to public consultation and endorsement by the relevant District council committee.

Other Organisations

The Southwold and Reydon Society stated that the Local Plan should provide a list of heritage assets and support for development that would protect and enhance the historic environment. There should also be flexibility to enable development that would keep them in use and sustainable.

Developers/Landowners

Gladman Developments Limited considered it necessary that the Council undertake an assessment of the impact of new development upon heritage assets. They drew attention to a recent high court judgement (FODC v SSCLG and Gladman Developments (2016) EWHC 421 Admin) which highlighted the balance between assessing the harm of development versus the benefits of development. This balance should apply to both the decision taking and plan making processes.

Members of the Public

Members of the public supported the protection of historic assets but also wanted flexibility that would enable historic assets to continue to be used. Development should also reflect and enhance the historic character of the area.

Q99 Should we continue to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from sustainable materials.

20 respondents

Statutory Consultees

Historic England considered it imperative that the Council continues to ensure that replacement windows, doors and porches in conservation areas are of an appropriate design and constructed from suitable materials in order to protect the built form in Conservation Areas. Historic England provides technical guidance on its website about historic buildings and energy efficiency.

Parish and Town Councils

Carlton Colville Town Council agreed that the Council should continue to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from suitable materials.

Oulton Parish Council agreed that the Council should continue to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from suitable materials.



Ilketshall St. Margaret Parish Meeting agreed that the Council should continue to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from suitable materials.

Southwold Town Council stated that it was necessary to explain why plastic replacements do not work in the long run and to appeal to enlightened self interest by demonstrating that historic features enhance property values. Conservation Area Appraisal Management Plans should promote article 4 directions, which suspend permitted development.

Other Organisations

The Southwold and Reydon Society agreed that there should be control of new windows doors and porches but with some flexibility to allow double glazing in certain circumstances because this would improve energy conservation.

Developers/Landowners

Badger Building stated that control of replacement windows, doors or porches in Conservation Areas was necessary because otherwise these designations would not be worthwhile.

Members of the Public

Members of the Public supported the continued control of materials in replacement doors, windows and porches to ensure that Conservation Areas maintained their unique characters. However one respondent stated that emphasis should be placed on repair and maintenance of existing materials rather than replacement and drew attention to double glazing that can be inserted into sash windows. Another respondent was concerned that too many regulations could dissuade homeowners from making repairs or taking steps to increase the energy efficiency of historic buildings.

Q100 *Are any other controls needed on alterations to buildings in Conservation Areas?*

9 respondents

Statutory Consultees

Historic England stated that additional controls may be necessary and that these should be identified through Conservation Area Appraisals and local knowledge. Consideration should be given to a strategy to help heritage assets adapt to climate change, particularly within conservation areas. The Council should adopt a balanced approach between tackling climate change and protecting the built environment. Technical guidance is available on the Historic England website.



Parish and Town Councils

Southwold Town Council stated that it was necessary to stop further changes to the terraces on Lowestoft sea front. If development is proposed for a heritage asset then the opportunity should be used to restore previously damaged significance. Protect non designated heritage assets to conserve both the fronts and backs of properties and to ensure the Local Plan complies with paragraph 126 of the National Planning Policy Framework. It is necessary to improve verification requirements to ensure heritage assessment is proportionate, focused, sufficiently detailed and that drawings are to scale and accurate and that accurate contextual photos and models are provided. There should be an example of a model heritage assessment on the Council's website. The importance of dialogue with the Design and Conservation Officer should be emphasised, which is crucial to achieving a good outcome. Where solar panels are installed on heritage assets this should be undertaken in accordance with Historic England guidance. The Local Plan should require heritage statements to demonstrate that all other conservation measures have been considered and the efficiency gains from solar panels as opposed to alternative conservation measures are sufficiently large to constitute a public benefit that outweighs any damage to the heritage asset and its setting.

Carlton Colville Town Council stated that alterations should be in keeping with the street scene.

Ilketshall St. Margaret Parish Meeting stated that roofing and external finishes should be in keeping with the character of the surrounding area.

Other Organisations

The Southwold and Reydon Society stated that solar panels of an appropriate design should be allowed on the front facing roofs of buildings in conservation areas. Solar panels of any design should be allowed on such buildings if they are not visible from the street.

Developers/Landowners

Badger Building stated that there should be controls over inappropriate painting and cladding and the replacement of traditional roofing materials with man-made products.

Members of the Public

Members of the public stated that alterations needed to be in character with the building and others in the vicinity. There should also be controls of signs and aerials on buildings. One respondent stated that this issue required further discussion.

Q101 *What level of protection should be given to non-designated heritage assets and locally listed buildings?*

11 respondents



Statutory Consultees

Historic England stated that heritage assets are not only those designated under statutory regimes but also those that are recognised by the local planning authority. Locally significant buildings, structures, features and gardens act as way finders, landmarks and create a sense of place. They are important because of their cultural, historical and architectural contribution and so should be afforded protection. Historic England therefore advocated a specific policy about locally listed buildings and a presumption in favour of retention of heritage assets. The Local List should include all types of heritage assets and its inclusion in the Local Plan will make it a material consideration. However a hierarchy of policies should be devised so that locally listed assets do not upstage nationally listed assets in the Local Plan.

Local Plans should also make provision for archaeological remains, which are also heritage assets. This will ensure that they also receive consideration as part of the development management process. Not all significant archaeological remains are scheduled and so archaeological investigation should take place where archaeological potential is suspected prior to consideration of allocation in the Local Plan or a planning application. Overall, Historic England stated that the more significant an asset the greater the weight that should be attached to its protection.

Parish and Town Councils

Carlton Colville Town Council stated that non-designated heritage assets and locally listed buildings should be afforded the highest level of protection.

Ilkeshall St. Margaret Parish Meeting stated that the local list should be maintained.

Kessingland Parish Council drew attention to the National Planning Policy Framework which requires local planning authorities to plan positively for the conservation and enjoyment of the historic environment. Heritage assets are irreplaceable and loss or damage to them should be exceptional with a judgement made about the harm to the heritage asset and its significance. The Parish Council drew attention to the recent planning appeal regarding the proposed demolition of the King's Head pub. The appeal failed because the inspector considered the site to be of sufficient value to be considered a non-designated heritage asset. The Local Plan should provide protection to all locally listed heritage assets and to buildings in conservation areas that contribute towards their character.

North Cove Parish Council stated that non-designated listed buildings should be afforded great protection.

Other Organisations

The Southwold and Reydon Society stated that locally listed buildings and non-designated heritage assets should broadly receive the same level of protection as buildings in conservation areas currently do.



Developers/Landowners

Badger Building stated that locally listed buildings merely add an extra layer of designation with no statutory protection or grant aid available for restoration. The retention of buildings that have reached the end of their useful life has placed huge burdens on owners. Retention of these buildings is not an economic proposition and should be retained for only the best examples.

Members of the Public

Members of the public supported the protection of listed buildings and non-designated heritage assets. Alterations to non designated heritage assets or locally listed buildings should only be permitted where they respect the character of the building's surroundings and the street scene. There was concern that complete redevelopment of an area often resulted in the loss of its historic character. Development should be required to make reference to previous uses on the site. However there was concern that this protection should be underpinned by policies that the Council is willing to enforce where an owner allows a heritage asset to fall into disrepair.



Evidence

3 respondents

Statutory Consultees

No comments were submitted in response to this section.

Parish and Town Councils

Worlingham Neighbourhood Planning Team noted that the Leisure and Retail needs survey for Beccles does not include Worlingham even though the majority of Ellough Industrial estate is within the boundary of the village.

Other Organisations

Sport England stated that the evidence base on Page 68 of the document fails to make reference to the completed Playing Pitch Strategy and Sports Facilities Strategy, both of which should be informing proposed policies in relation to the protection, enhancement and provision of indoor and outdoor sports facilities within the district.

Developers/Landowners

Bourne Leisure stated that 'The Sunrise Coast Tourism Strategy 2006-2011' which was prepared in 2006 is outdated and does not provide a robust understanding of the tourism needs within the district. They stated in order to ensure the emerging Local Plan policies in relation to tourism reflect and provide support for the growth and enhancement of Waveney's tourism sector it will be critical for an up to date data set to be taken into account.

Members of the Public

No comments were submitted in response to this question.



Other Comments

61 respondents

Statutory Consultees

Anglian Water provided detailed comments on each site option in terms of impact on their assets, the wastewater network and the waste water recycling centres.

The Broads Authority stated that the consultation document was well presented and easy to read and follow. They stated that as the plan progresses they would be keen to engage and understand how the Council will address provision of plots for self build, the strategic policies which neighbourhood plans need to be in accordance with, assets of community value, non designated heritage assets and local sites of biodiversity value.

