

Consultation Statement for the Waveney Local Plan

How we took into account
comments from previous
consultations in writing the
Final Draft Local Plan

To accompany the Waveney Final Draft Local Plan document

March 2018



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1. Introduction

This document provides an analysis of the consultations which took place during Spring 2016 known as the 'Options for the new Waveney Local Plan' and the 'First Draft Local Plan' consultation during Summer 2017. These documents were published in line with Regulation 18 of the Town and County Planning (Local Planning) Regulations 2012. This document explains how the Council has taken the responses to these consultations into account when preparing the Final Draft Local Plan. This document fulfils the requirements under Regulations 17 and 19 of the Town and County Planning (Local Planning) Regulations 2012 for the publication of a statement to this effect.

The consultation on the '**Options for the new Waveney Local Plan**' 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.

An eight week consultation took place between 22 April and 17 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.

The '**First Draft Local Plan**' consultation 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.

An 8 week consultation took place between 28 July and 22 June 2017. In total 683 individuals and organisations responded to the consultation. Between them they made 1,947 comments. 1,713 of these comments were made on First Draft Local Plan consultation document. The other 234 comments were made on the alternative sites considered which were also part of the consultation.

Full copies of the responses can be viewed by question/site/policy or by respondent at www.eastsuffolk.gov.uk/newwaveneylocalplan.

This document sets out who was consulted and how they were consulted at each stage. It summarises the responses and details how the Council took those comments into account when formulating the strategy, policies and proposals in the Local Plan. The document also summarises the comments made on potential site options together with summaries of the site assessments undertaken by the Council which have helped inform which sites to include in the Local Plan.

2. Who we Consulted

Who was consulted

Options for the new Waveney Local Plan and the First Draft Local Plan consultations

Specific consultation bodies

The Coal Authority
 Environment Agency
 Historic England
 Marine Management Organisation
 Natural England
 Network Rail
 Highways Agency
 Norfolk County Council
 Suffolk County Council
 Parish and Town Councils within and adjoining the Waveney District
 Suffolk Constabulary and Norfolk Constabulary
 Adjoining local planning authorities - The Broads Authority, Mid Suffolk District Council, Suffolk Coastal District Council, South Norfolk District Council, Great Yarmouth Borough Council
 NHS England and HealthEast (NHS Great Yarmouth and Waveney Clinical Commissioning Group)
 Anglian Water
 Essex and Suffolk Water
 Homes and Communities Agency
 Electronic communication companies who own or control apparatus in the Waveney District
 Relevant gas and electricity companies

General consultation bodies

Voluntary bodies some or all of whose activities benefit any part of the District
 Bodies which represent the interests of different racial, ethnic or national groups in the District
 Bodies which represent the interests of different religious groups in the District
 Bodies which represent the interests of disabled persons in the District
 Bodies which represent the interests of persons carrying on business in the District

Examples include:

Abeillo Greater Anglia Ltd
 Active Waveney Sports Partnership
 Associated British Ports
 Beccles Society
 Bungay Society
 Community Action Suffolk
 DIAL Lowestoft and Waveney

Fields in Trust

Halesworth and Blyth Valley Partnership

Home Builders Federation

Lowestoft and Waveney Chamber of Commerce

Lowestoft Civic Society

Kirkely Business Association

Southwold and Reydon Society

Sport England

Suffolk Fire and Rescue Service

Suffolk Preservation Society

Suffolk Wildlife Trust

Sustrans

Theatres Trust

The Woodland Trust

Other individuals and organisations

Includes individuals, local organisations and groups, planning agents, developers and others on the Local Plan mailing list.

3. How they were consulted

Public exhibitions

Options for the new Waveney Local Plan (2016)

Location	Date/time
Beccles - Public Hall	Wednesday 4 May 5-7.30pm
Lowestoft - shop unit, Britten Centre	Saturday 7 May 9am-5pm
Reydon - Village Hall	Tuesday 10 May 5.30-7.30pm
Halesworth - Library	Wednesday 11 May 10am-12.30pm
Lowestoft - Riverside	Thursday 12 May 6pm-7.30pm
Halesworth - Rifle Hall	Tuesday 17 May 5.30-7.30pm
Bungay - Fisher Theatre (The Gallery)	Wednesday 18 May 5.30-7.30pm

First Draft Local Plan (2017)

Location	Date/time
Beccles - Public Hall	Tuesday 8 August 5.30-7.30pm
Halesworth - Rifle Hall	Thursday 10 August 5.30-7.30pm
Bungay - Fisher Theatre (The Gallery)	Tuesday 15 August 5.30-7.30pm
Lowestoft - Riverside	Wednesday 16 August 6pm-8pm
Reydon - Village Hall	Monday 21 August 5.30-7.30pm
Lowestoft - Library	Saturday 2 September 9.30am-1pm
Beccles - Library	Tuesday 5 September 9.30am-12.30pm

An exhibition board was placed in local libraries on rotation during the consultation. The board included an A1 poster advertising the Local Plan consultation (targeted to the locality), and magazine holders contained copies of the tabloid leaflet and inspection copies of the Local Plan.

Town centres street leafleting

Options for the new Waveney Local Plan (2016)

Planning Officers handed out flyers to the public, shops, cafes, businesses etc.

Location	Date/time
Beccles town centre	Friday 29 April 10am-12.30pm
Lowestoft town centre	Saturday 7 May 10am onwards

Halesworth town centre	Wednesday 11 May 10am-12.30pm
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Presentations, meetings and workshops

Events organised by the Council or to which Planning Policy Officers attended upon request.

Options for the new Waveney Local Plan (2016)

Audience	Date/time
Waveney Town and Parish Councils	Thursday 5 May 6pm (Riverside)
Waveney Developer Forum	Thursday 12 May 6pm (Riverside)
Clinical Commissioning Group Infrastructure Meeting	Wednesday 18 May 1pm (Beccles House)
Oulton Parish Council Meeting	Tuesday 31 May 6.30pm (Oulton Community Centre)
Lowestoft and Waveney Chamber of Commerce Board	Monday 6 June 2pm (Waveney Chambers)
Sir John Leman High School	Wednesday 8 June 3.15pm (Sir John Leman HS)
Southwold Town Council and Reydon Parish Council (joint meeting)	Thursday 9 June 7pm (Reydon Village Hall)
Lowestoft Sixth Form College	Wednesday 29 June 8.30am (LSFC)

First Draft Local Plan (2017)

Audience	Date/time
Waveney Town and Parish Councils	Thursday 27 July 5.30pm (Riverside)
Waveney Developer Forum	Wednesday 30 August 8.30am (Riverside)
Parish Council 1-2-1s:*	
- Brampton with Stoven	Monday 7 August 1.30pm (Riverside)
- Carlton Colville	Wednesday 9 August 10am (Riverside)
- Reydon	Friday 18 August 11am (Riverside)
- Ringsfield and Weston	Tuesday 22 August 6pm (Riverside)
- Southwold	Friday 8 September 3pm (Riverside)
- Worlingham	Wednesday 20 September 5pm (Riverside)
Beccles Town Council Meeting	Tuesday 29 August 7pm (Beccles)
Lowestoft Town Council (Planning Committee)	Friday 18 August 2pm (Riverside)
Oulton Broad Parish Council Meeting	Friday 4 September 2pm (Oulton Broad)
Halesworth Town Council (Halesworth Forum)	Thursday 14 September 7pm (Halesworth)

* all town and parish councils were offered the opportunity to attend a 1-2-1 session with planning officers to discuss the Local Plan.

Media and publicity

Options for the new Waveney Local Plan (2016)

- Media briefing held at the Council's Riverside office, Tuesday 19 April.
- Council press release "Views sought on future plans for district" issued Friday 22 April.
- Council press release "We need more views from Lowestoft" issued Tuesday 24 May.

Media	Details
22 April	
Lowestoft Journal	"House building rate to double" front page, full story on pages 6-7
Eastern Daily Press	"Have your say on new homes" page 24
29 April	
Beccles & Bungay Journal	"Have your say at exhibitions on our area's future growth" pages 10-11
7 May	
Beach Radio	News item promoting (today's) public exhibition in Lowestoft town centre
20 May	
Beccles Independent	Paid for advert "How many new homes should be built in Beccles and Worlingham over the next 20 years?" page 11
Bungay & Harleston Community News	Paid for advert "How many new homes should be built in Bungay over the next 20 years?" page 11
Lowestoft Journal	Notice of Oulton Parish meeting on 13 June to discuss the new Waveney Local Plan at which Council officers will be in attendance, page 53
Twitter feed (Access Community Trust)	@accessEmma Want to know more about the @waveneydc new local plan? Visit @LowestoftRising community noticeboard @samscafeeast (re-tweeted by @SBakerCX)
24 May	
Twitter feed (Beach Radio)	#BeachNews Where should 4,000 homes be built in Lowestoft? Should the A12 & A146 be linked?
26 May	
Lowestoft Journal (The Journal online)	"Where will new homes go in Waveney?"
27 May	
Waveney Advertiser	Paid for advert "How many new homes and where?" page 37
Lowestoft Journal	"Call for more people to have say on area's future

	housing growth”, page 20 and editorial comment, page 30
3 June	
Halesworth & Southwold Community News	Paid for advert “How many new homes should be built in Halesworth, Southwold and Reydon over the next 20 years?” page 3
April-May	
Streetlife	Various threads throughout the consultation period
April	
In Touch (Residents magazine published by Waveney District Council and distributed to all households in the district)	“What should Waveney be like in 2036?” page 13

During the consultation period, a number of town and parish councils included information about the new Local Plan/Options consultation on their websites e.g. Carlton Colville Town Council, Southwold Town Council, Ashby, Herringfleet and Somerleyton Parish Council, Wissett Parish Council and Wrentham Parish Council.

First Draft Local Plan (2017)

- Media briefing held at the Council’s Riverside office, Monday 17 July.
- Council press release “Views sought on future development in Waveney” issued Friday 28 July.

Media	Details
28 July	
Lowestoft Journal	“Help shape the future of our towns and villages” pages 2-3
Beccles and Bungay Journal	“Help shape the town’s future” front page and full report pages 2-3
4 August	
Waveney Advertiser	“Waveney plan: your first draft” front cover signposting enclosed 12-page leaflet “Future of our towns, villages and countryside”
11 August	
Beccles and Bungay Journal	“Residents respond to Waveney development plan at first public exhibition in Beccles” page 4
18 August	
Beccles and Bungay Journal	“Councillors form group with residents aiming to share their town’s future” [Halesworth] page 20; “Waveney Plan could spell death of village, parish council claims” [Worlingham] page 22;

Beccles and Bungay Journal online	“Infrastructure will not cope” and “Major urges residents to shape the town’s future” page 35, letters “Waveney Plan could spell death of village, parish council claims” [Worlingham]
23 August	
Lowestoft Journal online	“People react in Lowestoft to Local Plan set to shape future of the town”
25 August	
Lowestoft Journal	“Town reacts to first draft on council’s Local Plan” page 6
29 August	
Beccles and Bungay Journal online	“Meeting called for Beccles and Worlingham residents following concerns over housing plans”
8 September	
Beccles and Bungay Journal	“We don’t want these homes” and “Why won’t they listen to us?” page 21, letters
11 September	
Facebook, area based (paid for) advertising Lowestoft area: minimum reach 4,600 maximum reach 12,000 Beccles area : minimum reach 4,400 maximum reach 12,000 Bungay area: minimum reach 4,200 maximum reach 11,000 Halesworth area: minimum reach 4,200 maximum reach 11,000 Southwold area: minimum reach 4,600 maximum reach 12,000	Lowestoft: Draft plans for Lowestoft include approximately 5,000 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. Beccles: Draft plans for Beccles and Worlingham include approximately 1,500 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. Bungay: Draft plans for Bungay include over 500 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. Halesworth: Draft plans for Halesworth and Holton include over 700 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. Southwold: Draft plans for Southwold and Reydon include over 300 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say.
15 September	
Beccles and Bungay Journal	“Final chance to have say on Waveney’s future” page 12; “We must fight development” page 29, letters
22 September	

Lowestoft Journal Beccles and Bungay Journal	"Plans piecemeal proposals only" page 46, letters "Houses yes, but not this many" page 31, letters
During consultation period	
Various twitter feeds regarding the Local Plan consultation and as a reminder about the exhibitions	
July	
In Touch (Residents magazine published by Waveney District Council and distributed to all households in the district)	"Local Plan for jobs, growth and a bright future" page 3

During the consultation period, a number of town and parish councils included information about the First Draft consultation on their websites/social media and parish noticeboards e.g. Ashby, Somerleyton and Herringfleet Parish Council, Brampton with Stoven Parish Council, Carlton Colville Town Council, Halesworth Town Council, Lound Parish Council, Oulton Parish Council, Rumburgh Parish Council, Worlingham Parish Council and Wrentham Parish Council.

Consultation and publicity materials

Options for the new Waveney Local Plan (2016)

Materials	Details
Options document "Help plan our future, options for the new Waveney Local Plan"	PDF version on website Consultation portal version on website Hardcopies provided to Town and Parish Councils Copies available at Council offices, libraries, exhibitions
Key Questions leaflet "Help plan our future, options for the new Waveney Local Plan"	Copies available at Council offices, libraries, exhibitions
Comments Form	Available as part of the exhibitions
Consultation poster included exhibition details	Hardcopies provided to Council offices, libraries Town and Parish Councils, GP surgeries/health centres, dental surgeries, post offices, schools/educational establishments, large employers, main supermarkets, youth clubs, sports centres
Sites consultation poster "What will Waveney look like in 2036?"	Hardcopies provided to Town and Parish Councils specifically identifying sites within their area included within the Options document
A6 Flyer "What will the Waveney District look like in 2036?"	Distributed to the public, shops, cafes, businesses in Beccles, Halesworth and Lowestoft town centres

Consultation letters newsletter format for email contacts, letter format for postal contacts	Sent to those on the Local Plan mailing list comprising specific consultation bodies, general consultation bodies, other organisations and individuals
Paid for adverts in local press	Waveney Advertiser Beccles Independent Bungay & Harleston Community News Halesworth & Southwold Community News
WDC twitter feeds	Various news feeds throughout the consultation
Marina Customer Service Centre TV screen	Presentation publicising the Options consultation

First Draft Local Plan (2017)

Materials	Details
Waveney Local Plan, First Draft Plan and Appendices Policies Map	PDF version on website Consultation portal version on website Copy provided to Town and Parish Councils Inspection copies available at Marina Customer Service Centre, libraries, exhibitions
“Future of our towns, villages and countryside” 12-page tabloid leaflet 43,000 print run	40,500 inserted at press and distributed with the Waveney Advertiser 4 August (delivered free to households in [part] Waveney) 2,500 copies provided to Town and Parish Councils, libraries, exhibitions etc Digital edition was placed on the Lowestoft Journal website for two weeks (minimum)
Comments Form	Available at the exhibitions
Site notices	Site notices placed on boundary/vicinity of each preferred site Copy provided to town/parish council as relevant to their area
Story map summary	Interactive summary of the Local Plan on website
Consultation poster “Have your say on future plans for the area” included exhibition details	Copies provided to Town/Parish Councils and Marina Customer Service Centre, libraries, GP surgeries/health centres, dental surgeries, post offices, large employers, youth clubs, sports centres
Sites consultation poster “What will Waveney look like in 2036?”	Hardcopies provided to Town and Parish Councils specifically identifying sites within their area included within the Options document
Consultation letters newsletter format for email contacts, letter format for postal contacts	Sent to those on the Local Plan mailing list comprising specific consultation bodies, general consultation bodies, other organisations and

letter sent at consultation start and reminder (email only) sent mid-consultation reminder	individuals and landowners/agents of preferred sites and those sites not being taken forward
Paid for Facebook advertising	5 adverts targeted to different parts of the district as detailed above (media and publicity)
WDC twitter feeds	Various news feeds throughout the consultation including reminder about public exhibitions
Marina Customer Service Centre TV screen	Presentation publicising the First Draft consultation

4. How we took comments into account from the Options for the new Waveney Local Plan (2016) Consultation

This section of the document explains how the Council took into account comments raised during the Options for the new Waveney Local Plan (2016) Consultation when writing the First Draft Local Plan consultation (2017)

Analysis of Responses to Questions on Strategy Options and Policy Topics

The 'Options for the new Waveney Local Plan' consultation asked a total of 101 questions on different planning policy topics to help inform the preparation of the Local Plan. The response to these questions are summarised below, together with a summary of how the Council has taken those responses into consideration in the preparation of the First Draft Local Plan.

Key Issues

2 respondents

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.

How these comments have been taken into account in the First Draft Local Plan

The Council disagrees that the term 'issue' implies a negative, they are specific matters local to Waveney which the plan needs to take into account of.

A key issue relating to water stress has been added into the First Draft Local Plan.

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) 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) 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

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.

For question1 Carlton Colville Town Council mentioned the semi-rural aspect.

For question 2 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.

For question 1, Frostenden, Uggeshall & South Cove Parish Council noted the lovely countryside.

For question 2, Frostenden, Uggeshall & South Cove Parish Council noted house price inflation and lack of facilities locally in the Parish. Frostenden, Uggeshall & 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.

For question 1, Ilketshall St Margaret Parish Meeting noted the low crime levels, natural environment and local facilities in Bungay. For question 2, 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. 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 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. 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.

For question 1, Lound Parish Council noted that residents agreed that it was a peaceful and friendly place to live with good community spirit. Lound Parish Council noted the lack of shops, and poor public transport provision in the village. 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 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.

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.

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 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.

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

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 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.

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.

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 these comments have been taken into account in the First Draft Local Plan

The vision for the District and for individual settlements within the First Draft Local Plan has taken into account the comments above on the existing good and bad points about the District and the different visions for the future.

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.

How these comments have been taken into account in the First Draft Local Plan

In light of the above comments, the Council commissioned Peter Brett Associates to produce a Strategic Housing Market Assessment to provide an updated and robust view on what the objectively assessed need should be. This work involved considering a number of different forecasts on jobs growth. The study confirmed that Waveney can be considered as its own Housing Market Area and that the objectively assessed need for housing was 375 homes per annum, taking into account demographic trends and a market signals uplift.

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.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Plan makes a slight over-allocation in terms of housing and employment land growth. This is in order to take into account the high need for affordable housing and to provide some flexibility in case some sites do not come forward as planned.

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.

How these comments have been taken into account in the First Draft Local Plan

The projections from the Retail and Leisure Needs Assessment have been used to inform the targets in the First Draft Local Plan. No evidence has been presented to suggest these figures are not robust. It is considered that the population growth models used in that assessment are broadly consistent with population projections from the Strategic Housing Market Assessment.

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) Q08 Are there any other approaches to distributing development across the District that we should consider? (45 respondents) 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 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.

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

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. 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.

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. Ilketshall St Margaret Parish Meeting stated that development should be spread across the market towns but not the rural areas. Ilketshall St Margaret Parish Meeting stated that a new settlement could be located between Lowestoft and Beccles.

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.

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

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. 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.

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. 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. 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.

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 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.

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 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

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. 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.

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

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. 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. 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.

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. 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.

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.

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.

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

How these comments have been taken into account in the First Draft Local Plan

Considering the above comments, together with the findings of the Sustainability Appraisal the Council considers that the most appropriate distribution of growth is a variation of Option 3 which would see slightly more growth allocated to Bungay and slightly less to Southwold and Reydon. The Council considers that this option presents the greatest likelihood of objectively assessed needs being met in the most sustainable way. Out of all the options, Option 3 seemed to be favoured by most respondents.

Policy WLP1.1 of the First Draft Plan therefore presents a distribution strategy which resembles Option 3 of the consultation. The only difference is that 6% of growth is allocated to Bungay rather than Southwold and Reydon.

It is considered that Beccles and Worlingham as the second largest built up area within Waveney should accommodate more than 10% of growth. The town is a sustainable location for further growth and accommodating 15% of the District's growth will allow the area to expand at similar rate to that of the last 20 years and enable the delivery of new and improved infrastructure. It is also considered that 25% of growth to Beccles and Worlingham as suggested by some consultees would be too high. This level of growth would still be challenging for the market to accommodate and there would be a greater risk the objectively assessed needs for housing may not be met under this option. Furthermore, it would reduce the potential for growth in other towns and the rural areas which could also benefit from appropriate levels of growth to support local services and facilities.

It is not considered that Option 1 of putting higher levels of development to Lowestoft would be appropriate as it is questionable whether the local housing market could support such high levels of growth in the town. The effect of the option would result in most greenfield sites to the north and south of the town being developed. Some of these would likely either be in a sensitive landscape or on high grade agricultural land. As greenfield land is normally a more attractive option for developers, there could be less interest from developers in the brownfield regeneration sites currently permitted in the central areas of Lowestoft. Focussing growth in Lowestoft at the expense of other towns would do less to support town centres in the market towns and significant levels of development in Lowestoft would result in further elongation of the town with most new development taking place some distance from the town centre.

Whilst the First Draft Plan does promote a new Garden Village to the North of Lowestoft it is considered that due to its proximity to Lowestoft this is more part of accommodating growth in Lowestoft. Furthermore, it is considered unlikely that a new settlement could accommodate 2,000 new homes within the plan period as suggested by Option 4.

Q10 Which option for the distribution of new retail development presented do you think is the best? (57 respondents) Q11 Are there any other approaches to distributing development across the district that we should consider? (16 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. 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 Council favoured option 2 for retail and leisure distribution. Ilketshall St. Margaret Parish Meeting did not think there was another approach to distributing development.

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

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.

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.

How these comments have been taken into account in the First Draft Local Plan

Considering the comments above and the Sustainability Appraisal, the First Draft Local Plan seeks to distribute retail and leisure growth in a similar manner to Option 2 from the consultation.

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Plan identifies a site at Peto Square (Policy WLP2.3) and the Battery Green Car Park (Policy WLP2.7) for town centre use development. No other sites were found to be suitable or available for this type of development. The First Draft Local Plan also includes provision for retail development on large residential sites allocate in Lowestoft and south of Beccles (Policies WLP2.4, 2.12, 2.15 and 3.1)

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP7.1 categorises villages and the level of development based on scale and service provision. It was not possible to categorise villages based on their level of housing need and aspirations for growth as there was insufficient local evidence on this.

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.

How these comments have been taken into account in the First Draft Local Plan

The services suggested above were used to help define Larger and smaller villages in Policy WLP7.1 of the First Draft Local Plan.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP7.1 of the First Draft Local Plan allows for development within all rural villages but promotes more development in larger villages with better service provision.

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 be suffice during the next plan.

Concerns were raised about development in the Beccles area.

How these comments have been taken into account in the First Draft Local Plan

These comments have been taken into account when considering sites in each village. There was not enough consensus for these comments to inform the overall rural settlement strategy outline in Policy WLP7.1

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) 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) Q18 If we remove physical limits, what criteria should be put in place to address the issues discussed above? (12 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. The Greater Norwich Local Plan Team stated that limits should be drawn allowing for limited potential for small-scale developments.

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

Ilketshall St Margaret Parish Meeting and North Cove Parish Council stated that physical limits should be retained. Ilketshall St Margaret Parish Meeting commented that the limits should remain as they are. Ilketshall St Margaret Parish Meeting stated that the countryside and natural resources should not be adversely affected.

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. 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“*

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.

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 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. 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 retained, especially around settlements in the AONB.

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

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. 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.

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.

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."*

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 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. 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.

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.

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.

Most members of public 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.

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.

How these comments have been taken into account in the First Draft Local Plan

The comments received with respect to settlement boundaries indicates strong support for their retention as an effective tool of managing development and provides useful clarity as to where development is appropriate. Therefore, Policy WLP1.3 of the First Draft Local Plan retains Settlement Boundaries around the towns and larger villages. It also introduces them around smaller villages. Settlement Boundaries have been defined around the built-up area. Due to the nature of built up area and physical features on the ground, in some cases this results in quite a tight drawn boundary with limited scope for development and in other cases does allow for opportunities for small scale development.

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.

Ilkeshall 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.

How these comments have been taken into account in the First Draft Local Plan

There was a mixed response to this issue. Policy WLP1.4 states that the Community Infrastructure Levy and any replacement to it will continue to be used as the main source of funding for the provision of infrastructure off-site. The Policy and the supporting text makes clear that the levy may need to be reviewed for larger sites where a more bespoke approach to contributions which can effectively deliver infrastructure on-site may be more appropriate.

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 national 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.

How these comments have been taken into account in the First Draft Local Plan

Most comments support the increase in provision of cycle paths and improvements to existing ones. The provision of green infrastructure was also encouraged. Policy WLP8.21 addresses these themes and requires developers to specifically consider the Waveney Cycle Strategy. Policy WLP8.32 on Biodiversity encourages the consideration of the Waveney Green Infrastructure Strategy.

It is not possible for the Local Plan to set prices of bus tickets or set speed limits as suggested by some consultees.

The First Draft Local Plan acknowledges that tourism uses may need to be located in areas only served by the private car. Policy WLP8.15 allows for small scale tourist accommodation in remote areas.

Sites allocated in the Local Plan all have good walking and cycling access to at least some services and facilities.

Q21 What infrastructure is required in your area? (66 respondents) Q22 What infrastructure do you think would be needed to support the growth scenarios? (57 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.

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 NHSGY&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 NHSGY&WCCG and NHS England.

The NHSGY&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 NHSGY&WCCG would welcome future details of the Local Plan so that they can respond. NHSGY&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

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. 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.

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.

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

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. North Cove Parish Council commented the Third Crossing, doctors, dentists, teachers and tourists 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. 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 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. 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 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. St James South Elmham Parish Council commented that it is unlikely additional infrastructure would be needed to support the options for growth.

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.

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. 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. 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 & 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.

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.

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

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.

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

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.

General comments about what infrastructure is needed to support future growth:

- 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.

How these comments have been taken into account in the First Draft Local Plan

Requirements for all types of infrastructure associated with planned growth have been assessed in the First Draft Local Plan Infrastructure Study (2017). The specific infrastructure required in each settlement is also identified within the Local Plan in the strategy sections for each town.

The Waveney Water Cycle Study (2017) assesses the capacity of wastewater treatment /recycling works/centres and the sewerage network. Policy WLP1.4 states that developers should ensure there is capacity in the water recycling centre and the wastewater network. Where improvements to wastewater infrastructure are required, these have been highlighted in the strategy sections for each town.

Policy WLP2.15 allocates land for a strategic residential development of 800 homes. This allocation includes land for flood mitigation as noted by the Environment Agency. This will also help address the concerns raised by Carlton Colville Town Council. The site also provides land for a community centre which could benefit young adults and provides significant amounts of open space for different types of users.

Policy WLP3.1 allocates land for a Garden Suburb of 1250 new homes south of Beccles and Worlingham. As part of this a new school, open space and sports facilities, retail facilities, a community centre will be provided. Additionally a cycle link to the Ellough Industrial estate will be provided.

Policy WLP4.1 allocates land for a mixed use development and will facilitate the provision of new health facilities in Halesworth as well as new sports facilities.

Housing development proposed in Somerleyton will help fund a new village hall.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP1.4 of the First Draft Local Plan states that the Council will work with partners to ensure the delivery of the Third Crossing and ensure that it is a success.

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.

How these comments have been taken into account in the First Draft Local Plan

The Council agrees with the benefits identified by the community which the Beccles Southern Relief Road will bring. Policy WLP1.4 of the First Draft Local Plan states that the Council will work with partners to ensure the delivery of the road and ensure that it is a success.

Policy WLP3.1 allocates development between the relief road and the existing built up area. The policy states that access to the development area should be from two points along the southern relief road.

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 than 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.

How these comments have been taken into account in the First Draft Local Plan

The Council agrees with the benefits and opportunities identified above. Section 2 of the document continues with a regeneration strategy for the Central and Coastal Areas of Lowestoft. This strategy will benefit significantly from the flood risk management project.

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.

How these comments have been taken into account in the First Draft Local Plan

Section 2 of the First Draft Local Plan includes a regeneration strategy for central and coastal Lowestoft. The strategy widens the area covered by the existing Lowestoft Lake Lothing and Outer Harbour Area Action Plan.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP2.2 continues to allocate the PowerPark for the development of a renewable energy and offshore engineering cluster.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP2.3 of the First Draft Local Plan gives a greater focus to leisure uses and environmental improvements to the Peto Square site. The Policy still allows for retail development although does not take such a strong focus as the Area Action Plan policy. The policy also opens the scope for residential and hotel development once strategic flood defence measures are in place.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP2.4 of the First Draft Local Plan continues to allocate the Jeld Wen Factory site as part of a mixed use development of 1380 homes and employment development. The policy advises that employment uses should still be located on the waterfront on the Jeld Wen site. It is more flexible as to housing provision on this part of the site. A Strategic Flood Risk Assessment is currently under preparation.

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.

How these comments have been taken into account in the First Draft Local Plan

The majority of respondents supported a policy that requires a mix and type of housing based on assessment of local need. Policy WLP8.1 requires the mix of development to be informed by the Strategic Housing Market Assessment and from consulting the Council, as needs can change from time to time. Policy WLP8.1 also sets out a specific requirement for 35% of new properties to be 1 or 2 bed homes.

A number of developers who responded to the consultation indicated that a market based approach may be preferential. Policy WLP8.1 provides some flexibility to allow for this, but it is considered that some local policy requirements are necessary to ensure local needs are met.

In terms of meeting need for housing for older people, Policy WLP8.1 requires 5% of homes on sites above 20 to meet optional building regulations standards for accessible and adaptable homes. Policy WLP8.2 requires a proportion of affordable housing on a site to be sheltered or extra care housing where practicable. Larger sites allocated in Lowestoft and Beccles require a proportion of homes to be private sheltered or extra care housing. Policy WLP4.1 makes provision for a retirement community in Halesworth.

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.3 sets out a positive approach to self-build development. Taking into account the comments above the policy requires self-build schemes of more than five homes to be developed in accordance with a set of design principles.

Some developers suggested the need for self-build is not as high as thought and plots should preferably not be sought as part of larger developments. Evidence from the Council's self-build register indicates a current need for 100 self-build plots. The Housing and Planning Act 2016 places a duty on local planning authorities to grant permission for sufficient development to meet demand evidenced by the register. As such Policy WLP8.3 requires 5% of homes on sites above 100 dwellings to be self build or custom build.

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 of 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.

How these comments have been taken into account in the First Draft Local Plan

Given the significant need for affordable housing in the District as evidenced by Part 2 of the Strategic Housing Market Assessment, Policy WLP8.2 continues to set a requirement of 35%. This target will be tested through a viability assessment of the Local Plan following consultation on the First Draft Local Plan. The requirement may go up or down depending on the results of the assessment. The Council may consider a differential target based on areas if supported by evidence.

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.

How these comments have been taken into account in the First Draft Local Plan

Given the national planning policy position of a threshold of above 10 as identified in the consultation responses above, Policy WLP8.2 sets a threshold of sites of 11 or more dwellings.

Affordable Housing

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.2 requires 50% of new affordable housing to be starter homes or shared ownership. The policy also requires affordable homes to be of a design standard which makes them indistinguishable from the market housing on the site.

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

There was a mixed response to this question. In line with emerging national guidance, Policy WLP8.2 includes starter homes as part of the affordable housing requirement.

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.

How these comments have been taken into account in the First Draft Local Plan

No sites have been allocated for just starter homes in the First Draft Local Plan.

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

There was a clear preference for the continuation of a criteria based policy and respondents agreed the existing approach seemed to work. Policy WLP8.5 continues the criteria based policy approach and in line with advice from the Environment Agency specifically requires water and sewerage connections and prohibits development within flood zones 2 and 3.

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 meets a housing need.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.4 continues the existing approach of identifying areas where the conversion of properties to flats will be controlled.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.4 identifies flat saturation areas on Lyndhurst Road, Denmark Road, London Road South, Kirkley Cliff Road, Grosvenor Road, Cleveland Road and Windsor Road.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.4 includes many of the criteria points identified above.

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

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

Although there was some opposition to this approach, no reasons were given why. Given the support in national planning policy for the approach and the potential ability to deliver more affordable housing, given the significant need, Policy WLP8.6 allows for this providing that the market housing element is subsidiary.

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.

How these comments have been taken into account in the First Draft Local Plan

There was only limited response to this question and no reasons were given in support of requiring rural affordable housing exception sites to be in villages with good accessibility to services and facilities. Given that there could be a need in smaller villages without good accessibility to services and facilities, Policy WLP8.6 does not require rural affordable housing exception sites to be in villages with good accessibility to services and facilities.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.7 provides a flexible approach to allow small scale development in the countryside. It also allows larger schemes of up to five homes to progress where there is local support.

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 or 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.8 takes into account the comments above and establishes a criteria based approach to assessing these types of developments. The criteria is largely based on the former PP7 as mentioned by the Broads Authority.

Q44 a) Should we continue to restricts 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.

How these comments have been taken into account in the First Draft Local Plan

Given the recent changes to permitted development rights which allow large extensions to properties, it is not considered that the existing approach of restricting the size of extensions to dwellings and the size of replacement dwellings in the countryside is appropriate or effective.

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) **Q46 If we continue to identify 'Existing Employment Areas', which areas should be identified? (6 respondents)** **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. (7 respondents)** **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? (11 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. 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'. Norfolk County Council stated that those identified in the current plan should continue to be protected unless circumstances have changed. Norfolk County Council suggested a flexible approach should be taken with respect to question 47. 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.

Ilketshall St Margaret Parish Meeting supported the identification of 'Existing Employment Areas'. Ilketshall St Margaret Parish Meeting stated that at least the current list of sites should be protected. Ilketshall 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. Ilketshall St Margaret Parish Meeting stated that the protection should be in a strategic policy.

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.

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

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.

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.

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. 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

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.

Two members of the public responded to question 46. 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.

Four members of the public supported the existing approach as detailed in question 47. 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.

Three members of the public responded to question 48 who all agreed protection should be in a strategic policy.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.12 continues to identify and protect employment premises within Existing Employment Areas. The Policy provides a flexible approach and will allow for change of use to a compatible use if marketing

evidence demonstrates there is no demand for the unit in employment use. It is not considered appropriate to identify industrial/warehouse/workshop area off St Edmunds Road as an Existing Employment Area. The site has a low proportion of existing premises within employment use and a high vacancy rate. The site suggested by BKW Ltd is also not appropriate as the site is currently undeveloped.

In line with the general support above, the policy continues to allow uses such as cars showrooms and trade counters on the main road frontages of Existing Employment Areas.

All policies in the Local Plan are considered to be strategic policies.

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.

Ilketshall 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 reference d 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.

How these comments have been taken into account in the First Draft Local Plan

In line with the comments above the First Draft Local Plan takes a flexible approach. The plan allocates slightly more employment land than what is required and Policy WLP8.13 also allows a flexible approach to allow new employment development outside of allocated sites where a need can be demonstrated.

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.

How these comments have been taken into account in the First Draft Local Plan

Two allocations, Policy WLP2.12 and Policy WLP3.1 allocate mixed-use housing and employment developments where the housing will help cross-subsidise the employment use. To address concerns raised above, these sites are large sites which will enable suitable landscaping buffers to be put in place between housing and heavier industry. The outline masterplan for WLP3.1 shows a green buffer between the employment area and housing.

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 stated 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.15 does not specifically restrict new tourism development in the Area of Outstanding Natural Beauty or the Heritage Coast. However, national planning policy gives a high level of protection to the Area of Outstanding Natural Beauty and the Heritage Coast, and it is not considered necessary to repeat this in

the Local Plan. Therefore, the scope for development in these areas is still limited. However, the new approach will allow for small-scale tourist developments where there is no or limited impact on the landscape. Policy WLP8.33 gives some protection to all landscape character areas.

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.15 allows for a more flexible approach for small and medium scale tourist accommodation developments and supports these developments anywhere in the District. Larger developments of more than 80 units are expected to be in or close to Lowestoft, the market towns and coastal resorts. It is not considered appropriate to restrict new tourist accommodation in Corton and Kessingland given the importance of tourism to the local economy.

To address some of the concerns raised by Barnby Parish Council and Kessingland Parish Council, the policy restrict new tourist accommodation in the form of permanent buildings to areas within settlement boundaries, or on large sites where commercial, recreational or entertainment facilities are provided on-site. This restriction should reduce the risk of tourist accommodation converting to residential accommodation at a future date.

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.17 provides protection to existing tourist accommodation and only allows conversion in exceptional circumstances where marketing evidence demonstrates there is no demand for the existing tourist use. It is not considered appropriate to have a more flexible approach given the importance of tourism to the local economy. This is particularly important in the countryside, where new isolated dwellings should be resisted.

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

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

The supporting text to Policy WLP8.15 states that the Council will use planning obligations or conditions to require units to be vacated for a continuous period of six weeks each year. In order to facilitate year round holiday use, the Council will allow proposal to vacate a proportion of the site at one time and the rest of the site at another time.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.16 allows for a slightly more flexible approach than at present which allows for some new hotel development in residential streets where further conversion to flats would also not be permitted providing there is adequate parking and bin storage and that the property is above average size. It is not possible to prevent the conversion of residential properties into holiday lets through planning policy as suggested by Southwold Town Council.

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. 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.

How these comments have been taken into account in the First Draft Local Plan

The town centre boundaries identified in the 'Options' consultation have been kept the same in the First Draft Plan. The amendments suggested by Southwold Town Council, Southwold and District Chamber of Commerce and Southwold and Reydon are not considered appropriate, extending the town centre by this

degree would potentially allow for larger retail units such as supermarkets to be developed some distance from the main High Street which detract from the existing offer and could undermine the vitality and viability of the centre.

Policy WLP8.19 allows Neighbourhood Plans to set their own requirements for the mix and use of units within primary and secondary frontages within the town centre.

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.19 defines primary and secondary shopping frontages and prioritises retail and restaurant and café uses within primary frontages and other town centre uses within secondary frontages.

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 respondent stated that more information was required.

How these comments have been taken into account in the First Draft Local Plan

The primary and secondary frontages identified in the 'Options' consultation have been kept the same in the First Draft Plan. The amendments suggested by Ilketshall St. Margaret Parish Meeting are not considered appropriate as there are insufficient retail premises along Earsham Street to justify it being part of the primary shopping area.

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.

How these comments have been taken into account in the First Draft Local Plan

All policies in the First Draft Local Plan are Strategic Policies. However, Policy WLP8.19 allows Neighbourhood Plans to set their own requirements for the mix and use of units within primary and secondary frontages within the town centre.

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.

How these comments have been taken into account in the First Draft Local Plan

Policies WLP2.10 and 2.11 continue to identify Oulton Broad and Kirkley as District Centres. Policy WLP2.10 for Oulton Broad is consistent with the approach emerging in the Broads Local Plan. The Policies prioritise retail use but also are flexible with respect to cafes and restaurants. This will ensure the centres remain vibrant and vacancies are kept low. Policy WLP8.2 continues to prioritise retail uses. Retail uses are considered more important in smaller local centres to the overall function of the centre.

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.

How these comments have been taken into account in the First Draft Local Plan

Most respondents supported the threshold, and based on the evidence contained within the Retail and Leisure Needs Assessment, Policy WLP8.18 introduces the 350sqm threshold for an impact assessment. It should be noted that this assessment is only required for proposals on edge of centre and out of centre sites.

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) 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) Q64 Should some types of services and facilities be given more protection than others? (10 respondents) 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 agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use. Carlton Colville Town Council stated that some uses should be given greater protection than others. Carlton Colville Town Council stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

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.

Ilketshall St. Margaret Parish Meeting agreed that services and facilities should be protected as far as possible. Ilketshall St. Margaret Parish Meeting agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use. Ilketshall St. Margaret Parish Meeting stated that some uses should be given greater protection than others. Ilketshall St. Margaret Parish Meeting stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

Oulton Parish Council agreed that services and facilities should be protected as far as possible. Oulton Parish Council agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use.

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

The Southwold and Reydon Society agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use. The Southwold and Reydon Society stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

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

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. Badger Building did not agree with investigating alternative community uses prior to residential or commercial conversion or development. 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. 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 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.

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.

Members of the public mostly favoured protecting some uses over others. One responded 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.

Members of the public disagreed with only protecting assets of community value, 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.

How these comments have been taken into account in the First Draft Local Plan

Most respondents supported protecting community services and facilities from redevelopment or change of use to non-community uses. There was no consensus of whether some community services or facilities should receive more protection. Most respondents did not favour assets of community value being the only community service and facilities to protect.

Taking these views into account, Policy WLP8.22 provides broad protection to existing community facilities. It only allows redevelopment where the existing use or alternative community use is not viable and marketing evidence demonstrates there is no demand.

In defining community services and facilities, the supporting text to Policy WL8.22 Ptakes into account comments made by the Theatres Trust. Policy WLP8.23 on Protection of Open Space takes into account comments made by Sport England.

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.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Local Plan continues to promote a regeneration strategy in the Lake Lothing area of Lowestoft.

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.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Local Plan continues the approach of the existing Local Plan and Policy WLP8.25 defines a Coastal Change Management Area based on the area of land likely to be at risk over the next 100 years as identified in the Shoreline Management Plan. The results of the National Coastal Erosion Risk Mapping service are not yet available for Suffolk.

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.

How these comments have been taken into account in the First Draft Local Plan

It is considered that schemes for coastal defences can be best assessed as part of a strategic approach through the review of a shoreline management plan where the cumulative effects along the coastline can be assessed. Considering proposals on a piecemeal basis may undermine a strategic approach to the protection and management of the coastline. Therefore, Policy WLP8.25 continue the existing approach of requiring coastal defence schemes to be in accordance with the Shoreline Management Plan.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.26 continues the same approach as the existing Local Plan. Policy WLP6.1 also allocates land for residential development including 7 plots for the relocation of properties lost or at risk from erosion at Easton Bavents.

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.

How these comments have been taken into account in the First Draft Local Plan

There was limited consensus on this issue and limited suggestions as to where suitable areas might be. As such the First Draft Local Plan does not identify suitable areas for renewable energy development. However, Policy WLP8.27 supports Neighbourhood Plans to identify suitable areas.

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.

How these comments have been taken into account in the First Draft Local Plan

The Council has considered the comments above in the formulation of Policy WLP8.28 which encourages sustainable construction through a variety of means, including a sustainable show home. The policy requires a sustainability statement to be submitted with major residential and commercial schemes. Based on evidence from the Water Cycle Study (2017), a water efficiency target of 110 litres/person/day is required for all new residential properties. The suggestion for a community infrastructure levy discount for energy efficient dwellings is not possible under existing regulations.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.28 continues the requirement for new school and office development to meet higher standards of energy efficiency.

Design

Q73 What makes a well designed development? Can you give any examples of new developments which you think are well designed?(12 respondents) Q74 How can we improve design quality through planning policy? (8 respondents) 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) 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 these questions.

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. 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. Southwold Town Council stated that detailed design guidance should be applicable to all sites. Southwold Town Council agreed that Building for Life 12 should be used as a tool to improve the quality of new development.

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.

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.

Ilketshall St. Margaret Parish Meeting agreed that Building for Life 12 should be used as a tool to improve the quality of new development.

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. 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. The Southwold and Reydon Society stated that the Local Plan should include design principles that were applicable to all sites.

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. 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. 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. 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

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. 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. Badger Building opposed the inclusion of Building for Life 12 if it was applied subjectively.

Wellington Construction stated that the design of new build development is a matter of personal taste.

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. 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.

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 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.

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.

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.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.29 takes into account many of points and suggestions about good design referred to above. The policy and the supporting text addresses the points made by Suffolk Police about designing out crime. Policy WLP8.28 addresses points made about sustainability.

Policy WLP8.29 requires major residential developments to be assessed against Building for Life 12. Policy WLP8.29 applies to all developments, but the Local Plan does contain some more site-specific design guidance in respect to some of the allocated sites.

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.

How these comments have been taken into account in the First Draft Local Plan

Sites allocated by Policy WLP2.12 in North Lowestoft and WLP3.1 in Beccles require developments to be built to garden city principles. Most garden city development occurs at approximately 30 dwellings per hectare which is consistent with the density guidance in Policy WLP8.30 of the Local Plan.

Q78 a) Should we set a minimum housing density for new developments? b) If so what should it be?

(20 respondents) 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

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. Carlton Colville Town Council replied that different design principles should possibly be applied at different densities.

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. 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.

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. 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 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. 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.

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. 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 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.

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.

How these comments have been taken into account in the First Draft Local Plan

In light of the comments above, Policy WLP8.30 takes a flexible approach to residential density and requires it to be design lead. In Lowestoft and the market towns the Policy requires development to be at least 30 dwellings per hectare unless local character indicates otherwise. The policy includes extra design guidance for developments built at 30 dwellings per hectare or more.

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.

How these comments have been taken into account in the First Draft Local Plan

The Council does not consider there is sufficient evidence to implement the national space standards. Most new housing developed in the District is already meeting the standards, therefore to implement the standard would result in unnecessary bureaucracy.

Evidence from the Water Cycle Study (2017) suggests the technical standard for water is justifiable and Policy WLP8.28 requires compliance with this.

Evidence from the Strategic Housing Market Assessment (2017) suggests the technical standard for adaptable and accessible homes is justified and Policy WLP8.1 requires 5% of homes on sites above 20 to be built to this standard.