The Environment Agency provided further detailed advice on groundwater and contaminated land, water quality, SFRA review and the water cycle study.

Historic England advised that they have been unable to provide detailed comments on every site but have specifically highlighted sites where there could be issues. Historic England advised of their site selection methodology and recommended that the Council followed it in selecting sites in the plan.

The Marine Management Organisation did not provide a bespoke response to the consultation. They provided generic information about the Marine Plan and marine licensing.

Natural England stated that the Local Plan should avoid allocating areas of high environmental value for development. They stated that this should be demonstrated through sustainability appraisal and habitats regulations assessment. They added that the plan should include policies to ensure protection and enhancement of public rights of way and National Trails. Natural England also stated that the plan should give appropriate weight to soil resources. Natural England stated that the impact from air pollution on habitats from increased traffic should be considered. They stated that designated sites with 200m of a road with increased traffic could be vulnerable to nitrogen deposition/acidification. Natural England stated that they expect the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 156 of the NPPF. They also stated that the Local Plan should consider climate change and the role of the natural environment to mitigate it. Natural England also provided information on different sources of evidence to support the plan.

Suffolk County Council stated that the interrelationship between Lowestoft and Great Yarmouth will be a significant influence on the local economy and, therefore, the development of the options. This will be particularly relevant to the phasing of development to the North of Lowestoft. They added that the Enterprise Zone is an important tool and will need to be factored into the next stage of the



plan's preparation. The Council supported the section of the consultation on healthy communities and noted the importance of encouraging healthy lifestyles. They also noted the need to take into account the Suffolk Mineral Core Strategy and Site Allocations and the Suffolk Waste Core Strategy. Suffolk County Council also provided comments on archaeological issues with respect of the sites consulted on.

Parish and Town Councils

Corton Parish Council stated that too much of the consultation overlaps with other ongoing consultations.

Lound Parish Council noted that they held an extraordinary meeting to discuss the consultation and 30 members of the public attended. They distributed consultation forms to encourage responses from people without internet access.

St James South Elmham Parish Meeting stated that all areas at risk of or prone to flooding for whatever reason and areas isolated from the transport and service infrastructure should not be identified for development.

Other Organisations

Beccles Society recommended that for future consultations a public forum format should be used where a panel sits at the top table and the audience asks questions. They suggested that this type of consultation would prevent much duplication of questioning and would also allow the more timid audience members to hear the answers to questions which they may be unwilling to ask themselves.

Southwold and Reydon Society stated that protection is needed for the smaller residential properties in Southwold and Reydon so that they are not easily bought and extended. They added this could be addressed by clear policies to tighten the definition of overdevelopment, to prevent further building in gardens/courtyards at the back of existing properties, at least in the central area of Southwold, and strong provision for any additional parking that may arise from extensions where these are permitted.

Sport England stated that no existing playing fields should be allocated for development unless replacement provision of equivalent quantity, quality and accessibility is provided.

Suffolk Wildlife Trust noted that they hadn't specifically assessed each proposed allocation site for the known or likely presence of protected and/or UK/Suffolk Priority species or UK/Suffolk Priority habitats. They noted that whilst in their responses on specific sites (below) they have identified a number of sites that we consider should not be allocated for development, this does not mean that sites they have not listed are of no value for wildlife. They added that the Local Plan should be subject to a Habitats Regulations Assessment.



Developers/Landowners

Bourne Leisure stated that the importance of tourism to employment should be referred to in the employment section of the Local Plan.

Members of the Public

A number of respondents suggested the Council should write to every resident likely to be affected by the plan. One respondent suggested this could be funded by developers/landowners who submitted land. One respondent stated that the website was difficult to navigate.

One respondent suggested that land to the west of Halesworth, to the west of site 163 may be more appropriate than other sites currently identified in the consultation. One respondent suggested building over the top of car parks in the central parts of Lowestoft by constructing buildings on stilts, allow cars to continue to park underneath them.



Appendix 1 - Glossary of Technical Terms

Affordable housing

Affordable housing is housing provided to eligible households whose needs are not met by the market. It consists of social and affordable rented (such as those normally provided as Council Housing or Housing Association housing) and shared ownership products. Eligibility is determined with regard to local incomes and local house prices.

Area of Outstanding Natural Beauty

Land designated under the National Parks and Access to the Countryside Act 1949 for its special landscape value. The Suffolk Coast and Heaths AONB was confirmed in 1970 by the Countryside Commission to protect the high landscape quality of the area. Suffolk Coast and Heaths is one of the 41 AONBs which cover 15% of England and Wales.

Coastal Change Management Area

This is the area at risk from coastal erosion over the next 100 years. It is based on the findings of the Shoreline Management Plans.

Community Infrastructure Levy

A levy charged on new development in order to fund infrastructure provision. Waveney adopted the levy in August 2013 and charges the levy on new residential development, supermarket and retail warehouse development and holiday lets. www.waveney.gov.uk/CIL

County Wildlife Site

Local wildlife designations. County Wildlife Site designation is non-statutory, but it recognises the high value of a site for wildlife. Many sites are of county, and often regional or national, importance. They are often designated because they support characteristic or threatened species or habitats included in Local or National Biodiversity Action Plans.

Flood Zone

Flood Zones refer to the probability of river and sea flooding, ignoring the presence of defences. They are shown on the Environment Agency's Flood Map for Planning (Rivers and Sea), available on the Environment Agency's web site, as indicated below

Zone 1: Low Probability Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)

Zone 2: Medium Probability Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or Land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)

Zone 3a: High Probability Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.



(Land shown in dark blue on the Flood Map)

Zone 3b: The Functional Floodplain This zone comprises land where water has to flow or be stored in times of flood.

Green infrastructure

A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Heritage Coast

An area of coastline protected and promoted by Natural England in association with local authorities for the enjoyment of the undeveloped coast whilst protecting its natural beauty, nationally important wildlife and landscape features and improving the quality of inshore waters and beaches.

Local Green Space

A Local Green Space is piece of land which is designated in a Local Plan or a Neighbourhood Plan because it has a particular importance to a local community. These spaces would have a similar level of protection to the Green Belt. The National Planning Policy Framework states that the designation should only be used where the green space is in reasonably close proximity to the community it serves, where it is demonstrably special to the local community and where it is local in character and is not an extensive tract of land.

Local List

This is a list of locally important buildings which have historic or architectural value.

Listed Building

Listing marks and celebrates a building's special architectural and historic interest, and also brings it under the consideration of the planning system, so that it can be protected for future generations.

Grade I buildings are of exceptional interest, only 2.5% of listed buildings are Grade I

Grade II* buildings are particularly important buildings of more than special interest; 5.5% of listed buildings are Grade II*

Grade II buildings are of special interest; 92% of all listed buildings are in this class and it is the most likely grade of listing for a home owner.

Objectively Assessed Need

This is a technical assessment of the need for housing and economic development in an area. It is normally based on a consideration of population and household trends and economic growth projections.

Optional Technical Standards



These are a set of standards set by the Government which Council's can impose on development in their areas through the Local Plan. More information and details of the standards can be found here: <http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/>

Permitted Development Legislation

Some development can take place without the need for planning permission. These types of development are set out in a piece of legislation called the General Permitted Development Order.

Physical Limits

Physical limits are a line drawn around the edge of settlements to define the extent of the built up area, otherwise known as a settlement boundary. The current objective of physical limits is focus development within the physical limits of towns and larger villages in Waveney.

Site of Specific Scientific Interest

Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Special Area for Conservation

Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

Special Protection Area

Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Strategic Policy

Strategic policies are policies which apply to the whole District and set out strategic matters such as the amount and distribution of development and the protection of environments of strategic importance. Neighbourhood Plans have to be in conformity with strategic policies.

Source Protection Zone

These zones show the risk of contamination to groundwater from any activities that might cause pollution in the area. The closer the activity, the greater the risk. There are three main zones (inner (Zone 1), outer (Zone 2) and total catchment (Zone 3)) and a fourth zone of special interest (zone 4).



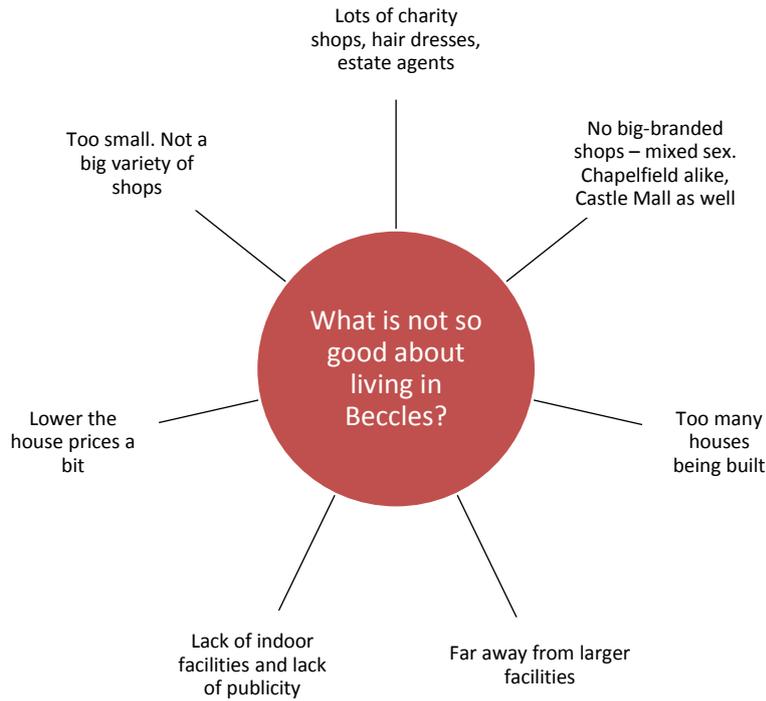
Appendix 2 – Summary of Workshop with students at Sir John Lemman High School

Officers from Waveney District Council visited students from Sir John Lemman High School in June 2016. The workshop centred on the following four questions:

1. What is good about living in Beccles?
2. What is not good about living in Beccles?
3. What would the ideal Beccles look like in 2036?
4. What do you think the main considerations are which should determine how much Beccles grows by over the next 20 years?

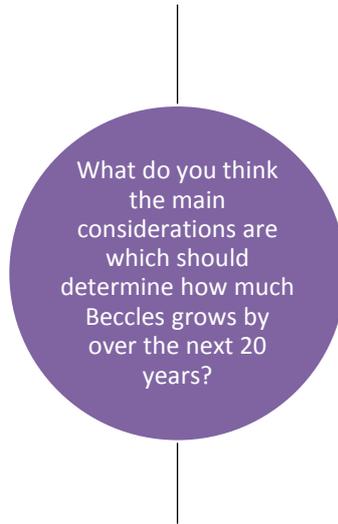
Sir John Lemman High School (8th June 2016)







Growing population



Younger and older population,
facilities for both



Appendix 3 – Summary of Workshop with students at Lowestoft Sixth Form College

Officers from Waveney District Council visited students from Lowestoft Sixth Form College in June 2016. The workshop centred on the following four questions:

1. What is good about living in Lowestoft/Waveney?
2. What is not good about living in Lowestoft/Waveney?
3. What would the ideal Lowestoft/Waveney look like in 2036?
4. What do you think the main considerations are which should determine how much Lowestoft grows by over the next 20 years?

What is good about living in Lowestoft/Waveney?

Students noted that Lowestoft had a good range of services and facilities and that the town centre had everything you need in one place. The beach was noted as being an important asset as was the water frontage.

It was noted that Beccles was more pleasant than Lowestoft and had less crime.

What is not good about living in Lowestoft/Waveney?

Traffic was noted as a particular issue affecting Lowestoft. Students agreed that there was generally a lack of things for young people to do in the town. It was suggested that there were not enough informal leisure facilities available in town. It was also noted that there were a lack of jobs in the town and most students believed they would move elsewhere for work when they have finished studying. Students raised concern that the attitude of local people was not pleasant.

What would the ideal Lowestoft/Waveney look like in 2036?

Students agreed that more shops and brands were needed in Lowestoft town centre. It was agreed that more jobs are needed in the town including more retail jobs. It was suggested that Lowestoft needed improved provision of higher education, cultural and other educational provision. Students agreed there should be more greenspace provided with new developments. It was suggested that new developments should have more spacing between homes. It was suggested that a mini park and ride could benefit the town.



What do you think the main considerations are which should determine how much Lowestoft grows by over the next 20 years?

Students suggested that traffic congestion and pollutions were important factors to consider. It was suggested that the space between existing settlements should be protected. They stated that development should avoid areas at risk from coastal erosion. They generally supported further development to the south of the town and low-cost housing near to the town centre. However, they noted that development to the north of the town may not create as many traffic issues.



Appendix 4 – Brampton with Stoven Parish Council Survey

Brampton with Stoven 2036

The Results of the Survey

Have your say on the future of our villages

We **ALL** have the chance to influence future development and YOUR opinion counts - so please complete this survey and we will return to collect it between **July 1st and July 3rd 2016**.

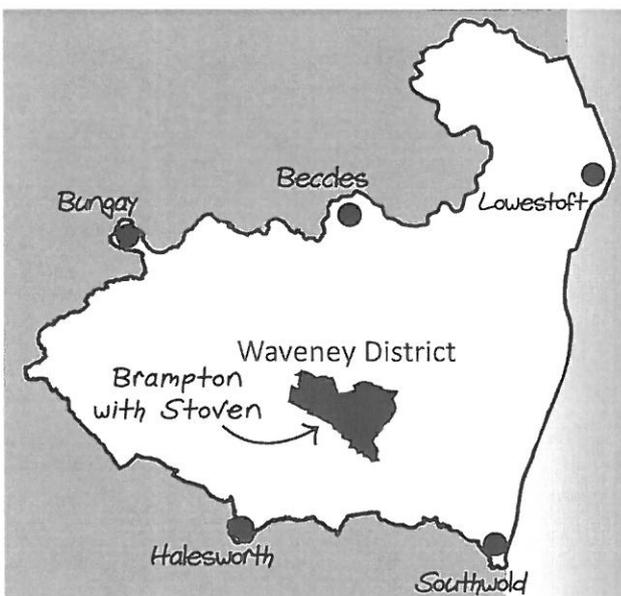
Dear Resident of Brampton and Stoven

Your Parish Council would like to know your opinions on a number of issues so that we can best improve our villages and influence local government and service providers with a unified voice.

Brampton and Stoven are great places to live with a range of businesses, a successful School, a Railway station, a Village Hall and playing field, a bowls club that is celebrating its 40th anniversary next year, and 2 churches. However over the past 30 years Brampton and Stoven has lost a number of community facilities; 2 public Houses, a doctors surgery and a post office and is struggling to retain those that remain through limited community support and funds.

Waveney District Council (WDC) over the past decades had made building in rural area very restrictive and our Parish has largely been forgotten. However WDC is currently in the consultation phase of a New Waveney Local Plan, which would involve a potential 1200 new homes being required across rural areas within the district boundaries **over the next 20 years** (out of a potential total of 9,500 new homes).

It is important that we work with WDC so that we retain influence on any potential future development and to get the best outcomes for our existing residents. This is why asking you to complete the following survey.



Did you know the total population of Brampton and Stoven fell from 453 in 2001 to 427 in 2011 (census data) and only 5 new homes were built between 2001 and 2013 (WDC data).

Also did you know that 33% of Brampton and Stoven residents are currently aged over 60 (census) and WDC projections indicate that % will increase.

Survey Questions

110 responses from 191 surveys (58%)

Part 1. About you

Please provide us with the following information about you. This will help us to understand the pattern of response

Your Postcode
How many people live in your household? Total 223. Average per household 2.14
Age(s) of each member of your household (number of people in each age group) under 16 21 17-24 13 25-40 25 41-64 80 64+ 80
How long have you lived in Brampton or Stoven? Average 21 years
If you work, do you work in Brampton or Stoven? 23 people do
If you work outside Brampton or Stoven, where do you work? (which town/village) Beccles x3, Ellough x2, Felixstowe x1, Gorleston x1, Halesworth x6, Henham x1, Leiston x1, Lowestoft x4, Norwich x1, Offshore x3, Reydon x1, Saxmundham x1, Southwold x2, Uggeshall x1, Wangford x1, Westhall x1, Yoxford x1
If you have children in your household which school(s) do they attend? Brampton x2, Bungay, Ilketshall St Lawrence x1, Reydon x1, Ringsfield x2, SJL x6
Where would you go to do a your main weekly food shop? (which town/village) Beccles x 83, Bungay x1, Great Yarmouth x1, Halesworth x7, Lowestoft x2, Pakefield x2, Wangford x1, Online x1
Where would you go to buy clothing? (which town/village) Beccles x34, Great Yarmouth x2, Halesworth x2, Ipswich x1, Lowestoft x13, Norwich x30, Online x8, Southwold x1, Wrentham x2
Where do you travel to if you need to see a doctor? (which town/village) Beccles x23, Halesworth x24, Kessingland x1, Reydon x14, Wangford x38, Wrentham x1

Part 2. A Shared Vision for Brampton and Stoven

As part of the New Waveney Local Plan, new development may happen in Brampton and Stoven. Your responses will help us manage any development in line with needs and aspirations of people who live here.