The viability of these standards will be assessed following the consultation on the First Draft Plan.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.31 provides specific design requirements for this type of development taking into account the points raised above.

Healthy communities

Q82 What size residential development should provide on-site recreational open space? (14 respondents)

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) Q84 If we continue to set a standard, what should the standard be? (6 respondents)

Statutory Consultees

No comments were submitted in response to these questions.

Parish and Town Councils

Carlton Colville Town Council suggested that on-site open space should be calculated per dwelling.

Ilketshall St Margaret Parish Meeting stated the existing policy approach is appropriate. Ilketshall St Margaret Parish Meeting suggested a 'per dwelling' standard. Ilketshall St Margaret Parish Meeting suggested a standard per 20 dwellings.

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.

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.

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. Badger Building suggested the policy requirement should be based on need rather than a fixed standard. In response to question 84, Badger Building suggested the NFPA Six Acre Standard should be used.

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.

Four people provided comments on question 83 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.

Three people provided comments on question 84 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP1.4 requires open space on sites greater than 1 hectare. It was thought that an area based threshold was better than a per dwelling threshold due to differing densities of sites. A site of 1 hectare is considered large enough to provide a useable open space. The policy requires provision to be based on the needs identified in the Waveney Green Infrastructure Strategy and Open Space Needs Assessment. The six acre standard referred to by Badger Building was not considered appropriate because it only relates to children's play and playing fields, and the type of open space which could be provided on-site could be more varied dependant on local needs.

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 apposite 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.

How these comments have been taken into account in the First Draft Local Plan

Although some suggestions of spaces are made above, there was insufficient justification as to why these spaces were demonstrably special to the local communities. As such the First Draft Local Plan does not identify any Local Green Spaces and instead devolves this responsibility to Neighbourhood Plans. However, Policy WLP8.23 does provide a level of protection to all open spaces in the District.

Q86 Should we restrict the development of fast food outlets within 400 metres of nurseries, schools and colleges?(16 respondents) Q87 Within town centres should we restrict the number of fast food outlets in shop frontages? (14 respondents)

Statutory Consultees

No comments were submitted in response to these questions.

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.

Six people supported the restriction in town centres. 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.

How these comments have been taken into account in the First Draft Local Plan

On reflection it is not considered that such a policy approach would be effective in reducing obesity, so the First Draft Local Plan does not contain such a policy.

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 habitats 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.32 takes into account the consensus of opinion above and requires regard to be had to the Waveney Green Infrastructure Strategy to help enhance biodiversity .

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.32 protects locally designated sites of biodiversity value. It requires proposals which may have a direct or indirect effect on these sites to mitigate or the effect or provide compensatory measures.

Landscape

Q90 What landscapes in Waveney do you think are the most valuable and worthy of protection in the Local Plan? (24 respondents) Q91 Should we continue the strong protection given to rural river valleys and tributary valley farmlands? (23 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.

The proposal to continue with strong protection of rural river valleys and tributary farmland was supported by:

- Carlton Colville Parish Council;
- Ilketshall St Margaret Parish Meeting;
- North Cove Parish Council;
- Southwold Town Council.

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. Southwold and Reydon Society supported protection for rural river valleys and tributary valley farmland.

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

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.

Fourteen people supported the continuation of the approach to protect rural river valleys and tributary valley farmland. 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.33 provides protection for the setting of the Area of Outstanding Natural Beauty and the setting of the Broads. It also provides protection for tributary valley farmland and rural river valleys.

The Area of Outstanding Natural Beauty itself is given high levels of protection in the National Planning Policy Framework and it is not considered necessary to repeat this protection in the Local Plan.

The Council is not responsible for planning policy within the Broads area. The Broads Authority is preparing a new Local Plan for the Broads.

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) 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) 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 these questions.

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;

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.

Carlton Colville Town Council did not support a strategic policy.

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 supported the strategic gaps and added that they should all be enhanced with Local Green Space designation.

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 these questions.

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). Badger Building stated that the Council should take account of Neighbourhood Plans that support some development in the Strategic Gap.

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.

Strategic Gaps between the following settlements were suggested:

- 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.

Six people responded to question 94 and five supported the policy being strategic.

How these comments have been taken into account in the First Draft Local Plan

The retention of strategic gaps has some support through the above consultation responses. However, this approach is considered to have some conflict with national planning policy as it would be effectively establishing new areas of 'Green Belt' but with a separate name. It could lead to an overly strict approach where some development which may be appropriate being refused. It could also result in development which could lead to coalescence in areas not specifically designated. Therefore Policy WLP8.34 of the Local Plan presents a criteria based approach to avoid the coalescence of settlements. The supporting text identifies where there may be specific issues in relation to this.

All policies in the First Draft Plan are considered to be strategic.

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) 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 these questions.

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.

Carlton Colville also suggested sites 7, 21 and 80 should be classified as open breaks.

Oulton Parish Council suggested continuing with the open break designation.

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 these questions.

Developers/Landowners

No comments were made in response to these questions.

Members of the Public

Members of the public 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.

How these comments have been taken into account in the First Draft Local Plan

Although there is significant support for the retention of open breaks, national planning policy suggests that green spaces should be objectively considered reflecting their circumstances. There is not enough evidence to identify which green spaces are particularly important to communities compared to others. Open spaces important to the character of a settlement and the community can be designated as Local Green Spaces to ensure they have a high level of protection in Neighbourhood Plans instead.

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 Geldeston. 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.

Ilketshall 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 to 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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.33 provides protection for dark skies and areas of tranquillity across the District. Based on evidence from the Campaign to Protect Rural England and The Broads Authority, the supporting text identifies areas of tranquil nature and dark skies, within the Area of Outstanding Natural Beauty, the rural area near the Saints and the area between Mettingham and Shipmeadow.

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.

How these comments have been taken into account in the First Draft Local Plan

Policies WLP8.35 through to WLP8.38 help provide a positive strategy for the protection and enhancement of the historic environment, taking into accounts the comments made above.

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.

How these comments have been taken into account in the First Draft Local Plan

The comments above demonstrate significant support for continuing with the approach to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from sustainable materials. As such Policy WLP8.37 on Conservation Areas requires proposals for replacement windows, doors and porches to be of a suitable design and constructed in appropriate materials.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.35 requires the submission of Heritage Impact Assessments with all planning applications for development which may impact on Heritage assets. Policies WLP8.36 and WLP8.37 provide protection for non-designated heritage assets. The Built Heritage and Design Supplementary Planning Document which will be retained and updated, provides more detailed guidance on renewable energy and aerials and satellite dishes.

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.

Ilketshall 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.

How these comments have been taken into account in the First Draft Local Plan

Policies WLP8.36 and WLP8.37 provide protection for non-designated heritage assets. The policies set out the specific circumstances when a loss of these assets would be permitted.

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.

How these comments have been taken into account in the First Draft Local Plan

The Retail and Leisure Needs Assessment only covers main town centre uses (retail, leisure and community facilities) not industrial premises. The Ellough Employment Area is predominantly made up of industrial units.

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.

How these comments have been taken into account in the First Draft Local Plan

These documents have informed the First Draft Local Plan.

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.

How these comments have been taken into account in the First Draft Local Plan

Comments noted and agreed. There are currently plans to provide an updated Tourism strategy but this has not yet been published.

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.

How these comments have been taken into account in the First Draft Local Plan

Anglian Water's comment have provided a useful starting point for the Water Cycle Study 2017.

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.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Plan contains guidance on these matters.

The Environment Agency provided further detailed advice on groundwater and contaminated land, water quality, SFRA review and the water cycle study.

How these comments have been taken into account in the First Draft Local Plan

These comments helped inform the scoping of the Water Cycle Study (2017) and the Strategic Flood Risk Assessment which is currently under preparation.

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.

How these comments have been taken into account in the First Draft Local Plan

These comments have been taken into account in assessing sites.

The Marine Management Organisation did not provide a bespoke response to the consultation. They provided generic information about the Marine Plan and marine licensing.

How these comments have been taken into account in the First Draft Local Plan

Comments were noted.

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.

How these comments have been taken into account in the First Draft Local Plan

These comments have been taken into account in assessing sites.

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.

How these comments have been taken into account in the First Draft Local Plan

These comments have influenced the contextual section of the First Draft Local Plan. Promoting healthy communities is central to the Local Plan's vision. The Minerals and Waste Local Plans have been considered in assessing sites.

Parish and Town Councils

Corton Parish Council stated that too much of the consultation overlaps with other ongoing consultations.

How these comments have been taken into account in the First Draft Local Plan

Comments noted. In order to produce a Local Plan against a tight deadline it was necessary to go out to consultation at the time.

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.

How these comments have been taken into account in the First Draft Local Plan

The Council welcomes the proactive approach taken by the Parish Council to get people involved in the consultation.

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.

How these comments have been taken into account in the First Draft Local Plan

Flood Risk has been taken into account in assessing sites. In order to deliver regeneration priorities in Central Lowestoft it has been necessary to allocate some land in flood zones.

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.

How these comments have been taken into account in the First Draft Local Plan

The Council continually reviews its methods of consultation and will consider this approach for future consultations.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.31 sets out criteria for controlling new dwellings in residential gardens and other urban infill plots. With respect to extensions, this is more difficult to control, given permitted development rights that

allow owners to extend their properties significantly without planning permission. Policy WLP8.29 on Design will ensure overdevelopment is managed.

Sport England stated that no existing playing fields should be allocated for development unless replacement provision of equivalent quantity, quality and accessibility is provided.

How these comments have been taken into account in the First Draft Local Plan

Comments noted.

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.

How these comments have been taken into account in the First Draft Local Plan

Comments noted.

Developers/Landowners

Bourne Leisure stated that the importance of tourism to employment should be referred to in the employment section of the Local Plan.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Local Plan has a specific section relating to tourism and the importance of tourism is noted on a number of occasions throughout the document.

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.

How these comments have been taken into account in the First Draft Local Plan

The Council will write letters to neighbours of sites which are proposed to be allocated, alongside other publicity associated with the consultation.

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.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP4.2 allocates land to the west of site 163 for residential development. Most development types built over the top of existing car parks are likely to require their parking so without resorting to multi-storey car-parking it will not be possible to maintain the same level of parking in the town centre under this suggestion.

Analysis of Sites Considered

Over 170 potential sites for development were presented for consultation in the 'Options for the new Waveney Local Plan' document. 1,218 comments were made on these potential sites. Additionally a number of additional sites were submitted during and just after the consultation. All of these sites are considered in detail below. A summary of the comments made on each site is included. To supplement this, the section below also provides a summary of the draft Sustainability Appraisal for the site and the draft Strategic Housing and Economic Land Availability Assessment for the site.

Sustainability Appraisal is an iterative process which must be carried out during the preparation of a Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging Local Plan, when considered against alternatives, will help to achieve relevant environmental, economic and social objectives. A draft sustainability appraisal has been undertaken on all the different policy options and site options considered during the preparation of the First Draft Plan. The appraisal tests site and policy options against 17 sustainability objectives. These include:

- Health
- Education
- Crime
- Access to services
- Deprivation
- Housing
- Air quality
- Water quality
- Landscape and townscape
- Natural resources
- Climate change
- Biodiversity
- Historic environment
- Economic development
- Rural economy
- Town centres
- Efficient travel

The appraisal tests whether a site or policy option will have a positive or negative on these objectives and whether the effect is significant or not.

The Strategic Housing and Economic Land Availability Assessment tests the amount of deliverable and developable land for development within the District and whether there is sufficient land to meet objectively assessed needs. In doing so, it is necessary to test the suitability, availability and achievability of all site options. Only sites which are suitable, available and achievable can be included for allocation in the

Local Plan. However, just because a site is considered to be suitable, available and achievable in this assessment, it doesn't necessarily translate that it would be appropriate to allocate it in the Local Plan as there could be other planning reasons why the site would not be allocated (such as sufficient more favourable land elsewhere).

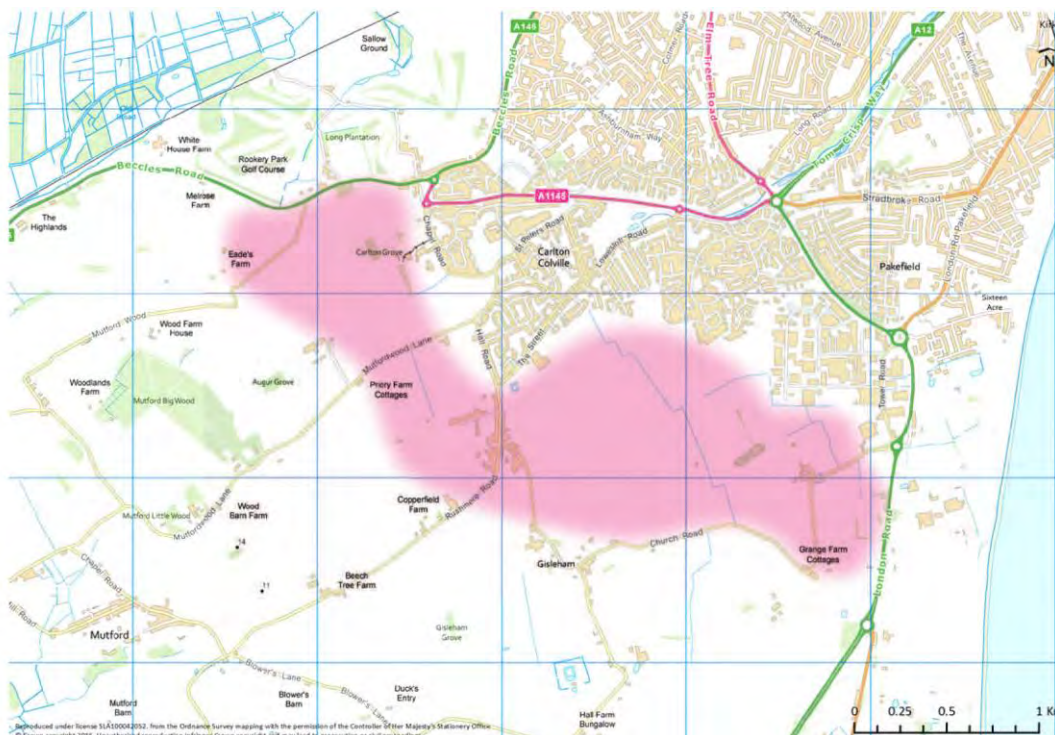
For each site considered a conclusion is also presented which takes into account the consultation responses and site assessments. The conclusions detail the reasons why a site has been identified in the Local Plan or not.

Lowestoft Area

Broad Area for Development – Potential Development Area south of Lowestoft

Suggested Use: Housing, Employment, and associated community infrastructure and sports and recreation facilities.

Site Area: Approximately 300 hectares



This is a large swathe of land covering most of the farmland to the south of Lowestoft and Carlton Colville. The site is proposed as a potential area for a large development encompassing a link road between the A12 and the A146.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, and an 'Amber' impact on the foul sewerage network. Full details are on the Council's website

The Environment Agency stated that they would consider this area as generally appropriate for development. They noted that Pakefield landfill within this area is now closed. They also noted that the area does fall within a Drinking Water Protection Area, although the area is also largely underlined by a principle aquifer, but this will not generally restrict the majority of development. The Environment Agency noted that Carlton Colville and the Kirkley Stream in general are known to suffer from flooding from both the Kirkley Stream and surface water sources. They suggested that development of this area could offer the opportunity to reduce the existing flood risk and implement some of the early concepts that have been produced for public consultation as part of the Lowestoft flood risk management strategy.

Suffolk County Council stated that in general the proposed scale of development justifies a new link road although it is not clear if the new road would reduce traffic elsewhere on the network. The County Council is supportive of the link road in principal, assuming that the cost of the link and all other infrastructure, such as schools and open space, is funded through the development.

Carlton Colville Town Council stated that they didn't think the whole area was appropriate for development. They stated that LOW11 (Oakes farm on the western part of the area) has already been agreed. They added that development on any of the rest of this area will completely envelop Carlton Colville and remove the semi rural character of the area. They stated that flooding will increase as the drains are already inadequate and many natural soakaways have already been built on. They stated that Carlton Colville has already grown to a size equivalent of a new settlement and should not be made any bigger. The Town Council suggested that Waveney should look for a new settlement elsewhere near Halesworth for example. They added that Carlton Colville has already outgrown its infrastructure, as there were insufficient doctors, dentists and medical provisions, no post office, no youth club and no provision for adult education classes. They suggested that if some areas have to be built on then housing south of The Dales would be less intrusive.

Gisleham Parish Council stated that that rather than concentrate the development in a southern swathe the town should develop with a natural even spread. They raised concern that the land is grade 1 or grade 2 agricultural quality. They noted that the road link will only direct traffic away from Lowestoft town centre which is already struggling. They added that development to the north of the town may likely support the town centre better. The Parish Council argued that green spaces should be provided in accordance with current legislation. They suggested that brownfield sites should be a priority for development and should accommodate flats and sheltered housing. They added that the housing needs associated with the renewable energy industry could be accommodated by caravan style accommodation given the temporary nature of the jobs.

Oulton Parish Council considered that the area was appropriate for development. They suggested that the link road would make the area a possibility for development. They noted that there would be easy access

out towards Ipswich on the A12 and Norwich on the A146 which would make this a desirable place to live for people working in these areas. They raised concern that development would add to existing traffic pressure in Lowestoft and Oulton Broad but if any permission for this large scale development was given with a proviso for a major contribution to road infrastructure, i.e. the third crossing, it would be more acceptable.

Badger Building supported the possibility of development of land south of the town, along with the possibility of improved highway connectivity from the A12 to the A146 which would reduce local congestion. They added that area is particularly well related to the opportunities for employment growth at Ellough. They noted that the area has no especially outstanding characteristics and such a proposal if carefully planned and executed could bring measurable benefits to the town.

Savills on behalf of the landowners of this area stated that the proposal would allow development to take place in an area where there are significant future job opportunities and where there is considerable local service and facilities infrastructure, which can be improved accordingly. They stated that with the provision of the third crossing development to the south of Lowestoft will be more practical and sustainable, as the area will be better connected to Great Yarmouth to the north, which is seen as a key employment growth area. They added that with the Sizewell C development and the potential duelling of the A12 between Lowestoft and Ipswich a relief road in this location could help improve connections with Norwich and the A12. Savills added that the land currently comprises mostly poor quality arable land and benefits from a relatively level topography. They noted that it would be easily serviceable and would be accessible from various different locations. They concluded that the site offers an opportunity to develop a well landscaped, predominantly residential development within a close vicinity of central Lowestoft and adjacent to the South Lowestoft Enterprise Zone. They added that the development would also involve significant opportunities in relation to leisure and community facilities and infrastructure improvements.

Members of the Public were split evenly as to whether this would be an appropriate area for development.

Those who considered that the area was not appropriate raised concerns the proposal would lead to urban sprawl and coalescence with the nearby settlements of Gisleham, Kessingland and Mutford. Concern was raised about the loss of high grade farmland and impact on local flooding issues. Concern was also raised about the impact of traffic on the A146 and the possibility of the relief road diverting traffic away from the town centre. More generally, concern was raised about the capacity of local infrastructure such as healthcare and schools to accommodate the scale of development proposed. It was suggested that it would be preferable to build on brownfield sites and on sites to the North of Lowestoft where there were better connections to the town centre and north to Great Yarmouth.

Those who considered the area was suitable for development noted it was a logical area for new development and was of a scale to deliver new community facilities. It was noted that the development would link well to planned leisure provision to the west of the area and other existing facilities in the built up area. It was noted that the relief road would link well to the third crossing and provide good access to Norwich. It was suggested that the area could be developed as a new settlement with a distinct sense of community. It was noted that a strategic gap should be maintained between the development and the

villages of Mutford and Barnby. It was suggested that new development should be supported by a firm plan for public transport provision.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

A number of issues were identified with respect to this broad area. However, the assessment did not identify any constraints or impacts which could not be mitigated.

Access to the broad area would be dependent on the delivery of a link road from the A12 to the A146. Development of this scale is also likely to have an impact on local roads, particularly the Bloodmoor Roundabout where congestion can be an issue.

The site is likely to be attractive to the market, although it is unlikely that the local market could deliver the full quantum of 2000 homes in this plan period.

Although the sensitivity of the landscape in this area is low, the scale of development proposed will create an impact. Significant amounts of landscaping will be required to mitigate this effect.

There are various natural features on the site which will need to be retained within the development. The site is in close proximity to Broads SAC and SPA and the Benacre to Easton Bavents SPA off Kessingland Beach. The scale of this development may increase recreational pressure on these protected areas. Significant alternative recreational areas will need to be provided as part of the development to mitigate this potential impact.

Parts of the site have significant potential for archaeology. Any planning application would need to be accompanied by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect on natural resources as the development of the area would result in a significant loss of grade 1 and 2 agricultural land. Minor negative effects were identified in relation to impact on the landscape.

A significant positive effect on health and wellbeing was identified in relation to the sports and recreation facilities which would be provided. Minor positive effects were identified in relation to improving education through the provision of a primary school, access to facilities, reducing deprivation, meeting housing need and supporting economic growth.

An uncertain effect was identified in relation to biodiversity. South Lowestoft has good access to the Broads SAC and SPA and the Benacre to Easton Bavents SPA off Kessingland Beach. There is potential that significant development in south Lowestoft could increase recreational pressure on these protected sites.

An uncertain effect was also identified with respect to the potential impact of development on the setting of the Grade I listed Gisleham Church.

In terms of mitigation the appraisal stated that existing natural features on the site should be retained and enhanced. Appropriate space should be created between any new development and Gisleham village and the church to mitigate impacts and require archaeological investigation to mitigate impacts on the historic environment. If there is a potential recreational impact on European protected sites it will be necessary to ensure an appropriate amount of suitable alternative recreational space is provided.

Conclusion

Whilst development of this area could provide a relatively sustainable option for the future growth of the built-up area of Lowestoft, it is considered there are significant risks with respect to its deliverability. Suffolk County Council made clear in their consultation response that the link road between the A12 and the A146 would need to be funded by the development. Whilst there is no evidence at present to suggest this would not be viable, there is a significant risk that the development would not be able to fund the construction of the road as well as the other community infrastructure necessary to support the development.

Such a scheme would also be a longer term aspiration and would not likely deliver the full capacity of 2,000 homes within the plan period to 2036. There is a significant need to housing in the early parts of the plan period and with limited options in the North of Lowestoft to provide short-term delivery, the allocation of this site could result in a shortfall in delivery in the early part of the plan period.

The site is also in the ownership of numerous landowners who would all need to work collaboratively to ensure the development is a success. With such a large number of landowners involved there is a risk, that any consortium of landowners could breakdown, undermining delivery.

Whilst initial transport modelling detailed in the Waveney Local Plan Suffolk County Transport Model Forecast Model Report (2017) identifies a positive benefit on congestion from the link road, it is not a significant impact and there is likely to still be congestion at Bloodmoor Roundabout.

Having such a significant development to the south of Lowestoft could also increase risks of impacts on nearby European protected habitats at Benacre and Carlton Marshes. Much of the land is also high grade agricultural land.

For the reasons above, the broad area for growth is not considered suitable for allocation as part of this Local Plan.

Site 3 - Ashfield Stables, Hall Lane, Oulton, Lowestoft

Suggested Use: Housing and Tourist Uses

Site Area: 0.93



This is a small site north of Camps Heath currently used as a paddock with stables.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, a 'Green' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

The Environment Agency stated that the site is within Source Protection Zone 3.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

No comments were received from members of the public.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is accessed from Hall Lane, which is a narrow carriageway in this location in open countryside. There is no pedestrian access to the site without substantial improvements which would unlikely be viable. Therefore the site is not considered suitable for development.

Other issues identified include a need for landscape mitigation giving the open and isolated character of the site and the sensitivity of the landscape due to the area being within a tributary valley farmland character area.

There is archaeological potential and a possible gas main running under the site.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects included the lack of accessibility and impact on the landscape.

Minor social and economic positive effects related to the provision of housing and tourist accommodation.

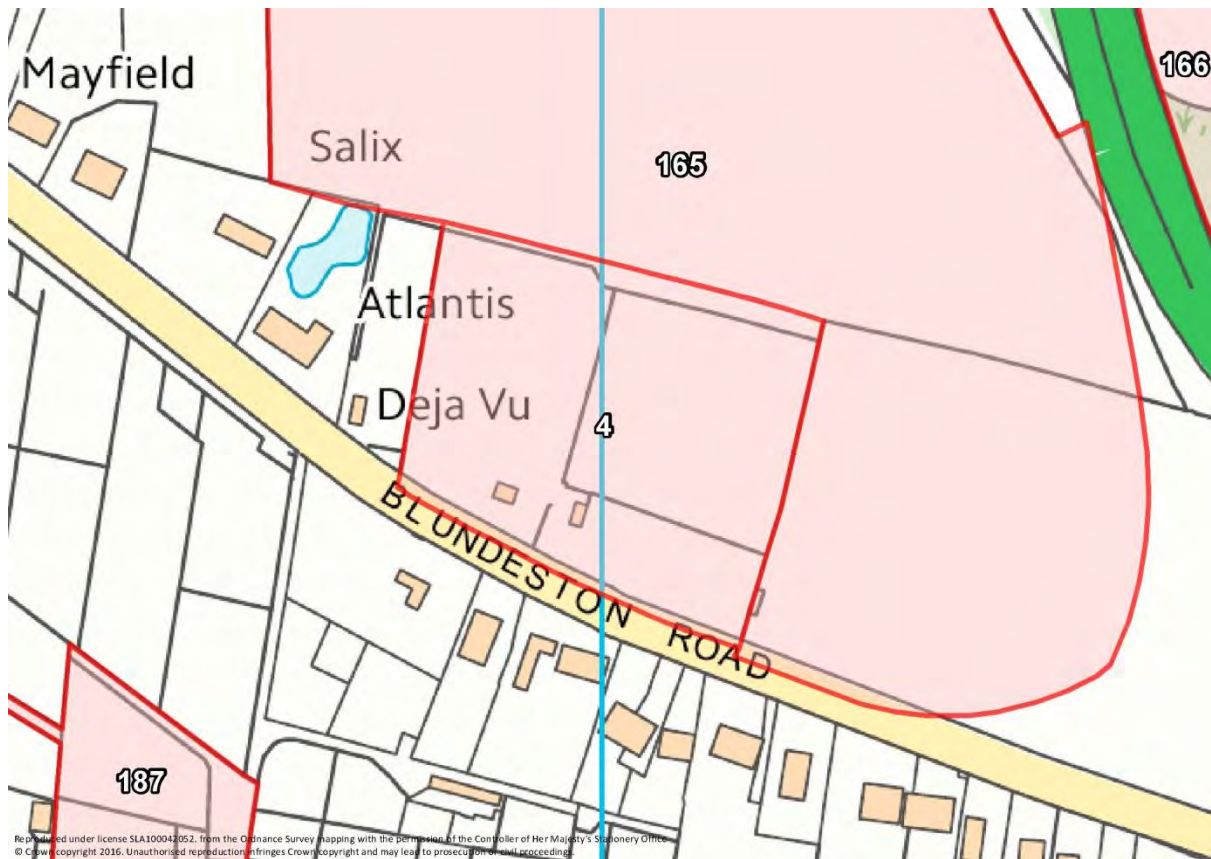
Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation in this Local Plan.

Site 4 - Blundeston Road (west end), Corton, Lowestoft

Suggested Use: Housing

Site Area: 1.59



This site is currently used as paddocks.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, a 'Green' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber/Green' impact. Full details can be found on the Council's website.

Members of the Public who responded objected to this site. Concern was raised about the loss of farmland, flooding and impact on wildlife. It was suggested that this site is planted as a woodland area to make wildlife habitation.

More generally, concern was raised that further development would make Blundeston like Carlton Colville. Concern was raised that The Street in Blundeston was already congested with parked cars and further development would make it worse. It was suggested that the development of the former prison site was sufficient for Blundeston. It was suggested that if development does go ahead only with materials in keeping with the local area should be used. Concern was also raised on the impact on local infrastructure.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints which could not be mitigated. The main issue identified by the assessment is impact on the landscape. The site is within tributary farmland landscape character area. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value and low capacity for development. However, this site is well contained within the landscape and does not exhibit some of the qualities identified for the wider character area in the Sensitivity Study. The site is rural in character. The site does not relate well to the existing settlement. Impact would be lessened if developed in conjunction with site 165. The site does not relate well to the existing settlement. These impacts could be lessened if developed as part of a more strategic development with its own identify with site 165 which surrounds it.

The site has some archaeological potential.

The site has capacity for 45 dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies a significant negative effect on the conservation of natural resources as the site is grade 2 agricultural land. Minor negative effects included the lack of accessibility to employment and impact on the landscape.

Minor social and economic positive effects related to the provision of housing.

In terms of mitigation measures, the appraisal suggested retaining the northern boundary hedgerow and trees to integrate the site into the surrounding countryside.

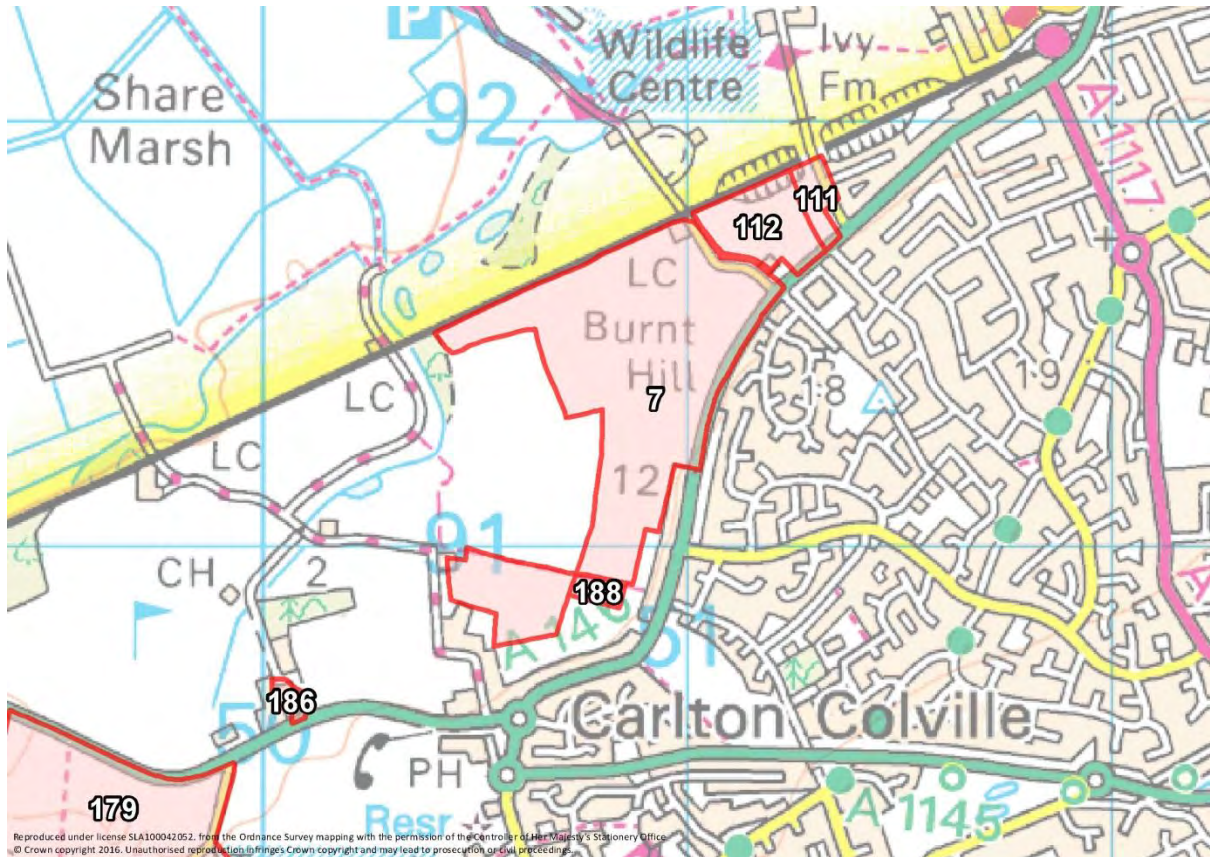
Conclusion

Considered as part of a wider allocation with sites 165 and 166, the site provides a sustainable location for future housing growth. Out of the all the areas in North Lowestoft this area will have the most limited impact on the landscape, given the flat nature of the site, the A47 and the nearby electricity pylons. The sites have access to the strategic road network with bus connections to Lowestoft and Great Yarmouth. The sites, considered together, are of a scale to deliver new services and facilities as well as deliver new employment land in north Lowestoft where there is the most demand. As such the site is allocated as part of Policy WLP2.12, the North Lowestoft Garden Village. Policy WLP2.12 allocates sites 4,165 and 166 for 1,400 dwellings, 2 form entry primary school, playing field, local shopping centre, and 8.5 hectares of employment land.

Site 7 - Burnt Hill Lane to Marsh Lane, Carlton Colville

Suggested Use: Housing

Site Area: 31.81



This large site is currently used mainly for agriculture. Parts of the southern part of the site are used as paddocks.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe crossed part of the site. Full details are on the Council's website.

The Broads Authority stated that the site lies along the Broads boundary albeit separated by the railway line. They raised concern that development on this site would extend the urban boundary of Lowestoft towards the Broads area and could impact upon the landscape and visual amenity. They also raised concern about additional recreational pressures as a result of housing development on Carlton Marshes.

The Environment Agency noted that the site is partly in flood zone 3.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Carlton Colville Parish Council stated that the site should be kept clear of additional development in order to preserve the wildlife of the marshes.

North Cove Parish Council stated that the development of the site would have a severe impact on Carlton Nature Reserve, green infrastructure and an important landscape area. They also raised concern about visual impact effect on the nature reserve including run-off and light pollution.

Suffolk Wildlife Trust stated that the site is adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat's Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI). They stated that large part of these sites is owned and managed by Suffolk Wildlife Trust as part of our Carlton and Oulton Marshes reserve. They raised concern that development in this location appears likely to risk an adverse impact on these sites and therefore object to an allocation.

Members of the public opposed the development of this site. They raised concerns about the impact on wildlife on the adjacent Carlton Marshes, including the impact of recreation and dog-walking. It was noted that drainage water could cause pollution in the marshes further down the hill and also adversely affect septic tank drainage of properties.

Concern was also raised about the landscape impact on the setting of the Broads. It was noted that the site currently provides an open vista across to Oulton Broad.

Concern was also raised about the impact on the surrounding road system including the A146 which was considered to be already at capacity with frequent queues stretching from Oulton Broad to Hollow Grove Way.

More generally concern was raised about the impact on heath and education services. It was also suggested that brownfield sites should be considered first. One respondent considered that Lowestoft was large enough already and development should be located within its existing borders.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue identified is the impact on the landscape. The site is within tributary valley farmland and rural river valleys character areas. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a low sensitivity, a moderate value and low capacity for development. This is mainly due to major contribution the landscape area makes to the setting of the Broads. The site is rural in character. The site is highly exposed to the north and east. Large parts of the site are exposed and highly visible from The Broads. Development on Beccles Road at present has an impact on The Broads and further encroachment on this site towards The Broads would likely have a significant impact which could not be mitigated. As such the site is not considered suitable for development.

There are potential impacts on the transport and foul sewerage networks given the scale of the site.

There is potential for archaeology on the site.

There is a potential noise impact form the adjacent railway line.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies a significant negative effect on the landscape due to the impact on the setting of the Broads. Minor negative effects included lack of accessibility to employment and loss of greenfield land.

Minor positive effects identified relate to the provision of housing and accessibility to services and facilities.

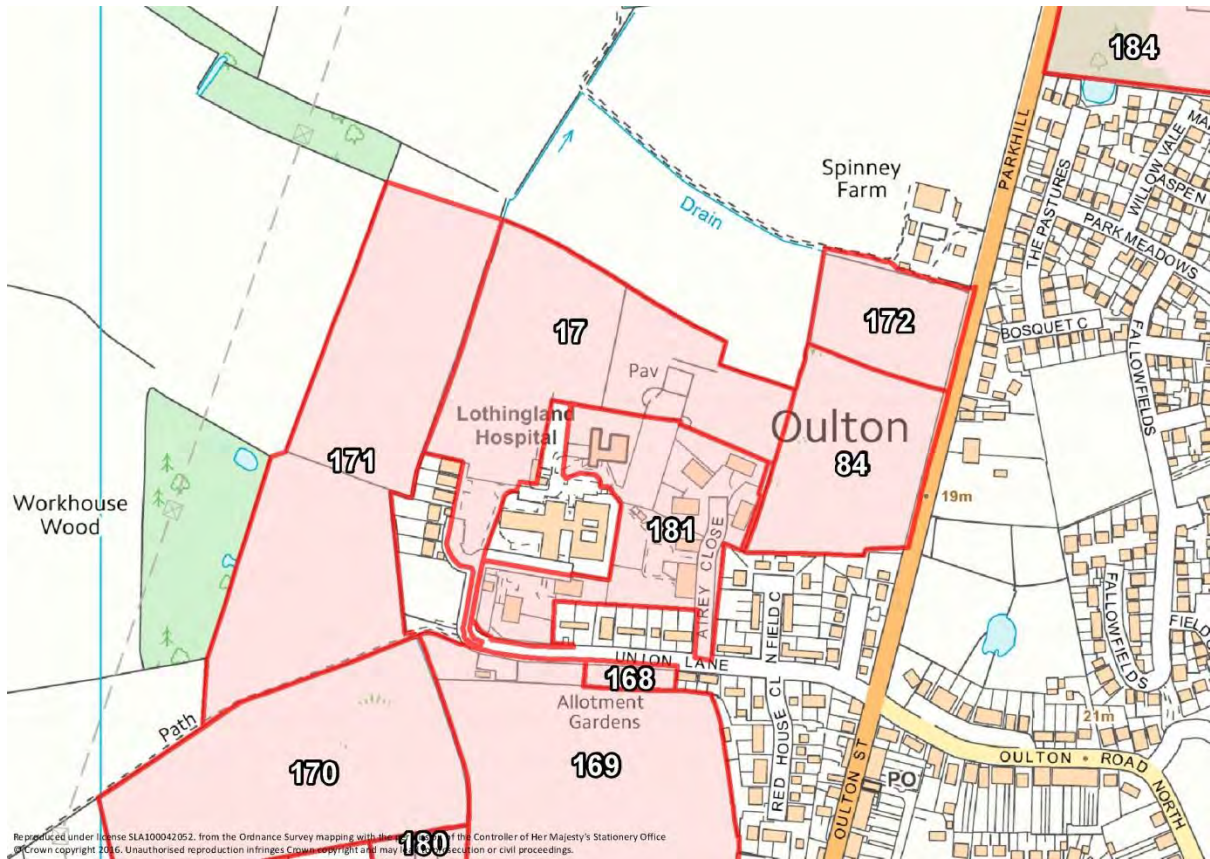
Conclusion

Due to the impact on the setting of the Broads, the site is not considered suitable for allocation in this Local Plan.

Site 17 - Former Lothingland Hospital, Union Lane, Oulton

Suggested Use: Housing

Site Area: 3.90



This site was the former site of the Lothingland Hospital. Some parts of the site are being used as a builder’s yard with other parts overgrown and unused.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England noted that the site was in close proximity of The Lodge and The Hall, both grade II listed to the east and ruins of Church of St Andrew also grade II to the west. They stated that development could have a potential impact on the setting of the listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red’ impact. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not suitable for development due to poor access and egress to road infrastructure.

One respondent stated that housing on the site would require additional medical facilities.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The assessment noted that access to the site was difficult from Union Lane. This constraint could be overcome from accessing the site from site 84 to the east or other sites in the vicinity as part of a more strategic development.

The assessment identified a risk of contamination from the large amounts of dumped material and storage of machinery on the site.

Improvements to the foul sewerage network will be needed to accommodate development.

The site has some archaeological potential and part of the site is a historic burial ground which will need to be avoided.

The site has a capacity for 60 dwellings.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to the loss of greenfield land.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

Conclusion

In isolation the site is not considered suitable for allocation in this Local Plan due to the poor road access from Union Lane. However, combined with Site 84 to the east, the site is considered suitable and is allocated under Policy WLP2.13 of the Local Plan.

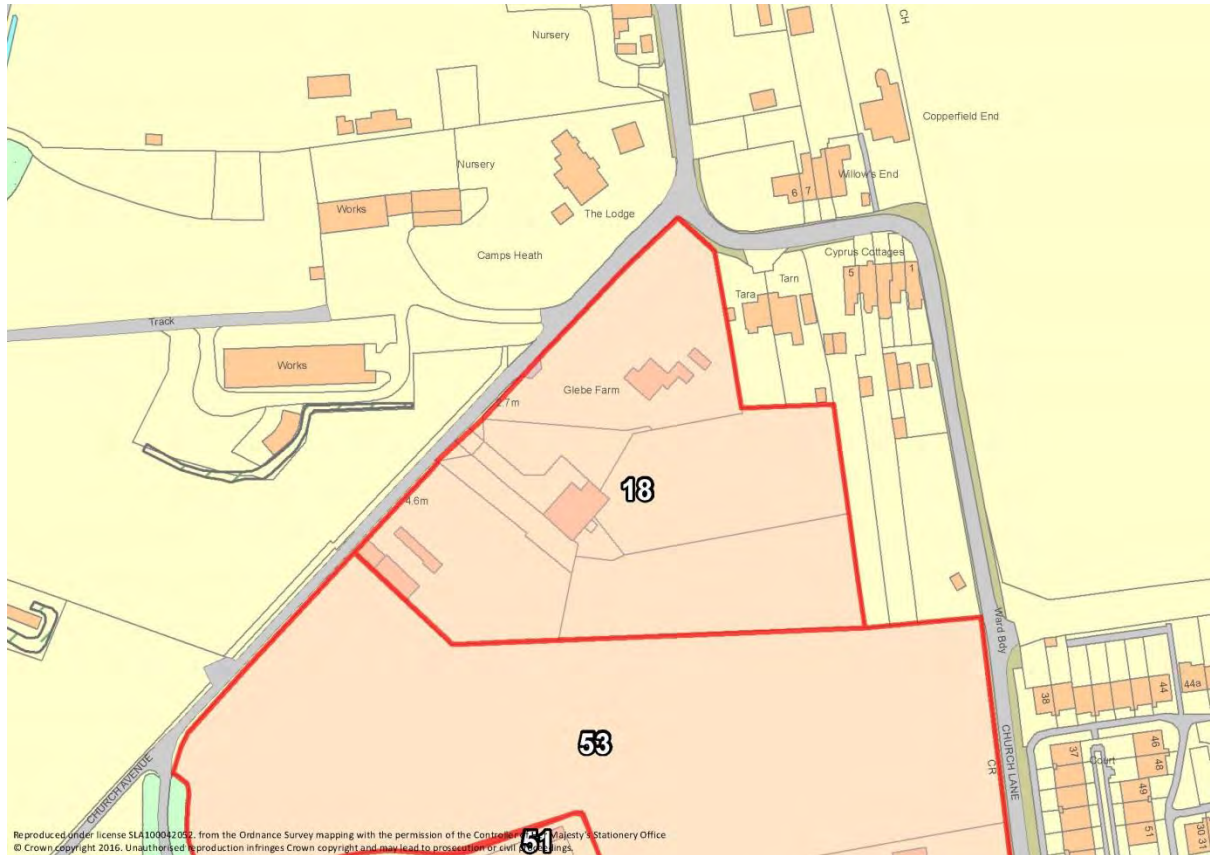
The site has good access to existing services and facilities in Oulton and in the future will have good access to the primary school, community centre, medical centre and retail facilities which are to be provided on the Woods Meadow development. The site is also in close proximity to the Mobbs Way Employment Area. There are bus stops nearby which provide access to the town centre. Development of the site is expected to have a limited impact on the landscape and is not used for agriculture. Development of the site will help improve the appearance of the former Lothingland Hospital site which is currently being used informally for the storage of building materials and equipment.

Policy WLP2.13 addresses concerns raised by Suffolk County Council Archaeology by requiring development to avoid the historic burial ground to the north west of the site. It is not considered that the development of this site will have an impact on the setting of any listed building.

Site 18 - Glebe Farm plus adjoining land, Church Avenue, Oulton

Suggested Use: Housing

Site Area: 1.08



This site comprises a dwelling, garden land and a paddock.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Broads Authority stated that there are existing pressures on Oulton Broad marshes relating to land use. They added that additional housing may add to these pressures as well on the marshes as a recreational resource.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /Green’ impact. Full details can be found on the Council’s website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England stated that the site is in close proximity to the Church of St Michael, a grade I listed building. They stated there may be potential for impact on the setting of the high grade listed building although it maybe screened by The Spinney.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust commented that the site is in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

A member of the public stated that any development on the site would have to be carefully landscaped. They stated the area has certain charm and it could easily be spoilt. More generally they added that development would probably add to the strain on services such as local health facilities.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue identified in the assessment is the impact on the landscape. The site is within tributary valley farmland character area. The Settlement Fringe Landscape Sensitivity Study identifies the area which this site falls within as having a moderate sensitivity, a high value, a major contribution to the setting of the Broads and a very low capacity for development. The site is quite exposed to views from the west and the Broads. The site is very rural in character and housing development would be out of character. Given the impact on the setting of the Broads, the site is not considered suitable for development.