The following questions are intended to help us to understand what your priorities and aspirations are for the Parish over the next 20 years.

2.1 What do you most value about living in Brampton and Stoven. List up to three in order of importance (please keep answers short and to the point)

1.

- **A pretty village**
- **Being a semi rural location**
- **Being in the countryside**
- **Community**
- **Community centre**
- **Country views and walkways/footpaths**
- **Countryside x11**
- **Friendly community**
- **Housing for my children**
- **Isolation**
- **It is a small village**
- **Living in the countryside**
- **Local friends**
- **Lots of green space**
- **Lovely unspoilt countryside**
- **Low disturbance/crime**
- **Low population**
- **Near work**
- **Nice Area**
- **Not over populated**
- **Not yet informed opinion**
- **Our cul de sac**
- **Peace and quiet x20**
- **Proximity to towns and amenities in a rural setting**
- **Quality of life**
- **Quiet x19**
- **Rural x11**
- **Sense of community**
- **Small community**
- **Small Village**
- **The country life**
- **The country views**
- **The family benefitted from living in a safe and friendly community**
- **The green space**
- **The quiet life**
- **The ruralness**
- **Tranquillity**
- **Tranquillity**
- **Unspoilt countryside**
- **Unspoilt rural landscape**
- **Very beautiful area**
- **Very little pollution**

- Very peaceful
- Views

2.

- A local school
- a nice country area
- Access to footpaths
- An easy slow moving pace of life
- Away from busy roads
- Away from the maddening crown
- Bowls club
- children's play area
- Clean
- close enough to mains shops
- Close to sea
- Community
- Community events
- Community Spirit
- Countryside
- Countryside
- Easy rail access
- easy to park
- Fairly safe
- Fields and views around
- Friendly
- friendly
- Friendly neighbours, good community atmosphere
- Friendship
- Good access to local towns
- Good links to major cities
- Good neighbours
- green fields/country walks
- Happy
- Have tried for years to persuade the planners to allow more housing
- Ideal property
- Just lovely area
- Kind neighbours
- Lack of criminality
- less noise, light and air pollution
- Living in a small community
- Local railway
- Lots of open space
- lots of walks
- Low crime area x5
- Neighbours
- No noise
- no vandalism
- Not to build up
- open countryside
- Peace and quiet x9
- privacy
- Proximity to business
- Quality of life

- Quiet x5
- Reasonable access to shopping
- Rural
- Rural Area
- Rural Aspect
- Rural countryside
- Rural existence
- Rural location
- Rural setting
- safe area in which to live
- Sense of community
- situated between Beccles & Halesworth
- small amount of pollution
- Small village
- Surrounded by fields not houses
- That it stays small
- The countryside
- The quiet
- Tranquillity
- Unspoilt
- Upbringing by children
- Virtually crime free
- Well situated
- Wild life
- Wildlife in abundance, unspoilt

3.

- Convenient and handy for the coast and local towns
- A nice village atmosphere
- Air quality
- Approximately 7 miles from all ones needs
- Birds singing
- Children can't go on streets and mix with wrong people easily
- Close to good rail links
- close to the coast
- close to town
- Close to work
- Convenient public services and train station
- Darkness (lower light pollution)
- Doctors and hospitals have so far been very helpful
- Easy access to towns
- Easy travel by road
- feeling safe
- footpaths
- Friendly Community x4
- Friends
- Good bus service to Beccles & Southwold
- Good location
- Good location to other main villages
- Good neighbours
- Good neighbours
- Having a school and bus service
- house and garden

- Its hush
- Know most of residents
- Lack of development
- Little traffic and helpful neighbours
- Love my house
- Low crime
- Low crime, feeling of safety and security
- No dislikes
- No excessive over crowdedness
- no hassle and bussle
- No traffic
- Not living on a housing estate
- Open Space
- peace and quiet x5
- People who respect the landscape and rural life
- Proximity to rail services
- Quiet
- Quiet and peaceful
- quiet roads
- Relaxed pace of life
- safety reasons
- Slow pace of life
- Small friendly community
- Small village
- Some good walks
- Stoven Church
- The smallness of the village
- The train and bus service
- They are friendly people here, if you can meet them
- Tranquillity
- Unspoilt countryside
- Very good neighbours
- Views
- Village green
- Village life
- wildlife

2.2 What do you most dislike about living in Brampton and Stoven

- **A bit fragmented**
- **A degree of Little England attitudes**
- **Absence of shop and pub**
- **awful internet**
- **Bit isolated**
- **Busy main road**
- **cars parked in my close who don't live in it**
- **Council houses**
- **Countryside spoiled by agribusiness**
- **Difficulties when you can no longer drive**
- **Fast traffic through village**
- **Growing traffic coming through the village**
- **Having to drive everywhere**
- **Having to transport everywhere**
- **Increase in speed of traffic on A145**
- **Lack of a speed restriction at Brampton, Station Road**
- **Lack of community x3**
- **Lack of mains drainage**
- **Lack of mobile phone reception**
- **Lack of parking facilities at school to pick up children**
- **Limited public transport**
- **Low broadband speed**
- **Neighbours with noisy dogs - too many**
- **No amenities close by**
- **no dislikes x 2**
- **No drainage in roads or gulleys in verges to take away surface water**
- **No late night buses or trains from Beccles**
- **No meeting point (pub or shop)**
- **No post office x 3**
- **No shop x 8**
- **Non compliance of speed restrictions**
- **Not enough people**
- **Not yet informed opinion**
- **Nothing x 13**
- **Occasional small from chicken farm**
- **Overall appearance of the village not good**
- **People who live here and never support or join in**
- **Poor broadband speed**
- **Poor facilities**
- **Poor internet**
- **Poor transport links x 2**
- **Remote**
- **Slow broad band speed**
- **Speed and volume of traffic on Molls Lane**
- **Speed limits on Station Road too high**
- **Speeding motorists**
- **Speeding road users**
- **Speeding Traffic**
- **The crossroads at the Dog very poor visibility to the left from Station Road**
- **The disgraceful state of the flats and bungalows outside areas**
- **The Essex people moving in**

- The inadequacy of WDC planning dept over the past 10 years
- The prospect of more people and houses
- The speed limits on roads
- The state of the roads
- The way the parents park on the road at the school
- There is nothing we dislike
- Through traffic
- Too many untidy gardens
- Traffic Noise
- traffic that speeds on narrow lanes
- Very good

2.

- Absence of post office and village centre
- Barking dogs
- Bins left everywhere, uncut grass, paths deteriorating
- Bird Scarers
- Brampton Station now request only
- Bus service
- Bus services not reliable enough
- bus times needing more frequency through
- Children outside my house waiting for school bus
- Community Spirit
- Incomers with no appreciation of rural values/courtesy
- Lack of Caring
- Lack of mobile reception
- Lack of post office and village store
- Lack of regular bus service
- Lack of village shop
- Landowners not keeping verges clear
- Litter (usually from passing cars)
- Local farmers have a total disregard for residents
- No amenities, post office shop etc
- No club or pub
- No community events
- No evening entertainment
- no gas
- No good places to take the dog
- No local pub
- No local shop x 4
- no mobile signal
- No pub x 4
- No village spirit
- Oversized vehicles and lorries
- Poor broadband
- Poor bus service to nearby towns
- Poor internet speed
- Poor phone coverage
- Poor roads
- Refusing to visit our acre property to advise on building one or two houses to therefore
- Road conditions
- Self appointed committees

- Station lights kept on all night
- Stoven is forgotten about
- The latest bird scarers used on surrounding farm land constant battlefield volume
- The posts in Brampton on the roadside on people's grass
- Threat of housing development
- Vehicles speed - need a 'bend' sign
- Village roads used as a cut through from the main A12 by lorries and large vehicles creating safety issues

3.

- A rise in littering
- Broadband speed
- Bigger all transport
- Cars with loud music going by
- Closure of post office pub etc
- Dark roads (poor lighting)
- free up our present house for another family
- Having to pay for local recycling tip
- Heavy lorries still using Molls Lane
- Isolated at times (Winter)
- Lack of young people
- need more activities for children to attend
- No doctors surgery
- No policing
- No post office
- no pub
- No shop or pub
- No shop/post office
- Not a great sense of community
- Nothing for children
- People using Old School Close to turn in from the school
- Poor broadband speed and phone reception
- Poor mobile phone coverage
- Poor phone reception
- poor public transport services
- Poor transport links
- Proximity to local wind farm
- Public Transport
- Speeding through traffic
- The apathy of residents when putting on something at village hall
- The broadband
- The danger of Brampton church corner
- Traffic that use the main road not only a nuisance but also a danger to road users

2.3 If you have children or close family, would you like them to be able to live in Brampton or Stoven (now or at some point in the future)

YES 50 / 45%

2.4 How do you see Brampton and Stoven in the year 2036?

- **A few more properties, local pub and local post office and shop, good local policing**
- **A large housing estate with loud music and barking dogs**
- **A mix of age and income, a tranquil friendly lived in community**
- **A small thriving community**
- **A thriving friendly community with no large developments**
- **About the same**
- **About the same**
- **Affordable housing for young people and a doctors surgery and health centre for all ages**
- **as it is**
- **As it is now hopefully**
- **As it is, maybe more younger people able to live here still with good rail link**
- **As unchanged as possible**
- **At our age, from above!**
- **bigger village more housing and people**
- **Community centre, shop, new housing should be a good place to live**
- **Dead**
- **Dead if things don't change**
- **Difficult as we have only just moved here but already we prefer here to town life and the lovely pace of this area, and the lovely people we have met so far**
- **Dismal**
- **Don't know**
- **facilities near by, good sense of community, job opportunities here**
- **Hardly any change**
- **Hopefully a thriving community**
- **Hope it will be still a quiet village**
- **Hopefully a nice village as it is now**
- **Hopefully a redeveloped area with plenty of new life**
- **Hopefully as it is now, a small rural location**
- **Hopefully as it is, hope things stay as they are**
- **Hopefully as now**
- **Hopefully improved**
- **Hopefully largely unchanged**
- **Hopefully much the same**
- **Hopefully much the same, not too much development**
- **Hopefully not altering too much**
- **Hopefully not much different from what it is now, peaceful, low crime and no rowdy behaviour, may be a few more homes**
- **Hopefully not spoilt, people still like a rural environment**
- **Hopefully remain the same**
- **Hopefully remain the same**
- **Hopefully similar with a few more houses and lower age group**
- **Hopefully still the same**
- **Hopefully the same**

- hopefully the same as it is now, too many more properties would ruin the area
- Hopefully unchanged in this fast moving world it is vital we hang on to treasures such as we have now
- Hopefully unchanged, still a peaceful and quiet idyll, not blighted by housing development
- Hopefully with a younger population taking an interest in local affairs, this means more housing, preferably affordable
- Hopefully with limited development and more facilities
- I don't expect we will be around
- I hope the village will have expanded, a new shop, sport activities
- I shall be underground by then!
- If not same, then maybe extra housing possible
- Impossible to say, probably covered in ghastly dead estates allowed by unfit purpose planners
- Larger village more houses
- Less hedges, more houses, more rubbish dumped
- Less peaceful
- More built up with infill housing and hopefully with more community spirit
- More development, but spread out
- More housing play areas for children maybe a park for all
- More or less the same as it is now
- More people who have no connection to immediate area, unfortunately
- Much as it is now
- Much the same
- Much the same as it is
- No idea
- Not so good with the build up of traffic
- Not with more houses, not built up area, with swimming pool and venue for activities for adults and children/learning centre
- Over run with town folks but country folks
- Probably larger, dirtier, and more dominated even more by commercial interests
- Probably more built up
- Probably with more houses and people and hopefully with a shop and doctors
- Proper village centre
- Quite build up but still with no village hub
- Remaining unspoilt but with more sympathetic housing development
- Roads maintained better, verges cut more frequently, facilities for younger members of our community, youth club, pub
- Same as now
- Similar - some small housing development
- Slightly larger more community interaction
- Still a close knit small community
- Still small quiet village
- The same as it is now
- The same as it is now
- the same as it is now maybe have lost the school
- To have a better sense of community, any developments to be done sensitively allowing Brampton & Stoven to retain their rural roots and beauty with minimal impact on the existing community
- To maintain its rural heritage with new inhabitants that understand and embrace a rural way of life and to understand its importance for wildlife, flora and fauna
- Unless some regeneration takes place Brampton and Stoven could almost cease to be

- Very little change
- Very quiet with nothing to do. Nowhere for the next generation of children to go
- We would prefer it not to change we chose to move here for the way it is now, as previously mentioned, it would be nice to have a shop and a pub within walking distance
- With increasing dependence and use of the internet the practical amenities will become less and less viable therefore we will become more isolated - social cohesion is only likely way to engender community spirit

Sustainable development is a core principle of local planning. It says that development that brings benefits to a community should generally be approved. In short sustainable development is development that is good for people and their sense of community; supports the local economy; gives people the opportunity to live and work here; does not waste resources; and protects green places and wildlife.

2.5 What do you think the biggest benefits development could bring to Brampton and Stoven over the next 20 years. Please tick up to five boxes.

A community with a balance of ages and income	42	38%
Broadband Speed	32	29%
Facilities and services for young people	26	26%
Facilities and services for older people	31	31%
Investment in infrastructure	18	18%
Land for Recreation (allotments, playing field)	22	22%
Leisure Facilities	11	11%
Local jobs and businesses	21	21%
Medical and care facilities	29	29%
Mobile phone coverage	25	25%
Protection of the countryside and local assets	52	47%
Schools and Childcare	13	12%
Shops and Services	28	25%
Transport Links	33	30%
Variety of Housing	23	21%
Village identity and sense of Community	44	40%
<ul style="list-style-type: none"> • All the above very important • Cannot see any benefits development would ruin Brampton • Cannot see that development would be at all beneficial • Development normally means change, no thanks • Don't think development would benefit Stoven • I don't think development will have any benefits except that it may help keep the bus service • Leave the village alone • No benefits, leave community alone, it is a farming community and should remain • None of above, happy as things are • Overdevelopment would bring a lot of problems • post office • This suggests that Brampton and Stoven would become as big as Beccles which goes against sustainable development • We are a small village, we ant to stay this way 		

2.6 What worries you about further development in Brampton and Stoven? In other words, what outcomes of further development would you say are unsustainable?
Please tick up to five boxes.

A Weaker sense of community	24	22%
expansion targeted only at people on high incomes	35	32%
Increase in crime and anti-social behaviour	55	50%
Increased traffic	71	65%
Insufficient sports and leisure facilities	11	10%
Lack of School / Childcare places or school / childcare overcrowding	16	15%
Loss of countryside and/pr green space between settlements	59	54%
No obvious centre to Brampton or Stoven	28	25%
Overloaded sewage and drainage system	54	49%
Overstretched local amenities	19	17%
Oversubscribed medical and care facilities	34	31%
Reduction in amount of green space	52	47%
<ul style="list-style-type: none"> • All the above • Dependant on scale of development few houses will not make a difference, a large number will • I think there is room for development • I would not be in favour of any mass building in Brampton at all I understood that all new settlements would be near towns • Loss of rural views and land • Only build with new roads built for housing such Old School Close • Too many people 		

A fragmented community?

Brampton is often said to have no centre. Instead there are separate areas within it:

- 1: Area around Southwold Road & Woodside,
- 2: Area around Molls Lane & the Street,
- 3: Area around Brampton Station

2.7: Which of the following approaches do you think is in the best interest of the Village (tick one)

1. Do nothing - let the market decide and allow each area to develop as it will	20	22%
2. Actively support all areas equally to develop their potential	20	18%
3. Choose one area to be the centre of the village, and work with WDC and landowners to realise its potential as a community and leisure heart	53	48%

2.8: If you think we should make one area the main village centre, which should it be? (tick one)

1: Area around Southwold Road & Woodside,	55	50%
2: Area around Molls Lane & the Street,	15	14%
3: Area around Brampton Station	11	10%

Part 3. Housing

3.1 Thinking about sustainable development within Brampton and Stoven **over the next 20 years**, where do you think the priority in house building should be?