Access to the site is potentially an issue as Church Avenue which is unmade track and is unlikely to be suitable to accommodate additional development. If site 53 is developed this could provide a solution and the landowner has confirmed access would be available from site 53.

Foul sewerage improvements would also be needed to accommodate development.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies a significant negative effect on the landscape due to the impact on the setting of the Broads. Minor negative effects included the loss of greenfield land.

Minor positive effects identified relate to the provision of housing and accessibility to employment premises.

Conclusion

The site would form an unnatural extension to the built up area and would likely have a significant impact on the landscape and the setting of the Broads. Therefore the site is not considered suitable for development.

Site 21 - Hall Road, Carlton Colville

Suggested Use: Housing

Site Area: 3.99



This site between the community centre and the ‘Four Acres’ development is currently vacant.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website

Historic England note there could be potential impact on the setting of a moated site scheduled monument to the east

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.

Suffolk Wildlife Trust stated that based on aerial photographs the site may contain habitats of conservation value. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value.

The landowner considered that the site was one of the most suitable sites put forward in the Lowestoft area. They stated that the site was well related to the existing settlement in close proximity to services and facilities. They added that public transport is within walking distance. They stated that information provided by Durrants suggest the land is Grade 2 agricultural land rather than Grade 1 as shown on the national map. They added the site has not been in agricultural use for over 10 years and therefore development would not involve the loss of agricultural production. They consider that the site is both available and achievable as the landowner supports development and Carlton Colville is a highly popular location in terms of the market. They suggest that the site will make a valuable contribution to the Council's housing targets.

Members of the Public raised concern about surface water drainage. They raised concern that drainage would need to flow into the southern end of the Kirkley Stream which has been subject to regular flooding. They also raised concern about foul drainage and whether the local pumping station would be capable to accepting additional flows. Concern was raised that Hall Road was narrow and congested at school times and extra traffic and extra school children would make the situation worse. More generally it was considered that Carlton Colville had already had too much development.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The main issue identified in the assessment was the risk of surface water flooding. Approximately half of the site suffers from surface water flooding which could mean that drainage is an issue requiring land to be set aside for sustainable drainage solutions.

The other main issue is the impact on the local roads network which are already under pressure from traffic at school times.

The site also has high archaeological potential and foul sewerage improvements would be needed to accommodate development.

The site has a capacity for 120 dwellings.

Summary of Draft Sustainability Appraisal

The draft sustainability appraisal identified a significant negative effect on the objective to conserve natural resources as the site is on high grade agricultural land (grade 1). A minor negative effect is the risk of flooding.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

Conclusion

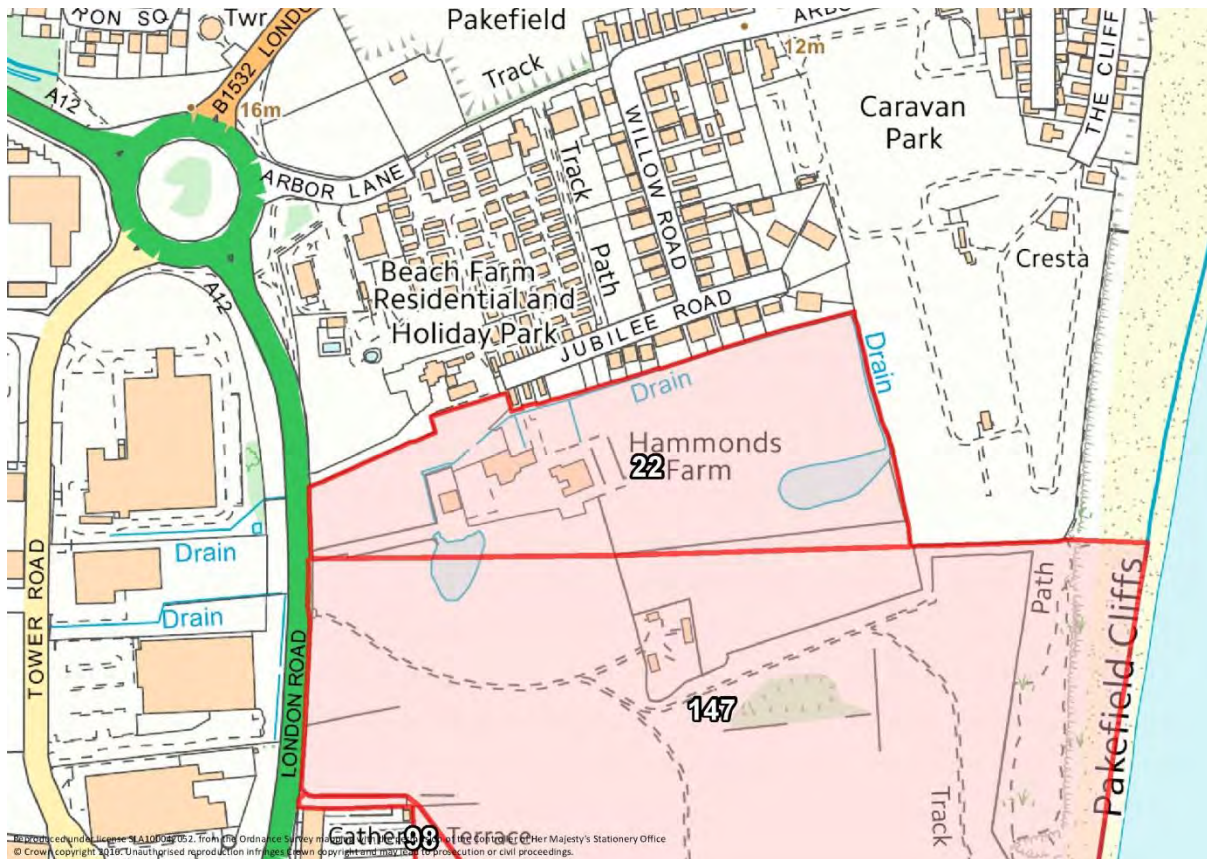
There are currently significant issues with traffic movements associated with Carlton Colville Primary School which would be difficult to mitigate through the development of this site in isolation. The site is not of a scale to deliver any on-site infrastructure improvements.

The site is considered less favourably to the site allocated under Policy WLP2.15 of the First Draft Local Plan and the other preferred sites in Lowestoft for residential development. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 22 - Hammonds Farm, London Road, Gisleham, Lowestoft

Suggested Use: Housing and/or Caravan Park

Site Area: 4.10



This land is just south of Beach Farm Residential and Holiday Park in Pakefield and is currently used for agriculture.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

Suffolk Wildlife Trust stated that the site, based on aerial photographs, may contain habitats and species of conservation value. They stated that the site should not be allocated unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that the site has.

Martin and Lawrence Tegerdine supported the development of the site and consider that it represents a sustainable and deliverable site, and in conjunction with site 147 is capable of accommodating a significant quantum of the planned growth for Lowestoft. They stated that the development would represent a logical extension to the town. They stated that the site is well served by public transport from services between Lowestoft and Kessingland and is located close to schools, retail units and employment.

Wellington Construction on behalf of the landowner noted that part of the site is brownfield and there is room to include additional strategic landscaping and open space. They noted that the site was adjacent to both residential and holiday accommodation and could be built out as a stand-alone site without impacting on the landscape of the area. They noted the potential to combine the development with sites 147 and 98. They noted that there are no viability issues with this site and development could be delivered relatively swiftly.

One member of the public supported the development of this site and stated that it should provide affordable rented 2-3 bed houses. They noted that the site was close to schools, shops, on a main bus route, and close to the beach.

One member of the public stated that it is crucial to keep the buffer between Lowestoft and Kessingland and another stated that there has been too much development in this area already and any more will exceed the ability to provide services and viable communications.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The main issues identified in the draft assessment were potential access constraints from the A12 and the potential impact on the road network.

Foul sewerage improvements would also be necessary to accommodate development.

There is some potential for biodiversity on the site.

There is potential for contamination on site.

The site has some archaeological potential.

The site has a capacity for 117 dwellings.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal considered two separate uses for the site, housing and tourist accommodation.

For housing and tourism uses the appraisal identified minor negative effects on natural resources.

For housing, minor positive effects were identified in relation to encouraging efficient patterns of movement and provision of housing.

For tourism minor positive effects were identified in relation to reducing deprivation and economic growth.

In terms of mitigation measures, the appraisal identified that a wildlife survey will be needed to assess whether there are any protected species on the site. Open space could be provided on the site to address the lack of accessibility to existing open space.

Conclusion

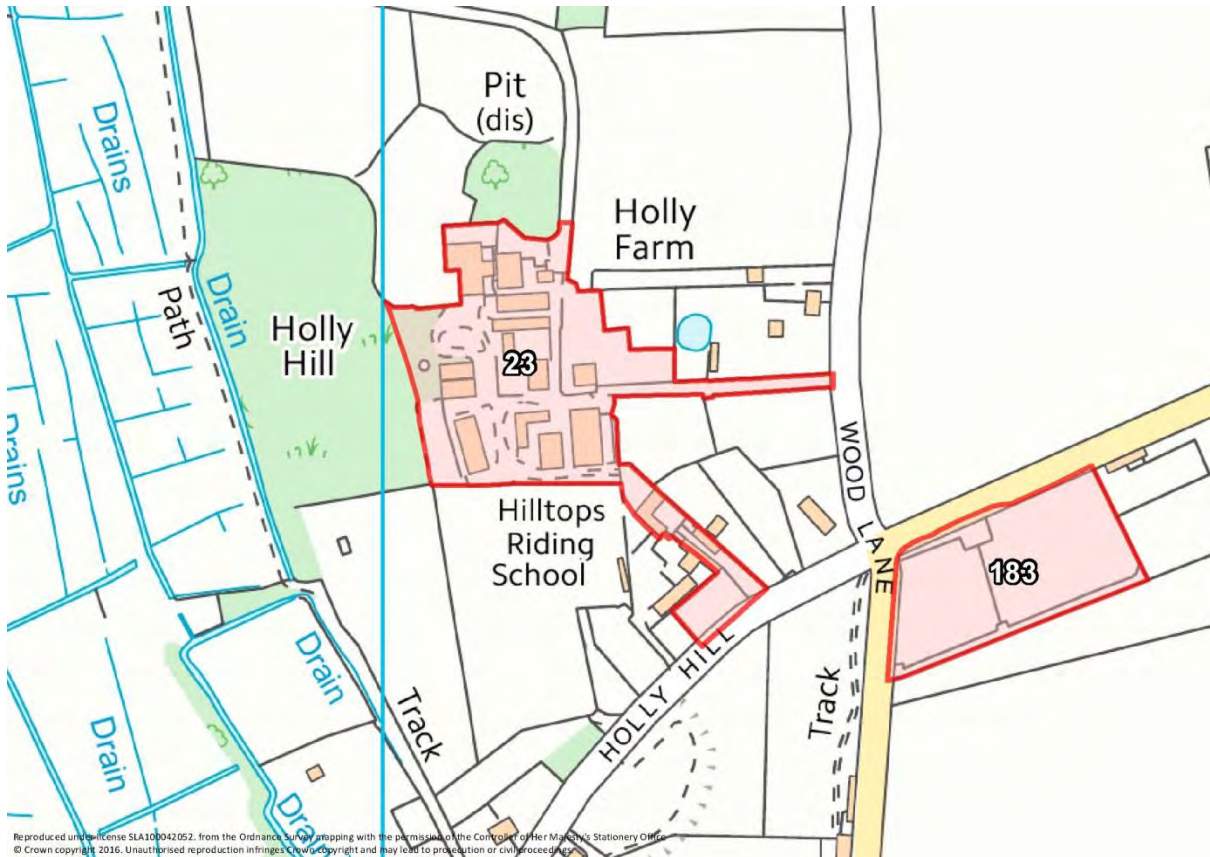
The site does not have a particularly good relationship to existing residential areas and sits within an area characterised by out-of-centre retail and tourism uses. The site falls within the catchment of Pakefield Primary School which is forecasted to be at capacity in the next five years. The school has no potential to expand. This would mean future school children would have poor access to primary school education.

Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 23 - Holly Farm, Wood Lane, Oulton, Lowestoft

Suggested Use: Housing and Tourist Accommodation

Site Area: 1.66



This site is to the west of Oulton and north of Camps Heath in open countryside on the edge of the Broads.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust commented that the site is in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. They considered that the site should not be

allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is accessed from Wood Lane, which is a narrow, unmade track in this location in open countryside. There is no pedestrian access to the site without substantial improvements which is unlikely to be viable. Therefore the site is not considered suitable for development.

A further issue identified in the assessment was the impact on the landscape. Development of this site for housing is likely to have a significant impact on the landscape and the setting of the Broads. As such the site is not considered suitable for development.

Improvements would need to be made to the foul sewerage network if this site was developed.

Other issues identified included the potential for contamination on the site.

There is also the potential for archaeology.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies a significant negative effect on the landscape due to the impact on the landscape and the setting of the Broads. Minor negative effects included access to services and facilities.

Minor positive effects were identified in relation to housing provision, the tourist accommodation use on reducing deprivation, and supporting economic growth and the rural economy.

Conclusion

Due to the lack of safe pedestrian access to the site and impact on the landscape and on the setting of the Broads, the site is not considered suitable for allocation.

Site 33 - Land adjacent to Travelodge Hotel, Leisure Way, Lowestoft

Suggested Use: Housing

Site Area: 0.72



This site sits to the south of Tesco off Leisure Way in North Lowestoft. A previous planning permission on the site for an 80 bed care home has recently expired.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /‘Green’ impact. Full details can be found on the Council’s website.

The Gunton Woodland Community Project stated that the site is not suitable for a dense housing development. They stated that the site forms a critical link in the “green belt” surrounding North Lowestoft that stretches from the beach all the way through the Denes, Dip Farm golf course, Gunton Wood, Pleasurewood Hills meadow, Gunton Meadow Nature Reserve to Foxburrow Wood and thence to

the West of the A12. They added that immediately adjacent to Site 33, there is a large natural pond which is well known as a great- crested newt habitat. They noted that Gunton Meadow Nature Reserve is an important asset to the area with its wide variation of habitat, two ponds, interesting ground flora and a great deal of bird life. They stated that the outcome for Site 33 would be to incorporate it as a part of the Reserve. They suggested one way forward could be to create an “adventure playground” attraction for children based on outdoor activities with parking and a small café with the possibility of planting a significant number of trees to preserve its green credentials.

Suffolk Wildlife Trust noted that a number of ecological issues have arisen as the result of site clearance that has previously occurred in relation to now expired planning consent for a care home. They added that Gunton Meadow is part of a network of small wildlife rich habitats in north Lowestoft which form an important ecological network in the area. They stated that whilst it is understood that some form of development has previously been considered acceptable on this site, they do not consider that residential development of the density identified in the Local Plan consultation is appropriate. They stated that preferably the site should not be allocated for any built development. However, if it is determined that some form residential development is deliverable it must be ensured that it is of low density and includes substantial buffers of both the nature reserve to the east and the green space to the south.

The landowner commented that the site is conveniently located in north Lowestoft, 2 miles from the town centre and close bus stops and cycle routes providing access to services and facilities. They stated that the site is within 2.4 miles of a railway station. They added that the principle of development has already been established through the previous care home consent on the site. They noted the site is within flood zone 1 and not considered at risk from surface water flooding. They noted that the site contains no known heritage assets, ecological designations or other physical constraints that would prevent development. They added there is an existing gas main on the site and a Tree Preservation Order (TPO). They stated that any development on the site could be adequately designed around the gas main and TPO. Frostdrive also provided more detailed comments on the initial Sustainability Appraisal and raised concern about the Council’s conclusions on landscape and townscape impact, natural resources impact, climate change impact and efficient movement impact.

One member of the public objected to the development of the site for houses. They stated that the site adjoins the Gunton Meadow Nature Reserve and a pond which has been a breeding ground for great crested newts. They added that the site has an oak tree on it which should be protected.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The main issue identified is impact on the landscape and townscape. The site has a poor relationship with existing residential areas and housing development on the site would be out of character with the surrounding leisure and retail uses. This could be mitigated by screening and retention of existing planting and establishing pedestrian and cycle connections with the residential area to the south.

The foul sewerage network would have to be improved if the site was developed and a gas main runs under the site which would have to be accommodated for.

The site has capacity for 21 homes.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to landscape and townscape impact and natural resources impact and poor accessibility to employment areas.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

Mitigation measure identified by the assessment related to the impact on the landscape. The site would need to be well screened, including retaining existing planting. Opportunities to provide pedestrian and cycle connections into the surrounding residential areas to the south would need to be explored.

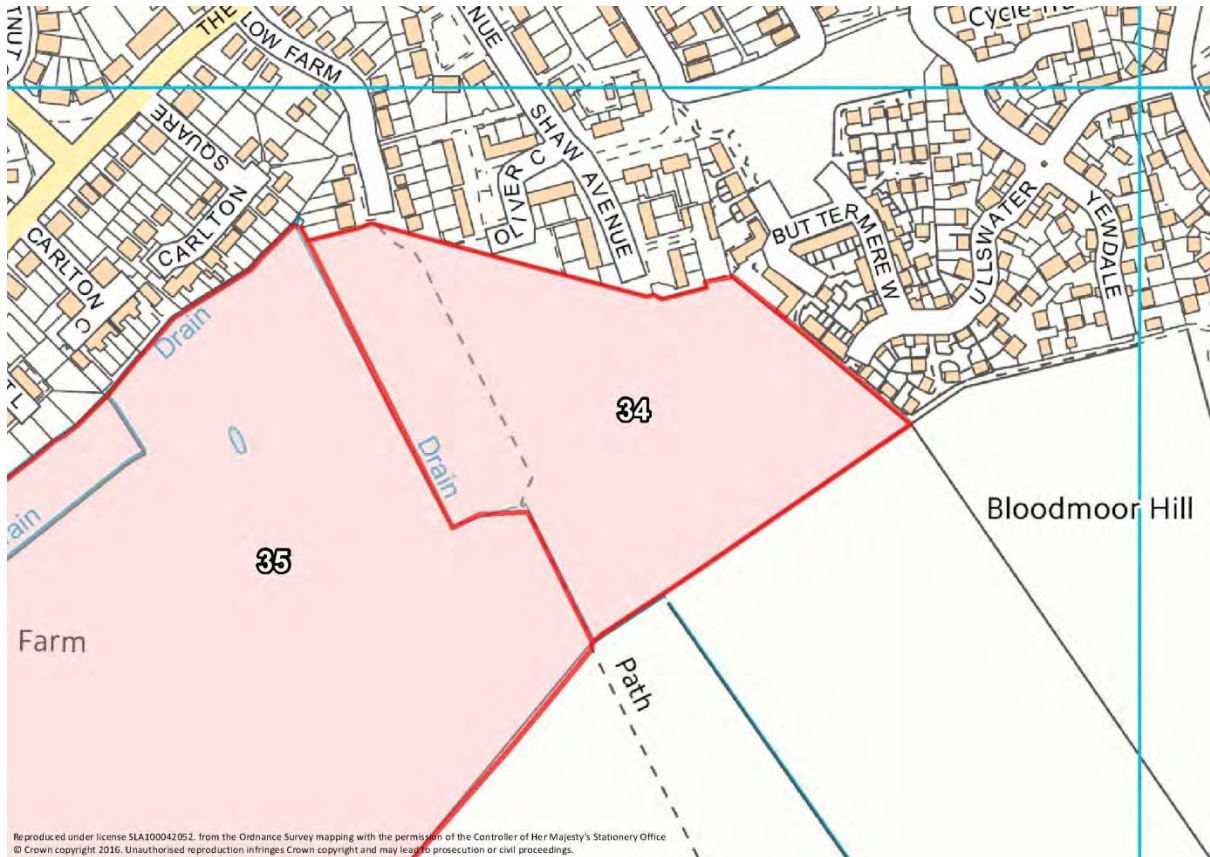
Conclusion

The site now has planning permission for housing therefore the site will not be considered any further for allocation as part of this Local Plan.

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

Suggested Use: Housing

Site Area: 5.00



This site sits to the south of Carlton Colville and is accessed by Shaw Avenue which connects to the Street. The site is currently in agricultural use.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

The Environment Agency stated that Carlton Colville and the Kirkley Stream in general are known to suffer from flooding from both the Kirkley Stream and surface water sources. They stated that the development of this site could offer the opportunity to reduce the existing flood risk and implement some of the early concepts that have been produced for public consultation as part of the Lowestoft flood risk management strategy. They added that the management of surface water from any future developments in this area will need to be strictly controlled, and ideally consider opportunities to reduce flood risk to existing communities.

Historic England commented that there is potential for the development of the site to impact on the setting of a nearby Moated Site Scheduled Monument to west.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Suffolk Wildlife Trust stated that based on aerial photographs the site may contain habitats of conservation value. They considered that the site should not be allocated unless for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value.

The landowner stated that the site is considered to be suitable, available and deliverable in the next 1-5 years. They suggested the site is accessible via Low Farm Drive, and there is also potential to create an access from The Street, through Site 35 to Site 34. They stated that development would represent a logical extension to the south of Carlton Colville being abutted by development to the north and the east. They stated that the site is within cycling and walking distance from Lowestoft, a key area for prospective employment growth over the coming plan period.

The majority of members of public who responded opposed development of the site. Concern was raised that development could create flooding problems from the Kirkley Stream. Members of the public noted issues about access on to The Street where parking is already a problem. Concern was raised about the loss of agricultural land. More generally concern was raised that there had already been too much development in Carlton Colville and it was questioned whether the local schools and other services and facilities could cope.

One member of the public stated they thought the site was suitable land for development.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The most significant issue identified is the potential for archaeological remains on the site. Any future planning application would need to be accompanied by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts. As such there is a risk that the development potential of the site could be reduced.

A right of way runs through the site. Foul sewerage improvements would be needed with development and it is possible that underground electricity cables run under the site.

The site has capacity for 130 dwellings.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to natural resources impact.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

Mitigation measure identified by the assessment related to the need for an archaeological investigation.

Conclusion

Policy WLP2.15 of the Local Plan allocates this site as part of a larger allocation for 800 new homes, a primary school, country park, allotments, flood mitigation, play space, local shops, and a community centre. The allocation also includes a car park for the community centre as existing Carlton Colville Primary School.

The site is a logical extension to the existing built up area. The sensitivity of the landscape is low and development could improve the existing exposed edge of the settlement around the Ullswater development. The site has good access to employment opportunities in South Lowestoft Industrial Estate and the nearby retail facilities.

Carlton Colville Town Council has expressed a desire to create a new community hub. There is already some funding available from a section 106 agreement from the Ullswater development. The development of 800 homes on this site provides an opportunity to provide funding and land for this development.

A development of 800 homes on this site provides the opportunity to deliver a new primary school in more central location serving pupils in the south Lowestoft and Carlton Colville area. This will help reduce the need to travel to the existing Carlton Colville Primary School in the future. Additionally, the site provides an opportunity to deliver parking and drop-off space for parents at the existing Carlton Colville Primary School to relieve pressure on the existing streets around the school. Parking could be shared with the new community hub

The indicative masterplan provided with Policy WLP2.15 addresses concerns raised by Historic England by showing open space around the Moated Site Scheduled Monument. The policy requires an archaeological investigation to take place prior to planning permission being granted.

Concerns raised about flooding are noted, and the indicative masterplan provided with Policy WLP2.15, shows open space in the area of flood risk on the site. Furthermore, the Policy requires the provision of flood mitigation works in line with the Lowestoft Strategic Flood Risk Management Project. These works could reduce the existing risk of flooding downstream on the Kirkley Stream.

Detailed access issues will need to be addressed as part of a planning application. There may be potential within the site to provide additional parking for users of The Street to avoid parking on the road. The site is

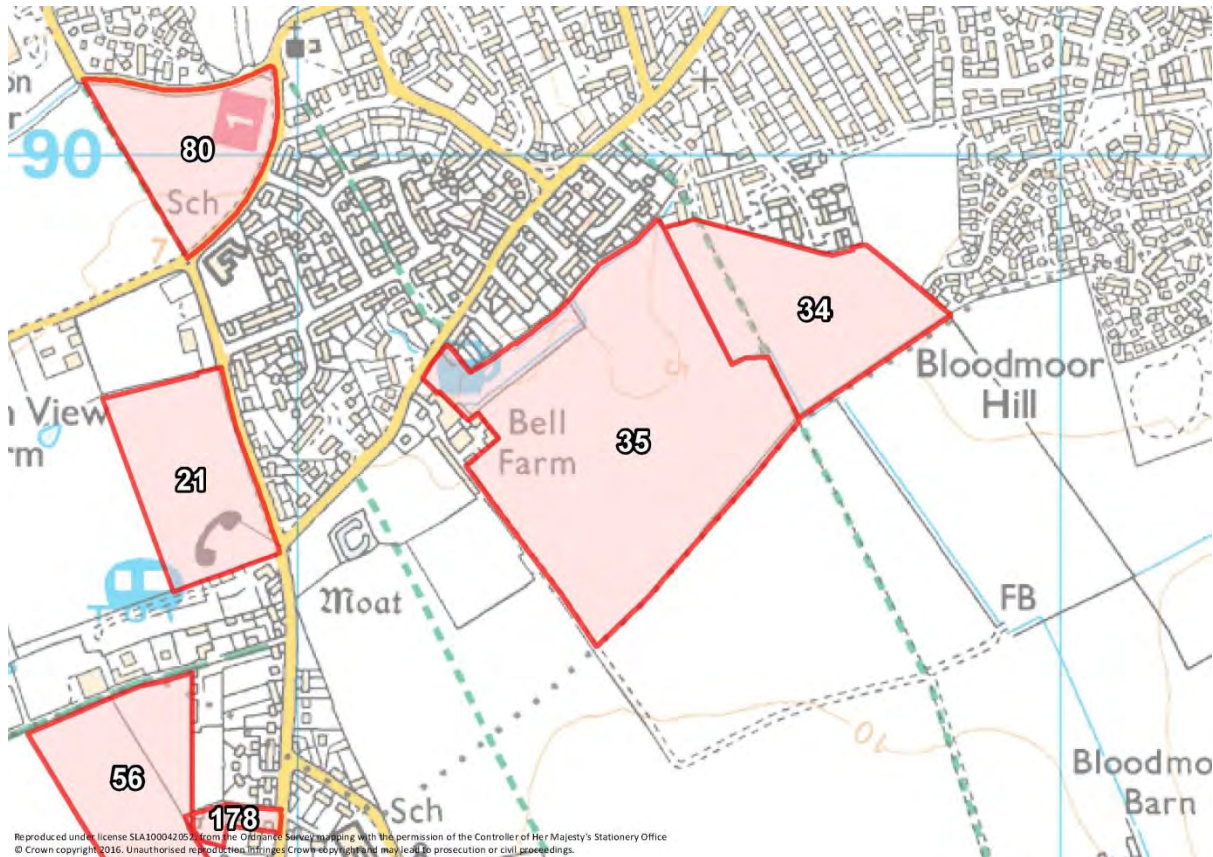
on high grade agricultural land, however, most sites in and around Lowestoft are on high grade agricultural land.

In response to concerns raised by members of the public about infrastructure, the site will provide a new primary school which will take pressure of the existing primary school and reduce traffic impacts associated with the existing primary school. The site will also provide new open space, local shops and a community centre. Development contributions will be made towards extensions to Rosedale Surgery, improvements to junctions such as Bloodmoor Roundabout and improvements to the cycle network.

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

Suggested Use: Housing

Site Area: 13.38



This large site is south of the Street Carlton Colville and is currently in agricultural use.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe crosses the site. Full details are on the Council’s website

The Environment Agency stated that Carlton Colville and the Kirkley Stream in general are known to suffer from flooding from both the Kirkley Stream and surface water sources. They stated that the development of this site could offer the opportunity to reduce the existing flood risk and implement some of the early concepts that have been produced for public consultation as part of the Lowestoft flood risk management strategy. They added that the management of surface water from any future developments in this area will need to be strictly controlled, and ideally consider opportunities to reduce flood risk to existing communities.

Historic England commented that there is potential for the development of the site to impact on the setting of a nearby Moated Site Scheduled Monument to west.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Members of public who responded opposed development of the site. Concern was raised that development could create flooding problems from the Kirkley Stream. Concern was raised about the loss of agricultural land. More generally concern was raised that there had already been too much development in Carlton Colville and it was questioned whether the local schools and other services and facilities could cope.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The most significant issue identified is the potential for archaeological remains on the site. Any future planning application would need to be accompanied by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts. As such there is a risk that the development potential of the site could be reduced.

There is a risk from surface water flooding on the site, although as noted by the Environment Agency there is potential for mitigation works to reduce the risk of flooding in the area through the development of the site.

Access to the site could be an issue from The Street due to poor visibility. However, access could also be achieved through site 34. There is also potential for local traffic impacts on The Street and at Bloodmoor Roundabout, given the scale of development which could be accommodated on this site.

There is a sewer pipe crossing the site and improvements to the foul sewerage network would be necessary for development.

The site has capacity for 320 dwellings.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to natural resources impact and the impact of climate change, specifically flooding.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

An uncertain effect was identified with respect to biodiversity, as there are some natural features on the site.

Mitigation measure identified by the assessment related to the need for an archaeological investigation and the retention of natural features.

Conclusion

Policy WLP2.15 of the Local Plan allocates this site as part of a larger allocation for 800 new homes, a primary school, country park, allotments, flood mitigation, play space, local shops, and a community centre. The allocation also includes a car park for the community centre as existing Carlton Colville Primary School.

The site is a logical extension to the existing built up area. The sensitivity of the landscape is low and development could improve the existing exposed edge of the settlement around the Ullswater development. The site has good access to employment opportunities in South Lowestoft Industrial Estate and the nearby retail facilities.

Carlton Colville Town Council has expressed a desire to create a new community hub. There is already some funding available from a section 106 agreement from the Ullswater development. The development of 800 homes on this site provides an opportunity to provide funding and land for this development.

A development of 800 homes on this site provides the opportunity to deliver a new primary school in more central location serving pupils in the south Lowestoft and Carlton Colville area. This will help reduce the need to travel to the existing Carlton Colville Primary School in the future. Additionally, the site provides an opportunity to deliver parking and drop-off space for parents at the existing Carlton Colville Primary School to relieve pressure on the existing streets around the school. Parking could be shared with the new community hub

The indicative masterplan provided with Policy WLP2.15 addresses concerns raised by Historic England by showing open space around the Moated Site Scheduled Monument. The policy requires an archaeological investigation to take place prior to planning permission being granted.

Concerns raised about flooding are noted, and the indicative masterplan provided with Policy WLP2.15, shows open space in the area of flood risk on the site. Furthermore, the Policy requires the provision of flood mitigation works in line with the Lowestoft Strategic Flood Risk Management Project. These works could reduce the existing risk of flooding downstream on the Kirkley Stream.

Detailed access issues will need to be addressed as part of a planning application. There may be potential within the site to provide additional parking for users of The Street to avoid parking on the road. The site is on high grade agricultural land, however, most sites in and around Lowestoft are on high grade agricultural land.

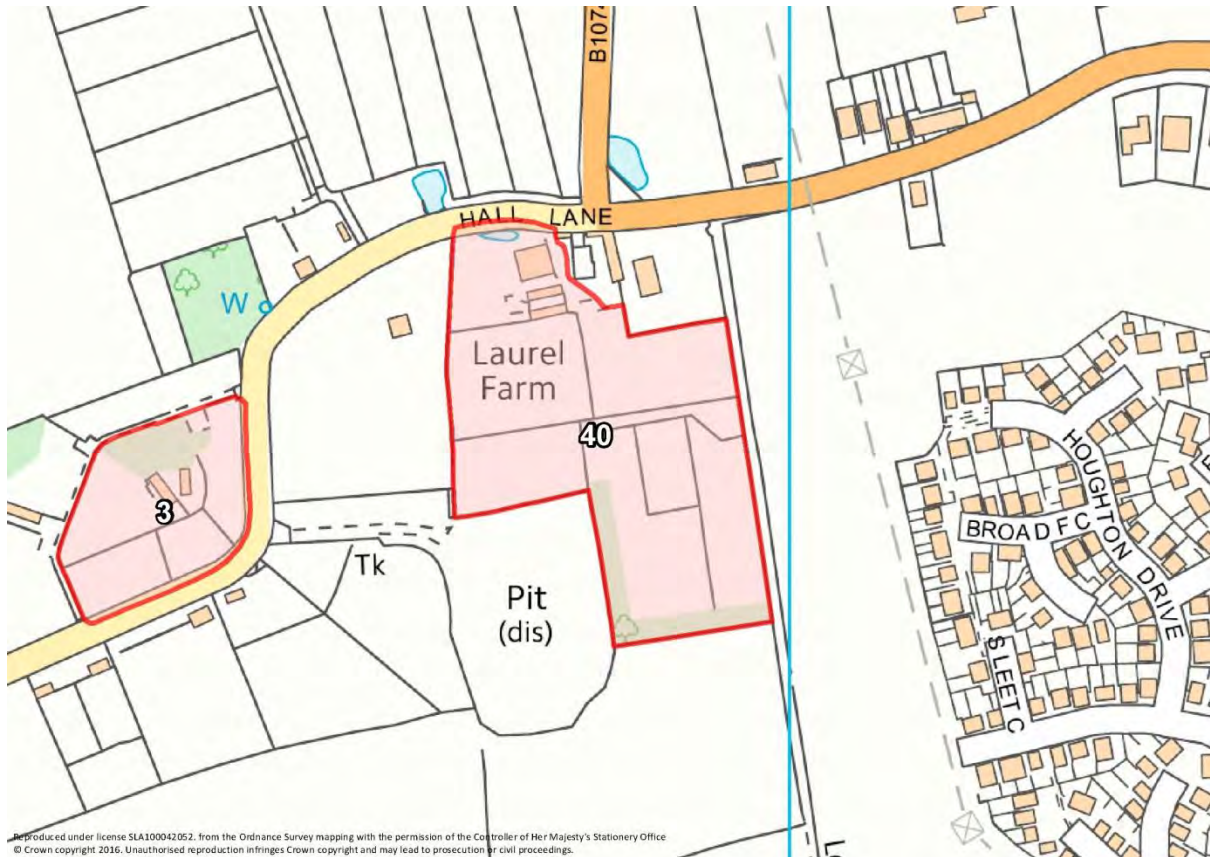
In response to concerns raised by members of the public about infrastructure, the site will provide a new primary school which will take pressure of the existing primary school and reduce traffic impacts associated with the existing primary school. The site will also provide new open space, local shops and a

community centre. Development contributions will be made towards extensions to Rosedale Surgery, improvements to junctions such as Bloodmoor Roundabout and improvements to the cycle network.

Site 40 - Land at Laurel Farm, Hall Lane, Oulton

Suggested Use: Housing

Site Area: 2.74



This site is to the west of Oulton on Hall Lane. It is currently used as paddocks and some holiday accommodation.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

The Environment Agency stated that the site is within Source Protection Zone 3.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' /Green' impact. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Badger Building stated that the site could be brought forward for development within the early years of the plan. They stated that the site is well located in relation to existing built development and can proceed without reliance on others. They stated that the site relates well to the development to the south, presently under construction by Persimmon.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The main issue is that at present there is no pedestrian access to the site. This should change with the completion of the adjacent Woods Meadow development.

Other issues include the lack of relationship with the existing built up area. This will change with the completion of the Woods Meadow development.

Foul sewerage improvements have also been identified.

The site has capacity for 80 homes.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to natural resources impact.

Minor positive effects were identified in relation to the provision of housing in a potentially accessible location which will help encourage healthy lifestyles.

An uncertain effect was identified with respect to biodiversity, as there are some natural features on the site.

A mitigation measure identified by the assessment related to the need to provide a lit footpath to the village of Oulton which would improve accessibility to services and facilities and help promote healthy lifestyles. The assessment also identified the need for the retention of natural features.

Conclusion

The site currently has a poor relationship to the existing built-up area of Lowestoft. At present there is no pedestrian access to the site. This should change with the completion of the adjacent Woods Meadow development. However, completion of this development is not expected until 2028. As such at the present time this site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the

development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 51 - Land at The Old Rectory, Church Lane, Oulton

Suggested Use: Housing

Site Area: 2.09



This site is part of the grounds of the Old Rectory and is currently an open meadow.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, a 'Green' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council's website

The Broads Authority stated that there are existing pressures on Oulton Broad marshes relating to land use. They added that additional housing may add to these pressures as well on the marshes as a recreational resource.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red' impact based on historic landscape grounds. Full details can be found on the Council's website. It should be noted

that further correspondence received suggests there is less likely to be potential for archaeology on the site.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England stated that the site is in close proximity to the Church of St Michael, grade I listed building. They stated there may be potential for impact on the setting of the high grade listed building although it maybe screened by The Spinney.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust commented that the site is in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

The landowner raised a number of points in support of development on the site. The landowner stated that the site had good access to services and facilities and employment, including the Mobbs Way Enterprise Zone which would help contribute to healthy communities. They stated that the site would help meet the District's housing needs and was available, suitable and achievable in line with the National Planning Policy Framework. They stated the site would contribute towards air quality and would minimise impacts on climate change as it is an accessible site which would discourage travel by car. They also mentioned there would be no impact on water quality as there is capacity in the sewerage network. They suggested that the impact on the landscape would be limited as the existing trees would screen the development. In terms of natural resources it was stated that the land is low quality grassland which is too small to be economically viable for use as a small holding. It was stated that there was no flood risk on the site. They stated that the intention was to develop the site without loss or removal of any significant trees or woodland. It was stated that a local developer has already committed to the early development of the site and that the development will create jobs in the construction phase.

A member of the public commented that the land is suitable for development and has pretty good transport links and facilities. They noted that the local school should take more pupils from local area rather than half way across town.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issues identified in the assessment are the impact on the landscape and heritage. The site is within tributary valley farmland character area. The Settlement Fringe Landscape Sensitivity Study identifies the area which this site falls within as having a moderate sensitivity, a high value, a major contribution to the setting of the Broads and a very low capacity for development. The site is located very close to The Broads. Large parts of the site are wooded which contributes significantly to the local landscape and the setting of the Broads. Approximately half of the area is open meadow secluded by trees. The site has a poor relationship to the existing settlement.

Comments from Suffolk County Council Archaeology suggest the site has historic landscape value as a planned garden associated with the rectory. It has been indicated by the landowner that this part of the site (to the east of the Rectory) would not be developed. The Settlement Fringe Study concludes there is historic continuity of the wider landscape with significant heritage features.

The Old Rectory and grounds are a non-designated heritage asset that could qualify as a locally listed building. The rectory is typical of other country houses of its period in that it has a pastoral setting outside its own garden area that is intrinsic to its setting. It is judged that this is a very important component of the Rectory's setting. Regardless of the very good level of tree screening that exists development would be harmful to its heritage significance. It is unlikely that this impact could be mitigated.

Another issue identified was with respect to access as the current access is from a narrow drive which is unlikely to be suitable for a level of development which could be accommodated on this site at standard densities.

There is some risk from surface water flooding and some potential for archaeology. The woodland on the site could provide a habitat for wildlife.

The site has capacity for 9 houses.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies that the site would have a significant negative effect on the landscape for the reasons described above. Minor negative effects were identified with respect to the conservation of natural resources, the impacts of climate change and the historic environment.

Minor positive effects were identified with respect to providing housing in an accessible location.

An uncertain minor negative effect was identified with respect to impact on biodiversity.

In terms of mitigation the appraisal identified that low density development on the meadow area only and preserving the trees and woodland would mitigate some of the landscape impacts. It is not considered possible to mitigate the historic environment effects.

Conclusion

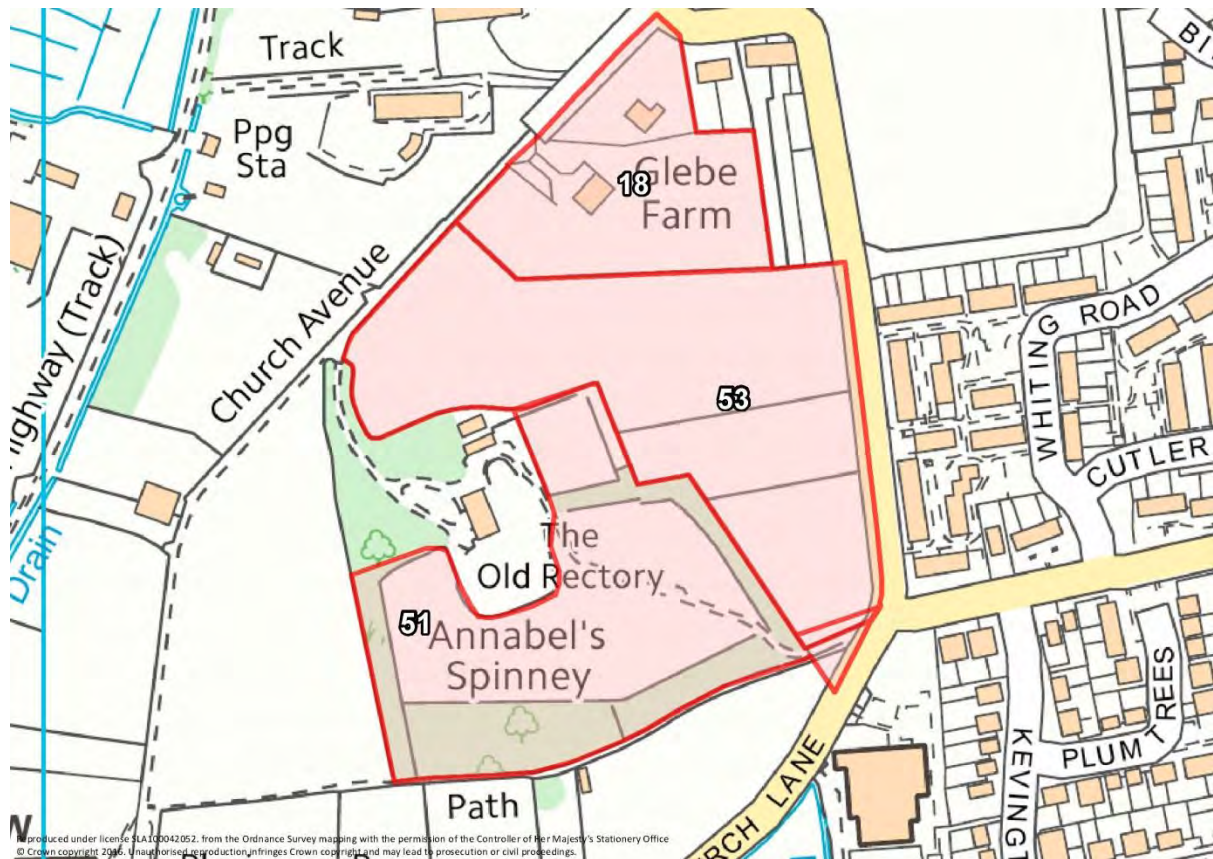
This site has a poor relationship with the existing built up area and any development on the site would be out of character of the area. The land may not benefit from any statutory designation but it clearly has some landscape and historic value. Due to the poor relationship to the existing built up area where development would result in an unnatural extension to the existing settlement, together with the effects on the setting of a non-designated heritage asset, the site is not considered preferable for allocation compared to other options available within and around Lowestoft. The preferred sites identified in the First Draft Local Plan cumulatively deliver more than sufficient housing for Lowestoft under the strategy

outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 53 - Land between Church Lane and Church Avenue, Oulton

Suggested Use: Housing

Site Area: 2.38



This site is currently used as paddocks and lies to the west of Oulton between Church Lane and Church Avenue.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council's website.

The Broads Authority stated that there are existing pressures on Oulton Broad marshes relating to land use. They added that additional housing may add to these pressures as well on the marshes as a recreational resource.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England stated that the site is in close proximity to the Church of St Michael, grade I listed building. They stated there may be potential for impact on the setting of the high grade listed building although it may be screened by The Spinney.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' /Green' impact. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not suitable for development due to poor access and egress to road infrastructure.

The landowner stated that the site is adjacent the built up area in walking distance of a primary school, a shop and public transport facilities. They noted that once the Woods Meadow site is established Site 53 will be reasonably close to additional retail facilities, a community hall, medical centre, primary school, play areas and a country park; together with further public transport facilities. The landowner raised concern about the initial Sustainability Appraisal conducted by the Council and argued that the western boundary of the Whiting estate does not perform a natural edge to the built form. In support of this they argued that there was development to the north and south of the area. However, they acknowledged that the surroundings to the immediate west are semi-rural and therefore a lower density development may be more appropriate. The landowners outlined the potential for the site to deliver highway improvements to a concealed junction where Church Lane and Sands Lane converge. The landowners stated that the site could help meet the District's housing need and there are no viability issues and therefore development could be delivered swiftly.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue identified in the assessment is the impact on the landscape. The site is within tributary valley farmland character area. The Settlement Fringe Landscape Sensitivity Study identifies the area which this site falls within as having a moderate sensitivity, a high value, a major contribution to the setting of the Broads and a very low capacity for development. The site is located very close to The Broads and the western part of the site is exposed to the Broads. The site is distinctly rural in character. Mature planting from the Whiting Road estate to Church Road provides a natural edge to the settlement. These potential impacts on the landscape are not considered to be mitigatable. As such the site is not considered suitable for development.