Please tick all that you would support:

Areas to the South of Southwold Road & opposite the school	51	46%
Areas to the east of Molls Lane and south of Station Road	24	22%
Areas to the west of Brampton Station	22	20%
Opposite Wood Cottages, Stoven	11	10%
Opposite Church Cottages, Stoven	9	8%
No Opinion / don't know	11	10%
Other (please specify) <ul style="list-style-type: none"> • Around the village hall • Between A145 and Molls Lane would begin to bring community together both sides • Common Road Stoven • do not build on protected land • Don't know enough about area yet • Leave as it is • Makes sense to be as close to rail station as possible • Non conscious for any main centre • none, leave village alone • Nowhere • on village hall • Should be no concentrated development except towns • Would rather the village stay as it is 		

3.2 Thinking about you next move, what type of house would you want to move to if were to stay in Brampton and Stoven? Please tick which would best suit your future requirements

1-2 bed house	4 / 4%	Eco-friendly	15 / 14%	Shared Ownership	1 / 1%
2-3 bed house	15 / 14%	Low cost housing (relative to local incomes)	7 / 6%	Smaller retirement housing	9 / 8%
3-4 bed house	9 / 8%	Residential Care	1 / 1%	Social Housing	2 / 2%
5+ bed house	2 / 2%	Self Build	8 / 7%	Warden-assisted retirement housing	12 / 11%
Bungalow	34 / 31%	Private rented	1 / 1%		
<p>Other (please specify)</p> <ul style="list-style-type: none"> • A tragedy that Woodside is no longer warden assisted retirement housing, which was its original intention • Do not intend moving • I am not thinking of moving unless the area I am in gets destroyed • Move elsewhere • Move to Beccles • No intention of moving • no intention of moving • No wish to move • None • Not been here long enough to know • not moving, why I bough a house here • Not planning to move • Not thinking of moving • Stay as I am • The cemetery • We are very happy where we have moved to 					

3.3 Thinking of the needs of others in Brampton and Stoven, what types of housing do you think are most needed? Please tick up to five boxes

1-2 bed house	17 / 15%	Eco-friendly	30 / 27%	Shared Ownership	8 / 7%
2-3 bed house	44 / 40%	Low cost housing (relative to local incomes)	43 / 39%	Smaller retirement housing	28 / 25%
3-4 bed house	15 / 14%	Residential Care	8 / 7%	Social Housing	17 / 15%
5+ bed house	0 / 0%	Self Build	8 / 7%	Warden-assisted retirement housing	23 / 21%
Bungalow	33 / 30%	Private rented	2 / 2%		
<p>Other (please specify)</p> <ul style="list-style-type: none"> • Any • none • None • Suitable housing for single person • We don't need anymore housing 					

3.4 In the past 15 years, 6 houses have been built or granted planning permission in the Brampton and Stoven Parish. How many houses do you think could be sustainably built **over the next 20 years** (2016-2036). Please tick one of the following options

More than 100	5	5%	Up to 100	8	9%	Up to 80	1	1%
Up to 60	13	14%	Up to 40	16	17%	Up to 20	49	53%

Median 32 houses

3.5 What size of housing developments do you think would be most appropriate to meeting the need for housing in Brampton and Stoven. Tick all that apply

Large development (more than 25 houses)	13 / 12%	Smaller Developments (fewer than 10 houses)	33 / 30%
Medium developments (10 - 25 houses)	34 / 31%	Individual homes	42 / 38%
Other (please specify) <ul style="list-style-type: none"> • Don't see the need • I am not qualified to answer, lack of knowledge re school services and policing • I do not see why there is a need to build at all • Not needed • Not needed • only conversion of existing buildings or brownfield sites 			

3.6 Additional housing may provide the Parish with the opportunity to move the playing field and build a new modern Community Hall to a new site opposite Brampton school. This would also provide a car park and additional facilities for the school and the wider community.

Would you be in favour of this opportunity should it become available?

Strongly in favour	41	37%	Moderately in favour	26	24%	Moderately against	7	6%
Strongly against	14	13%	No opinion / don't know	9	8%			

3.7 If the opportunity for a new Community Hall and playing field became available, What facilities would you like to see provided? Tick all that apply

A Kitchen	66 / 60%	Additional Meeting rooms	37 / 34%	A Post Office	58 / 53%
A Bar	47 / 43%	A Stage	37 / 34%	A Wider range of Outdoor Children's Play Equipment	46 / 42 %
Indoor Sports	42 / 38%	Cinema equipment	19 / 17%	Outdoor gym Equipment	16 / 15%
Allotments	22 / 20%	Facilities for Caravans and Camping	17 / 15%	An all weather fenced multi use sports pitch	28 / 25%

Other (please specify)

- **A car/bus park for the school, it is unsafe and an eyesore that parents churn up verges and park dangerously when the school was expanded this should have been a high priority**
- **Bowling Green**
- **Current hall unsupported and feel a new community hall would be no different**
- **Current playing field was changed to caravan park, village hall not even local children want to use, any further development waste of time and money**
- **Depends on what is proposed and is in proportion to what is ultimately achieved**
- **Instead of building new community centre build a few houses on that land which already has a community**
- **Keep it the way it is**
- **Musical nights**
- **Nature area, beacon, pre-school**
- **The one we have isn't used so why build another**
- **Very large screen tv for football and other events**
- **Village halls are not used so much these days, one good village hall between say 4 villages is more manageable and affordable**

3.8 What activities do you or would you support within the Parish?

Girls Brigade	22 / 20%	Bowls Club	21 / 19%	Bingo	21 / 19%
Quiz nights	41 / 37%	Social evenings	32 / 29%	Film nights	26 / 24%
Mother and Toddlers	17 / 15%	Over 60's Club	22 / 20%	Church activities	23 / 21%
<p>Other (please specify)</p> <ul style="list-style-type: none"> • A pub! • Ballroom dancing • Childrens sports clubs • community arts • Fitness activities, computer help, plant sales, carboot sales, open gardens • Fitness and dance classes • Fitness classes • keep fit classes • Keep fit classes • Like to see for younger generation • more exercise classes • none • None because all in Brampton • Plough Day • walking club around public footpaths in Brampton and Stoven • We meet up regularly with others in the village afternoons and evenings, good community • Why is there no BB? 					

3.9 What suggestions do you have that might help improve community involvement?

- A better village hall
- A better village hall with space for fitness classes, short mat bowls etc allotments to enable residents to meet and enjoy a shared interest
- A local pub
- A meeting room/village shop in Stoven and a Stoven notice board
- A new community hall
- Activities well advertised
- better interaction between those on higher/lower incomes in the perfect village no demarcations
- Build more up to date facilities that people want to use
- Community is too dispersed, to make any meaningful improvement
- Does it need improving, I think we're happy as we are
- Establish a yearly Summer fete
- Keep the residents informed about parish meetings and the outcome, we have no idea what is said and decided at these meetings
- Keeping the communities small
- Litter picks, community wildlife meadow
- Make sure 'what's on' is advertised in the Brampton Station area
- More community events
- Music events, entertainment 1 - 2 times a month
- Not everyone wants to be involved in the community and those that do should respect this
- People talk to one another
- Publicise more openly
- Since we've lived here many areas have been trailed but lack of community hacking have caused to fail e.g. social evenings, bingo mother and toddler
- Subsidised bar/social club similar to Kessingland
- The awareness of good visual design and aesthetics
- The lack of a centre to the community engenders no support so this is the obvious solution
- Times have changed there is no sense of community now in a modern village!
- To do this would be a fantastic improvement on the village and encourage people to move back into Brampton and bring it back to life
- To get more young people involved, and give support to the few people working so hard and making such a difference to our village
- Village hall needs to be updated to attract clubs
- Village newsletter informing residents of up and coming events and key contact individuals such as parish council members, the village should be working together there does seem to be some internal politics causing the village to pull in different directions i.e. village hall and plough day
- WDC need to be more aware of the sorts of people they house up here as it is a small community of mainly older people and we do not want trouble or anti social behaviour

Part 4. Transport and Highways

4.1 As a resident, what form of transport do you use most? please tick one

Car	97 / 88%	Bicycle	8 / 7%	Motorbike	3 / 3%
Bus	4 / 4%	Train	5 / 5%	Other (please specify) WALKING	3 / 3%

4.2 How often do you use local buses?

Daily	1 / 1%	A few times a month	7 / 6%	Hardly ever	24 / 22%
A few times a week	6 / 5%	Occasionally	13 / 12%	Never	51 / 46%

4.3 How often do you catch a train to anywhere from Brampton Station?

Daily	0	A few times a month	11 / 10%	Hardly ever	18 / 16%
A few times a week	0	Occasionally	37 / 34%	Never	34 / 31%

4.4 Hopefully you have seen the flashing speed signs outside the school and along the A145. How effective do you feel these have been in reducing speeds? and what more do you feel could be done to reduce speeding?

Brampton Station area

- Quite effective, have not thought speeding was a problem
- Reduce 60mph to 50mph increase some 40mph to 50mph
- We think they are good as a slight deterrent often motorists do not realise they are speeding, these are a reminder
- Effective, 30 mile limit is added on Station Road by Station
- Effective
- Very effective, more of them

Old School Close / Southwold Road / Woodside / London Road area

- Not very effective
- They do remind you to watch your speed more of them would be nice especially on the London Road
- Increase traffic police
- Somewhat helpful, improve visibility at Brampton Dog crossroads by taking the hedge back
- No effect whatsoever, mobile camera van needed
- Moderately help
- Somewhat effective but not totally
- Very effective, more signing
- Good idea to reduce speed
- Minor effect, needs more police intervention
- Speed signs are very effective maybe speed cameras
- Very short term effect by most motorists
- Some reduction
- Not very
- Rumble strips
- These have helped but you can never stop speeding altogether
- No improvement
- Effective in short term

- An excellent reminder of limit
- Very effective, a permanent speed camera with penalties would be considerably better
- 30mph from 1st Brampton sign, 40mph between Brampton and Shadingfield, traffic island on A145 between telephone box and village sign
- Very effective
- Haven't been here long enough to notice
- Keep the flashing lights, they work
- No opinion
- Speeding vans needed
- Flashing speed signs can hopefully deter speeding
- More effective if the parish council were allowed to put fixed penalties on offenders

Station Road / Molls Lane / The Street area

- Not much
- These signs do help, but familiarity soon reduces their effectiveness, speed bumps, road narrowing, speed cameras
- Very effective
- It has to help
- Very effective, apart from more police presence
- Not effective, introduce a 30mph speed limit
- Good idea, what about the crossing at Brampton Station
- Very effective, speed ramps
- Excellent, they certainly affect my driving
- Traffic lights at the crossroads, this would help pulling out from the village hall and Brampton Dog more safe and also for the children crossing the road
- I think they are effective and should be extended beyond the church bend to reduce accidents on the corner
- Only effective if drivers consider other road users and their speed
- Fairly effective, speed camera
- Very effective
- Very effective as a constant reminder of speed awareness
- Not very effective, needs fixed speed cameras on A145 also required ad hoc visits to side roads by police speed camera van due to excessive speeding
- Very effective, community speed checks
- Yes but everybody speeds I stick to the speed limits but I don't often travel to Beccles without a build up of cars behind me at Shadingfield
- Moderately effective
- Have not seen speed signs yet
- 40mph max on all country roads
- They seem to be fairly effective, making people aware, however, if you still get the odd idiot going over the limit. Maybe cameras would help
- The signs make you more aware of the speed you are travelling at
- Don't know, drive slower
- Very helpful reminder for those genuinely wanting to keep to the speed limit
- Speed limit signs needed in Station Road where motorists pass built up areas well in excess of 30mph
- More warning signs that show speeds
- A roundabout at Brampton Dog

Stoven

- Speed limits of 30mph
- Permanent flashing speed signs
- One at the school is a good idea but one on A145 no need it is a main road
- Speed bumps outside school road narrowing at crossroads
- Not sure outside school but cars speed through speed limit in Stoven. Mobile speed cameras, rumble strips
- Cars still speed in other parts of the road 30mph
- Effective
- Only while they are there
- Very effective
- Speed bumps on Southwold Road
- Minimal effect, more police speed checks needed
- Not noticed any effect
- Don't think they make any difference if someone wants to speed they will, regardless of a flashing light
- One needs to be placed in Stoven as regular cars go over 30mph, send police down to catch
- Speed cameras
- They seem to work well
- Very effective
- Yes, hedges cut back and maintained to increase visibility of other signs along the roads
- I think that flashing signs that tell your speed are the most effective, could these be mobile and situated at different places?
- Quite good, but usually they are temporary, traffic reverts to pre-signs speed
- Very effective
- Very effective, police presence with a speed camera, boy racers

area unknown

- Sleeping policemen i.e. humps, double white lines, narrowing roads
- Minimal effect

4.5 What is your opinion on the current state of the roads within the parish and are there any maintenance issues that need addressing?

Brampton Station area

- Not too bad considering very heavy weight of lorries
- More need for snow/ice clearance in winter
- Use tarmac instead of chippings
- Good
- Poor
- More verge cutting for safety reasons, resurfacing as slippery for horses and vehicles

Old School Close / Southwold Road / Woodside / London Road area

- Alright
- Verges are encroaching into the roads
- Poor
- Increase lay by space along Southwold Road
- Pretty good although needs are gathering pace in Old School Close
- Satisfactory
- Roads are good
- Very good
- Quite happy, other than poor maintenance of hedges/verges at junctions
- Reasonable
- State of roads is reasonable at the moment, dependant on weather
- Improvements being made, many roads in the area being repaired/resurfaced
- Unsafe akin to a cart track
- Lots of pot holes and uneven surfaces which damage vehicles
- Good
- Not too bad
- Could be improved
- There are places where attention is needed
- Above average for County
- The roads appear ok but the mess created not only during harvest should be sorted before someone dies in a RTA
- Adequate
- Ok
- The Halesworth Road can be likened to Brands Hatch at certain times!
- Roads could do with more maintenance
- Roads good, lots of work being done on the cross country roads
- Roads not too bad
- Pot holes and traffic calming by school on Southwold Road

Station Road / Molls Lane / The Street area

- Terrible, pot holes, verges, hedges not trimmed
- On the whole the roads do get patched up fairly regularly when pot holes appear
- Very poor
- Maintenance is an issue
- Potholes
- Reasonable
- Poor, but could be worse
- Very poor, edges missing, pot holes
- Average for a road network so shamefully neglected by central government
- Roads are good

- Grass verge should have been cut sooner as you could not see the water drains
- Bad potholes
- Not too bad
- Road surfaces generally good, verges need to be cut back more regularly in Summer to prevent dangerous lack of visibility
- Locally ok, potholes seem to be repaired quickly replacement road grit containers required
- Pleasantly good generally, better road surfaces than some counties
- Very poor, there are road drains in Molls Lane that have been choked up with dirt and rubbish for years and years
- Some roads, especially edges, becoming dangerous for cyclists in particular
- Too many potholes
- I can't say
- Good, hedge cutting needed in lanes
- good
- Surfaces to road, Station Road, dangerous
- Good, much better than our local Essex roads
- Reasonable for country roads, apart from the odd pot holes and flood areas on roads
- Speeding cars in the lanes and the HGV's
- OK the Dog cross roads could be better
- If there is to be new development off Southwold Road then that road needs to be widened and more parking provided.
- drainage for removal of surface water to avoid flooding. Cutting down foliage on parts of roads which endanger motorists visibility
- The crossing at Brampton is dangerous for old people and children
- poor for cyclists as edges of roads are in bad condition
- Cutting road side grass

Stoven

- Roads require maintenance, tarmacing, potholes filling
- Potholes and uneven surfaces need attention
- Roads okay road side and some trees need to be trimmed
- Lack of verge cutting, drainage Brampton Church and Stoven Arch
- Roads actually in Brampton and Stoven are ok but verges need cutting in Summer
- Pathway and street lights
- Neglected potholes
- Parking both sides of road at the school and all the posts and concrete lumps on sides of roads in Brampton, they are a danger
- Something should be done to sewer covers outside Woodend, terrible
- Fair but additional drainage needed at certain points between Stoven Church and Uggeshall
- Repairs have been undertaken recently so currently not too bad
- verges need cutting
- The are far too narrow, the verges need cutting out so two cars can actually pass each other without having to pull into a gateway
- bushes need to be cut back regular
- The level of traffic coming through Stoven as a cut through from the A12 is increasing, larger vehicles and lorries pass through at speed and where roads are almost single vehicle width in places this is an accident waiting to happen
- Verges require cutting on most of our roads and hedges, especially at the former Brampton Dog junction

- **Could be better maintained**
- **Good**
- **The potholes of course, and roadside verges are being eroded by the massive farm vehicles now used**
- **Very good, repaired fairly quickly, only issue is that the roads are closed when no one is working on them, sometimes for days at a time**
- **Reasonable**

area unknown

- **Improved drainage given proper attention**
- **Absolute disgrace, surface terrible, ineffectual patching, not gritted in winter, water retention, not cleared of snow in winter**

Potholes can be reported directly through the Suffolk Highways Website:

www.suffolk.gov.uk/roads-and-transport/roads-pavements-and-verges/potholes/report-a-pothole/

Part 5. Communication

Do you have a broadband internet connection? **Yes 87 / 79%**

if yes what speed do you currently receive (megabits/per second) **Average 10.9 megs/s**
 go to www.broadbandspeedchecker.co.uk to calculated your download speed

Do you have a mobile phone? **Yes 96 / 87%**

and how do you rate the quality of your reception

if yes, who
is your
provider

		Very good / good	fair / ok	poor / very poor	not rated
		18	17	44	17
		19%	18%	46%	18%
BT	good	1			
EE	Good	1			
EE	good	1			
EE	good	1			
EE	Good	1			
EE	good	1			
EE	good	1			
EE	pretty good	1			
EE	very good	1			
EE	very good	1			
Vodafone	excellent	1			
Vodafone	Good	1			
Vodafone	good	1			
Vodafone	Good	1			
Vodafone	good	1			
Vodafone	Have sure signal always good at home	1			
Vodafone	Quality good	1			
Vodafone	with a booster very good	1			
EE	Fair		1		
EE	ok		1		
o2	fair		1		
o2	Ok		1		
Tesco	adequate		1		
Virgin	Fair		1		