Other minor issues identified in the assessment include access constraints as Church Lane is quite narrow along the frontage of the site.

There is also a sewer pipe running through the site and foul sewerage improvements have been identified.

A small amount of surface water flood risk which may require space to be set aside to deal with surface water.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies that the site would have a significant negative effect on the landscape for the reasons described above. Minor negative effects were identified with respect to the conservation of natural resources and the impacts of flooding.

Minor positive effects related to the provision of housing in an accessible location which may help promote healthy lifestyles.

Conclusion

The site would form an unnatural extension to the built up area and would likely have a significant impact on the landscape and the setting of the Broads. Therefore the site is not considered suitable for allocation in this Local Plan.

Site 54/204 - Land between Harbour Road and the west end of the old Shell site, Lowestoft

Suggested Use: Housing, employment and marina.

Site Area: 1.03/1.20



This site sits on the north side of Lake Lothing at the end of Harbour Road. It is currently unused and is overgrown.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' /'Green' impact. Full details can be found on the Council's website.

Suffolk Wildlife Trust stated that, based on aerial photographs, the site may contain habitats and species of conservation value. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value.

Landowner has submitted the site for mixed use including employment and residential linked in with a marina on the frontage.

One respondent stated that the site includes a public footpath along the shore of Lake Lothing and a well-established but informal cycle track along the top of the bank, beside the railway line, from the footbridge over the railway to Harbour Road. They stated that in any development the route must be included as a formal cycle route.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. However, there is uncertainty with respect to the potential contamination constraints and the potential impact biodiversity from any redevelopment which may not be able to be mitigated. The land was historically used for industry and some waste has been dumped on the site presenting a high risk for contamination. The site is very overgrown in places and likely provides a valuable wildlife resource with links to the beach to the south of the site and Lake Lothing beyond.

There are potential issue with the market attractiveness of the site, given its potential contamination issues, proximity to industry and the existing character of the land over Lake Lothing. Once the Brooke Peninsula is redeveloped, along with the pedestrian and cycle bridge this may make the area more attractive to the market. The changing character of the area would also mean that redevelopment of this site would be more in keeping with the townscape.

This site is located in flood risk zones 2 and 3. Part of the site⁴ is located in functional floodplain 3b.

There are likely to be compatibility issues with neighbouring uses. Noise and odour from adjacent industry and the railway line may cause amenity problems for new residents.

Trees and shrubs that cover part of the site could provide habitats for local wildlife. Some of this is mature vegetation which complements the townscape. This could be lost if the site is developed. The site is also vulnerable to flooding.

If the site is developable it could have a capacity for about 30 homes. This would involve developing half of the site, in order to avoid areas at risk of flooding and protect the beach. It is suggested that 50 dwellings per hectare would be an appropriate density.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects related to the impact on health, the impact on townscape, the effects of climate change and the impact on biodiversity.

Minor positive effects were identified in relation to the provision of housing in a potentially accessible location and on economic growth associated with the mixed use development.

To help mitigate the effects the Sustainability Appraisal suggested ensuring buildings are designed to limit the effects of noise. It also identified a need to avoid the southern part of the site to minimise impacts on biodiversity and impacts from flooding.

Conclusion

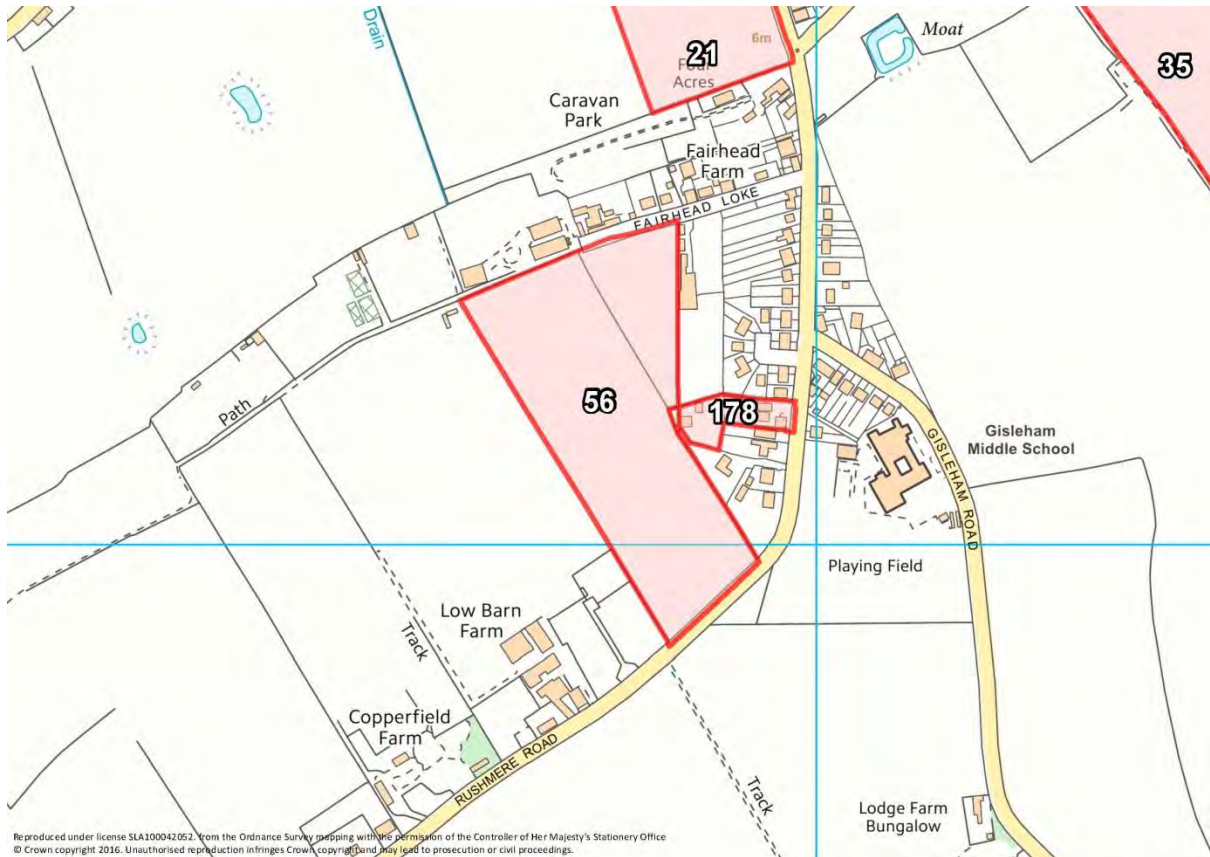
Given the uncertainty about the possible impact on biodiversity, the site should not be positively allocated for development in the Local Plan for a mixed use development. There are also concerns about the deliverability of the site due to the attractiveness of the site to the market given its surroundings. This may change with the completion of the Brooke Peninsula development and the associated pedestrian and cycle bridge.

A lack of allocation on this site will not prohibit its future development as the site will be within the settlement boundary/ physical limits of Lowestoft, where the principle of development will generally be accepted subject to conformity with the other policies of the Local Plan and national planning policy.

Site 56 - Land between Rushmere Road and Fairhead Loke, Carlton Colville

Suggested Use: Housing

Site Area: 5.58



This site is just to the west of Carlton Colville Primary School. It is currently in agricultural use.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.

Gisleham Parish Council raised a number of concerns about development on this site as summarised below.

- The road which the site accesses from is a busy rural road with a blind bend. They noted that the road could be widened, however, this would increase traffic speeds.
- There is no footpath to the site and the difficulty of providing one.

- Rushmere Road regularly floods at times of heavy rains, close to where the site entrance might be. They noted they were not aware of any sewerage constraints.
- Carlton Colville Primary School would not cope with what could be an extra 150 or more pupils and that if it was to be extended, parking problems would increase around the school. Concern was also raised about people driving to shops on Fadona Road where there is limited parking.
- The local roads would not be able to cope with the construction traffic
- An area of 'set aside' is located along the eastern boundary which is potentially an area for small mammals and birds and various varieties of flowering plant. They also noted bats in the locality.
- The site is some distance from development and would cause excessive light pollution.

The landowner stated the site is considered suitable, available and deliverable in the next 1-5 years. They noted that landscape issues could be addressed by the implementation of strategic landscaping in association with any future development, as well as the inclusion of attractive open space. They noted that the site could be accessed from the north via Fairhead Loke, subject to some highways improvement works, and is currently accessible via Rushmere Road to the south. They stated the site is adjacent to Carlton Colville Primary School and is situated within cycling and walking distance from Lowestoft. They added that there may be some potential synergies between the development of the site and a possible solution to the existing traffic congestion issues associated with Carlton Colville Primary School, which could involve some of our client's further land holding to the south of the school.

One member of the public responded to this site option and raised concerns about access to the site from a narrow country road which has poor visibility and subject to parking associated with the school. They also raised concern about surface water discharging into the Kirkley Stream causing flooding. They added that the development of the site would encroach into open countryside. They also questioned whether the school could accommodate the additional children.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. Access to the site is constrained. Access from Rushmere Road will require the footpath to be extended to the frontage of the site. Access from Fairhead Loke will also likely require improvements. There are also existing traffic congestion problems associated with the Primary School. The landowner has suggested that the development of this site could provide a solution to these issues, but there are no details of this solution to be confident it would be acceptable.

There is some potential for archaeology and any planning application would need to be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts. As such there is a risk that the development potential of the site could be reduced. Development on this site would also require foul sewerage network improvements.

There is potential for an impact on the landscape. This could be mitigated by planting on the western boundary of the site and reduced housing density.

The site has capacity for 110 dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect on the conservation of natural resources as the land is grade 1 agricultural land. Minor negative effects were identified in relation to impact on the landscape.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

The appraisal identified that minor negative effects on the landscape could be mitigated through adequate boundary planting on western boundary of the site to integrate the development into the countryside and replicate the existing low impact edge of the settlement to the east. The appraisal states that a lower residential development would be more appropriate on this site.

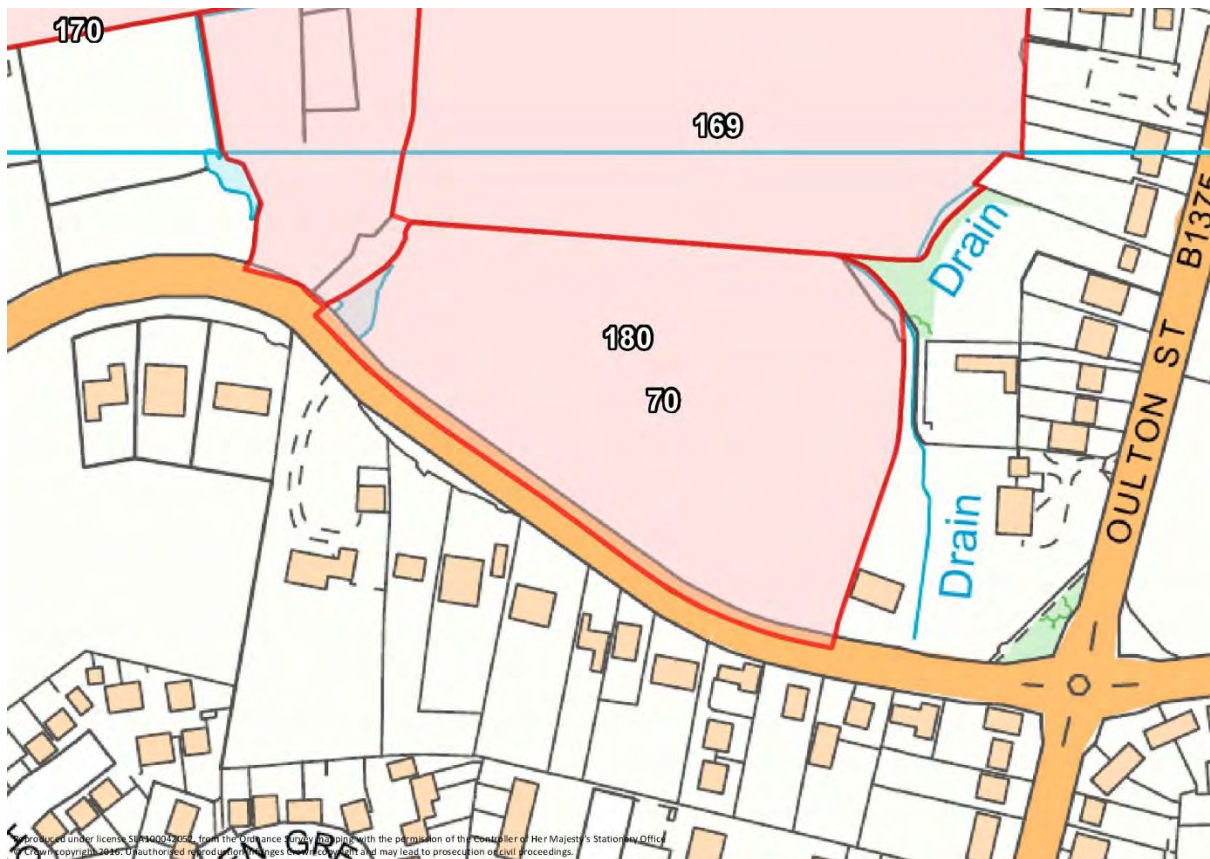
Conclusion

The site has a poor relationship to the existing built-up area and development would form an unnatural extension to the town. The site currently has no pedestrian access to the site. The site is on grade 1 agricultural land. Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of high grade agricultural land. As such the site is not considered suitable for allocation in this Local Plan.

Site 70/180 - Land north of Hall Lane, Oulton

Suggested Use: Housing

Site Area: 2.30



This site is currently used for paddocks and lies to the north of Hall Lane in Oulton.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England noted that the site was in close proximity to Blue Boar Inn, grade II to the east and the Manor House grade II * listed to the south east. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' /Red' impact on historic building/landscape grounds. Full details can be found on the Council's website. Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Badger Building stated that in the event of allocation, they are in a position to bring the site forward for development within the early years of the plan. They noted that additional land to the north has been promoted but is constrained by access from Union Lane. They added that there is merit in looking at a comprehensive proposal for development in this area which can embrace the re-use of the Lothingland hospital site with a compressive scheme for access and new housing, served off Somerleyton Road.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The main issue is the impact on the setting of the listed Manor House to the east of the site. This could be mitigated by providing open space adjacent to the Manor House boundary. The site has a high potential for archaeology and any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

Access to the site may require improvements. Using the land to the west covered by site 180 may resolve this.

Low level power lines cross the site and foul sewerage improvements have been identified.

There are small pockets of surface water flooding which may indicate a drainage issue, resulting in land being set aside to manage surface water.

There is a pond between Site 70 and 180 which could support biodiversity.

The site has capacity for 30 dwellings, given the need to have a large area of open space at the front of the site to help protect the setting of the listed building.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect on the historic environment due to the impact on the setting of the Grade II* Manor House. Minor negative effects identified were the impact on natural resources and flooding.

Minor positive effects related to the provision of housing in an accessible location.

To mitigate the significant effect on the historic environment the appraisal stated that leaving an area of the site adjacent to the Manor house undeveloped as open space may mitigate the impact on the setting of the listed building.

Conclusion

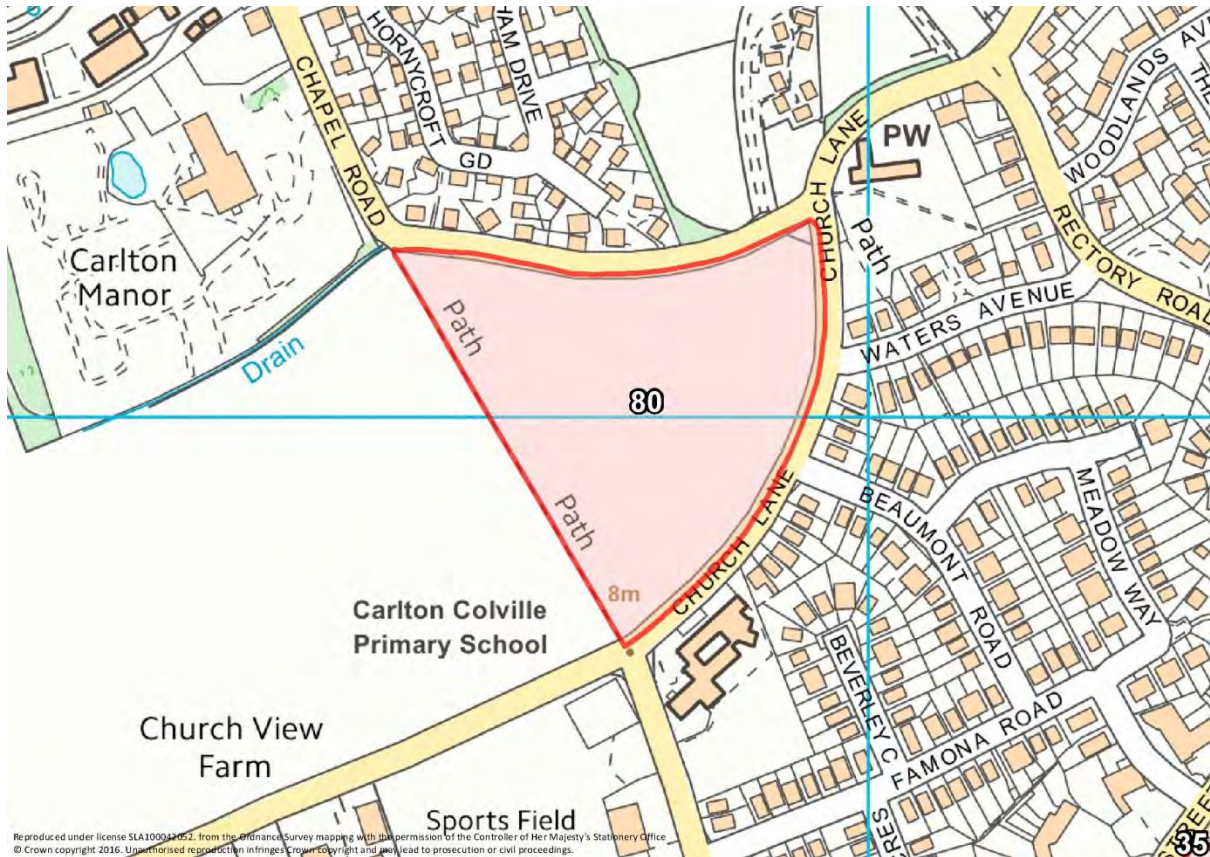
Policy WLP2.14 of the First Draft Local Plan allocates this site as part of an allocation for 200 dwellings. The site has good access to existing services and facilities in Oulton and in the future will have good access to the primary school, community centre, medical centre and retail facilities which are to be provided on the Woods Meadow development. The site is also in close proximity to the Mobbs Way Employment Area. There are bus stops nearby which provide access to the town centre. Development of the site is expected to have a limited impact on the landscape and is on grade 3 agricultural land. Vehicular access is possible from Hall Lane.

Concerns raised by Historic England with respect to the impact on the setting of the Manor House have been addressed in Policy WLP2.14 by requiring a significant area of open space to be provided on the southern part of the site.

Site 80 - Land off Church Lane, Carlton Colville

Suggested Use: Housing

Site Area: 3.51



This site is currently used for agriculture and is between Church Lane and Chapel Road in Carlton Colville.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

Historic England stated that there could be a potential impact on the setting of the grade II* Church of St Peter to the north east.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Carlton Colville Town Council stated that the site should be left undeveloped as it provides a green corridor and views of the church. They noted that the site is one of the highest points in Carlton Colville

and housing there would have a detrimental affect on drains and sewers. They also noted that the church also needs a parking area and extra burial area.

Badger Building stated that in the event of allocation, they are in a position to bring each forward for development within the early years of the plan. They added that the site is well located in relation to existing built development and can proceed without reliance on others. They stated that the site provides an opportunity to draw traffic away from the tight corner by the church and provide a more direct link from Chapel Road to Church Lane. They stated that the site rounds off the extent of development of Carlton Colville, to the west and does not extend in to open countryside.

Members of the Public who responded to this site option objected to the development of the site. Concern was raised that the site is surrounded by dangerous blind corners including from Carlton Manor where there is a blind left hand bend and a blind corner at the church which has regular accidents. The access road from Carlton Hall Residential Home was noted as another hazard along with other junctions and roads in the locality. Additionally it was suggested that development would create traffic problems.

Concern was also raised about flooding. It was suggested that if the site is developed there would be a huge flooding problem as the water would run downhill from Waters Ave and Beaumont Road towards The Mardle where it was noted there had already been serious flooding problems.

Concern was raised that the development would cut off light and privacy for existing homes opposite the site. Concern was also raised that the development would lock views of the 14th Century St Peter's Church.

It was suggested that development of this site would result in a loss of habitat for buzzards, sparrow hawks and owls which nest locally.

It was considered that the small number of houses proposed would do little to solve the housing problem.

More generally it was considered there had been too much development in Carlton Colville and the development would impact upon local infrastructure such as the school. It was suggested that if Carlton Colville needed further development, the old school could be sympathetically developed for first time buyers and or retirement bungalows.

It was suggested that small area of the site could be used for church parking.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The main issue is the potential impact on the setting of the on the grade ii* listed church. This could be potentially mitigated by controlling the height and the layout of the development to ensure views (including long distance views) of the church remain. An area of open space opposite the church would help maintain a visual setting of the church from Church Lane and Chapel Road.

This site is of extremely high archaeological potential and any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

Developing this site could have an impact on views to Carlton Colville Church. A footpath runs through the site and hedgerows run along the western boundary that should be preserved. There has also been identified the need for foul sewerage network improvements.

The site has capacity for 60 homes at 20 dwellings per hectare, including 0.5 hectares set aside for open space opposite the church.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal identified a potential significant negative effect on the historic environment due to the possible impact on the setting of the grade II* listed church. Minor negative effects were identified on the landscape and on natural resources.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

To mitigate the effects on the historic environment the appraisal stated that appropriate space is set aside to protect the setting on the Grade II* listed church and ensure development is of an appropriate scale and form to preserve views of the church from the surrounding landscape.

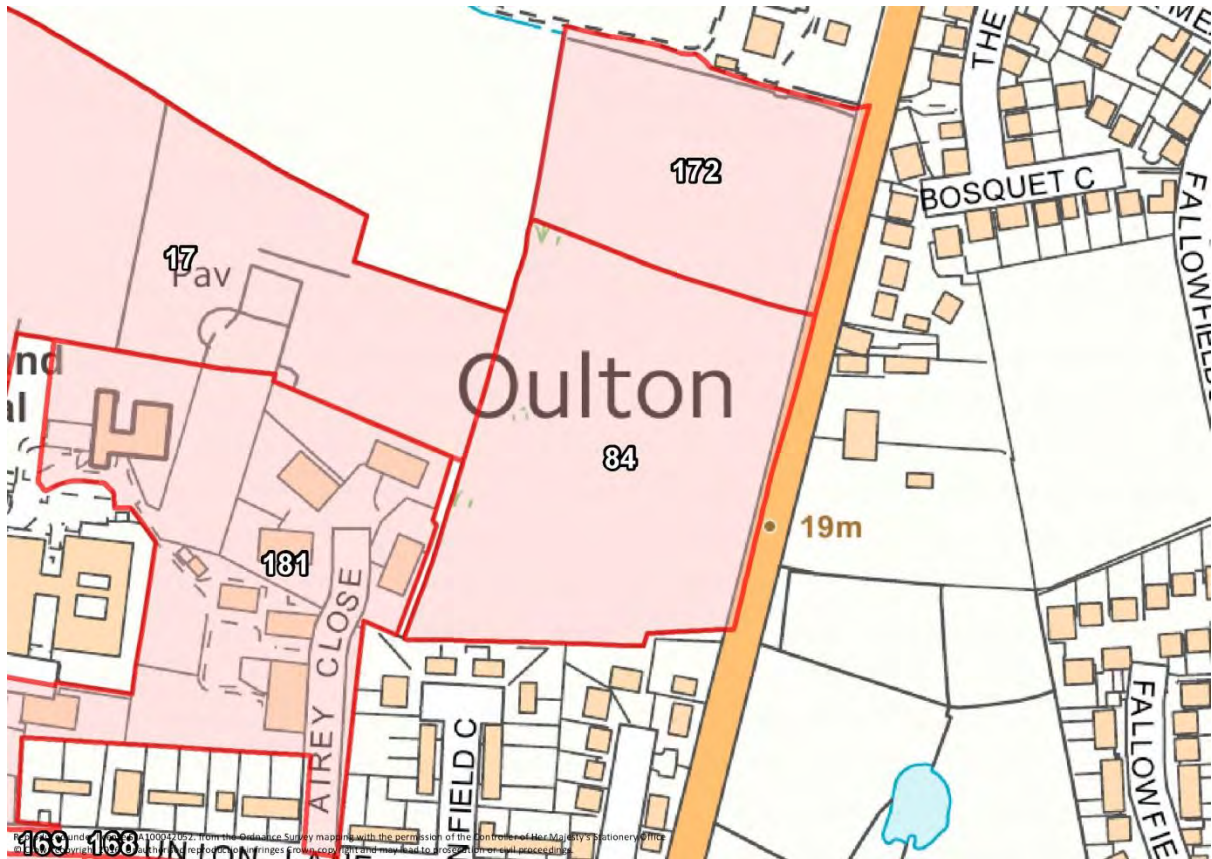
Conclusion

The development of this site has the potential to negatively impact on the setting of the grade II* listed church. Whilst through the design of development this may be able to be mitigated it nevertheless detracts from the suitability of the site for allocation. The site is considered less favourably to the site allocated under Policy WLP2.15 of the First Draft Local Plan and the other preferred sites in Lowestoft for residential development. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 84 - Land off Parkhill, Oulton, Lowestoft

Suggested Use: Housing

Site Area: 2.12



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

Suffolk County Council Archaeology noted that the development of this site would have a 'Green/Amber' impact. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust stated that, based on aerial photographs, the site may contain habitats and species of conservation value. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value.

Oldman Homes stated the site has no viability issues and therefore development could be delivered swiftly. They stated the site is adjacent to existing housing to the south and also the north east and south east on the opposite side of Parkhill. They stated the site could be developed as a standalone site or with other sites also promoted in the locality. They noted that such an approach could facilitate an improved access onto Parkhill via Site 84, thus avoiding what they regard is at present a most unsatisfactory cross road arrangement at the intersection of Union Lane, Parkhill and Oulton Rd North. Oldman Homes state that the development of the site could create an attractive entrance to the town when arriving from the north.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is vulnerable to some surface water flooding in certain areas and foul sewerage network improvements would be needed to support development. There is also a need to extend the footpath along Park Hill by some 200m to the frontage of the site.

The site has capacity for 42 dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to impact on natural resources and climate change.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

Conclusion

The site is allocated as part of Policy WLP2.13 of the First Draft Local Plan.

The site has good access to existing services and facilities in Oulton and in the future will have good access to the primary school, community centre, medical centre and retail facilities which are to be provided on the Woods Meadow development. The site is also in close proximity to the Mobbs Way Employment Area. There are bus stops nearby which provide access to the town centre. Development of the site is expected to have a limited impact on the landscape and is not used for agriculture. Development of the site will help improve the appearance of the former Lothingland Hospital site which is currently being used informally for the storage of building materials and equipment.

An ecological assessment of the site is currently under preparation.

Site 96 - Land opposite St Michael's Church, Church Lane, Oulton

Suggested Use: Housing

Site Area: 0.39



This site is at the western end of Church Lane, adjacent the Oulton Church. It is currently used as a paddock.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website

Historic England stated that the site is in opposite to the Church of St Michael, grade I listed building. They stated there may be potential for impact on the setting of the high grade listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /Red’ impact on historic building/landscape grounds. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust commented that the site is in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

A member of the public stated that the land is suitable for housing development.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue identified in the assessment was the impact on the landscape. The site is within tributary valley farmland character area. The Settlement Fringe Landscape Sensitivity Study identifies the area which this site falls within as having a moderate sensitivity, a high value, a major contribution to the setting of the Broads and a very low capacity for development. The site is located very close to The Broads and the western part of the site is exposed to the Broads. The development of the entire site could have a significant impact on the landscape and the setting of the Broads. There is also potential that development of the entire site could impact upon the setting of the Grade I listed church.

Foul sewerage improvements would also be needed if development took place on this site.

Access could also be a constraint if the entire site was to be developed due to the narrowness of Church Lane.

This site could accommodate 4 dwellings.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal identified a significant negative impact on the landscape and a potential significant negative effect on the historic environment for the reasons described above. A minor negative effect was identified in relation to impact on natural resources.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

In order to mitigate the impacts on the landscape and the historic environment, the appraisal stated that development would need to be restricted to along the frontage of Church Lane.

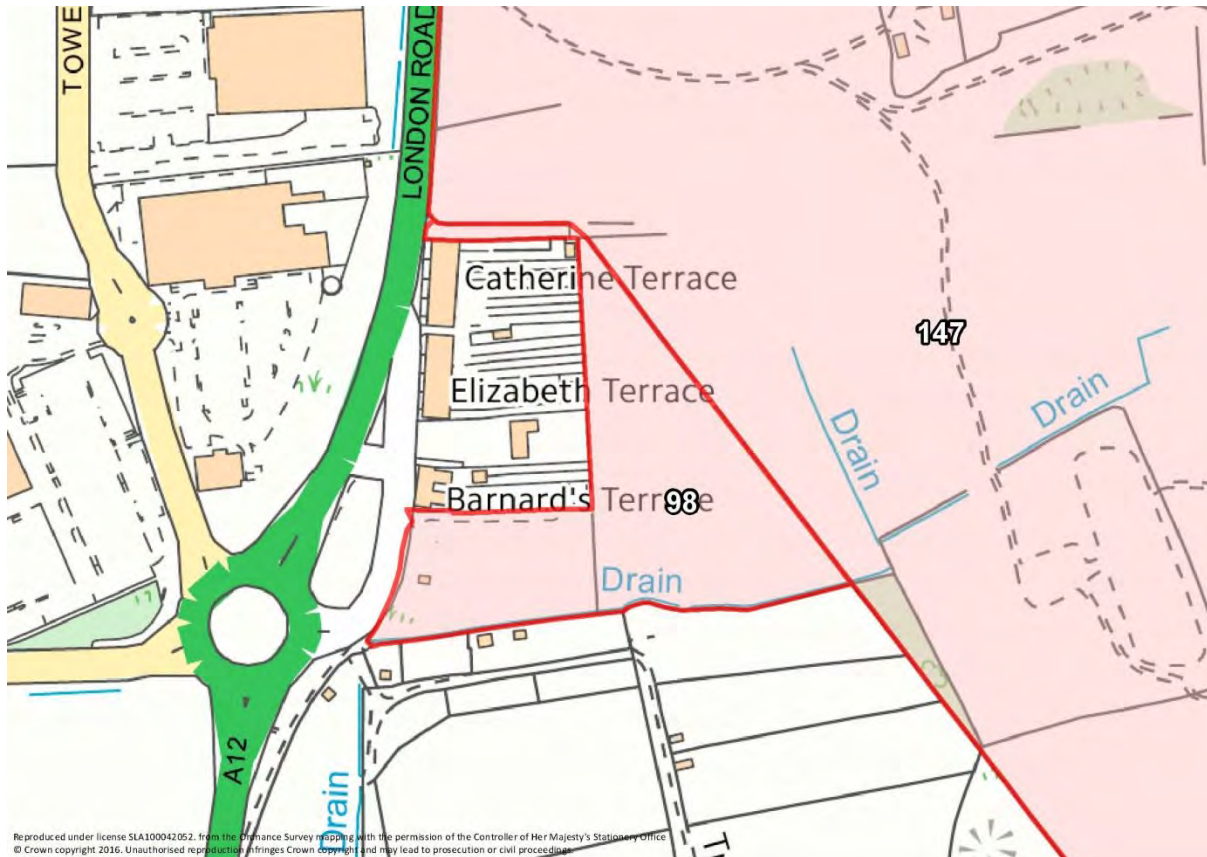
Conclusion

To mitigate the impacts of development on the landscape development would need to be restricted to just along the frontage on Church Lane. This would result in a development of approximately 4 homes which would be too small to allocate in the Local Plan.

Site 98 - Land rear of Elizabeth Terrace, A12 London Road, Gisleham

Suggested Use: Housing

Site Area: 1.80



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council's website

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' /Green' impact. Full details can be found on the Council's website.

Suffolk Wildlife Trust stated that the site, based on aerial photographs, may contain habitats and species of conservation value. They stated that the site should not be allocated unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that the site has.

The landowner stated the site is considered suitable, available and deliverable in the next 1-5 years. They stated the site is potentially accessible from the A12 London Road, and benefits from a road frontage of approximately 50 meters, and given its situation and proximity to existing dwellings it would be easily

serviceable. They stated that landscape issues could be addressed by the implementation of strategic landscaping in association with any future development, as well as the inclusion of attractive open space. They noted that the site is within cycling distance of Lowestoft. They also noted that historically, seven residential properties were situated on the site, and that the associated footings are still in situ. They acknowledged that the site could be developed alongside sites 22 and 147 allowing for a larger and carefully considered strategic development which may perhaps involve a more substantial road network leading from the A12 London Road.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. A minor issue is that access to the site may be constrained. Access can come from the layby from the A12 but this would result in the loss of mature vegetation on the site boundary. There is a small track but it is unlikely to be suitable for site access. The site could also be accessed from Site 147 if that was developed.

There is potential for a limited impact on the landscape and the site has a poor relationship to the main built up area of Lowestoft. Planting on the site could support biodiversity.

A sewer pipe crosses the site and foul sewerage improvements would be needed to support development.

The site has capacity for approximately 30 homes taking into account the irregular shape of the site and the need to retain the natural features present on the site.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified on the landscape, natural resources and potentially on biodiversity.

Minor positive effects include the provision of housing.

The appraisal stated that to mitigate the potential impacts on biodiversity, existing natural features should be retained.

Conclusion

The site has poor relationship to the existing built-up area of the town. The site falls within the catchment of Pakefield Primary School which is forecasted to be at capacity in the next five years. The school has no potential to expand. This would mean future school children would have poor access to primary school education.

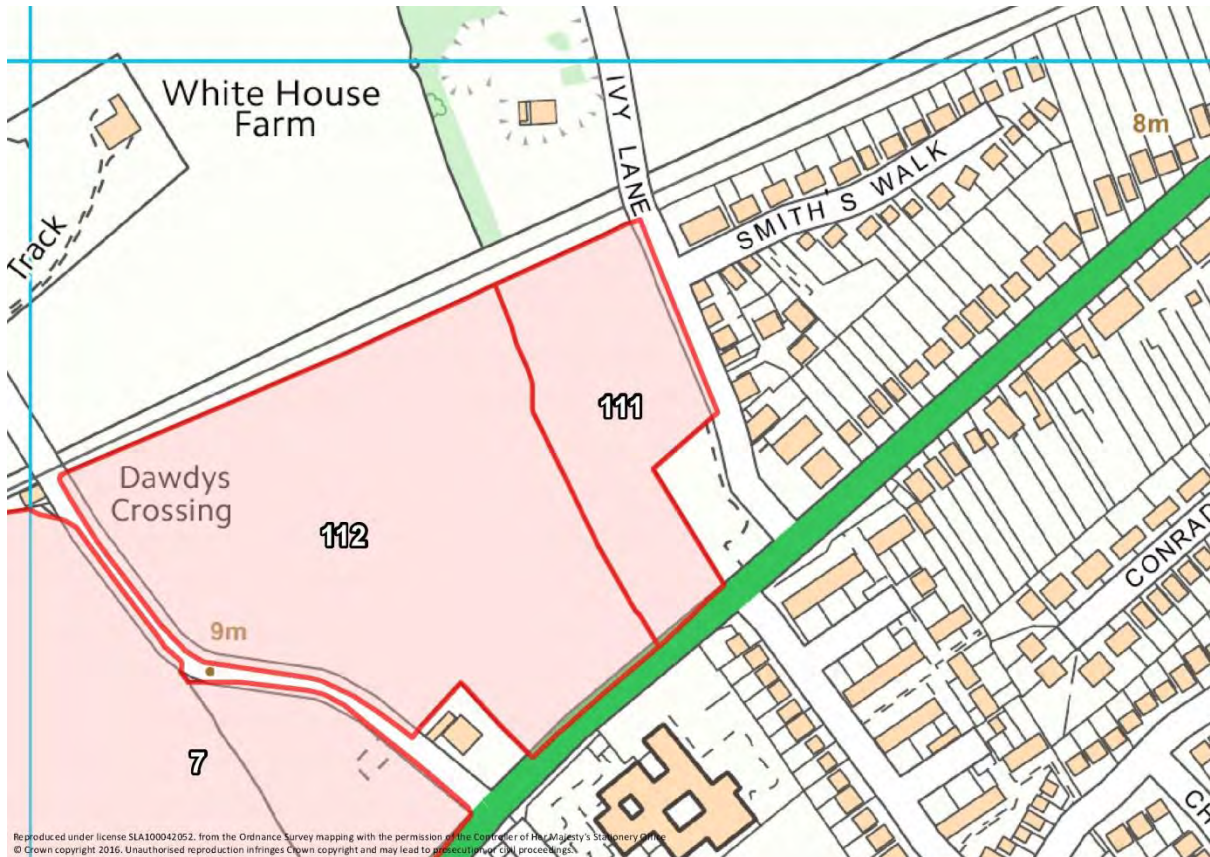
Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the

development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 111 - Land to the north of the A146, Beccles Road, Lowestoft

Suggested Use: Housing

Site Area: 1.37



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council's website

The Broads Authority stated that the site lies along the Broads boundary albeit separated by the railway line. They raised concern that development on this site would extend the urban boundary of Lowestoft towards the Broads area and could impact upon the landscape and visual amenity. They also raised concern about additional recreational pressures as a result of housing development on Carlton Marshes.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' /Green' impact. Full details can be found on the Council's website.

Carlton Colville Parish Council stated that the site should be kept clear of additional development in order to preserve the wildlife of the marshes.

Suffolk Wildlife Trust stated that the site is adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat's Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI). They stated that large part of these sites is owned and managed by Suffolk Wildlife Trust as part of Carlton and Oulton Marshes reserve. They raised concern that development in this location appears likely to risk an adverse impact on these sites and therefore object to an allocation.

Members of the public opposed the development of this site. They raised concerns about the impact on wildlife on the adjacent Carlton Marshes, including the impact of recreation and dog-walking. It was noted that drainage water could cause pollution in the marshes further down the hill and also adversely affect septic tank drainage of properties.

Concern was also raised about the landscape impact on the setting of the Broads. It was noted that the site currently provides an open vista across to Oulton Broad.

Concern was also raised about the impact on the surrounding road system including the A146 which was considered to be already at capacity with frequent queues stretching from Oulton Broad to Hollow Grove Way.

More generally concern was raised about the impact on health and education services. It was also suggested that brownfield sites should be considered first.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main impact is on the landscape and the setting of the Broads. Tributary valley farmland character area covers most of the site with rural river valleys character covering the land next to the railway line. The Settlement Fringe Landscape Sensitivity Study identified the landscape area as having a low sensitivity, moderate value, a major contribution to the setting of the Broads and a low capacity for development. The site is exposed to distant views from the Broads and the development of the site would extend the urban boundary of Lowestoft towards the Broads in a location where there is currently a more natural edge to the urban area. Given the impact on the landscape and the setting of the Broads, the site is not considered suitable for development.

Other issues include the risk of surface water flooding on the site which may require areas of land to be set aside for drainage on the site. A sewer pipe also traverses the site and foul sewerage improvements may be needed.

The railway to the south of the site could cause issues with noise. The site also has high archaeological potential.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal identifies a significant negative effect on the landscape for the reasons described above. Minor negative effects were the impact on natural resources and the impacts of climate change.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

To help mitigate the impact on the landscape the appraisal states that significant planting around the northern and eastern boundary of the site would limit the impact of the development. Bungalows on the northern boundary would also lessen the impact. However, it is likely there would still be a significant negative effect on the setting of the Broads, given the encroachment of development on the crest of the valley.

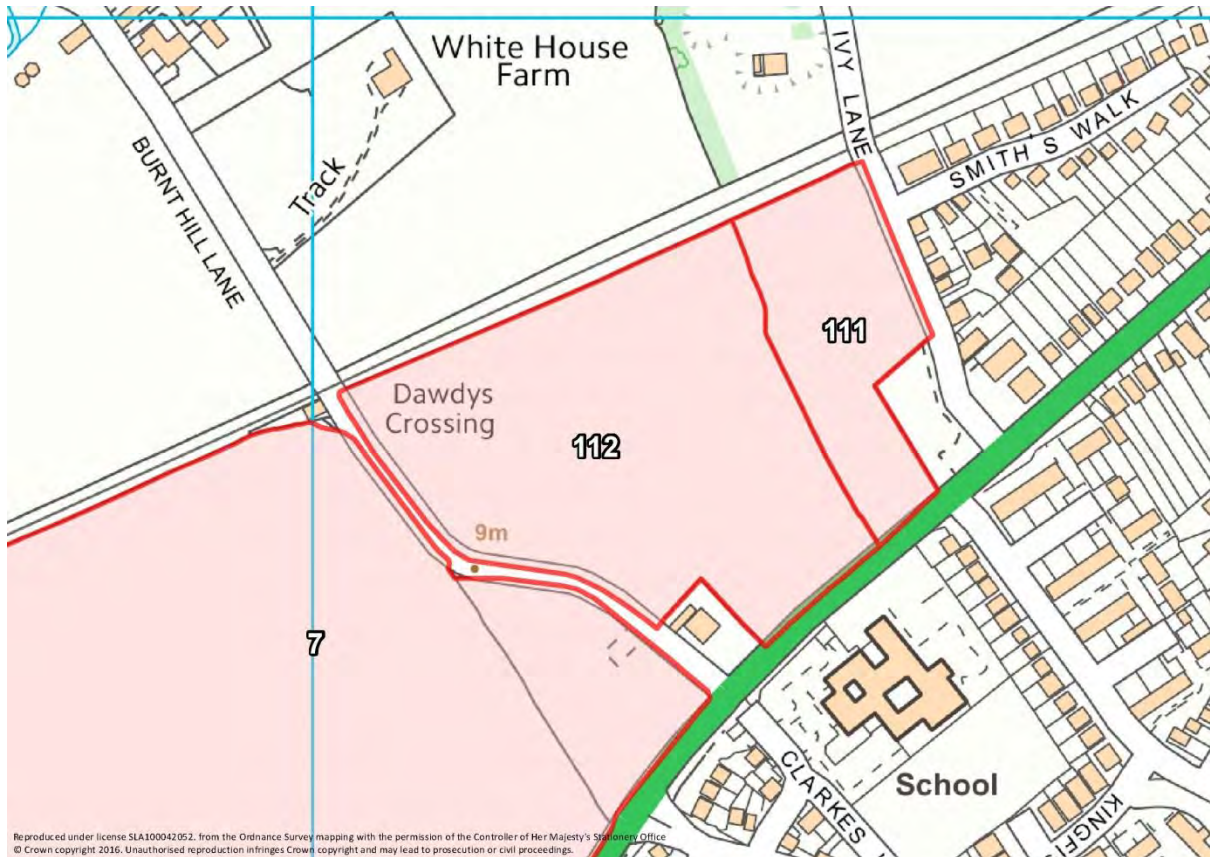
Conclusion

Due to the impact on the setting of the Broads, the site is not considered suitable for allocation.

Site 112 - Land to the north of the A146, Beccles Road, Lowestoft

Suggested Use: Housing

Site Area: 4.23



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted a sewer pipe runs through the site. Full details are on the Council's website

The Broads Authority stated that the site lies along the Broads boundary albeit separated by the railway line. They raised concern that development on this site would extend the urban boundary of Lowestoft towards the Broads area and could impact upon the landscape and visual amenity. They also raised concern about additional recreational pressures as a result of housing development on Carlton Marshes.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

Carlton Colville Parish Council stated that the site should be kept clear of additional development in order to preserve the wildlife of the marshes.

Suffolk Wildlife Trust stated that the site is adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat's Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI). They stated that a large part of these sites is owned and managed by Suffolk Wildlife Trust as part of its Carlton and Oulton Marshes reserve. They raised concern that development in this location appears likely to risk an adverse impact on these sites and therefore object to an allocation.

Members of the Public opposed the development of this site. They raised concerns about the impact on wildlife on the adjacent Carlton Marshes, including the impact of recreation and dog-walking. It was noted that drainage water could cause pollution in the marshes further down the hill and also adversely affect septic tank drainage of properties.

Concern was also raised about the landscape impact on the setting of the Broads. It was noted that the site currently provides an open vista across to Oulton Broad.

Concern was also raised about the impact on the surrounding road system including the A146 which was considered to be already at capacity with frequent queues stretching from Oulton Broad to Hollow Grove Way.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main impact is on the landscape and the setting of the Broads. Tributary valley farmland character area covers most of the site with rural river valleys character covering the land next to the railway line. The Settlement Fringe Landscape Sensitivity Study identified the landscape area as having a low sensitivity, moderate value, a major contribution to the setting of the Broads and a low capacity for development. The site is exposed to distant views from the Broads and the development of the site would extend the urban boundary of Lowestoft towards the Broads in a location where there is currently a more natural edge to the urban area. Given the impact on the landscape and the setting of the Broads, the site is not considered suitable for development.

A sewer pipe also traverses the site and foul sewerage improvements have been identified.

Other issues include the risk of surface water flooding on the site which may require areas of land to be set aside for drainage on the site. A pit is located to the south of the site which would require infilling.

The railway to the south of the site could cause issues with noise.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal identifies a significant negative effect on the landscape for the reasons described above. Minor negative effects were the impact on natural resources and the impacts of climate change.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

To help mitigate the impact on the landscape the appraisal states that significant planting around the northern and eastern boundary of the site would limit the impact of the development. Bungalows on the northern boundary would also lessen the impact. However, it is likely there would still be a significant negative effect on the setting of the Broads, given the encroachment of development on the crest of the valley.

Conclusion

Due to the impact on the setting of the Broads, the site is not considered suitable for allocation.

Site 136 - Rear of 11, 15,17,19 & 21 Birds Lane, Lowestoft

Suggested Use: Housing

Site Area: 0.23



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council’s website

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact. Full details can be found on the Council’s website.

One member of the public supported the development of this site. They suggested that development should be focussed within the town as it will create less traffic problems than development on the outskirts. They stated it would also encourage healthy transport such as walking and cycling. They noted that plans to address flood risk issues in the town meant that sites within the town could be brought forward for development.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The main issue identified is the risk of flooding. The site is currently within flood zone 2. There is also a risk of surface water flooding.

A sewer pipe also crosses the site and foul sewerage improvements may be needed to support development.

The site has the capacity for 13 new dwellings if the sequential and exceptions tests should be passed.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified on the townscape, climate change and natural resources.

Minor positive effects related to the provision of housing in an accessible location.

Conclusion

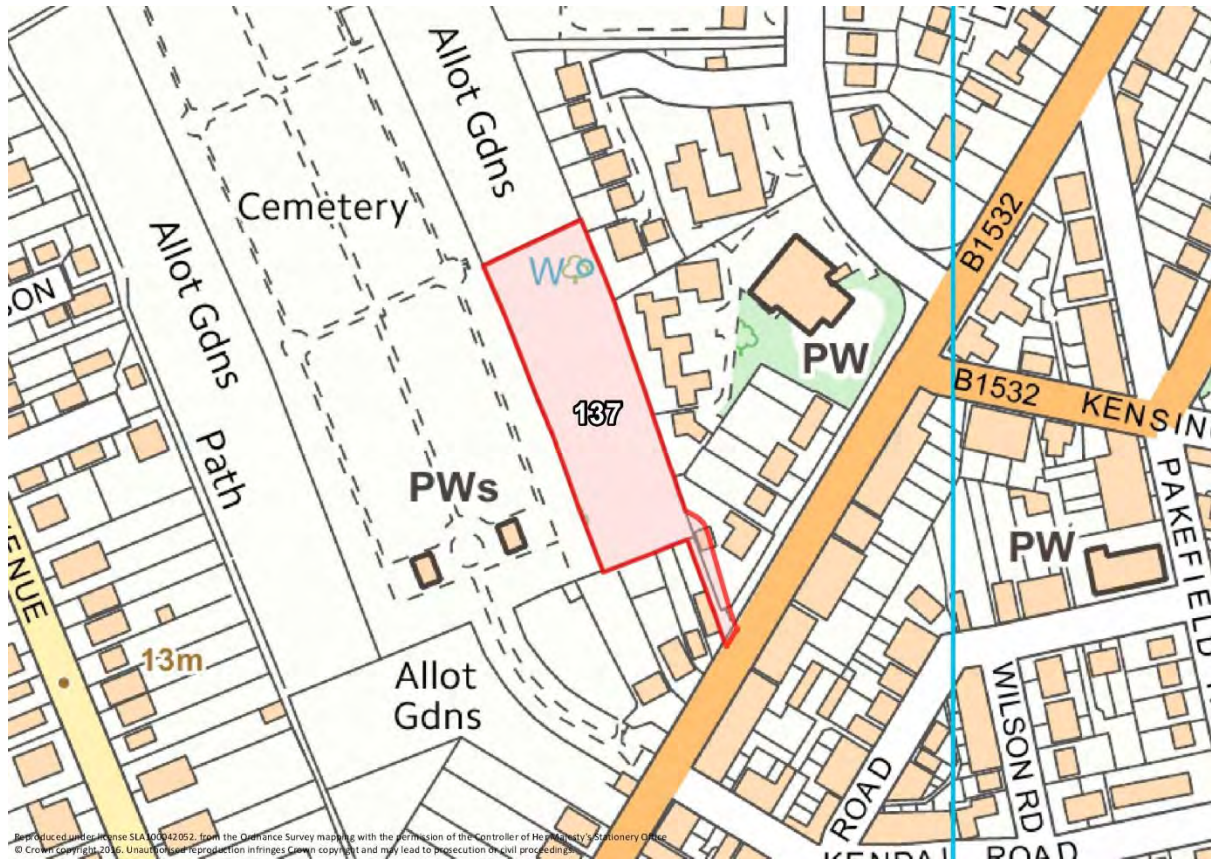
As there are there are other sites with a lesser risk of flooding, this site is not suitable for allocation.

A lack of allocation on this site will not prohibit its future development as the site should the issues with flood risk are overcome. It will be within the settlement boundary/ physical limits of Lowestoft, where the principle of development will generally be accepted subject to conformity with the other policies of the Local Plan and national planning policy.

Site 137 - Rear of Nos 485 & 487 London Road South, Lowestoft

Suggested Use: Housing

Site Area: 0.66



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, a 'Green' impact on the foul sewerage network and a 'Green' impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

Historic England noted that development on this site could have a potential impact on the setting of listed buildings (Two Chapels and Lychgate at Kirkley Cemetery) and the conservation area.

Suffolk County Council Archaeology noted that the development of this site would have a 'Green' impact. Full details can be found on the Council's website.

One member of the public supported the development of this site. They suggested that development should be focussed within the town as it will create less traffic problems than development on the outskirts. They stated it would also encourage healthy transport such as walking and cycling. They noted

that with plans to address flood risk issues in the town more sites within the town could be brought forward for development.

One member of the public felt the site should be left in its current use.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issues identified are with the impact on the townscape given the large numbers of mature protected trees on the site.

There is also potential for an impact on the setting of listed buildings in Kirkley Cemetery.

The site has potential biodiversity value.

There would need foul sewerage improvements to support development.

This site could accommodate 14 dwellings.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies a potential significant negative effect on the historic environment due to the potential impact on listed buildings with Kirkley Cemetery. It identified minor negative effects on the townscape, natural resources and a possible negative effect on biodiversity.

Minor positive effects related to the provision of housing in an accessible location.

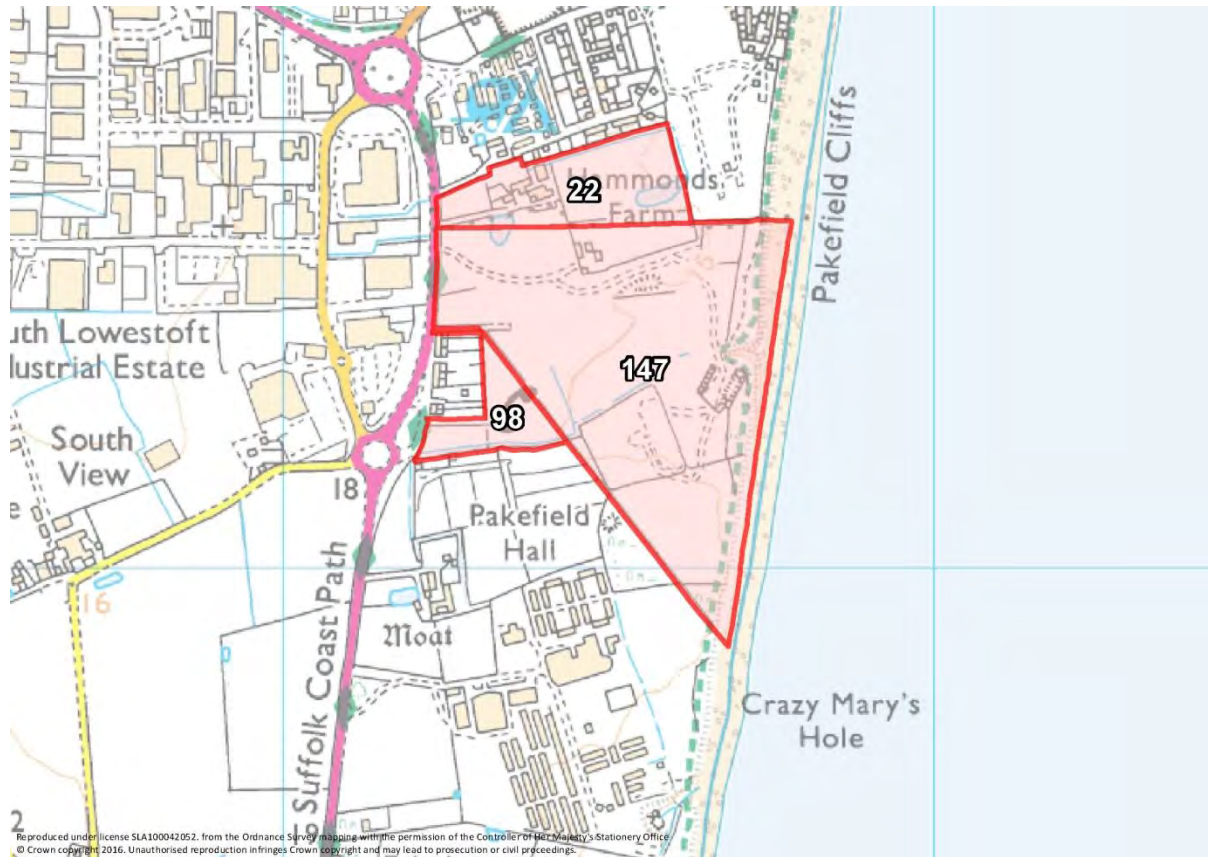
Conclusion

Development of this site would have a negative effect on the quality of the townscape through the removal of a number of large mature trees which currently benefit from a tree preservation order. There is a potential that development could impact upon the setting of listed buildings in Kirkley Cemetery. As such the site is not considered suitable for allocation.

Site 147 - The Old Rifle Range, A12 London Road, Pakefield, Lowestoft

Suggested Use: Housing

Site Area: 19.69



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

The Environment Agency noted that the site was partly within Flood Zone 2 and 3.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Suffolk Wildlife Trust stated that the site partly includes Pakefield Cliffs County Wildlife Site (CWS) and, based on aerial photographs, may also contain habitats and species of conservation value. They states that the site should not be allocated unless it can be demonstrated that this would not result in an adverse impact on either the CWS or any existing ecological value that the site has.

The landowners of the site support the development of Site 147 and consider that it represents a sustainable and deliverable site, capable of accommodating a significant quantum of the planned growth for Lowestoft. They stated that the development would represent a logical extension creating a natural defensible southern boundary to the town. They stated that the existing southern boundary of the town is poorly defined and unattractive. They suggested that if built development is concentrated at the northern end of the site, the southern and western parts could provide a significant area of open space, which would not only provide a community asset, but also an opportunity to enhance the appearance of the town and create an attractive entrance to Lowestoft from the south when travelling along the A12. In terms of impact on the strategic gap they suggested the triangular section of the site to the south be retained as open space resulting in a loss of 300-400m of Strategic Gap. They suggested that development could be kept away from the cliffs and the County Wildlife Site. They stated that the site is well served by public transport from services between Lowestoft and Kessingland and is located close to schools, retail units and employment. The landowners also stated that the site has not been in agricultural use since 1912 when it was used by the Ministry of Defence as a military rifle range and development for housing represents an opportunity to bring the site into productive use, which is not likely to occur otherwise.

One member of the public supported the development of this site and stated that it should provide affordable rented 2-3 bed houses. They noted that the site was close to schools, shops, on a main bus route, and close to the beach.

One member of the public stated that it is crucial to keep the buffer between Lowestoft and Kessingland and another stated that the site is in an open coastal area and adjacent to the Heritage Coast. They stated that it would be totally inappropriate to build on this land and should be left open for wildlife. They also suggested it was a vital gap between Pakefield and Kessingland.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

A number of issues were identified with respect to this site. However, the assessment did not identify any constraints or impacts which could not be mitigated.

The eastern part of the site is within the Coastal Change Management Area. Any development will need to be setback by at least 30 metres inland from the Coastal Change Management Area.

The site is within the coastal cliffs landscape character area where the main objective is to maintain the remote coastal character and open gaps which allow glimpses of the coast. The Settlement Fringe Landscape Sensitivity Study states that the landscape area has a low sensitivity, a low value and a high capacity for development. The site is largely flat but poorly related to the suburban area of the town. Development site 22 to the north could help mitigate this. Any development would need to be of lower density, retaining open breaks towards the sea and be sufficiently set back from the coast.

There is a County Wildlife Site on the cliff and there are small collections of natural features such as pond and vegetation dotted around the site which could support biodiversity. These areas and the links between them will need to be retained through any development.

There is considerable historical and archaeological content in the area, mostly dating from World War II. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork and heritage asset assessment, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

There is access from London Road (A12), however, to accommodate a large development there will likely need to be improvements. There would also need to be improvements to the foul sewerage network.

The site has a capacity for 230 dwellings. This takes into account the need to preserve natural features on the site and glimpses of the coast. The total developable area is likely to be around 11.5 hectares. A density of 20 dwellings per hectare is likely to be more appropriate in this location.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect in terms of impact from climate change given that parts of the site are at risk from coastal erosion. Minor negative effects were identified in relation to biodiversity, natural resources, and landscape.

Minor positive effects related to the provision of housing in an accessible location.

In terms of mitigation the appraisal stated that avoiding developing in the area at risk from coastal erosion will mitigate the impacts from climate change and some of the impacts on biodiversity by avoiding the County Wildlife Site. Preserving existing natural features on the rest of the site will also reduce the impact on biodiversity. The impacts on the landscape cannot be completely mitigated as any development would undermine the character of the undeveloped coast and lead to loss of part of the gap between Pakefield and Pontins. However, ensuring the development is set back from the cliff and glimpse of the sea are retained, together with a lower density of development, the impact on the landscape will be reduced.

Conclusion

The site does not have a particularly good relationship to existing residential areas and sits within an area characterised by out-of-centre retail and tourism uses. Development of this site would result in a large area of undeveloped coastline being lost to development.

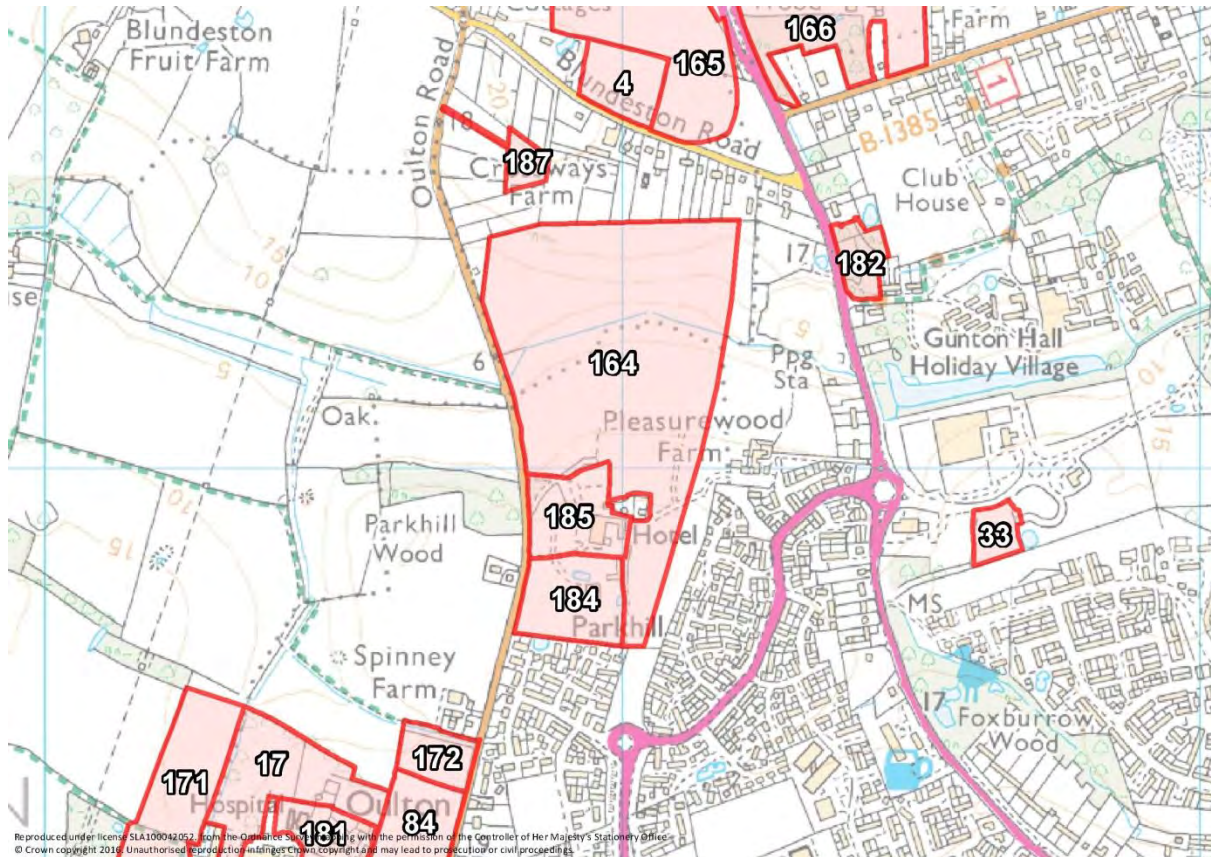
The site falls within the catchment of Pakefield Primary School which is forecasted to be at capacity in the next five years. The school has no potential to expand. This would mean future school children would have poor access to primary school education.

Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 164 - Land west of Northern Spine Road/north of Pleasurewood Farm, Corton/Oulton

Suggested Use: Housing

Site Area: 18.65



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe crosses the site. Full details are on the Council's website

Historic England stated that the site is adjacent to Parkhill Hotel which is a grade II listed building. They stated there could be a potential impact on the setting of this listed building.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

The Lowestoft & Yarmouth Regional Astronomers stated that agricultural land on the boundary of North Lowestoft should be retained and included in a Green Belt Policy.

Members of the Public objected to the development of this site. They raised concern about development of green areas and the loss of farmland. Concern was raised about the impact on wildlife and flooding.

More generally, concern was raised about impact on local schools and doctors surgeries.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

A number of issues were identified with respect to this site. However, the assessment did not identify any constraints or impacts which could not be mitigated.

There is possibility for vehicular access from Oulton Road although this may not be desirable from a landscape and character perspective.

Approximately 1.7 hectares of the site is used as drainage lagoons associated with the Northern Spine Road. Part of the site suffers from medium to high surface water flooding risk associated with the drain running through the site. There would be a need to investigate whether drainage from development could make use of the lagoons associated with the northern spine road.

Approximately 1.6 hectares of the site was a former brickworks and landfill. This part of the site will need to be avoided.

The development of the site will have an impact on the landscape. The northern section of the site is tributary valley farmland character. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. This site is not visible from the Broads and is some distance away. The site is undulating with a shallow valley running through the middle. The site is exposed from Oulton Road but contained from north, south and east. The drainage infrastructure with palisade fencing around detracts from the visual character of the landscape. Nevertheless care will need to be taken with new development to respect the undulating nature of the site and manage the exposed western boundary. Development may need to be less dense with significant planting. The height of the dwellings may need to be restricted on certain parts of the site.

The Grade II listed Parkhill Hotel is adjacent to the site to the west although development is unlikely to be an impact on the setting. There is high potential for archaeological content. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

Foul sewerage improvements have been suggested for the site and development could have a negative impact on junctions in North Lowestoft.

The site has capacity for 390 dwellings at 30 dwellings per hectare. This takes into account approximately 5.2 hectares of undevelopable land associated with the former landfill, bunding and drainage infrastructure.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies a significant negative effect on the landscape for the reasons described above. Minor negative effects that were identified were in relation to impact on natural resources and the effects of climate change.

A minor positive effect was identified with respect to the provision of housing.

The appraisal stated that open space could be provided on the site to address the lack of accessibility to existing open space. To reduce the effect on the landscape development may need to be less dense with significant planting and the height of dwellings may also need to be restricted on certain parts of the site.

Conclusion

The site sits within a sensitive landscape and comprises an undulating valley. Access to the site would be challenging and there is a risk of contamination from the adjacent former landfill.

Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 165 - Land west of A12 Yarmouth Road, Corton

Suggested Use: Housing

Site Area: 22.09



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe crosses the site. Full details are on the Council's website

Historic England stated that the site is close to White House Farm which is a grade II listed building. They stated there could be a potential impact on the setting of this listed building.

National Grid noted that an intermediate pressure gas mains runs through the site.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

Corton Parish Council stated that access to the area is difficult as the A12 is a very fast busy stretch of road. They stated that the proposal would double the size of the village which would be a bad thing. They

questioned how access, infrastructure, water, power, drainage, etc. be dealt with and raised concern that the water system is already struggling with low power throughout the village.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

The Lowestoft & Yarmouth Regional Astronomers stated that agricultural land on the boundary of North Lowestoft should be retained and included in a Green Belt Policy.

M J Edwards & Partners objected to the site due to it being well outside the building envelop of Corton village and to far into the strategic gap.

Most Members of the Public objected to the development of this site. They raised concern about development of green areas and the loss of farmland. Concern was raised about the impact on wildlife and flooding. Concern was raised about Blundeston being subsumed into Lowestoft through the development of this site. It was suggested developments should be built away from surrounding villages as it detracts from the appeal of such.

More generally, concern was raised about impact on local schools and doctors surgeries and what employment would support the development.

One member of the public supported development on land on both sides of the A12.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated.

The development of the site could impact upon the landscape. The site is within tributary valley farmland character. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. This site is not visible from the Broads and is some distance away. The site is flat and largely featureless with the exception of a small number of dispersed oaks towards the middle of the site. The site is well screened from most directions with the exception of Gorleston Road where some boundary planting may be required. The northern part of the site is more exposed and rural in character and development here would have a more significant effect. Limited impact from development on the southern part of the site as A12 already detracts from the landscape.

There is high potential for archaeological content. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

There could be a potential impact upon the trunk road network.

A gas main runs through the site and there would need to be improvements to the foul sewerage network if development was to take place. .

The site has capacity for 530 dwellings. This assumes a density of 30 dwellings per hectare and the development area reduced by 20% to take into account likely onsite infrastructure requirements

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies a significant negative impact on natural resources as the site is grade 2 agricultural land. Minor negative effects were identified in relation to impact on the landscape and encouraging efficient patterns of movement in support of economic growth.

Minor positive effects were identified in relation to provision of housing,

In terms of mitigation the appraisal stated that open space could be provided on the site to address the lack of accessibility to existing open space. The effects on the landscape could be mitigated by ensuring development is be less dense to the north with boundary planting along Gorleston Road.

Conclusion

Considered as part of a wider allocation with sites 4 and 166, the site provides a sustainable location for future housing growth. Out of the all the areas in North Lowestoft this area will have the most limited impact on the landscape, given the flat nature of the site, the A47 and the nearby electricity pylons. The sites have access to the strategic road network with bus connections to Lowestoft and Great Yarmouth. The sites, considered together, are of a scale to deliver new services and facilities as well as deliver new employment land in north Lowestoft where there is the most demand. As such the site is allocated as part of Policy WLP2.12, the North Lowestoft Garden Village. Policy WLP2.12 allocates sites 4,165 and 166 for 1,400 dwellings, 2 form entry primary school, playing field, local shopping centre, and 8.5 hectares of employment land.

It is not considered that the development of the site will have any impacts on the setting of listed buildings.

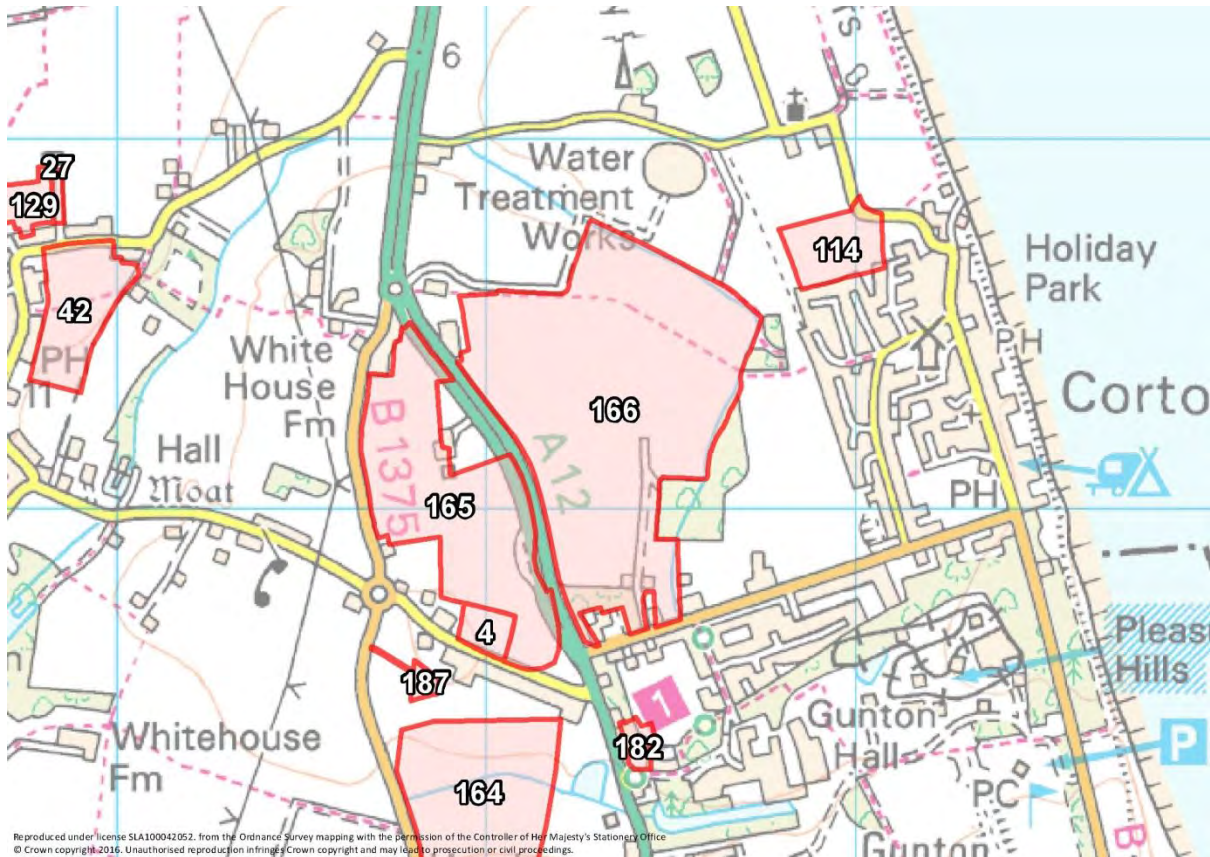
To address the concerns raised by Corton Parish Council and some members of the public, the new development allocated under Policy WLP2.12 will need to have its own identity with sufficient separation between existing settlements. The Policy requires the preparation of masterplan which could be produced through a Neighbourhood Plan led by Corton Parish Council.

The site is not at risk of flooding, and surface water run-off will have to be addressed to ensure there is no increase in the risk of surface water flooding locally.

Site 166 - Land east of A12 Yarmouth Road, Corton

Suggested Use: Mixed use

Site Area: 50.57



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and an 'Amber' impact on their assets. They noted a medium encroachment risk on to the water recycling centre and a sewer pipe crossing through the site. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

Historic England stated that the site is close to White House Farm which is a grade II listed building. They stated there could be a potential impact on the setting of this listed building.

National Grid noted that an intermediate pressure gas mains runs through the site.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact. Full details can be found on the Council's website.

Corton Parish Council stated that access to the area is difficult as the A12 is a very fast busy stretch of road. They stated that the proposal would double the size of the village which would be a bad thing. They questioned how access, infrastructure, water, power, drainage, etc. be dealt with and raised concern that the water system is already struggling with low power throughout the village.

Oulton Parish Council stated that the site was site suitable for development

The Lowestoft & Yarmouth Regional Astronomers stated that agricultural land on the boundary of North Lowestoft should be retained and included in a Green Belt Policy.

M J Edwards & Partners objected to the site due to its location in the Strategic Gap between Lowestoft and Great Yarmouth. They stated the development of the site would make Corton village a sprawled out habitat which would have a negative effect on the centre of the village where there are currently shops and businesses. They also raised concern that the option takes away a large portion of grade two arable land to the north of Corton and also affects an established livery yard business situated on Corton Long Lane which in turn gives employment to several people and companies in the Waveney area

Most Members of the Public objected to the development of this site. They raised concern about development of green areas and the loss of farmland and would close the essential gap between Lowestoft and Gorleston.

One member of the public supported the development of the site as it has immediate access to A12 and could support housing and industry

Summary of Draft Strategic Housing and Economic Land Availability Assessment

A number of issues were identified with respect to this site. However, the assessment did not identify any constraints or impacts which could not be mitigated.

Access could be a constraint. Access is possible from Corton Long Lane. There is possible access from the A12. There is also possible access from Rackham's Corner roundabout over third party land. Access could also be possible from another access point from the A12. All options would likely require significant improvements or alterations to the highway.

The development of the site could impact upon the landscape. The site is within tributary valley farmland character. This is a flat site well contained within the landscape. There are a small number of large oaks on the site which would need to be retained. There is a small area of woodland/scrubland to the north of the site which would need to be retained. There is a right of way on the northern part of the site which would need to be retained or redirected.

There is a small pond on the site. Woodland to the south of the site would need to be retained. Adjacent woodland to the east is of biodiversity value. There is potential for creating connections through the site with additional planting.

There is high archaeological potential. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

There could be a potential impact upon the trunk road network.

A gas main runs through the site as does a sewer pipe. Improvements would have to be made to the foul sewerage network to accommodate development.

Parts of the site are within 400 m of a water recycling centre. Residential development would need to be avoided in this location.

The site has capacity for 750 homes and 10 hectares of employment land. This based on 30 dwellings per hectare. Land area discounted by 6.6 ha to take account of woodland and to create a buffer with employment land. Developable land further discounted by 20% to take account of on site infrastructure.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies a significant negative impact on natural resources as the site is grade 2 agricultural land. Minor negative effects were identified in relation to impact on the landscape and the potential impact on biodiversity.

The appraisal identified a significant positive effect on economic growth by providing for at least half of the objectively assessed need for employment land growth. Minor positive effects were identified in relation to provision of housing, reducing deprivation and encouraging efficient patterns of movement in support of economic growth.

In terms of mitigation the appraisal stated that open space could be provided on the site to address the lack of accessibility to existing open space. To reduce the effect on the landscape and biodiversity, the woodland area to the south of the site should be retained together with existing oak trees on the site.

Conclusion

Considered as part of a wider allocation with sites 4 and 165, the site provides a sustainable location for future housing growth. Out of the all the areas in North Lowestoft this area will have the most limited impact on the landscape, given the flat nature of the site, the A47 and the nearby electricity pylons. The sites have access to the strategic road network with bus connections to Lowestoft and Great Yarmouth. The sites, considered together, are of a scale to deliver new services and facilities as well as deliver new employment land in north Lowestoft where there is the most demand. As such the site is allocated as part of Policy WLP2.12, the North Lowestoft Garden Village. Policy WLP2.12 allocates sites 4,165 and 166 for 1,400 dwellings, 2 form entry primary school, playing field, local shopping centre, and 8.5 hectares of employment land.

It is not considered that the development of the site will have any impacts on the setting of listed buildings.

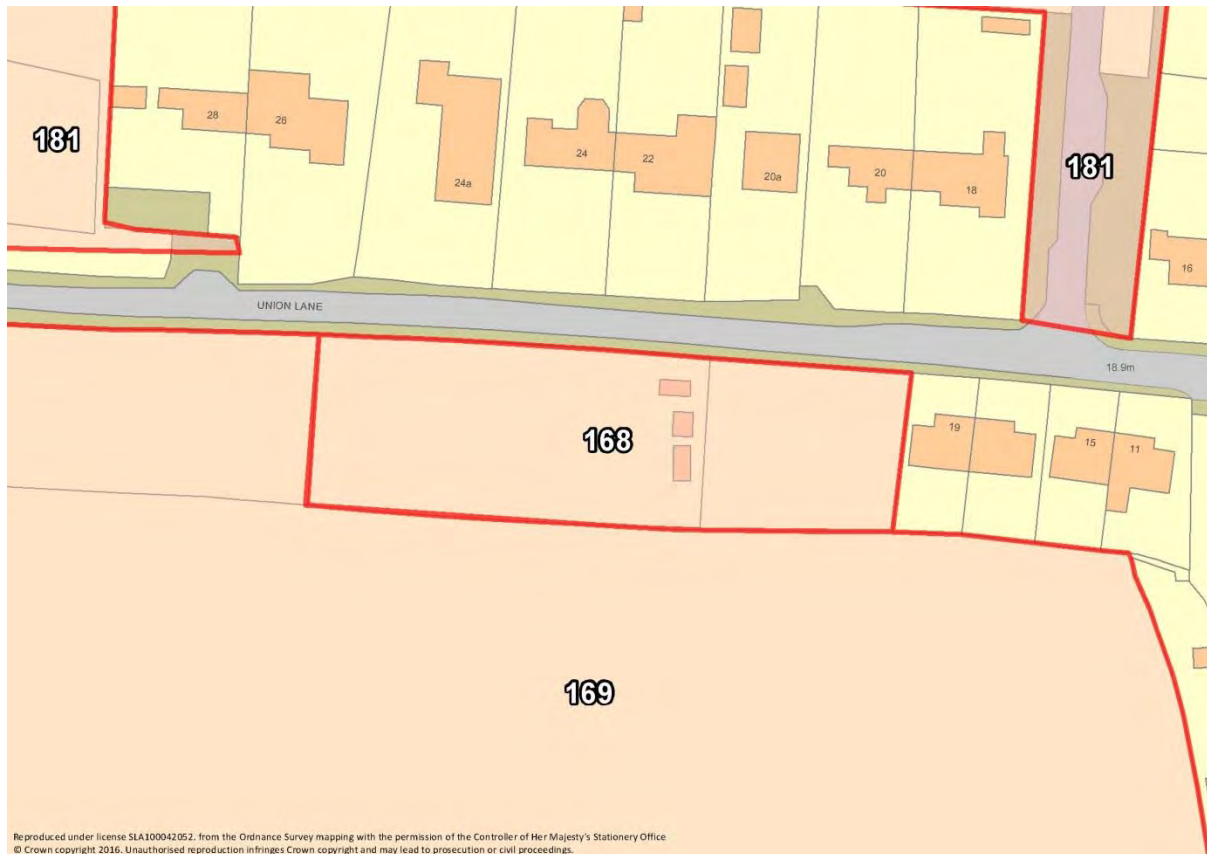
To address the concerns raised by Corton Parish Council and some members of the public, the new development allocated under Policy WLP2.12 will need to have its own identity with sufficient separation between existing settlements. The Policy requires the preparation of masterplan which could be produced through a Neighbourhood Plan led by Corton Parish Council.

The site is not at risk of flooding, and surface water run-off will have to be addressed to ensure there is no increase in the risk of surface water flooding locally.

Site 168 - Land south of Union Lane, Oulton / Land adjacent 19 Union Lane, Oulton

Suggested Use: Housing

Site Area: 0.18



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, a 'Green' impact on the foul sewerage network and a 'Green' impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England noted that the site was in close proximity to Blue Boar Inn, grade II to the east and the Manor House grade II * listed to the south east. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated.

Access is available from Union Lane, Access from Union Lane, although the road is very narrow at this point, which could cause difficulties.

There is potential for contamination due to rubbish being dumped on site. Site is also within source protection zone 3.

The site is heavily overgrown and therefore could support biodiversity

There is a high potential for archaeology. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

The site has a capacity for 5 dwellings.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. A minor negative effect was identified in relation to impact on natural resources.

Minor positive effects were identified in respect of providing housing in an accessible location.

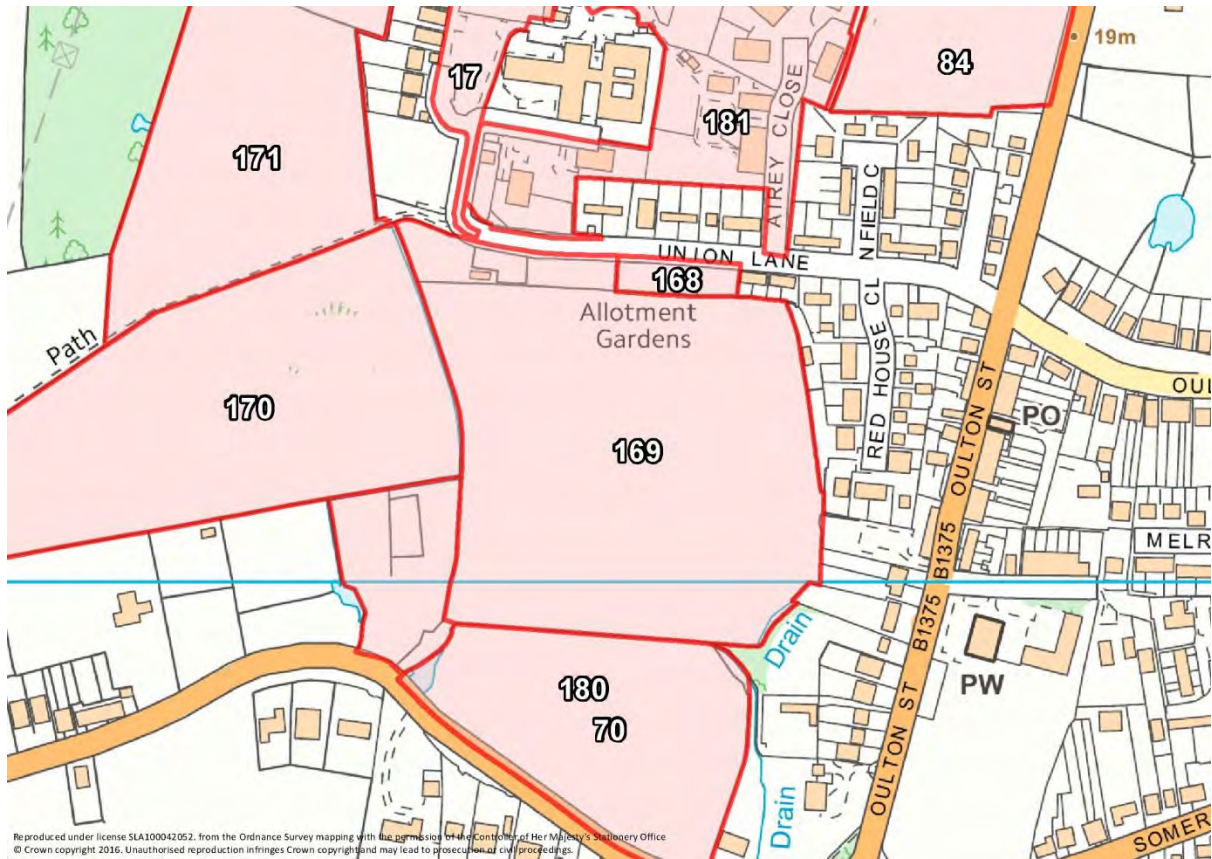
Conclusion

Policy WLP2.14 of the First Draft Local Plan allocates this site as part of an allocation for 200 dwellings. The site has good access to existing services and facilities in Oulton and in the future will have good access to the primary school, community centre, medical centre and retail facilities which are to be provided on the Woods Meadow development. The site is also in close proximity to the Mobbs Way Employment Area. There are bus stops nearby which provide access to the town centre. Development of the site is expected to have a limited impact on the landscape and is on grade 3 agricultural land. Vehicular access is possible from Hall Lane.

Site 169 - Land south of Union Lane and west of Red House Close, Oulton

Suggested Use: Housing

Site Area: 5.44



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England noted that the site was in close proximity to Blue Boar Inn, grade II to the east and the Manor House grade II * listed to the south east. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

One respondent raised concern that the village infrastructure not capable of sustain a development of this size. They raised concern about drainage which is already a problem, roads which are too narrow and unpaved for pedestrians.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated.

Access is available from Hall Lane, although it is over third party land. It is likely therefore that the development of this site will be dependant on the development of site 70/180.

A low level electricity line crosses the site which would need to be diverted or undergrounded. The foul sewerage network will require improvements if development is to take place.

The site has high archaeological potential. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

The site has capacity for 162 dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified against natural resources.

Minor positive effects related to the provision of housing in an accessible location.

Conclusion

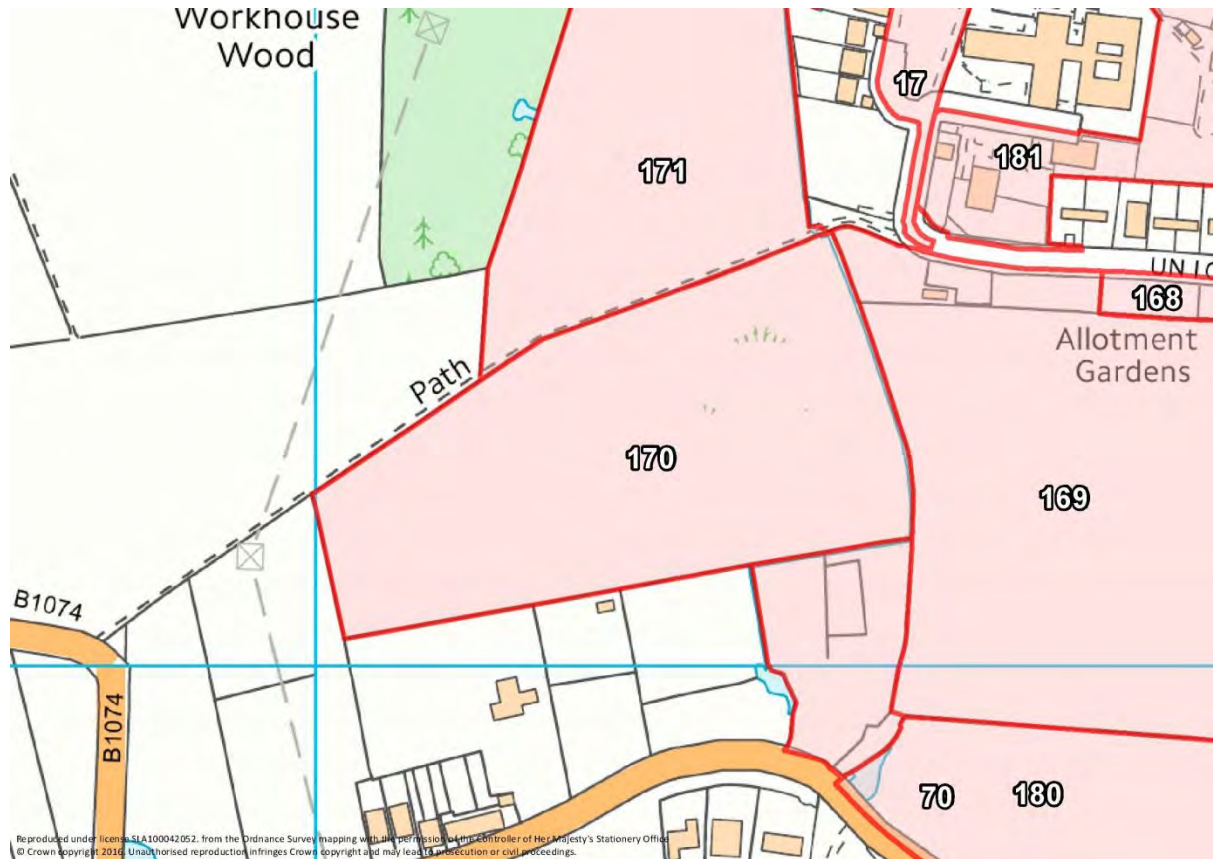
Policy WLP2.14 of the First Draft Local Plan allocates this site as part of an allocation for 200 dwellings. The site has good access to existing services and facilities in Oulton and in the future will have good access to the primary school, community centre, medical centre and retail facilities which are to be provided on the Woods Meadow development. The site is also in close proximity to the Mobbs Way Employment Area. There are bus stops nearby which provide access to the town centre. Development of the site is expected to have a limited impact on the landscape and is on grade 3 agricultural land. Vehicular access is possible from Hall Lane.