Vodafone	average	1
Vodafone	fine	1
Vodafone	Mixed	1
Vodafone	ok	1
Vodafone	reasonable	1
Vodafone	reasonable	1
Vodafone	reasonable most of the time	1
	ok	1
EE	not reliable	1
EE	poor	1
o2	non existent	1
o2	patchy	1
o2	rubbish	1
Orange	poor signal	1
Orange	variable	1
Orange	very poor reception	1
Tesco	Poor	1
Tesco	poor	1
Tesco	poor signal	1
Tesco	very poor reception	1
Virgin	hopeless	1
Vodafone	bad	1
Vodafone	non existent	1
Vodafone	not good	1
Vodafone	not very good	1
Vodafone	Not very good	1
Vodafone	patchy	1
Vodafone	poor	1
Vodafone	poor	1
Vodafone	poor	1

Vodafone	poor	1
Vodafone	poor to average	1
Vodafone	rather patchy	1
Vodafone	rubbish	1
Vodafone	rubbish	1
Vodafone	terrible	1
Vodafone	very bad	1
Vodafone	very poor	1
Vodafone	very poor	1
	not good	1
	poor	1
	poor	1
	very poor	1
<hr/>		
BT		1
EE		1
EE		1
EE		1
o2		1
Pay as you Go		1
Talk Talk		1
Vodafone		1
		1
		1
		1

Part 6. Policing

6.1 What is your opinion on policing within the parish?

Responses in age order. So responses from household with 65+ age group at top of each list

Brampton Station area

- Not too bad
- Apart from a couple of cars have never seen a policeman so really cannot comment
- No experience of it
- Never see one

Old School Close / Southwold Road / Woodside / London Road area

- Know nothing about it
- Seldom see a patrolling officer
- Other than the occasional speed check mainly in the Shadingfield area and the odd police car flashing along the main road I don't recall in the 8 years of living in Brampton ever seeing a policeman in the area
- No particular concerns, however, it seems strange that our local police are Halesworth rather than Beccles
- Regular police cars checking our area in Woodside
- What policing, cuts have made the sight of a policeman in Brampton a rare sight
- Fairly good
- Very good when needed
- Adequate
- Not aware of any
- Seems adequate
- There is not much of a police presence
- Could be better
- As far as we are aware good
- Fair
- Fair
- Good by modern standards
- Poor
- Very often a police presence
- Sufficient to meet the current needs of the current community
- A few months ago police were often seen in the village but recently we have seen none, a sign of the times
- No visible policing done
- Is there any?
- Poor, poor value for money
- I've never seen a policeman in Brampton
- OK
- Non existent, what policing?
- Very rare do you see police
- Good

Station Road / Molls Lane / The Street area

- Don't see very much policing in this area, unless a crime is committed
- Not aware that we have any policing
- What policing
- I have seen 3 police cars in the village in 15 months, given current government cut backs will it improve?
- Not aware of any policing
- Ok but could do with more speed traps
- Generally adequate, horse patrol a bonus
- Very good
- Good
- It seems non existent
- Not noticeable
- Ok but could do with more speed traps
- I haven't seen a policeman or car in this area for years, not that I've needed one, no idea what crime level is here, assure w are fairly safe!
- Invisible, ideally a local bobby is as beneficial as a good doctor, enhancing a sense of community
- Unable to give an opinion
- Poor, various outbuilding break-ins and barn break-ins with no outcome, would like a community officer whom everyone had a contact number for
- I have only ever seen police on four occasions at most
- Can't remember seeing any
- Don't know about it so no opinion
- Too much
- Not as good as it could be
- In the time that we have lived here we have not noticed any police presence, we haven't needed to call the police either
- Non existent, have not seen a policeman in the area for a very long time
- Never seen a policeman in the village
- I have never seen any
- Police visibility non existent, good service received when reported attempted break in
- A more visible policing required
- Non existent
- Not sufficient
- Negligible. There have been break-ins in peoples outhouses recently. 101 lines are always engaged.
- Ok at times

Stoven

- Adequate for crime levels at present
- Not very good
- Adequate, but would like to see more speed checks
- Never see any
- Not sure
- I saw a police car today, the first this year, and I should I say that when we had a break in a few years ago they were excellent
- Not very good
- What policing?
- What policing!
- Friendly and helpful
- There is none
- Rarely seen, no recognised local bobbie
- Next to nothing, no presence seen in area
- Never see them
- What policing, have not seen a police person in the village in years
- Good
- Non existent

area unknown

- No opinion
- There is none, never seen a policeman!
- Non existent

- **Part 7. Parish Council Engagement**

7.1 If the Parish Council was to invest in a parish website. Would you use the website?

Yes 60 / 55%	No 32 / 29%
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7.2 what information would you like it to provide?

Parish news	62 / 56%	Details of Parish events	65 / 59%	Council Minutes	49 / 45%
Other (please specify)					
<ul style="list-style-type: none"> • All local events and services/small ads • As the majority of the inhabitants work outside the village or are retired it is important to create a village community with events and fund raisers, such as Tractor Run, Plough Day and the firework display • Events and activities for the children • Notification of imposed county council and national government restrictions, influences • Parish History, old photo's, maps, list of businesses and service with contact links • We have to remember that Brampton is a very quiet and peaceful place to live and try to not destroy that with large developments, it is a village, not a town 					

Part 8. Any other comments?

Brampton Station area

- A few affordable houses would be a positive outcome but not too many that would spoil the look and atmosphere of the village
- Whatever the development, large, medium or small make it so that people with discerning taste will say I would like to live there! Do not ribbon build to avoid the inevitable bypass us now posters, just et on with it!
- I am very interested in this, much of this I have been advocating for 40 years. I am now too old to do anything about it
- We appreciate all the hard work that has gone into the village hall although unfortunately we have not been able to actively involved

Old School Close / Southwold Road / Woodside / London Road area

- A bus service from the village centre to the train station would be good, and timed to meet train arr/dept. I walk which takes 40 minutes
- Feel that all the small villages and hamlets around Beccles should and could have more houses built in them to help sustain the village
- The only part of Brampton we like is our close and the people in it. Film nights at village hall very dated idea, Brampton Church is in a very dangerous position and crossing over it is an accident waiting to happen, it needs a car park like Shadingfield
- This area is a haven for retirees
- Keep the Tractor Run and Plough Day
- More effort needed to form a community new people coming to village perhaps from towns and need including in the way the village is trying to involve all
- We moved here from Hertfordshire in 2000 and expected this area to remain rural
- This is an interesting and thorough survey will we have the result of the analysis and if so when?

Station Road / Molls Lane / The Street area

- 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. Complete lack of infrastructure, no mains gas, public sewers are inadequate for additional housing, loss of high quality agricultural land, the Government has communicated through various types of media that agricultural land is essential for food production
- Would be good if traffic coming from Westhall could find another route as there is too much traffic coming through The Street and Molls Lane
- Good fun, a thought provoking survey that raises more questions than answers, but a useful exercise for all that
- I would like to be able to receive DAB, what about making the Parish Council meeting a part social event to encourage more people to attend? A bar, speaker, demonstration!
- After the exit from EU the country does not know how much money can be allocated for changes of any sort to counties and parishes. We need to curb spending on unnecessary things, i.e. village hall and housing.
- We have been here for a few weeks, too short to express many opinions, sorry
- Why does it take so long to replace the parish vicar? Absolutely absurd

Stoven

- I love living in Stoven, but belong to all the Uggeshall clubs because they have a sense of community which is completely lacking in Stoven. I feel the Sheaf only gives details of Brampton and we are completely forgotten, we could be great if we had a village heart
- We understand development is needed but really do not feel Stoven is the correct area. We want to keep the views and agriculture in the area. Brampton would be better suited as they have the railway and village hall, better access to public transport for work and schools
- Brampton and Stoven is very fragmented due to the houses being scattered about. There is a lack of community and apathy to any attempt to put something on at village hall
- Keep village small it is not a town, a few new houses, but only a few
- Larger car park at station to encourage more train use
- Moved to Brampton for what it is now, do not change
- No need for more housing

area unknown

- As far as can be seen, proposed development plan would only generate a cash windfall for a few land owners. Village expansion will not have significant gains for those who bought houses here to enjoy the village as it is. For years, Council opinion was to concentrate on town expansion, many have had restrictions placed on what can and cannot be done. Infrastructure will not support large scale development
- Better bus service wanted, stop on demand

Thank you for your help

Please put your completed survey in the envelope provided and we will return to collect it at some point between **Friday July 1st and Sunday July 3rd, 2016**

further details about the New Waveney Local Plan can be found at www.waveney.gov.uk/newlocalplan

17th July 2016