Concerns raised by Historic England with respect to the impact on the setting of the Manor House have been addressed in Policy WLP2.14 by requiring a significant area of open space to be provided on the southern part of the site.

Site 170 - Land to south west of Union Lane, Oulton

Suggested Use: Housing

Site Area: 4.10



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England noted that the site was in close proximity to ruins of Church of St Andrew grade II to the north- west. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact due to potential impacts on scheduled monument. Full details are found in Appendix 3

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

One respondent raised concern that the village infrastructure not capable of sustain a development of this size. They raised concern about drainage which is already a problem, roads which are too narrow and unpaved for pedestrians.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. However, there is no evidence that the site is available for development.

Access is possible from Union Lane but this would not be desirable due to the narrow nature of the road. Access would be better achieved from site 169 or 171.

Foul sewerage network improvements would need to take place to support development.

Surface water flooding is an issue on parts of the site indicating a drainage problem. Parts of the site may need to be left undeveloped to accommodate drainage systems.

Development of the site could impact on the landscape. The site is within the tributary landscape character area. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. This site is not visible from the Broads and is some distance away. The site is well-screened, mostly flat and well contained in the landscape. The western part of the site is more exposed and development here would have more of an impact upon the landscape.

The site has high archaeological potential. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

This site is not available for development.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to impact on the landscape, the effects of climate change and impact on natural resources.

Minor positive effects related to the provision of housing in an accessible location.

The appraisal indicated that the effect on the landscape could be reduced if development on the western part of the site was of a lower density.

Conclusion

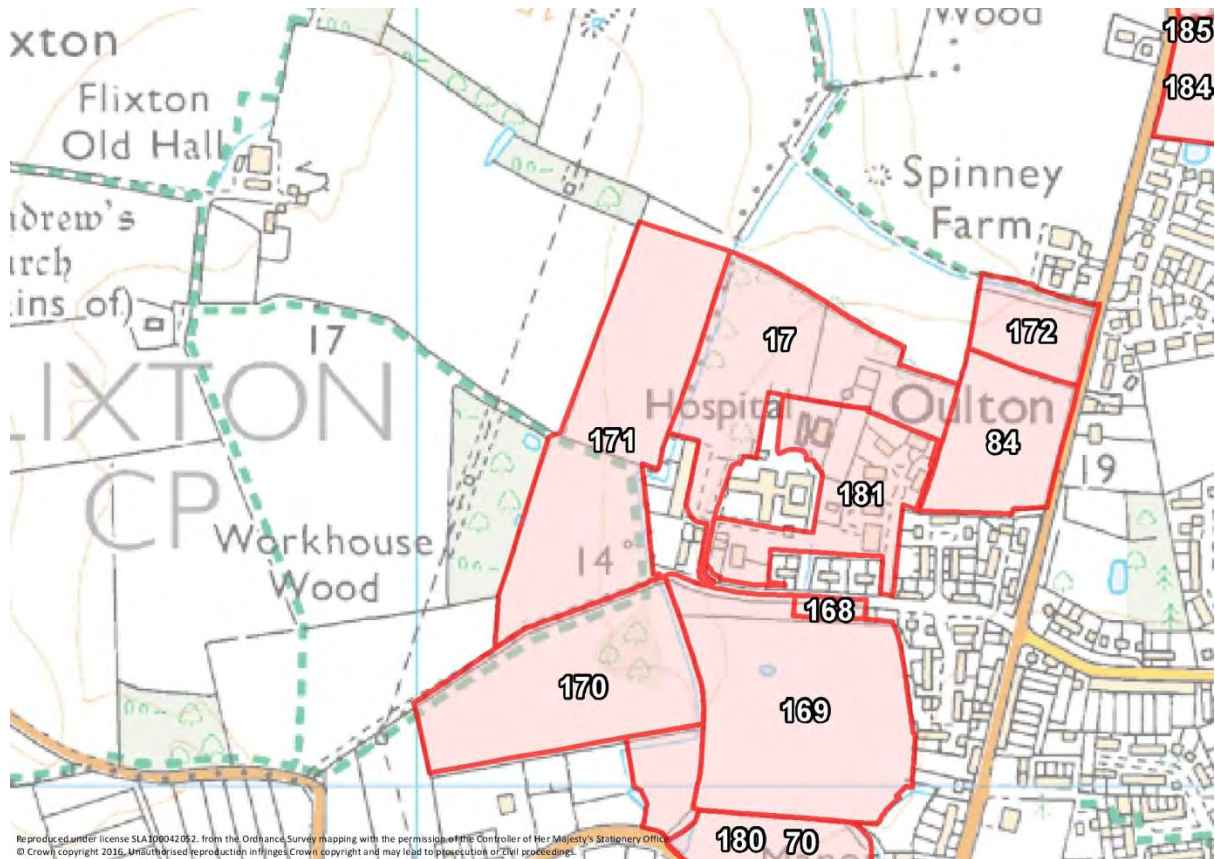
There is no evidence to suggest this site is available for development and therefore cannot be considered deliverable at the present time. The development of this site would extend the built up area further into the countryside than the nearby sites proposed for allocation.

Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 171 - Land west of Flixton View, Flixton

Suggested Use: Housing

Site Area: 5.32



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

Historic England noted that the site was in close proximity to ruins of Church of St Andrew, which is grade II listed, to the west. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact due to possible impacts on scheduled monument. Full details can be found on the Council's website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

One respondent raised concern about the impact of traffic from either Union Lane or Hall Lane and loss of farmland. It was suggested that using brownfield sites would have a better impact.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

A number of issues were identified with respect to this site. However, the assessment did not identify any constraints or impacts which could not be mitigated.

Access is available from Union Lane but this is unlikely to be desirable due to narrow nature of the road. Access would be better achieved from site 170 or 17.

Improvements to the foul sewerage network have been identified.

There is a large area of high, medium and low surface water flood risk to the south west of the site. Parts of the site may need to be left undeveloped to accommodate drainage systems.

Development of the site could impact upon the landscape. The site is within tributary valley farmland character. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. The southern half of the site is relatively flat and well screened. The northern half of the site is more exposed and mitigation might be difficult.

There is a county wildlife site (Workhouse Wood) along the western boundary, which contains a pond. A small area of vegetation near the site entrance may contain biodiversity. There are hedges along the southern and eastern borders of the site, part of the western border and a field boundary across the site.

The site has high archaeological potential. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork and visual impact assessment, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

The site has a capacity of 106 dwellings at 20 dwellings per hectare to reflect the more rural character of the area.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to impact on the landscape, the effects of climate change and impact on natural resources.

Minor positive effects related to the provision of housing in an accessible location.

The appraisal indicated that the effect on the landscape could be reduced if development on the northern part of the site was screened with a significant area of boundary planting.

Conclusion

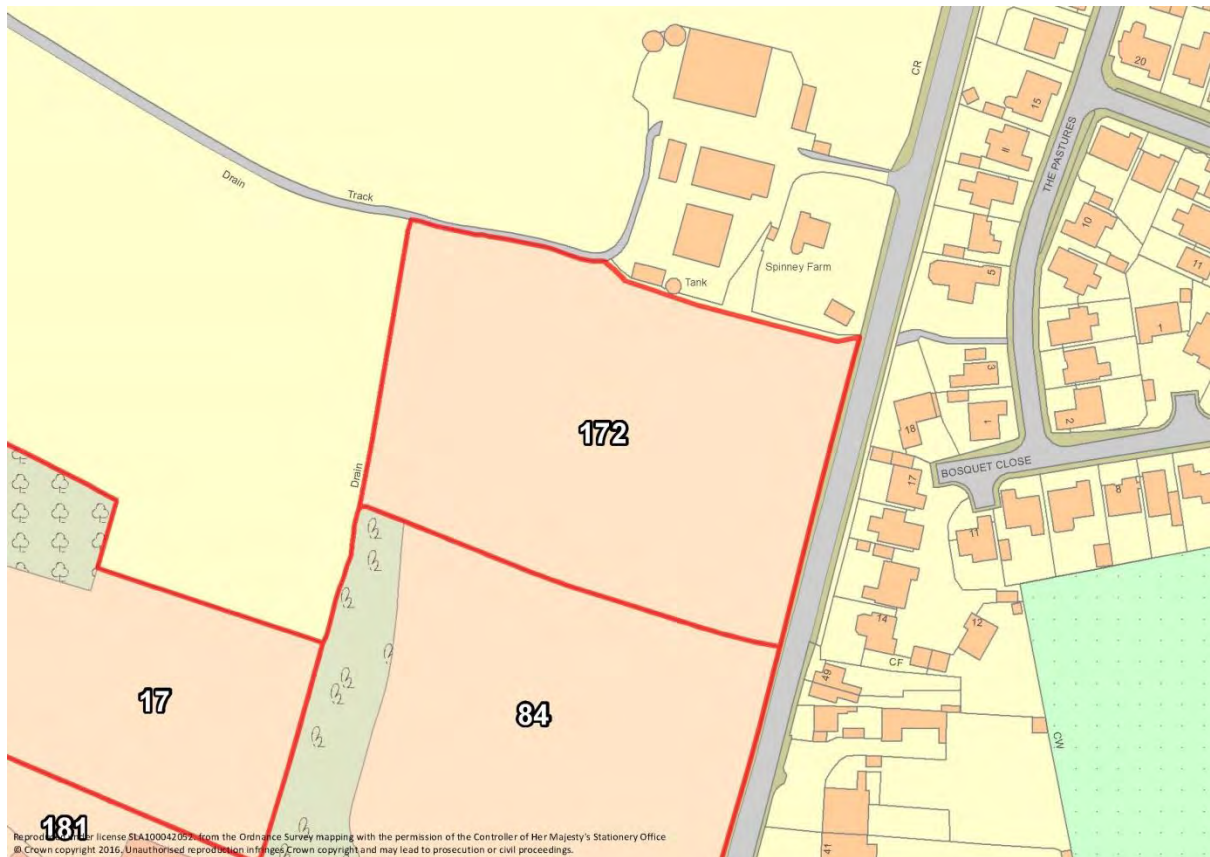
The site is only accessible through the development of other nearby sites. Development of the site is likely to have a greater impact on the landscape than nearby sites proposed for allocation.

Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 172 - Land west of Parkhill, Oulton (south of Spinney Farm)

Suggested Use: Housing

Site Area: 1.16



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website

Historic England note that the site is in close proximity of The Lodge and The Hall, both grade II listed to the east. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated.

Access onto Parkhill Road. There is good visibility but this is a fast road and the footpath will need to be extended 220 metres to reach the site.

Foul sewerage improvement have been identified to support development.

There is an area at risk of medium and low surface water flood risk in the northern part of the site to the south of Spinney Farm. There is also an area of low surface water flood risk in the middle of the site. Parts of the site may need to be left undeveloped to accommodate drainage systems.

Development of the site could impact upon the landscape. The site is within tributary valley farmland character. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. The site is a well screened flat site that would have limited impact on the landscape. The site has a poor relationship with the main built up area and would likely to only be acceptable if developed in conjunction with Site 84.

The site has a high archaeological potential. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

The site has capacity for 24 dwellings.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to impact on the landscape, the effects of climate change and impact on natural resources.

Minor positive effects related to the provision of housing in an accessible location.

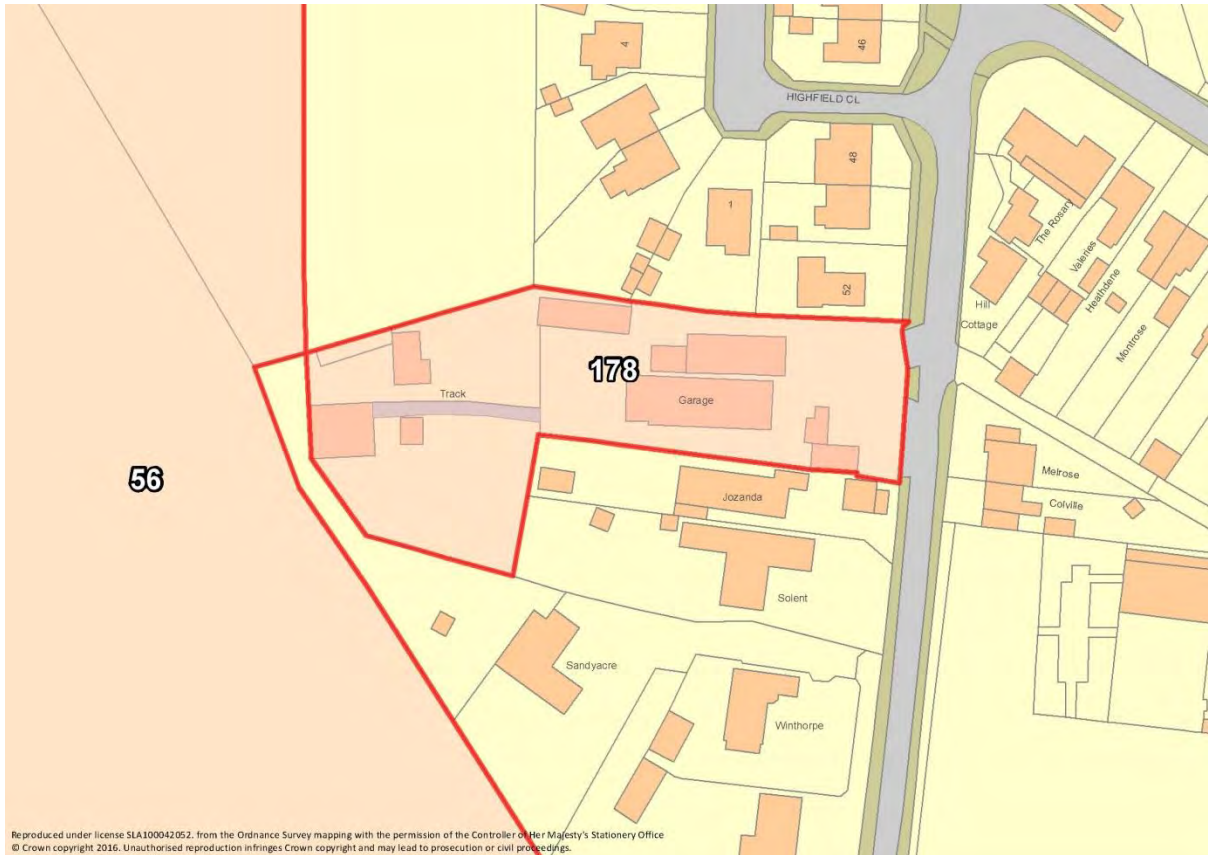
Conclusion

Development of the site is likely to have a greater impact on the landscape than nearby sites proposed for allocation. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 178 - Carlton Motors, Rushmere Road, Gisleham

Suggested Use: Housing

Site Area: 0.39



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The only issue identified in the assessment was the potential for contamination from the existing motor vehicle repair business on the site.

This site could accommodate 4 dwellings.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal did not identify any significant effects. A minor negative effect was identified in relation to impact on economic growth as the loss of the business would have a small negative effect.

Minor positive effects related to the provision of housing in an accessible location.

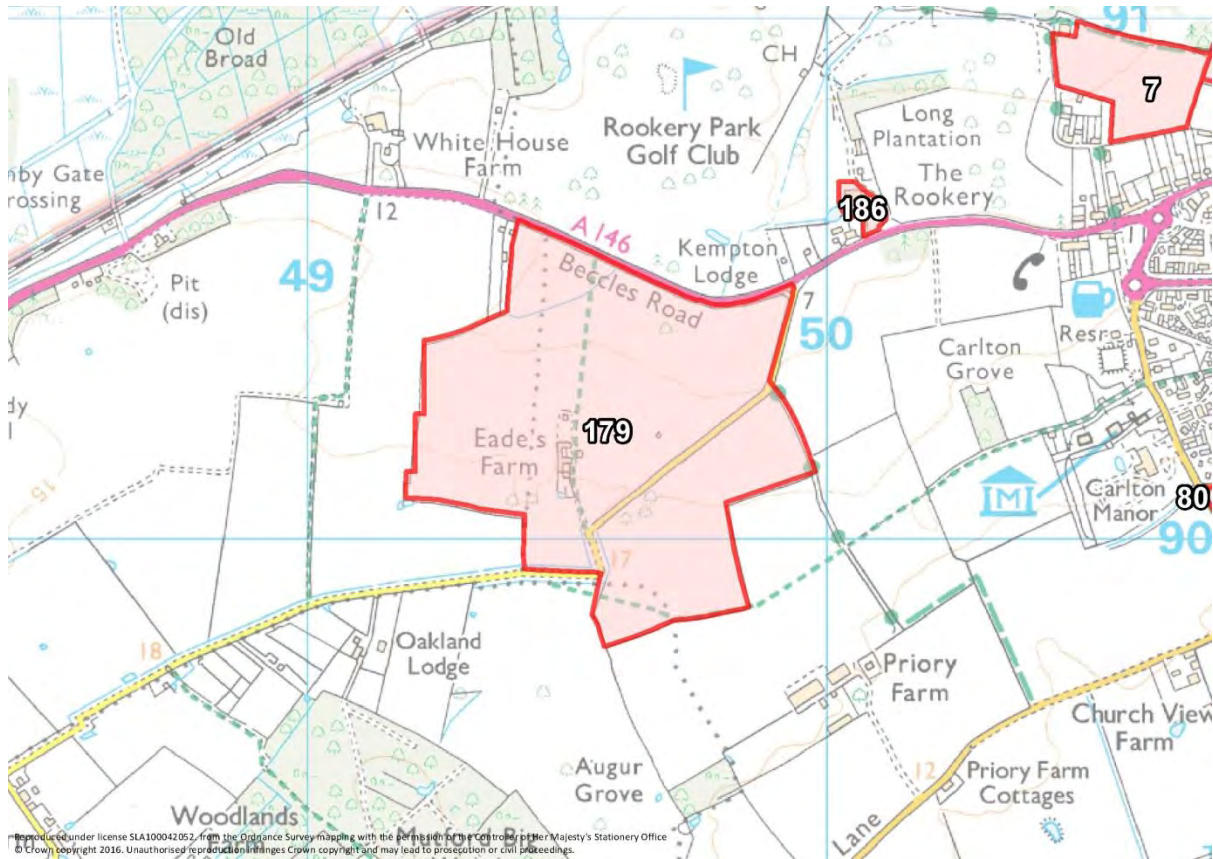
Conclusion

The site is very small and narrow. As such it would be difficult to fit four dwellings on the site in keeping with the surrounding residential density. As such the site is not large enough for a positive allocation in the Local Plan.

Site 179 - Eades Farm, Beccles Road, Carlton Colville

Suggested Use: Housing

Site Area: 37.96



Summary of Response from 'Options for the new Waveney Local Plan' Consultation
 Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
 The assessment did not identify any constraints or impacts which could not be mitigated.

The site has access onto Beccles Road although improvements will be necessary given the size of the site. The site may offer the potential to deliver part or all of the previously proposed Carlton Colville to Barnby bypass. This road could also provide access to the site. Given the scale of the site, there is likely to be an impact on surrounding roads which will require mitigation.

The development of the site has the potential to impact on the landscape. The site is within Tributary valley farmland character area in the northern part of the site and farmed plateau clayland character area in the southern part of the site. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity a moderate value and a high capacity for development. The site has mature vegetation on most boundaries although is exposed to views from the west. The site is screened from the

Broads by Rookery Park Golf Club. The site at present has a very poor relationship with the existing built-up area. The planned Oakes Farm sports development will extend the developed area of Carlton Coleville up to the boundary of the site but the site will still have a poor relationship with existing residential areas. To mitigate impacts, parts of the site will need to be developed at a lower density and the development would benefit from having an identity of its own, (rather than a suburb) which respects the rural character of the surroundings.

Parts of the site are susceptible to surface water flooding. Parts of the site will likely need to be left undeveloped to accommodate drainage systems.

There are low level power lines crossing the site.

The site has archaeological potential.

The site has capacity for 900 dwellings. This assumes 30 dwellings per hectare and that 20% of the site is used for infrastructure and community services and facilities.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal identified a significant negative effect on the conservation of natural resources as the site is mainly grade 2 agricultural land. Minor negative effects were identified in relation to impact on the landscape, the effects of climate change and efficient patterns of movement.

Minor positive effects were identified in relation to meeting housing needs.

In terms of mitigation the appraisal stated that to mitigate impacts on the landscape the development will need to have its own identity that is respectful to the rural character of the area. This will mean parts of the site, particularly to the west and south will need to be lower density.

Conclusion

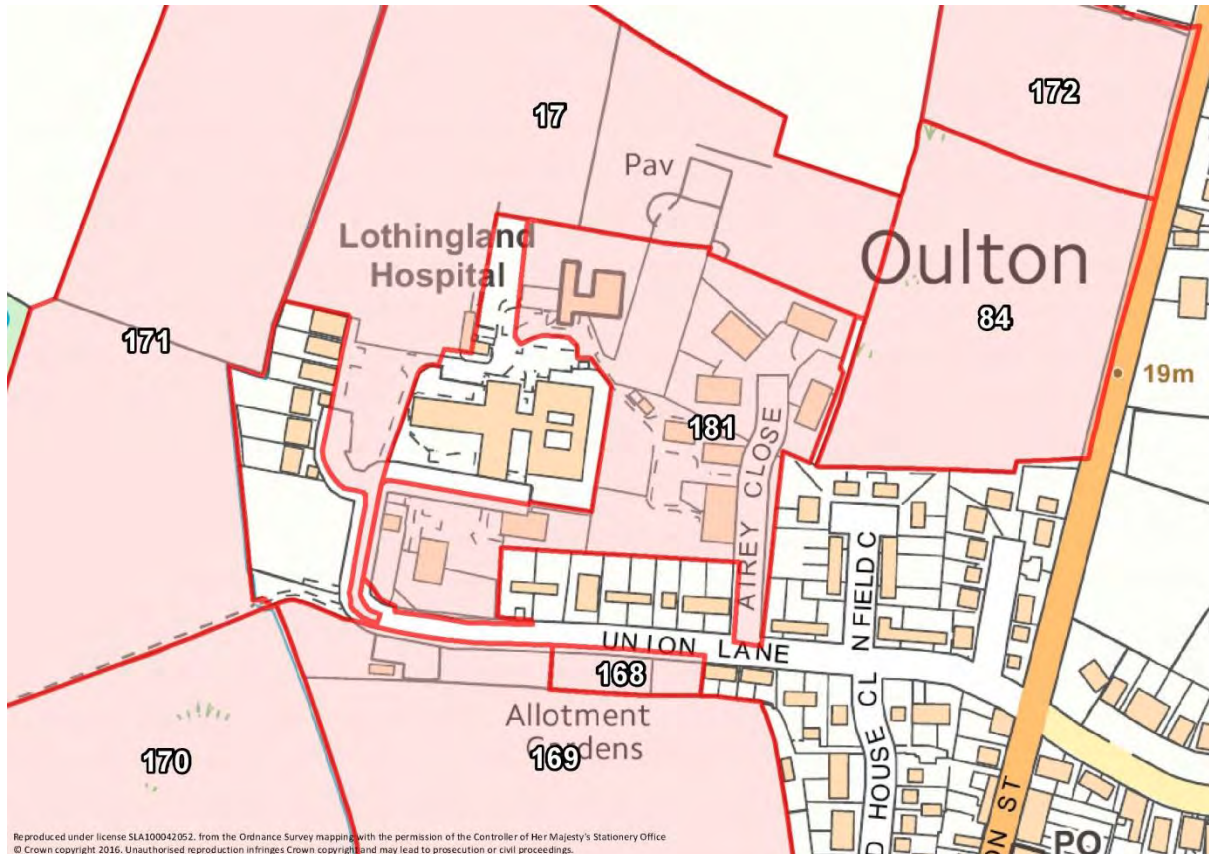
The site would represent a strategic scale development which would need to be supported by a range of on-site infrastructure. It currently has a poor relationship with the existing built-up area of Lowestoft and Carlton Colville. Parts are closer to Beccles Town Centre than Lowestoft Town Centre which could divert custom away from Lowestoft Town Centre. The site also has poor connections to existing employment areas. The site would not generate the same benefits as the proposed extension to Carlton Colville under Policy WLP2.15

Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 181 - Land at the former Lothingland Hospital site, off Airey Close and Allington-Smith Close, Lowestoft

Suggested Use: Housing

Site Area: 2.59



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any issues with the suitability of the site. This is because the site is already developed for healthcare and residential care purposes.

The site has capacity for 47 dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. No minor negative effects were identified.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

Conclusion

Since this site was submitted the agent has confirmed that only a smaller area of the site is now available. The site is wholly within the settlement boundary for Lowestoft and therefore the principal of development is already supported. As such at present it is not considered necessary to positively allocate a small site such as this within the Local Plan.

Site 182 - Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Suggested Use: Housing

Site Area: 0.93



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which could not be mitigated. The main issue is the potential impact on the townscape. The site currently makes an attractive contribution to the townscape and contributes towards the more rural feel of this locality. The site has a number of mature trees which benefit from tree preservation orders. Any development would need to retain the trees and be of a density appropriate to the surroundings.

A small part of the site is at risk of surface water flooding.

The hedgerows surrounding the site and the mature trees will likely support biodiversity, particularly given the good connectivity of habitats in the vicinity.

There is potential for noise pollution from nearby theme park and the holiday park.

The site has a capacity for approximately 15 dwellings reflecting the lower density of the surroundings and the need to retain the mature trees on the site.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified on the impact on the townscape, natural resources, the effects of climate change and efficient patterns of movement.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

Conclusion

This site makes an attractive contribution to the townscape and the entrance to the town. It provides a positive contribution towards the more rural feel of this locality on the edge of the town.

Considering the above, the site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 183 - Land to the south of Hall Lane, Oulton

Suggested Use: Housing

Site Area: 0.86



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is accessed from Hall Lane and Wood Lane, which are both narrow carriageways in this location in open countryside. There is no pedestrian access to the site without substantial improvements which is unlikely to be viable. Therefore the site is not considered suitable for development.

Other issues identified include a need for landscape mitigation giving the open and isolated character of the site.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to impact on the landscape, access to services and facilities, natural resources and efficient patterns of movement.

A minor positive effect was identified in relation to meeting housing need.

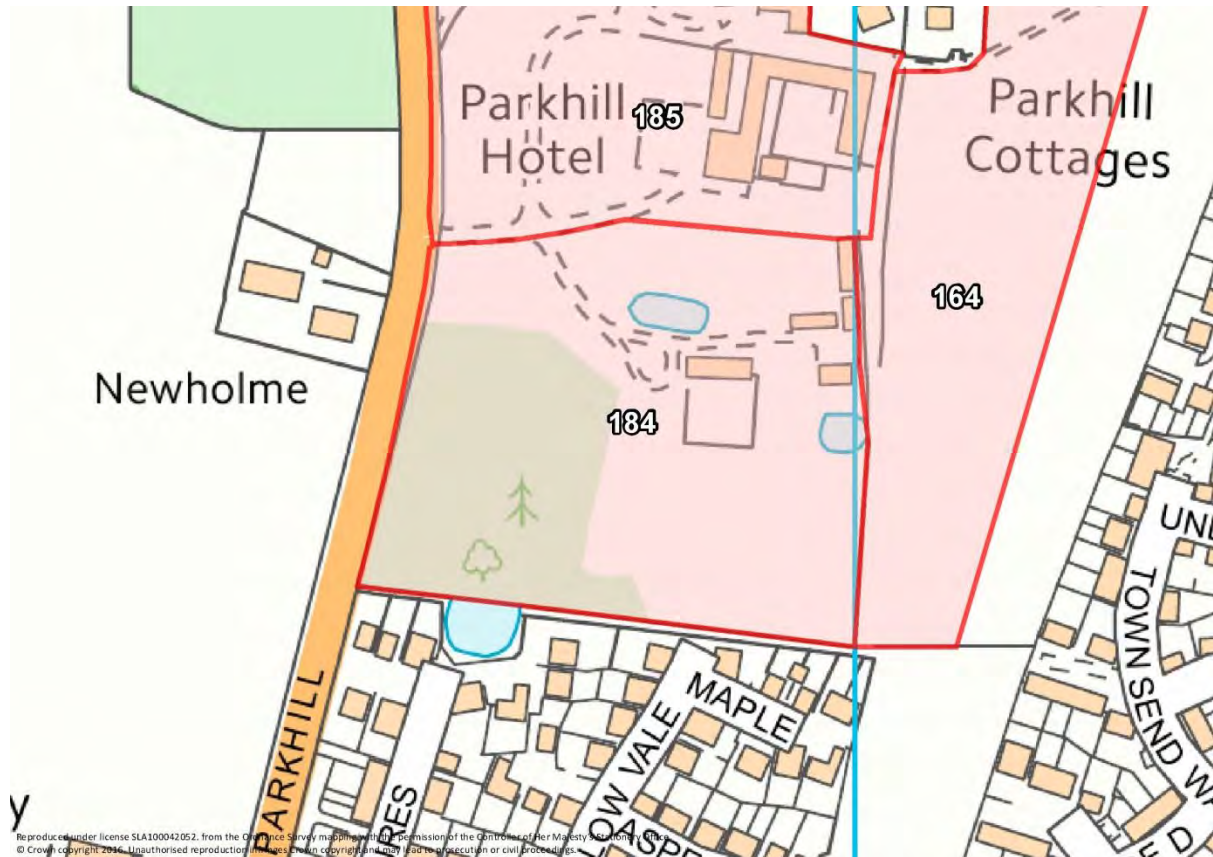
Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation.

Site 184 - Oakenshaw, Parkhill, Oulton

Suggested Use: Housing

Site Area: 2.54



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue identified in the assessment was the impact on the setting on the grade II listed building which would be difficult to mitigate. As such the site is not considered suitable for residential development.

Access could be a constraint. There is possible access from the Park Meadows residential estate to the south. However there might be a ransom strip as the highway does not go up to the boundary. There is also potential access from Parkhill although using this access could further impact on the setting of the listed building.

There is a large area of woodland on the site which could support biodiversity. Many of the trees benefit from tree preservation orders and make a positive contribution to the landscape. The site is also within the tributary valley farmland character area which would be heavily impacted by development.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect on the historic environment due to the impact on the setting of the Parkhill Hotel grade II listed building. Minor negative effects were identified on the landscape, natural resources and biodiversity.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

In terms of mitigation the appraisal stated that extensive screening around the site and the retention of the woodland and protected trees could mitigate the impact on the landscape, biodiversity and the historic environment to a degree. Even with mitigation it is likely that there will still be a significant impact on the historic environment as the development will result in the loss of, and change of character of part of the curtilage of the listed building.

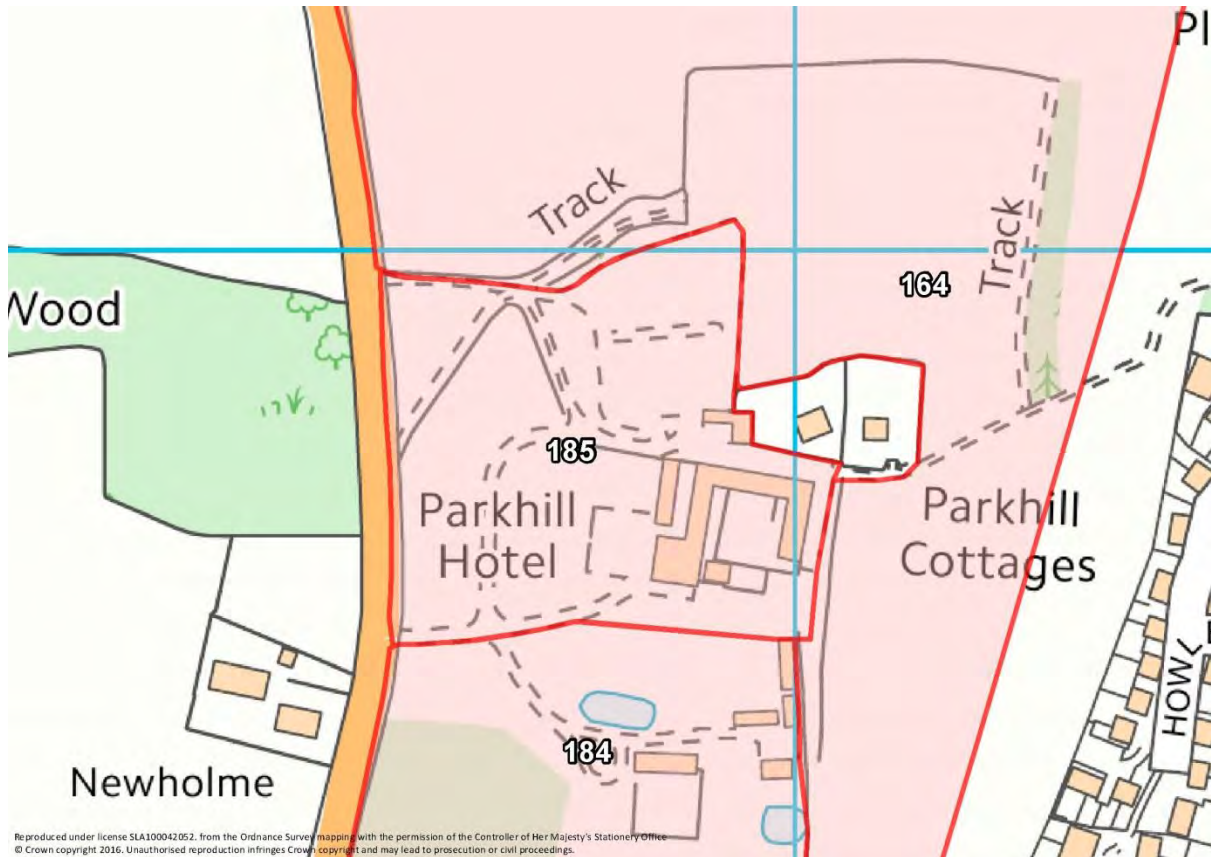
Conclusion

The site is not considered suitable for allocation due to the impact on the setting of the Parkhill Hotel which is a Grade II listed building. Additionally, access could be difficult to achieve if there is a ransom strip to the south of the site. The development of the site could also lead to the loss of protected trees which make a positive contribution to the settlement fringe in this location.

Site 185 - Parkhill, Oulton

Suggested Use: Tourist accommodation, housing (conversion and redevelopment).

Site Area: 2.27



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site has been promoted for the following uses:

- Holiday lodges to the north of the site on the area currently used as a car park
- Change of use of managers accommodation to residential
- Replace asbestos chicken sheds with retirement bungalows.

The most serious issue with this site is the potential impact on a grade ii listed building located on site. There is high potential for impact on this building from any development greater than minor developments or conversions.

There is a potential risk from contamination from asbestos from derelict chicken sheds and former landfill site to the north.

In terms of housing provision it is unlikely that the site has capacity for anything more than minor development and conversions.

Summary of Draft Sustainability Appraisal

The draft sustainability appraisal identified a significant negative effect on the historic environment due to the impact on the setting of the Parkhill Hotel grade II listed building. Minor negative effects were identified on natural resources.

Minor positive effects were identified in relation to the provision of housing in an accessible location and economic growth associated with the tourist accommodation.

To mitigate the significant negative effect on the setting on the listed building, the lodge development should be small scale and of a low density, limited to the area around the car park to the north of the site, with no loss of vegetation. The bungalow development which replaces the chicken sheds should be of a more rural design of similar proportions to the existing sheds and using the same footprint.

Conclusion

The amount of development possible on this site for housing is very small and not enough to warrant a specific allocation in the Local Plan. Some of the proposals for development on this site might be acceptable under existing planning policies. Positive allocation of the entire site in the Local Plan, may give the impression that more development would be acceptable in this location than is appropriate which could lead to substantial harm to the setting of the listed building.

Site 186 - Part of Rookery Park Golf Club, Carlton Colville

Suggested Use: Housing

Site Area: 0.55



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue identified in the assessment was the lack of pedestrian access to the site. The footpath on Beccles Road, Carlton Colville would need to be extended by 350m to reach the site frontage which is unlikely to be viable for such a small development. As such the site is not considered suitable for a residential development.

The site is also in open countryside with a poor relationship to the settlement of Carlton Colville.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified on access to services and facilities, landscape and efficient patterns of movement.

A minor positive effect was identified in respect of meeting housing need.

Conclusion

The site is isolated in open countryside with no safe pedestrian access. As such the site is not considered suitable for allocation.

Site 187 - Plot 'H', Blundeston Road, Oulton

Suggested Use: Housing

Site Area: 0.61



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue identified in the assessment was the lack of suitable vehicular and pedestrian access to the site. As such the site is not considered suitable for allocation.

Impacts were also identified on the landscape given the sites poor relationship to the existing settlement.

The site has archaeological potential.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal identified a significant negative effect on the conservation of natural resources as the site is grade 2 agricultural land. Minor negative effects were identified on access to services, landscape and efficient patterns of movement.

A minor positive effect was identified in relation to the provision of housing.

Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation.

Site 188 - Rear of 334 Beccles Road, Carlton Colville

Suggested Use: Housing

Site Area: 0.69



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue identified in the assessment was the lack of suitable vehicular access to the site. Access is currently by a single lane, unmade bridleway with no junction on to Beccles Road and poor visibility. As such the site is not considered suitable for allocation.

Development could also have an impact on the landscape, which would require mitigation.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified on the landscape, natural resources and efficient patterns of movement.

Minor positive effects related to the provision of housing in an accessible location.

Conclusion

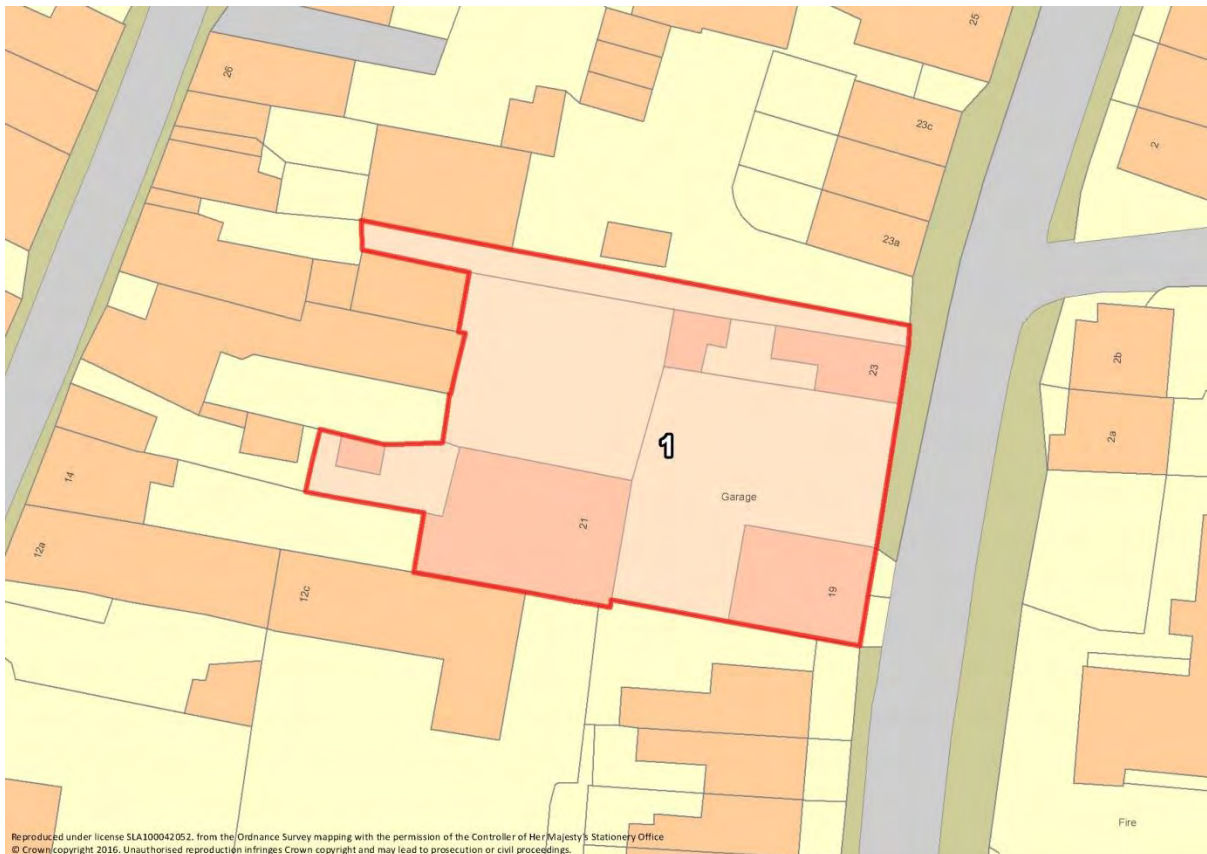
The site is not considered suitable for allocation due to lack of satisfactory access to the site with little potential for improvements.

Beccles and Worlingham Area

Site 1 - 19-21 Ravensmere, Beccles, Suffolk

Suggested Use: Housing

Site Area: 0.10



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, a 'Green' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

Historic England stated there is a potential impact on the Conservation Area and setting of the Grade II Listed 18 Northgate to the West.

Suffolk County Council Archaeology noted that the development of this site would have a 'Amber/Green' impact. Full details can be found on the Council's website.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site would require clearance and there is the potential for contamination from the previous garage/workshop uses. This would require remediation work.

The site is in a Conservation Area and the frontage is highly visible. Well designed development could improve the site and enhance the Conservation Area.

Redevelopment of the site would involve loss of the jobs from the site, however it is proposed to move these to employment land and nearby Ellough.

The site is considered to have capacity for 5 dwellings at 50 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not detect any significant effects. Minor negative effects included the effect on contamination on ground water from the former commercial garage.

Minor positive effects include the sites location close to services and employment, which could help promote sustainable movement patterns. This site could also provide housing to meet local needs.

There is an unknown impact on the historic environment relating to the Conservation Area.

The appraisal suggests that existing buildings should be re-used and sensitive design could mitigate effects to the Conservation Area. Contamination monitoring should also be carried out.

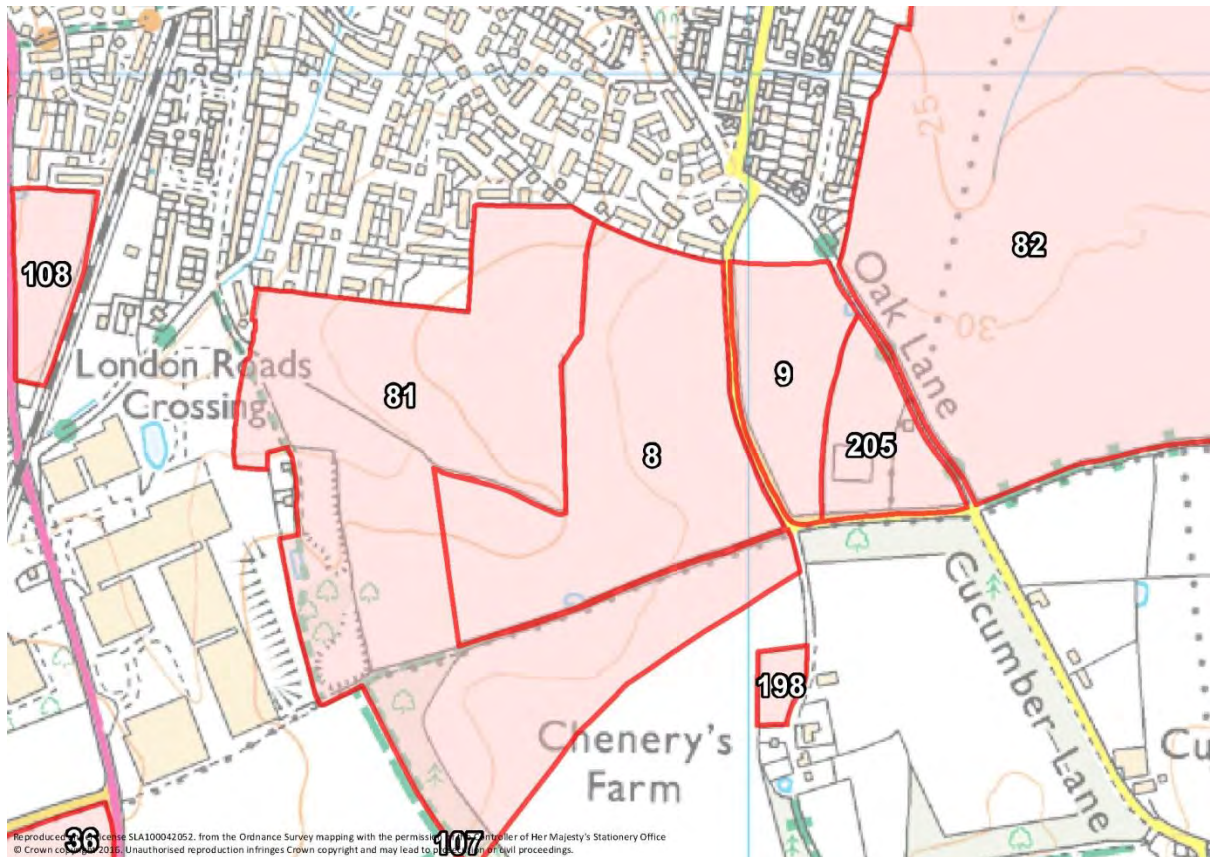
Conclusion

The site is wholly within the settlement boundary for Beccles and therefore the principal of development is already supported. As such at present it is not considered necessary to positively allocate a small site such as this within the Local Plan.

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

Suggested Use: Housing

Site Area: 10.00



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.

The Landowner made representations in support of this site. They stated that walking and cycling would be encouraged with links to existing and future cycle and pedestrian networks, including routes to employment areas. They highlighted that schools, services and the railway station are within walking and cycling distance. They stated the site is deliverable, developable, achievable and is not prone to flooding. It was contended that air quality would be maintained by development of this site. It was stated there is capacity available in water supply and sewerage systems and surface water could be disposed of. They asserted that development could be designed to blend in the landscape and surroundings, low carbon processes would be used in construction, the land is low grade agricultural land and biodiversity and geodiversity would be supported by development of the site. It was stated that development of the site would help to support Beccles town centre, create construction jobs and help Waveney District Council to achieve their housing targets.

A member of the public is supportive of this site provided that vehicular access is from the Southern Relief Road and the nearby smaller residential roads are used for pedestrian and cycle access only. Infrastructure should be provided if this site is developed along with neighbouring sites.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Existing vehicle access is unsuitable for a development on a site of this size and there is no footpath. Access of all types could be improved by linking to neighbouring sites which have been proposed for development.

The foul sewerage network will require improvements to support development. Overhead lines cross the site.

Some local surface water flooding has been recorded but this is not expected to be a significant issue.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for development. This site is exposed and extends into the open countryside.

The site has high archaeological potential.

With the access issue solved, the site could accommodate around 240 homes.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects include the effect on the landscape, due to the sites' irregular shape and exposure, impacts of climate change and the loss of greenfield land.

Minor positive effects include the accessibility and local services which would help encourage sustainable movement patterns. This site would also provide housing to meet local needs.

The appraisal suggested in terms of mitigation that a footpath to the west of Cucumber Lane could be included as part of a development. This would be very close to the meeting the footpath being constructed as part of the development of 20 homes on the triangular site to the northeast of this site. Combining with neighbouring sites could create a more cohesive appearance. The Southern Relief Road will change the character of the landscape in this location, reducing any negative impact. The pond on site should be surveyed and sensitive landscaping employed as part of any development.

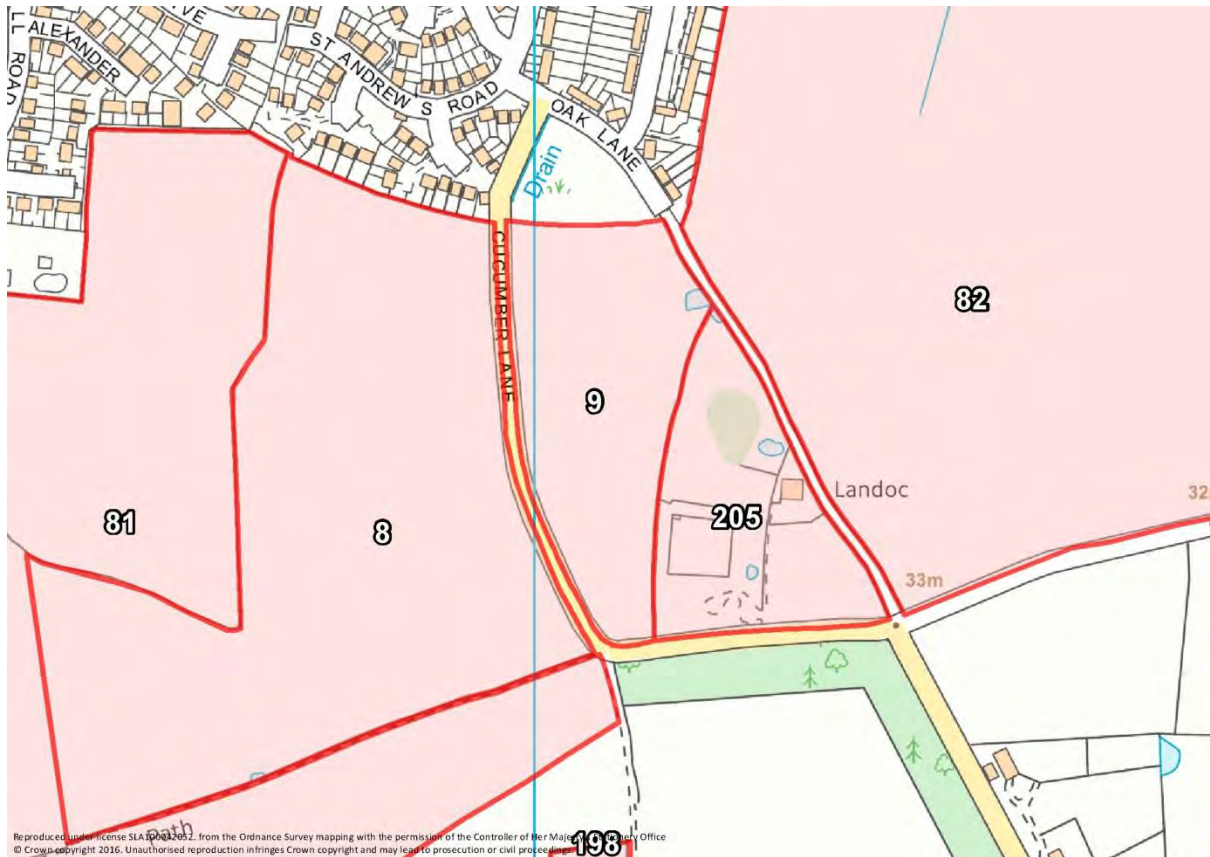
Conclusion

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all.

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

Suggested Use: Housing

Site Area: 3.10



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

No comments received from Parish Councils.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.

The landowner has provided a response in support of development of this site. They stated that the site is well located in relation to the town centre and existing employment sites, and links to the walking and cycling network would be built, including access to new networks forming part of the Southern Relief Road. They highlighted that schools, services and the railway station are within walking and cycling distance and access to the site will benefit from the Southern Relief Road. They stated that the site is deliverable, developable, achievable and there are no known abnormal constraints on the site and it is not prone to flooding. There are a lack of brownfield sites on the edge of Beccles making this greenfield site more suitable. It was contended that air quality would be maintained by development of this site. There is capacity available in water supply and sewerage systems and surface water could be disposed of. They stated that development could be designed to blend in the landscape and surroundings and low carbon processes would be used in construction. The land is low grade agricultural land and biodiversity and geodiversity would be supported by development of the site. It was asserted that a proposal would help to support Beccles town centre, create construction jobs and help Waveney District Council to achieve their housing targets.

One member of the public made comments and is supportive of this site provided that vehicular access is from the Southern Relief Road and the nearby smaller residential roads are used for pedestrian and cycle access only. Infrastructure should be provided if this site is developed along with neighbouring sites.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There is currently no footpath serving the site and vehicular access is poor for major development. Cycle access is good.

Foul sewerage improvements would be needed to support development. Overhead lines also cross the site.

The Settlement Fringe Sensitivity Study identifies this piece of land as the tip of an area which has low capacity to accommodate development. The area to the east is high capacity and there is moderate capacity to the west. The Southern Relief Road will alter the character of the landscape to the south creating a hard edge. Trees and buildings to the east of the site provide some screening.

There are ponds on-site and nearby which should be surveyed.

The site has high archaeological potential.

This site could accommodate 100 new dwellings.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to the impact on the landscape, the loss of greenfield land and the effect on nearby ponds.

Minor positive effects were identified in relation to provision and access to services and employment which will help encourage sustainable movement patterns. The provision of housing will help meet housing need.

Negative and potential negative effects could be mitigated through the provision of pedestrian access to the site, and surveys and remedial action for nearby ponds.

Conclusion

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all.

Site 12 - Low Meadows, Cucumber Lane, Weston

Suggested Use: Housing

Site Area: 1.13



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Red' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Suffolk County Council Archaeology noted the development of this site would have a 'Green' impact

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is isolated and has no public footpath to access it. This makes the site unviable for development.

Foul sewerage improvements would be needed to accommodate development. This would likely be substantial and not economically viable.

There is a risk of contamination from the builders yard use.

Clearing the site may make it more attractive for development.

Most of the site is within the tributary valley farmland character area although some is also in the farmed plateau clayland character area. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a high sensitivity, a high value and a low capacity for development. Edge of site appears to be enclosed by earth deposits, creating a bund on north and east edges.

A pond on site would require surveying for protected species.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative impacts included access to services and facilities and impact on the rural economy.

Minor positive effects included health and well-being, delivering housing, impact on the landscape, development of a brownfield site, and encouraging efficient movement.

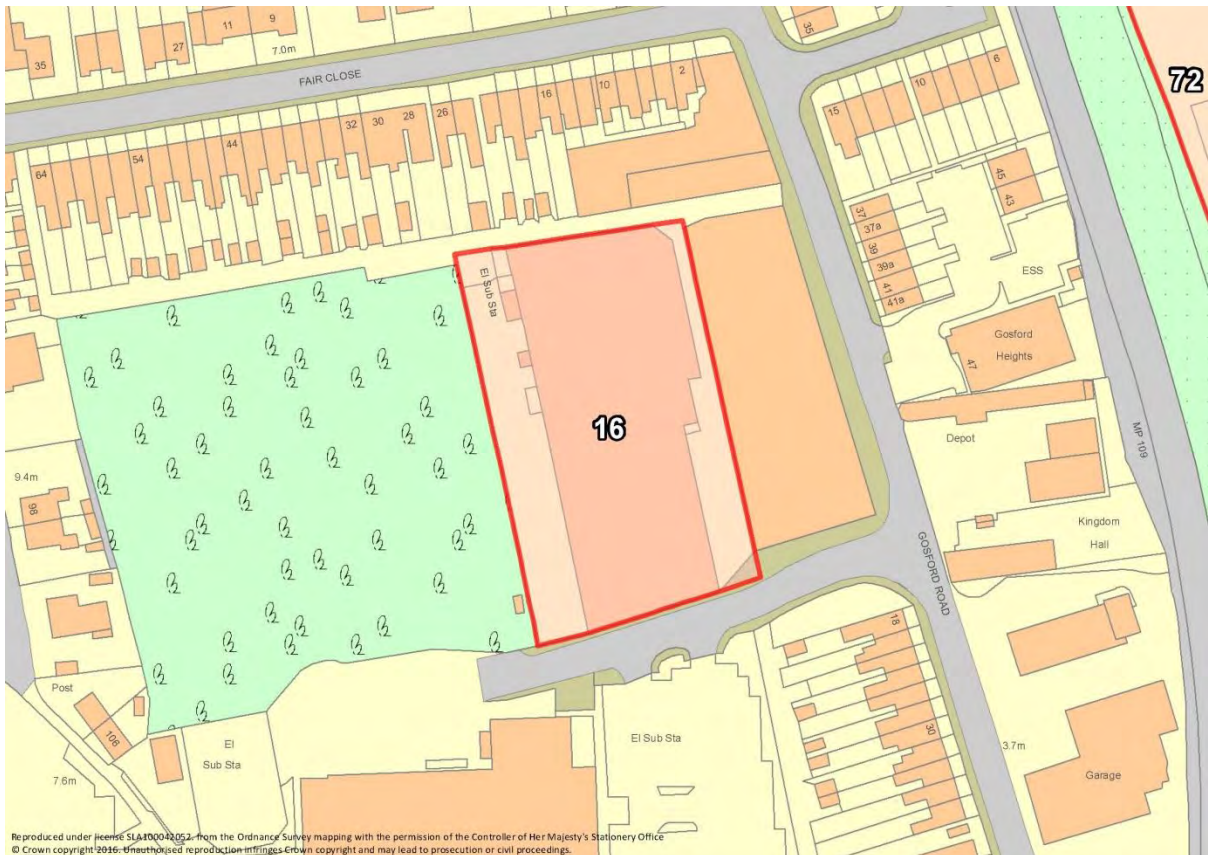
Conclusion

The site is remote from services and facilities and is not considered to be suitable for allocating for housing.

Site 16 - Former Beccles Heat Treatment, Gosford Road, Beccles

Suggested Use: Housing

Site Area: 0.48



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England highlighted the proximity of Grade II Listed Buildings on Blyburgate and the potential impact on the Conservation Area.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.

No comments received from Town or Parish Councils.

One member of the public commented that they would like to see this site re-developed as a mixed use development along with some other adjacent sites. Another member of the public expressed a preference for indoor sports facilities to be located here and somebody else supported a manageable sized development on this brownfield site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed if development was to occur.

This is a brownfield site with the buildings on site have been partially demolished, therefore there is potential for contamination on the site.

The northern part of the site is in a Conservation Area and adjacent to a locally listed building, although the site is not prominent in the Conservation Area and potential development may have only a limited impact on the townscape and character of the Conservation Area.

There are commercial and retail uses in the adjacent buildings to the east; a supermarket-type store to the south; and a commercial garage nearby to the northeast. There are potential residential amenity issues arising from the adjacent commercial garage and the tall buildings to the east.

Development would result in a loss of employment; however employment uses on the site could take place on industrial sites at Ellough.

The site has capacity for 19 dwellings at 50 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Negative impacts include the loss of employment land and potential contamination of ground water.

Minor positive effects include proximity of the proposed dwellings to services and employment. This could also encourage sustainable movement patterns. .

The site is well located for services and facilities and which would promote walking, however, there are potential residential amenity issues arising from the nearby commercial garage and dominating buildings. Therefore the effect on the health and well being of the population is considered to be neutral.

Residential development should be positioned away from the commercial garage to the northeast and the tall buildings to the east of the site to safeguard residential amenity. Careful investigation and treatment of contamination would be required to minimise risks from contamination.

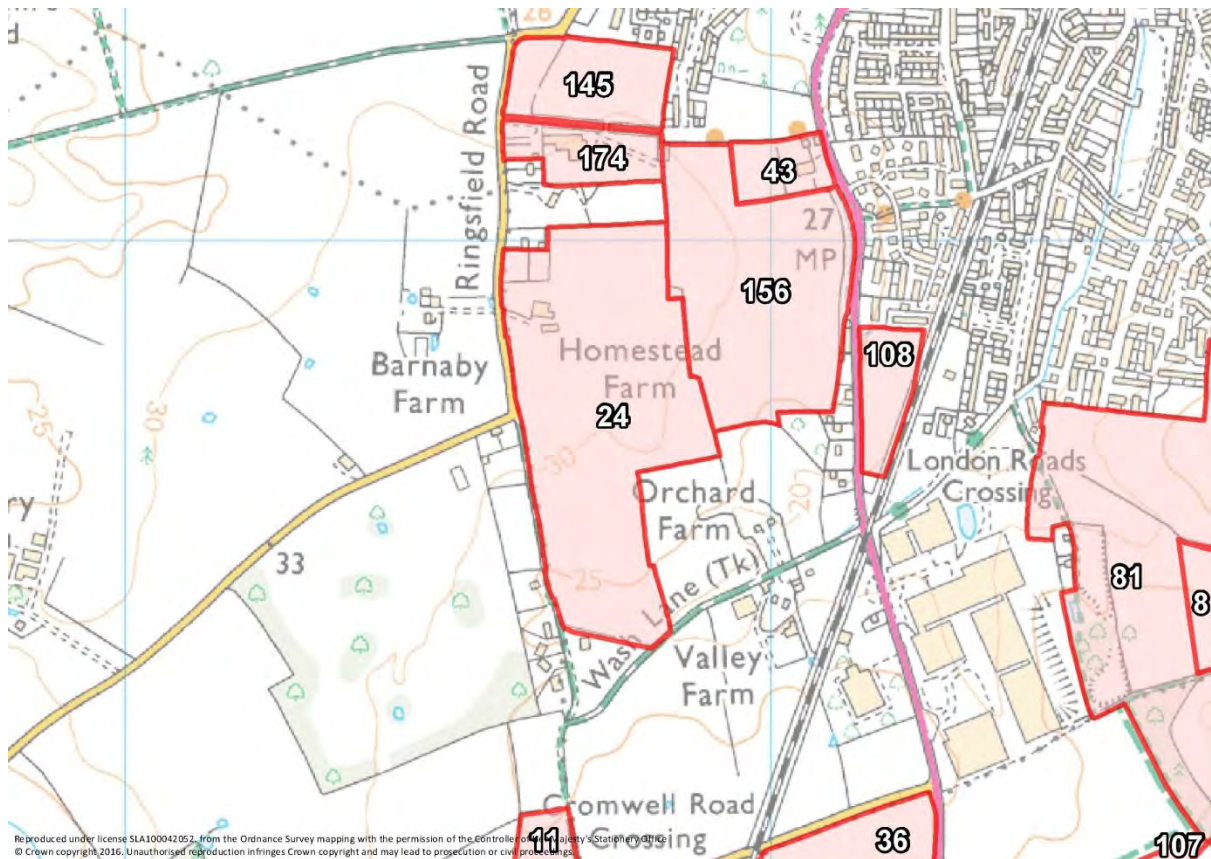
Conclusion

The unneighbourly commercial garage and dominating buildings would generate amenity issues making the site unsuitable as a housing allocation as proposed. If the vacant site to the west were to come forward then there would be an opportunity to explore a comprehensive, mixed use redevelopment of both sites.

Site 24 - Homestead Farm, Ringsfield Road, Beccles

Suggested Use: Housing

Site Area: 14.48



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that development of the site would have a 'Red' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority highlighted the need to assess impact in the landscape due to rising ground.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Beccles Town Council identified the need for development in the area but infrastructure in Beccles is at breaking point, especially the health centre. Housing development should be restricted to the area to the southwest of the town. Site 24 makes good use of existing and planned road infrastructure. This area would require a new primary school, convenience store and other infrastructure.

Members of the public objected due to traffic congestion, highway safety, impact on the National Cycle Network, pressure on local services and infrastructure and encroachment into the countryside. One member of the public would like to see it used as a campsite or nature reserve.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There are currently no footpaths serving the site.

Foul sewerage improvements would be needed to support development.

There is a high risk of surface water flooding at the southern extremity of the site.

The south and western edges of the site are exposed and development would be visible in views across the countryside. The Landscape Character Assessment recommends avoidance of exposed edges of development. The Settlement Fringe Study identifies the landscape as having moderate capacity to accommodate development.

The site has high archaeological potential.

Traffic from this site could impact on the junctions within Beccles.

The site could accommodate 260 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

A significant negative effect on natural resources was identified arising from the loss of a greenfield site and grade 2 agricultural land. Minor negative effects included lack of existing access to footpaths and bus stops, the impact of climate change and the impact in the landscape.

Minor positive effects included health and well being of the population from accessibility of open space, employment and GP surgery by cycle and delivering housing to meet local needs.

Links to neighbouring sites could provide access to footpaths and bus stops. Landscaping would mitigate the landscape impact to some degree. There is no mitigation for the loss of greenfield land or grade 2 agricultural land.

Conclusion

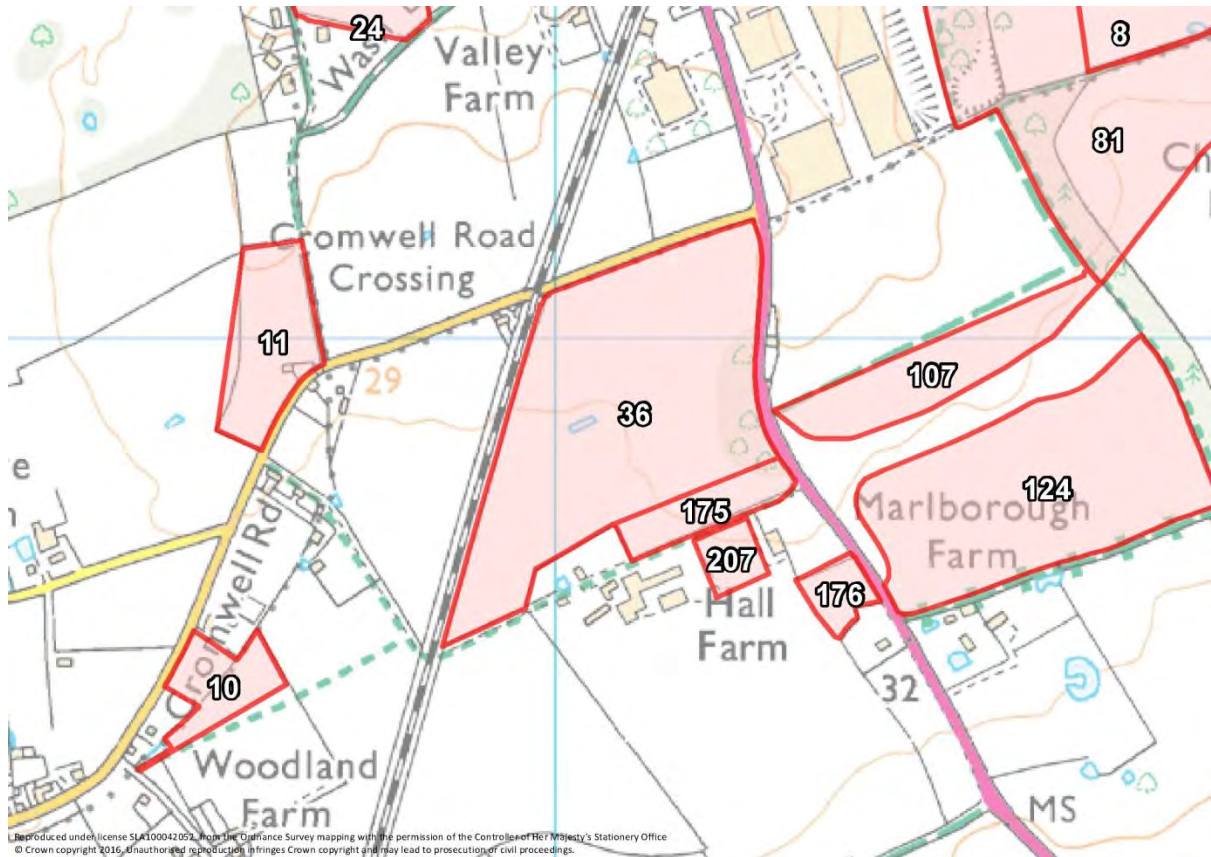
Development of this site will only be possible through a combined development with site 156 to the east as access on to Ringsfield Road will not be appropriate. Compared to other sites on the edge of Beccles and Worlingham, this site is likely to have a more severe impact on the landscape, given the higher sensitivity of the landscape in this location. The site also comprises higher grade agricultural land.

The site is considered less favourable to the other preferred sites in Beccles for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Beccles under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of high grade agricultural land in a more sensitive landscape. As such the site is not considered suitable for allocation in this Local Plan.

Site 36 - Land at Cromwell Road and London Road, Weston

Suggested Use: Mixed use

Site Area: 10.83



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.

No Parish or Town Council comments received.

One member of the public objected as the site is remote from the town, not well located to services and facilities and is exposed in the landscape.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There are no footpaths or public transport serving the site and the main road is not suitable for cyclists.

The foul sewerage network would need improvements to be able to support development. Overhead lines also cross the site.

Some records of surface water flooding on eastern parts of the site.

The site is bounded by the railway line and roads on three sides and there are buildings to the south, however development would still be visible in the countryside. Care should be taken to avoid exposed edges as suggested by the landscape character assessment.

The pond on site should be surveyed for biodiversity potential.

The site has high archaeological potential.

Housing should be carefully positioned away from unneighbourly employment uses.

The site could accommodate 108 new dwellings at 20 dwellings per hectare and would provide 5.4 hectares of employment land.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included lack of access to open space for housing, no pedestrian links and lack of public transport and no safe cycle links. The proposed employment uses may harm residential amenity for the dwellings. There is the potential for development to be exposed in the landscape. Development would result in the loss of a greenfield site and is at risk of surface water flooding.

Minor positive effects included creation of employment opportunities and promoting economic growth, delivering housing to meet needs and providing opportunities to reduce commuting distances.

There is a potential negative effect on biodiversity relating to the pond found on site, however this effect is not fully known.

Landscaping would help to limit the visual impact of development in the landscape. Housing could be separated from unneighbourly employment uses to reduce harm to residential amenity. The pond should be surveyed protective measures put in place as required.

Conclusion

Due to the remote position from the town centre and lack of transport options, this site is not considered to be a suitable location for housing. Whilst the site could be suitable for employment development it is

considered that the employment sites allocated by Policies WLP3.1 and WLP3.3 are in more preferable locations given their proximity to the Enterprise Zone and together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.

Site 43 - Land at Montrose Garage, London Road, Beccles

Suggested Use: Housing

Site Area: 1.32



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority highlighted the need to assess impact in the landscape due to rising ground.

Historic England highlighted the potential impact on the nearby Conservation Area.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.

Beccles Town Council identified the need for development in the area but infrastructure in Beccles is at breaking point, especially the health centre. Housing development should be restricted to the area to the

southwest of the town. Site 43 makes good use of existing and planned road infrastructure. This area would require a new primary school, convenience store and other infrastructure.

Badger Building commented they are in a position to bring the site forward in the early years of the plan without reliance on other sites and that the site is well related to existing development.

One member of the public objected on the grounds of traffic congestion and pressure on the medical centre. Two members of the public were supportive and stated the road links were good, it is a brownfield site (although density seems high) and traffic hot spot of Ingate/Lowestoft Rd is avoided.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The foul sewerage network would require improvements to accommodate development.

The current petrol station and garage use will require remediation to make the site suitable for residential use.

Some surface water flooding has been recorded on the site.

Settlement Fringe Landscape Sensitivity Study identifies this site as having a moderate sensitivity, a moderate value and a moderate capacity for development. However the views of the site from the countryside are limited.

The site has capacity for 30 dwellings.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included the potential to contaminate ground water.

Minor positive effects included good walking and cycling links to services and facilities, and delivering housing to meet needs. There is also the potential to improve the appearance of the site and enhance the street scene and setting of the Conservation Area.

Well designed development on London Road could improve the appearance of the street. The grass area to the rear of the site should be retained to minimise the loss of grade II agricultural land.

Conclusion

Policy WLP3.2 of the First Draft Local Plan allocates this site as part of an allocation for 250 dwellings. The site has good access to existing services, facilities, schools and employment opportunities in Beccles and the surrounding area via footpath, public transport, cycle and road links. The site offers moderate

landscape value but is considered to be reasonably well contained in the landscape, therefore the impact should be minimal. Redevelopment of this site also provides an opportunity to extend the cemetery.

Site 44 - Land at Sandpit Lane, Worlingham

Suggested Use: Housing

Site Area: 1.31



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Red' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that there is a low risk to encroachment on the Water Recycling Centre.

Suffolk County Council Archaeology noted that the development of this site would have a 'Amber/Green' impact.

Worlingham Parish Council stated that this site ranked as the second choice preferred site due to its proximity to the Southern Relief Road.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.

Badger Building commented they are in a position to bring the site forward in the early years of the plan without reliance on other sites and that the site is well related to existing development.

Members of the public objected due to pressure on infrastructure and facilities, excessive housing numbers in combination with nearby sites, loss of wildlife habitat, increased traffic, inadequate highway, school traffic issues, loss of a greenfield site, surface water drainage issues and lack of capacity in the sewerage system.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The foul sewerage network would require improvements to support development. There is a low encroachment risk to the water recycling centre.

The site is visible across the countryside from the west. The Settlement Fringe Landscape Sensitivity Study indicates that this landscape area has a low sensitivity, a low landscape value and a high capacity for new development.

There are ditches, hedgerows and trees on the site which may have biodiversity value.

An eastern portion of the site is within 400 metres of a water recycling centre. This could cause smells for dwellings on this site.

The site has a capacity for 20 dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included loss of a greenfield site and encroachment in to the countryside and the potential loss of trees and hedgerows.

Minor positive effects included proximity footpath access; proximity to services and employment and contributing to meeting housing need. This site could also promote sustainable movement patterns.

The southern tree belt should be retained and combined with other landscaping to minimise the effect on the landscape.

Conclusion

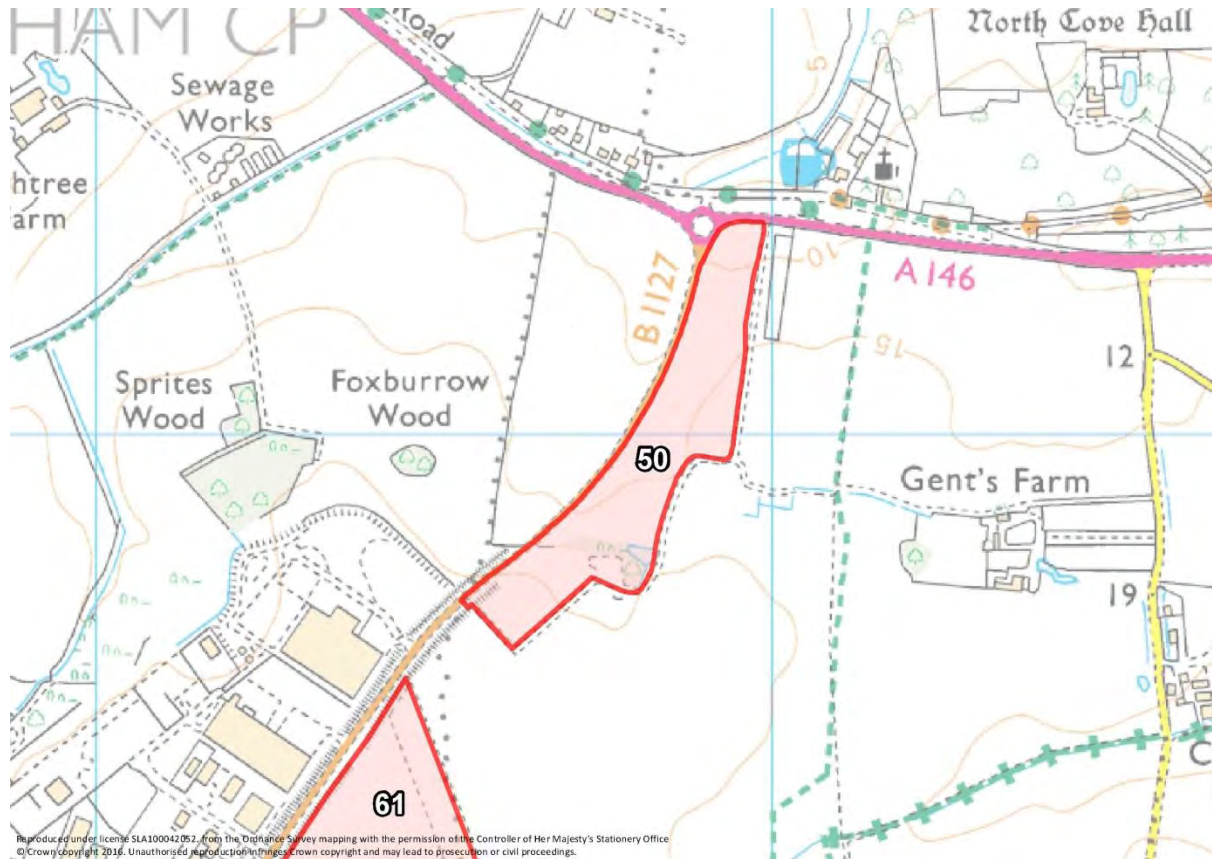
Whilst the development of the site would have limited impacts, the site is considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision. These preferred sites cumulatively deliver more than sufficient housing for Beccles under the strategy outlined under Policy WLP1.1, therefore the development of this site would

result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

50 - Land at the junction of Copland Way and the A146 Beccles / Lowestoft Road, North Cove

Suggested Use: Mixed use

Site Area: 7.73



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Red' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

Historic England highlighted the proximity of Grade I and II Listed Buildings and potential impact upon their settings (Church of St Botolph to the north and Three Horseshoes Public House).

Suffolk County Council commented this site is one of the further sites from the town centre and less likely to encourage sustainable travel.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

No Parish or Town Council comments received.

Members of the public objected due to large distance to existing facilities and development increasing the reliance on cars for transport, characterless development along the roadside, pressure on the A146 and close proximity to industrial areas.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There is no pedestrian access and the roads are not safe for cyclists. There is a bus stop nearby but this is not easily accessible.

Foul sewerage improvements would be needed to support development. A sewer pipe crosses the site.

Development here would be highly exposed and prominent, particularly in views from the west. The site is elevated in the landscape and development would have a very prominent appearance. The Landscape Character Assessment for the northern and most visible part of the site advises that development should avoid creating lit or exposed settlement edges, particularly in the context of the landscape setting of The Broads.

Some of the site is Biodiversity Action Plan (BAP) priority habitat.

The site has high archaeological potential.

Potential from some amenity issues from industrial uses to the south.

The site could provide 2.3 hectares of employment land and 9200 square metres of floorspace for retail and leisure.

Summary of Draft Sustainability Appraisal

A significant negative effect was identified in the loss of the pond and deciduous woodland which is a BAP priority habitat. Minor negative effects included health and well-being, access to services and facilities, landscape impact, loss of a greenfield site and impact on the town centres (from proposed retail use).

Minor positive effects included delivering housing, supporting economic growth and encouraging efficient movement patterns (locating housing near to employment opportunities).

There were unknown impacts on water quality.

The appraisal suggested that the deciduous woodland should be retained and protected/enhanced. The pond on site should be surveyed and protected as required.

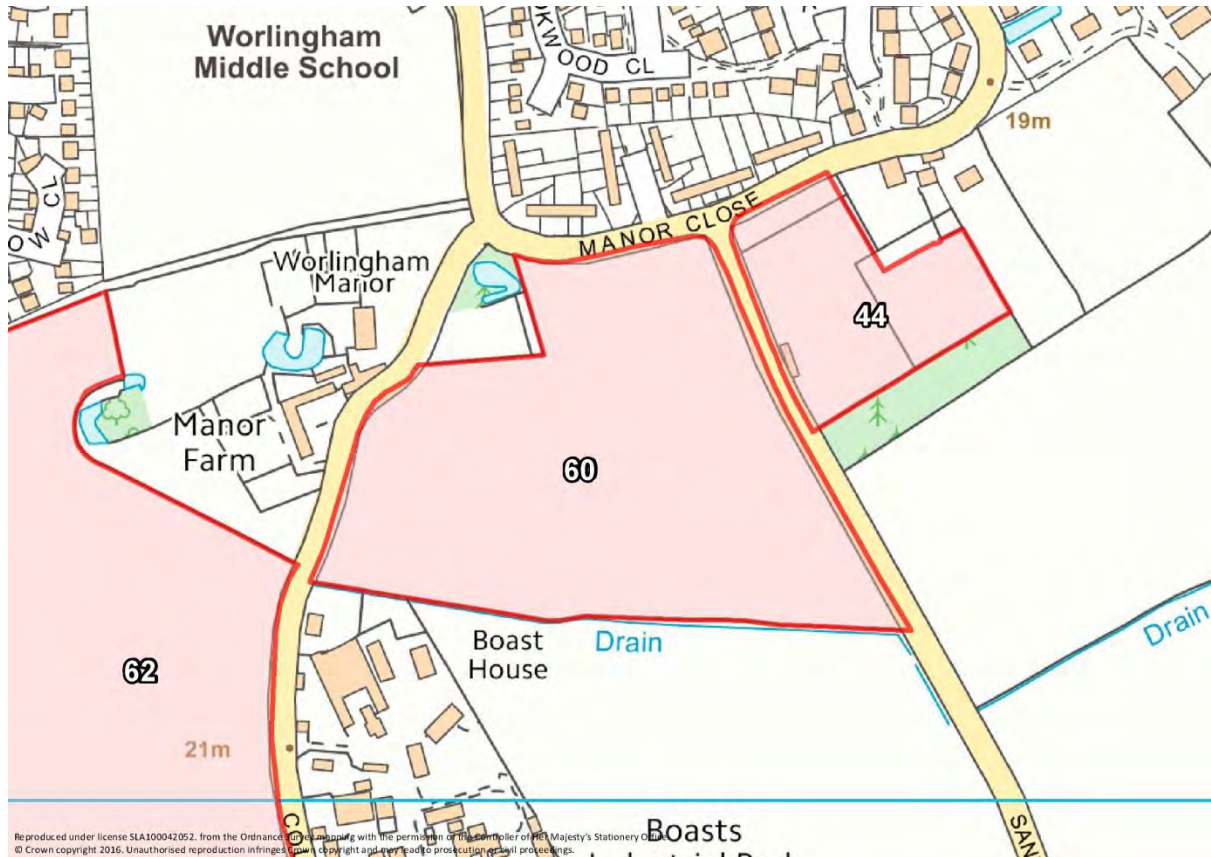
Conclusion

The site is considered to be remote with no pedestrian access and very poor cycle access and is therefore not considered to be suitable to allocate for housing. The Biodiversity Action Plan priority habitats on the site and the landscape impact also make it unsuitable for other types of development.

Site 60 - Land east of College Lane, Worlingham

Suggested Use: Housing

Site Area: 5.08



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Red' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crossed the site.

Historic England highlighted the potential impact on the setting of the grade II Listed Building (Worlingham Manor to the west).

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Worlingham Parish Council voted this site as their preferred site for development due to the proximity to the proposed Southern Relief Road.

Members of the public objected due to strain on infrastructure and facilities, loss of wildlife habitat, increased traffic, inadequate highways, school traffic issues, lack of capacity in the sewerage system, surface water drainage issues, uncharacteristically high density of development, excessive housing numbers alongside nearby proposed sites and loss of a greenfield site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site makes up setting of the grade II listed Worlingham Manor and development would cause significant harm to the setting which could not be mitigated.

Some of the local roads are narrow with poor visibility and the site is close to bends and junctions. Pedestrian and cycle access is good.

Foul sewerage would need improvements to support development. A sewer pipe also crosses the site.

Records of surface water flooding on the site.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having a low sensitivity, a low value and a high capacity for development. The site projects in to the countryside and would create an exposed edge, contrary to advice in the Landscape Character Assessment.

There are nearby ponds and a watercourse to the south of the site which may have biodiversity value.

The industrial estate to the south may be harmful to residential amenity.

Summary of Draft Sustainability Appraisal

Harm to the grade II listed Worlingham Manor was identified as a significant negative effect. Minor negative effects included creation of an exposed development in the landscape, the effects of climate change and the loss of a greenfield site.

Minor positive effects included proximity to open space, primary school, employment opportunities and facilities, helping to meet housing need and good cycle access.

The appraisal suggested that the adjacent pond should be surveyed for biodiversity value, however there is no clear mitigation measure in regards to the effects on the listed building.

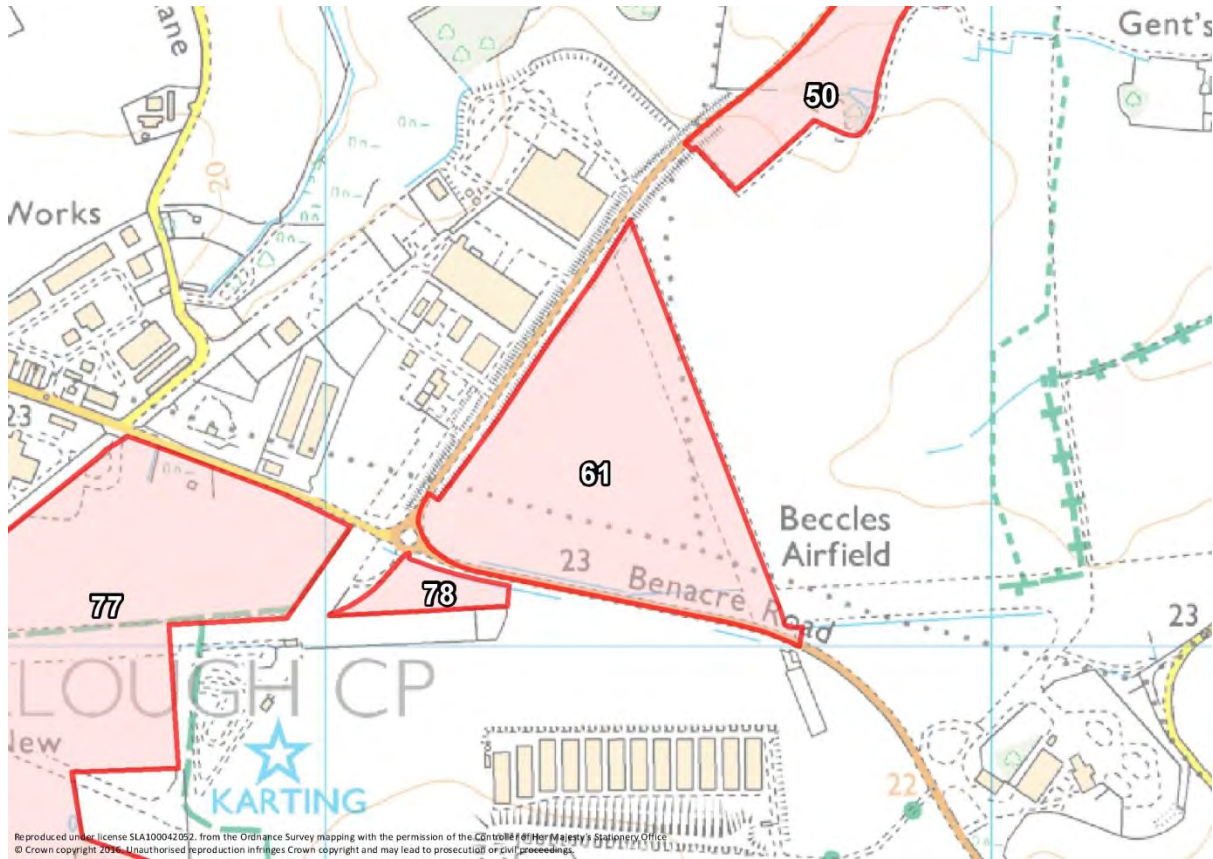
Conclusion

Due to the harmful impact on the setting of a grade II listed building and the exposed appearance that development on this site would generate, this site is not considered suitable for development.

Site 61 - Land east of Copland Way, Ellough Industrial Estate

Suggested Use: Employment

Site Area: 16.64



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Beccles Town Council support this site for employment use but highlighted the inadequate highway infrastructure including roads, buses and pedestrian and cycle access.

Suffolk Wildlife Trust objected to development of this site unless it can be demonstrated there would be no adverse impact on the County Wildlife Site which makes up part of the site.

The landowner's agent responded to the consultation to promote this site. The representation provides a description of the site, its history, and relevant local and national planning policies. It highlighted recent largescale planning permissions. The representation also amended the outline of the submitted site to exclude a County Wildlife Site. They consider the site to be suitable, available, achievable and viable (provided utilities capacity issues are overcome).

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Pedestrian, cycle and public transport links are poor.

The water recycling centre and the foul sewerage network will require improvement if development was to take place. Improvements to the water recycling centre are dependent on the scale and type of employment development.

Some records of surface water flooding.

There is potential for contamination from industrial uses which could be a risk to residential use.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a low value and a high capacity for development. Development of the east of the site would be exposed in the landscape. The Landscape Character Assessment states that exposed edges should be avoided.

There is a County Wildlife Site in the eastern most part of the site. This should be surveyed and protected.

There is some archaeological potential on the site.

The site could provide 15 hectares of employment land.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included impact on the landscape, loss of greenfield land, the effects of climate change, potential harm to the neighbouring County Wildlife Site, and lack of footpaths, cyclepaths and public transport.

Minor positive effects were the creation of employment opportunities which will reduce unemployment and support the economy.

The appraisal suggested that the County Wildlife Site should remain undeveloped and protective measures put in place as required. Exposed edges of development should be avoided. Addition of foot/cycle paths and/or public transport to serve the site would encourage sustainable travel patterns.

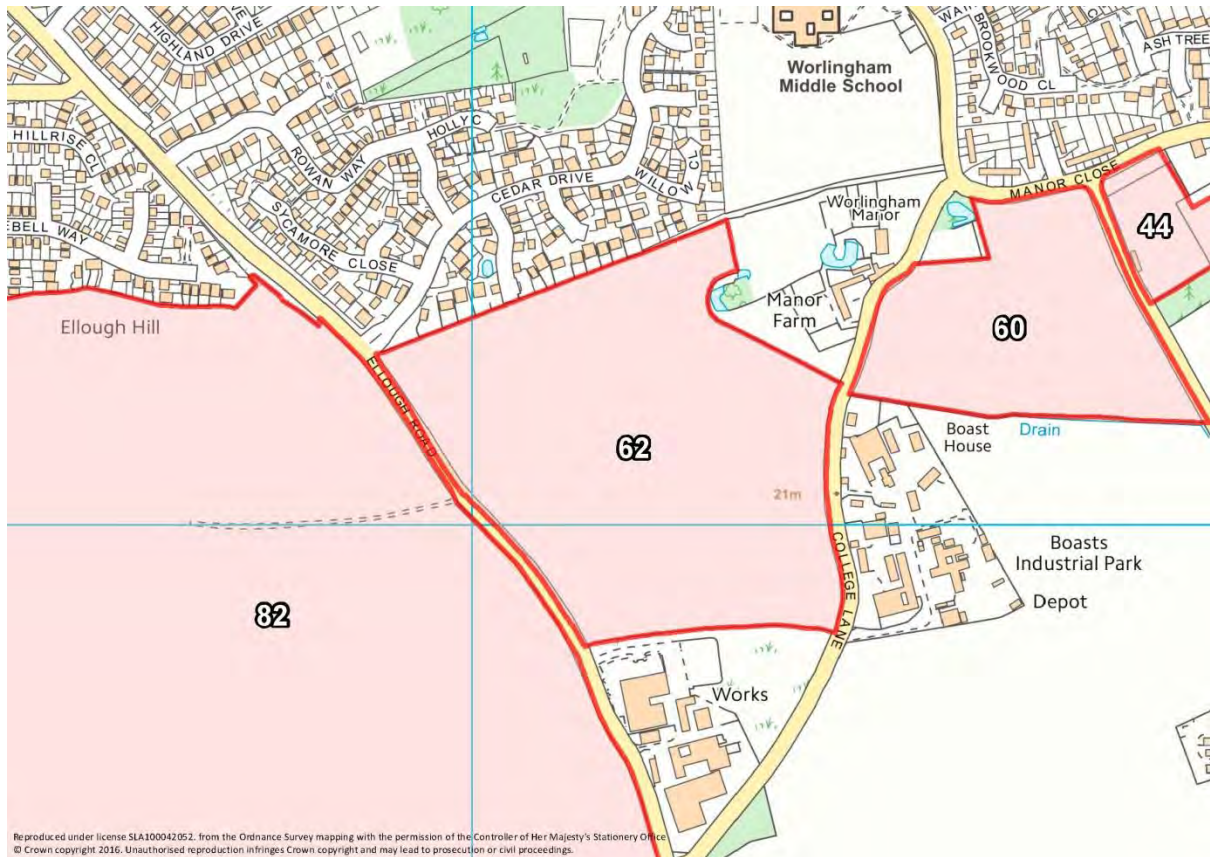
Conclusion

The development of this site for employment uses would extend the existing employment area further into the countryside to the east. As such it would have a greater impact on the landscape than the employment sites allocated by Policies WLP3.1 and WLP3.3. These sites together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.

Site 62 - Land east of Ellough Road, Worlingham

Suggested Use: Housing

Site Area: 12.00



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Red’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

Historic England highlighted the potential impact on the grade II Listed Building (Worlingham Manor to the north east).

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

No comments were received from Parish or Town Councils.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.

Members of the public objected due to lack of facilities and infrastructure, loss of wildlife habitat, excessive housing numbers, increase in traffic with particular reference to school traffic, lack of capacity in the sewerage system, surface water flooding, higher numbers of non-locals and retirees may put a strain on facilities and loss of a greenfield site. Concerns were also raised regarding the nearby industrial areas and problems arising from noises and smells. It was suggested that open space, leisure facilities and a pub/restaurant could be incorporated in to a development. One person supported the site as it has road, cycle and footpath links.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The foul sewerage network requires improvement.

Development would project in to the countryside and would be exposed. The Landscape Character Assessment recommends avoiding exposed edges. The Settlement Fringe Landscape Sensitivity Study identifies this site as having a low sensitivity, a low value and a high capacity for development.

There are ponds by the northeast corner of the site which may have biodiversity value.

Grade II listed Worlingham Manor lies around 150 metres to the east and development may impact on its setting.

There are two industrial areas to the south and east of the site which are unneighbourly uses.

This site could provide 270 new dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

No significant effects were identified. Minor negative effects include exposed development in the landscape, potential harm to biodiversity features and harm to the setting of the listed building.

Minor positive effects included proximity to open space, employment opportunities, primary school, and post office; and delivery of housing to meet need. This site could also promote sustainable movement patterns.

Mitigation could include avoidance of exposed edges through good landscaping and layout; surveying the adjacent pond for protected species; and a landscaped buffer may help to reduce the impact on the setting of the listed building.

Conclusion

The site is considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision. These preferred sites cumulatively deliver more than sufficient housing for Beccles under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 69 - Land north of Church Lane, Ellough

Suggested Use: Housing

Site Area: 1.31



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Red' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Suffolk County Council Archaeology noted that development of this site would have an 'Amber/Green' impact.

Concern was raised about the inability of the road network to support additional traffic and the adverse impact that new development would have on wildlife habitats.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

There is no footpath serving the site and public transport which makes the site unviable for development.

The site is wooded and on a gradient. There would be clear views of the site from the south near Ellough Church and the public footpath here. Development would appear intrusive on the rural landscape and would result in a significant effect on the landscape which could not be mitigated.

Foul sewerage improvements would be needed to support development. This improvement would be substantial and most likely financially unviable.

Development would lead to a loss of trees which could provide habitats for local wildlife.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included health and well-being, access to services and facilities, landscape impact, loss of a greenfield site, loss of wildlife habitat (trees) and encouraging efficient patterns of movement.

One minor positive effect identified was the delivery of housing.

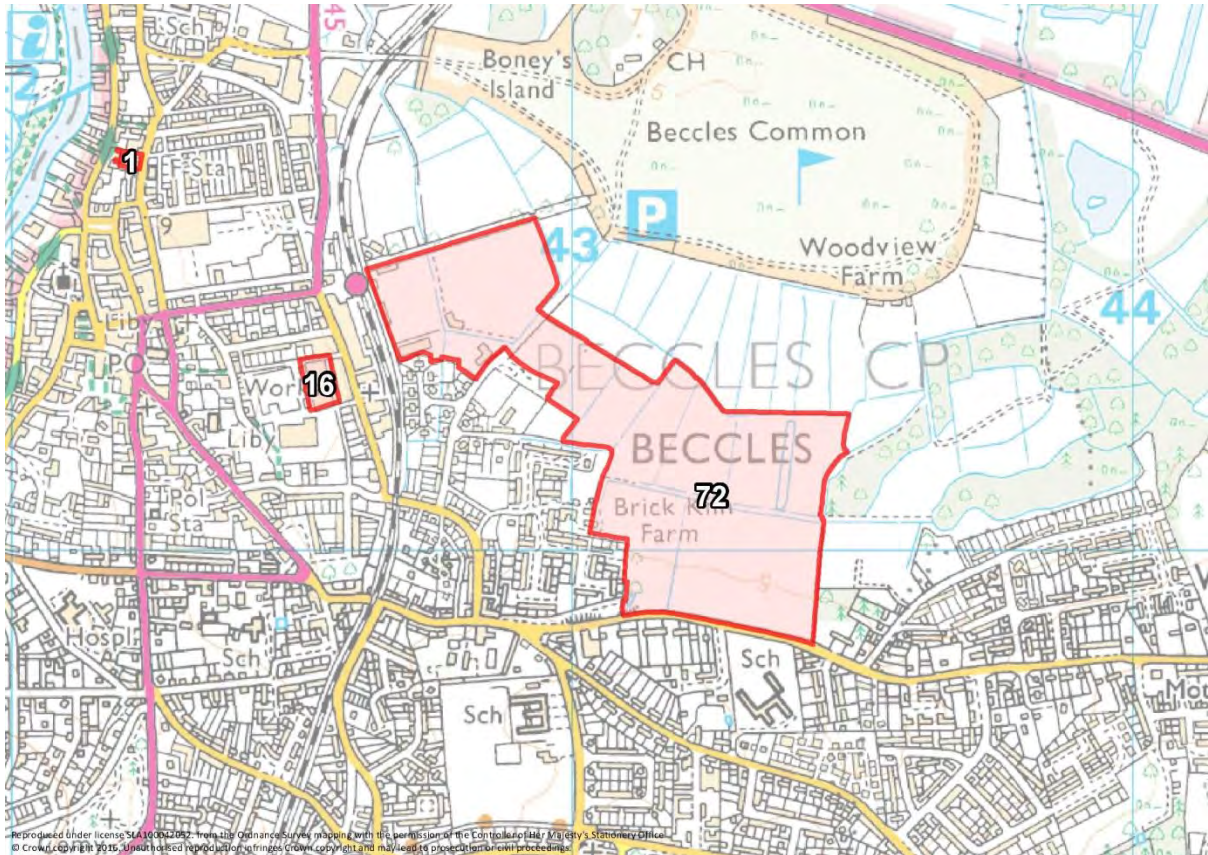
Conclusion

The remote location and the site's prominence in the landscape means that it is not considered to be suitable for allocation.

Site 72 - Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Suggested Use: Mixed use

Site Area: 24.02



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

Historic England highlighted the potential impact on the Beccles Conservation Area and its setting.

National Grid stated that the site is crossed by or within close proximity to intermediate/high pressure apparatus.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact.

Beccles Town Council stated that the site should remain as an open break and a park created.

The Beccles Society strongly opposed this site for development and its development would be highly damaging. They identified that development of the site would conflict with the Council's Green Infrastructure Strategy. The site is valuable in assisting flood mitigation. They commented that Beccles Town Council (who control part of this site) have not authorised its inclusion as part of the new Local Plan.

Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not have an adverse ecological impact.

There were strong objections from members of the public for a number of reasons. The loss of the open break between Beccles and Worlingham and resultant harm to the character and setting of the settlements was a key reason for objecting. Loss of wildlife habitat, flora and fauna was another key reason as was development in an area prone to flooding which could exacerbate flooding problems. Many people have cited increased traffic congestion, poor access, inadequate roads, parking issues, lack of capacity in the sewerage system, low water pressure and strain on local facilities and infrastructure as reasons for objection. Loss of views across the common, noise generated from a nearby dog boarding kennel, loss of sports facilities and development of the site conflicting with the Council's Green Infrastructure Strategy are also reasons for objection. Many members of the public commented that the site (or part of the site) belongs to the people of Beccles and is controlled by Beccles Town Council and they do not wish to see this land developed.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Development would conflict with the aims of the Rural River Valley character area in the Landscape Character Assessment which could not be mitigated. The Settlement Fringe Study states the area provides long views toward Beccles common and the Broads, provides a moderate contribution to the setting of the Broads, and has a moderate capacity to accommodate development. Development of the southern part of the site would contribute to the coalescence of Beccles and Worlingham.

The foul sewer network will need improvement to support development and it should be noted that a sewer pipe crosses the site.

The northern part of the site is in flood risk zone 2 and is subject to surface water flooding.

The northern part of the site is a floodplain grazing marsh and the southwest boundary takes in deciduous woodland which are both Biodiversity Action Plan priority habitats.

The site has high archaeological potential.

Summary of Draft Sustainability Appraisal

A significant negative effect on the landscape and townscape was identified in the loss of the open break between Beccles and Worlingham on the northern side of Lowestoft Road, resulting in increased coalescence of the two settlements. Minor negative effects included loss of greenfield land, the effects of climate change and harm to and loss of Biodiversity Action Plan priority habitats.

Minor positive effects include proximity of facilities and schools, protection of existing sports pitches and open space and provision of housing to meet needs.

The appraisal suggested that some of the northern part of the site could be used as open space to be compatible with the BAP habitats however this would need expert advice.

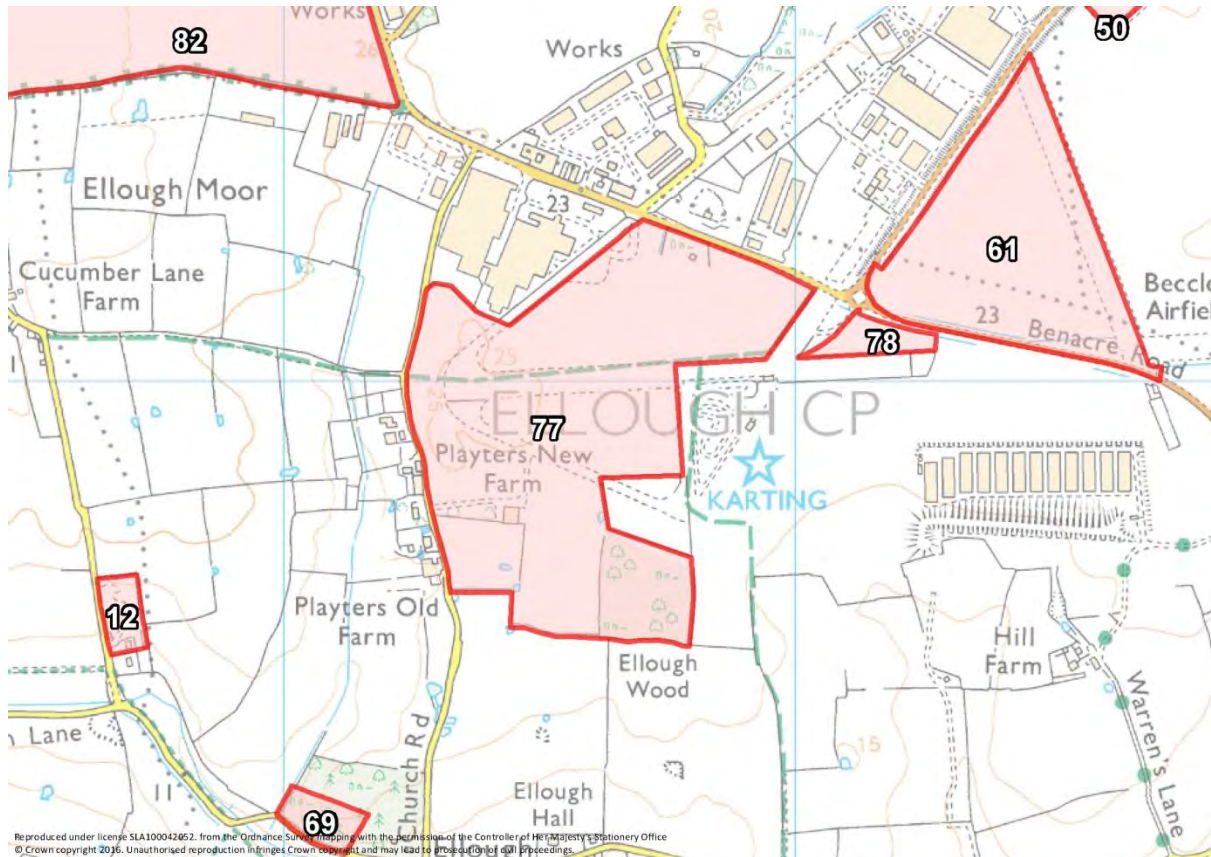
Conclusion

Development of this site would erode the views of the Broadland landscape to the north and harm the setting of the Broads. It is not considered that this impact could be mitigated. Therefore the site is not considered suitable for development. Additionally, the loss of the openness of this part of Lowestoft Road would result in increasing the coalescence of Beccles and Worlingham. The site also features some sensitive Biodiversity Action Plan priority habitats.

Site 77 - Land off Benacre Road, Ellough, Beccles (Site 1)

Suggested Use: Mixed use

Site Area: 36.98



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Red' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council commented this site is one of the furthest sites from the town centre and less likely to encourage sustainable travel.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact.

Beccles Town Council supported this site for employment use but highlighted inadequate highway infrastructure including roads, buses and pedestrian and cycle access.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There are no public footpaths serving the site or connecting to public transport. Cycle access is poor. However the site is of a sufficient size to provide services on site.

Foul sewerage improvements would be needed for development. Electricity and gas supply may be limited.

Some evidence of surface water flooding on site.

The Settlement Fringe Landscape Sensitivity Study identifies this site as having a low sensitivity, a low value and a high capacity for development. The south and central parts protrude in to open countryside and the southern part of the site is exposed.

Nearby Ellough Wood is a Biodiversity Action Plan habitat and is sensitive. An extension to Ellough wood would provide some mitigation to landscape impact.

The site has high archaeological potential.

The size of the site means development could impact upon local roads and junctions.

The adjacent karting track and employment uses would be unsuitable neighbours for residential development.

The site could accommodate 695 new dwellings at 30 dwellings per hectare and provide 4 hectares of employment land.

Summary of Draft Sustainability Appraisal

Significant negative impacts were identified in relation to access to services and facilities, harm to biodiversity in regards to the impact on Ellough Wood and harm to economic growth with the loss of the allocated enterprise zone. Minor negative effects were identified in relation to health and well-being of the population, impact on the landscape, the effects of climate change and loss of a greenfield site.

Minor positive effects included provision of housing and proximity of housing to employment opportunities. The site could also encourage sustainable movement patterns.

The appraisal suggested that the south of the site should be well landscaped to avoid an exposed edge in the landscape. An extension of Ellough Wood to the west is proposed which should be carried out, with the whole wood being protected and surveyed. Pedestrian access to bus stops and safe cycle routes should be provided to improve access. The submission refers to relocation of the enterprise zone to a neighbouring site which would mitigate the loss from this site to some degree. A noise assessment of neighbouring uses such as the karting track and air strip should be undertaken and mitigation carried out as required.

Conclusion

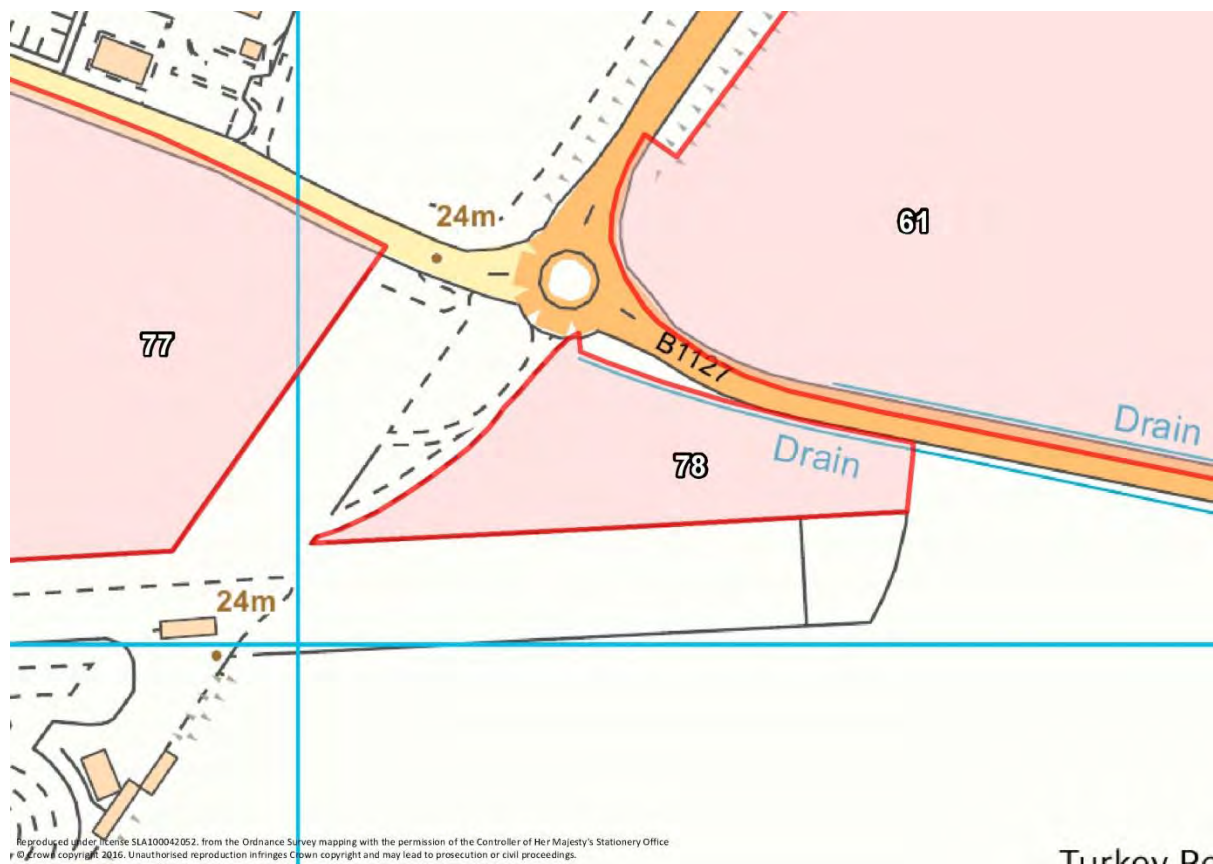
The site is remote from Beccles and public transport, cycle and footpath access is poor or non-existent. As a mixed use development including housing, the site is not considered suitable for allocation in this Local Plan. The site is considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision.

The northern part of the site, which forms part of the Enterprise Zone is considered suitable for employment development as an extension to the existing industrial estate. This land is allocated under Policy WLP3.3 of the First Draft Local Plan.

Site 78 - Land off Benacre Road, Ellough, Beccles (Site 2)

Suggested Use: Employment

Site Area: 1.24



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There is no pedestrian access to the site and cycle routes are poor. This is likely to become worse with the building of the southern relief road.

Foul sewer improvements would be needed to accommodate development.

The site is farmed plateau clayland. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a low value and a high capacity for development.

Development would extend into the open countryside. The Landscape Character Assessment recommended the avoidance of exposed edges.

The site could provide 1.1 hectares of employment land.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any constraints that could not be mitigated. Minor negative effects include the impact on the landscape, the loss of greenfield land and the lack of encourage for sustainable transport due to the poor connections to the site.

Minor positive effects include the provision of employment, which will support the economy.

Landscaping was recommended to soften the edges of the development. Foot and cycle paths were also recommended to encourage sustainable movement patterns.

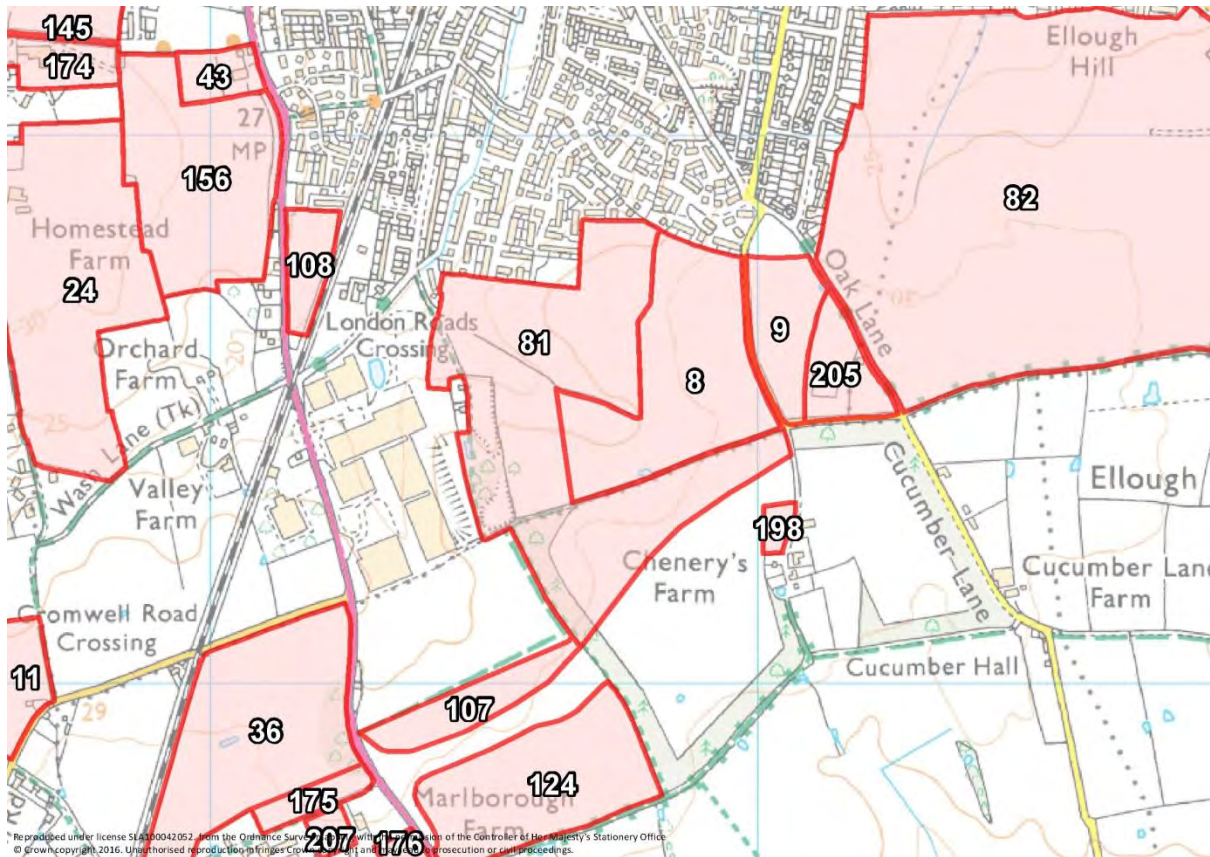
Conclusion

The development of this site for employment uses would extend the existing employment area further into the countryside to the east. As such it would have a greater impact on the landscape than the employment sites allocated by Policies WLP3.1 and WLP3.3. These sites together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.

Site 81 - Land off Darby Road, Chenery's Farm, Beccles

Suggested Use: Housing

Site Area: 20.53



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Red' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

No Parish or Town Council responses received.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.

Some members of the public objected on the grounds of over development, surface water flooding, strain on sewerage system, increased congestion, parking issues, pollution issues, harm to the character of Beccles and lack of local jobs.

Other members of the public were supportive of development of this site provided good cycle and pedestrian links are provided and vehicular access is from the Southern Relief Road. Smaller residential roads nearby should be used for cycle and pedestrian access only. Development of this site along with neighbouring proposed sites could deliver infrastructure such as a community centre, shops, school, health centre and a pub.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Vehicular traffic access should be from the Southern Relief Road or across a neighbouring site for development.

Foul sewer improvements will be needed to support development.

The Settlement Fringe Landscape Sensitivity Study identifies that this landscape area has a moderate sensitivity, moderate value and a moderate capacity for new development. The site is irregularly shaped and extends in to open countryside. The southern relief road will mitigate this visual impact to some degree.

The west of the site features biodiversity habitats and protected trees under the BAP priority habitat.

The site includes allocated allotment land (BEC4), this could be provided as part of a new development.

Pedestrian and cycle access is good, however access comes from a minor road.

The industrial site to the west may generate amenity issues.

The site could accommodate 465 new dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

A significant negative effect identified the Sustainability Appraisal is on the impact on biodiversity due to the sites location close to a BAP site. Minor negative effects were identified in respect of the impact on the landscape and the loss of a greenfield site.

Minor positive effects were identified in respect of access to services and facilities, housing delivery, and housing in cycling distance of employment opportunities. This could help promote sustainable movement patterns.

The appraisal suggested the Retention and protection and/or enhancement of the woodland to the west of the site which would mitigate harm to the landscape and biodiversity. A more compact and regular

shaped site would reduce the intrusion in to the landscape. Extensive landscaping should be provided to avoid a hard edge to the settlement. Allotments could be provided as part of the development to mitigate the loss of the allocated site.

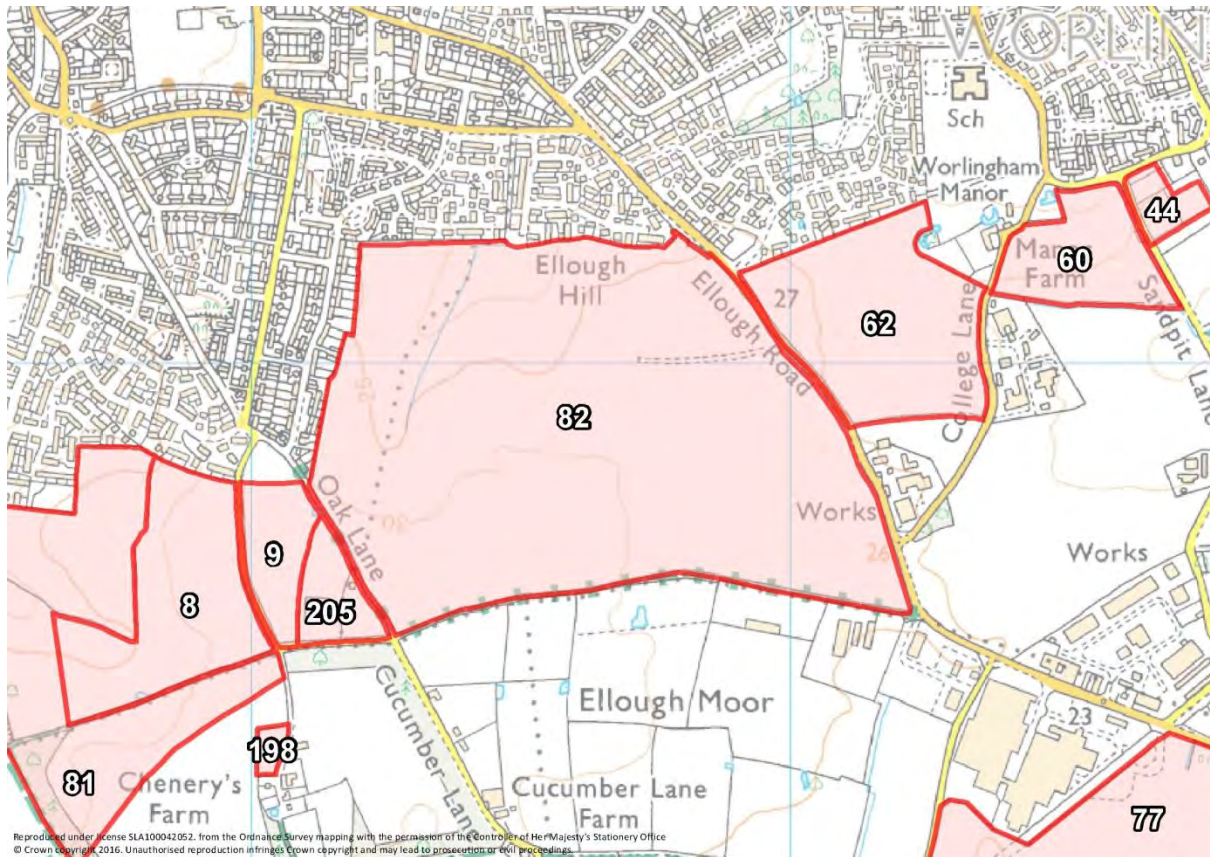
Conclusion

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all.

Site 82 - Land off Ellough Road, Beccles

Suggested Use: Housing

Site Area: 52.42



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Red' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Beccles Town Council opposed development of this site due to proximity to industrial areas, noise and air pollution, increased traffic along Ellough Road connecting into a bottleneck at Ingate. Infrastructure would not cover the needs of residents who would still need to travel in to the town centre.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.

Worlingham Neighbourhood Planning Team viewed the site as unacceptable due to the impact on infrastructure, drainage, roads, schools, medical facilities and lack of local jobs.

Members of the public objected on the grounds of surface water drainage issues, loss of privacy, lack of jobs locally, over development and loss of wildlife habitat. Increased traffic and vehicle pollution, the site not being well related to supermarkets and secondary schools and generation of school traffic problems were also raised. Fumes, noise and pollution from the nearby industrial sites and loss of a greenfield site were given as reasons for objections. One person stated that the land is unstable and munitions have been dumped on the site. Pressure on infrastructure such as the medical centre, schools and dentists was commonly highlighted. Another person stated that development of the site would result in Worlingham becoming a suburb of Beccles. One person commented that the quality of life for existing and future residents should not be put at risk to meet the demands of landowners and developers.

A nearby business was concerned about the proximity of site 82 to existing industrial operations and the noise nuisance for future occupiers that may result if the site is developed. They highlighted it would be difficult for them to re-locate and jobs and business rates may be lost if they cannot operate with the housing development nearby.

A number of people supported development of this site due to its good vehicular access to the Southern Relief Road and major road links and potential for good cycle and pedestrian links. Low existing landscape value and the ability to provide a significant number of homes, along with infrastructure including schools, shops, medical provision and recreation were given as reasons of support to develop site 82. One member of the public stated that development of the site would have little environmental or visual impact and could be a significant benefit to the town.

There were suggestions of providing a pub and overnight accommodation, green space, health services, dentists, schools, community centres and town centre parking improvements as part of a development. A park and ride facility to the centre of Beccles was also suggested. One person has commented that the mix of homes should reflect the needs of the community and include smaller starter homes and retirement properties along with larger family homes.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access will have to come from Ellough Road or the Southern Relief Road.

Foul sewerage improvements would be needed to support development. A sewer pipe also crosses the site.

Some areas on the site are at risk of surface water flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a low value and a high capacity for new development. Development will extend in to the open countryside; however the Southern Relief Road will mitigate this to some degree.

Ponds adjacent to the site may provide biodiversity and habitats.

The site has high archaeological potential.

A development of this scale may impact on local roads and the wider network. A transport assessment will be required to assess this.

Nearby employment uses could generate amenity issues.

This site could accommodate 950 new dwellings.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in respect to the loss of a greenfield site, the effects of climate change and the potential impact on biodiversity.

Minor positive effects were identified in respect of access to services and facilities, improving educational attainment, housing delivery and housing in cycling distance of employment opportunities. This could help promote sustainable movement patterns.

The appraisal suggested that housing should avoid the southeast corner of the site which is close a waste depot. The edge of the development should be sensitively landscaped to avoid an exposed edge. The adjacent ponds should be surveyed and mitigation measures employed as required.

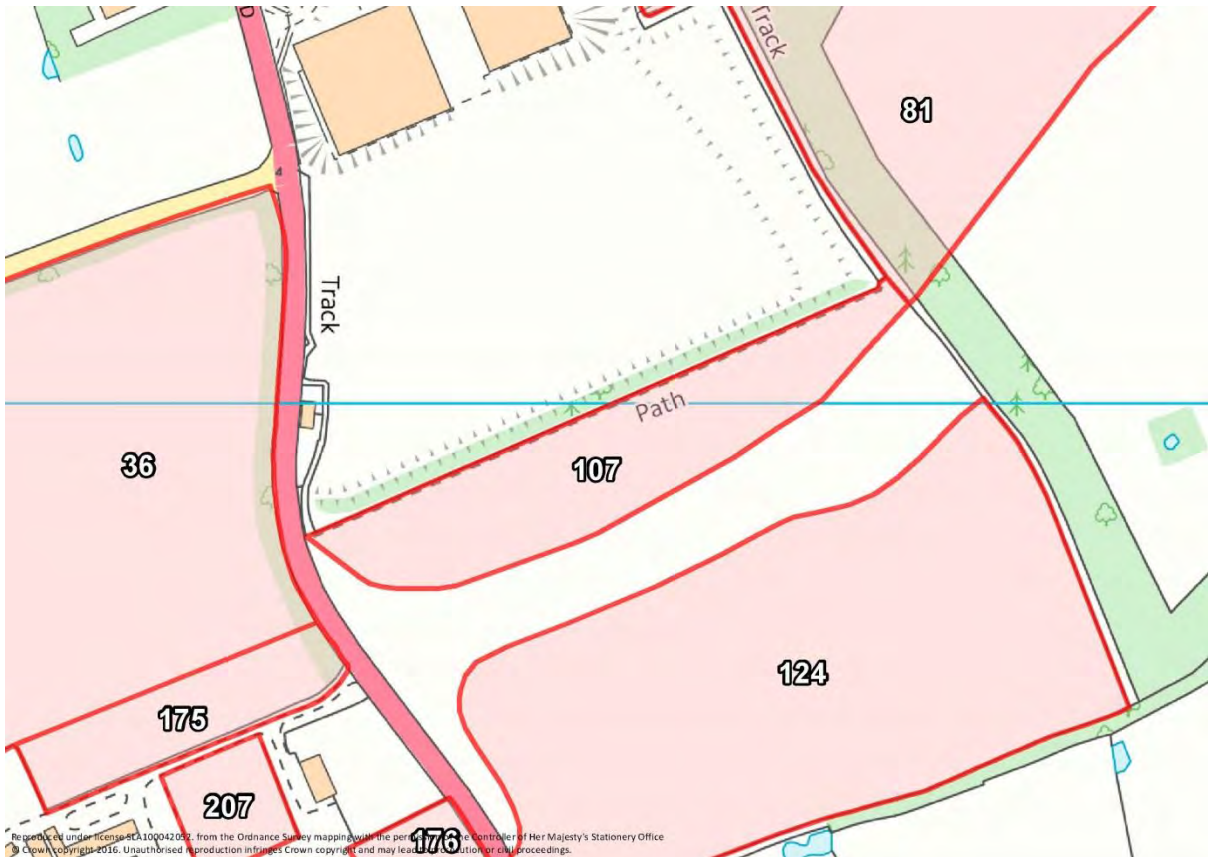
Conclusion

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all. The provision of employment uses opposite existing employment uses will limit the conflict between existing industry and new housing.

Site 107 - Land to the East of London Road, Beccles

Suggested Use: Mixed use

Site Area: 2.57



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that substantial off-site infrastructure is required to connect to the foul water which may not be economically viable.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Amber/Green’ impact.

No Parish or Town Council comments were received.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The road is national speed limit and not very safe for cyclists. There is no footpath to Beccles.

Foul sewerage improvements will be needed to support development, which may not be economically viable. Overhead lines also cross the site.

This site could be made attractive to the market if issues of noise from industrial uses and nearby roads can be overcome.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development. The southern relief road will change the character of the landscape but hard edges should be avoided. Care will be needed to avoid exposed edges in line with the landscape character assessment.

Development would be sandwiched between an industrial site and the relief road which is likely to generate amenity issues for housing.

The site could accommodate 30 dwellings.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified with respect to health and well-being of the population, access to services and facilities and loss of greenfield land.

Minor positive effects were identified with respect to reducing deprivation, generating employment and delivering housing.

The appraisal suggested that avoiding town centre uses on the site would reduce competition with the town centre. Improving pedestrian, cycle and public transport links would improve accessibility.

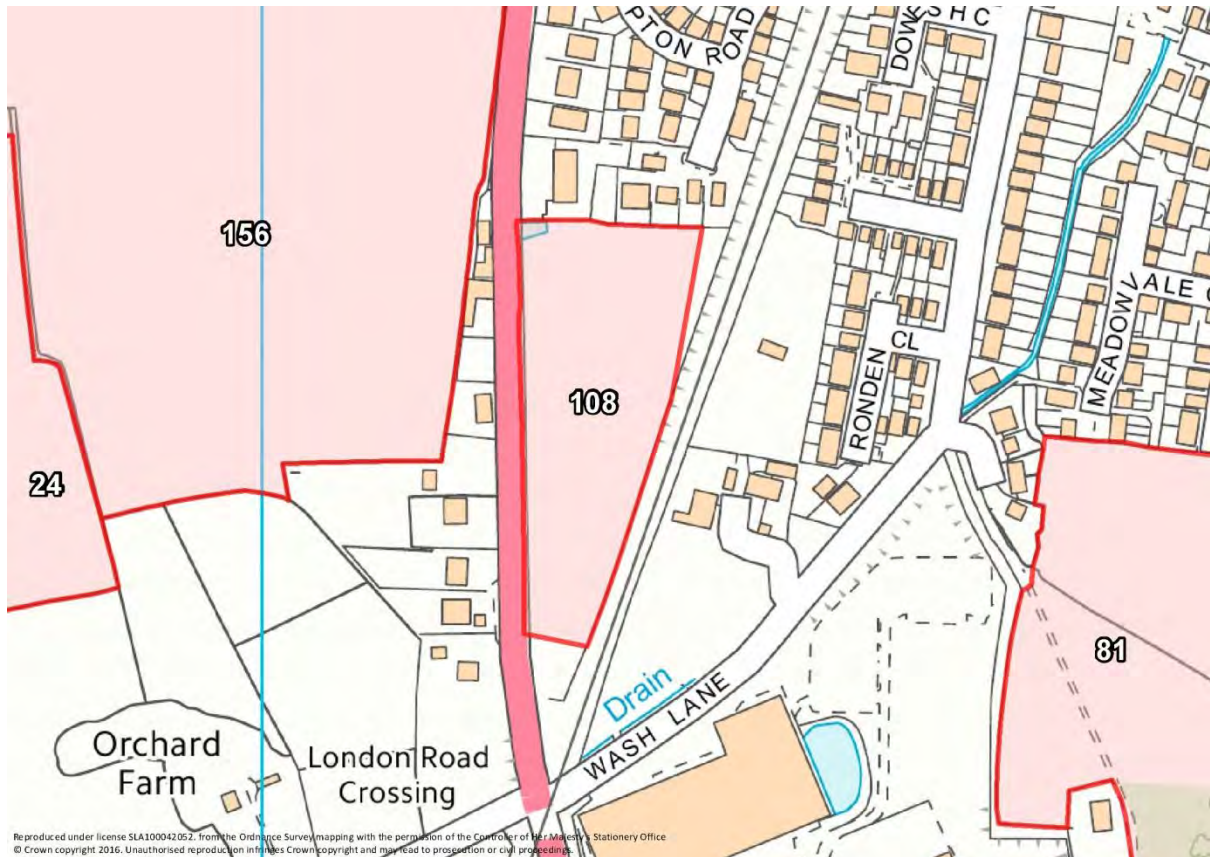
Conclusion

This site is considered to be too remote from the town centre, services and facilities to be suitable for housing development. The size and shape of the site would make it difficult to be utilised for employment uses, unless used as an extension to M and H Plastics to the north.

Site 108 - Land to the east of London Road, Beccles (south of John Lawrence Close)

Suggested Use: Housing

Site Area: 1.63



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses through the site.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

Beccles Town Council identified the need for development in the area but infrastructure in Beccles is at breaking point, especially the health centre. Housing development should be restricted to the area to the southwest of the town. Site 108 makes good use of existing and planned road infrastructure. This area would require a new primary school, convenience store and other infrastructure.

A member of the public did not oppose affordable homes and bungalows where they are built in manageable sizes around the periphery of the town. Site 108 is on a main road where there is currently little development and does not feed into busy traffic areas such as Ingate/Lowestoft Rd.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. A sewer pipe also crosses the site.

There are high levels of surface water flooding on parts of this site.

This site could be made attractive to the market if noise issues can be overcome.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development. There is good boundary hedging and the site is currently well screened.

A pond on site may provide habitats for local wildlife.

A noise survey would be required with respect to the adjacent railway line and A145.

The site could accommodate 50 new dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

No significant effects were identified. Minor negative effects were identified in relation to effects of climate change and loss of a green field site. A pond on site would require careful treatment.

Minor positive effects were identified with respect to improving the health and well-being of the population, access to services and facilities, delivering housing and access to employment sites.

Conclusion

The site is considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision. These preferred sites cumulatively deliver more than sufficient housing for Beccles under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan

Site 124 - London Road, Weston, Beccles

Suggested Use: Housing

Site Area: 8.10



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that substantial off-site infrastructure is required to connect foul water, which may not be economically viable.

Suffolk County Council welcomed reference to the Southern Relief Road and stated the proposed level of growth around Beccles is generally acceptable subject to further assessments and the exception of sites further from the town centre which would not encourage sustainable travel.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Beccles Society stated that development of site 124 would result in urban sprawl beyond the Southern Relief Road and that housing on land adjacent to the road should be limited in scale.

Members of the public have commented that development of this site would result development creep into the countryside and over reliance on cars. This would generate issues with parking, congestion and pollution.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There are no footpaths and roads are poor for cyclists.

Foul sewerage improvements are required to support development.

This site can be made attractive to the market if noise and amenity issues are overcome.

The Settlement Fringe Landscape Sensitivity Study identifies this site as having a moderate sensitivity, a moderate value and a moderate capacity for new development. The site would protrude in to open countryside beyond the proposed relief road. The Landscape Character Assessment states that extensions in to the landscape should be closely monitored and exposed edges avoided.

The east and south part of the site are Biodiversity Action Plan priority habitat.

The site has high archaeological potential.

The proposed roundabout adjacent to the site could create amenity issues.

The site could accommodate 137 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

A significant negative effect was identified due to the impact on Biodiversity Action Plan priority habitat. Minor negative effects were identified with respect to health and well being, access to services and facilities, impact on the landscape, loss of a greenfield site and encouraging efficient movement patterns.

A minor positive effect is the provision of housing to help meet local needs.

Conclusion

This site would extend development south of the planned Southern Relief Road. It will therefore have a greater impact on the landscape than preferred sites. The site is therefore considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision. These preferred sites cumulatively deliver more than sufficient housing for Beccles under the strategy outlined under Policy WLP1.1, therefore the development of this site would

result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 126 - Marsh Lane, Worlingham

Suggested Use: Housing

Site Area: 0.44



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that there is a high risk to encroachment of the Water Recycling Centre.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.

A member of the public objected due to the site being too close to the sewage works and that they have limited capacity. The high density of development would be out of character with the area and there would be an increase in traffic using a narrow lane.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is not accessible to pedestrians and there is no feasible mitigation to see any link back to Worlingham.

The foul sewerage network will require improvements. There is also a high risk of encroachment on the water recycling centre.

The site is visible from the Broads area. The landscape has a high landscape value and has a major contribution in the setting of the Broads and has a very low capacity to accommodate development.

Summary of Draft Sustainability Appraisal

A significant negative effect was identified with respect to the impact on the landscape and the setting of the Broads. Minor negative effects were identified due to loss of a greenfield site and the potential impacts on biodiversity.

Minor positive effects were identified with respect to access to services and facilities and delivering housing. There is a potential positive effect on promoting sustainable movement patterns from this site.

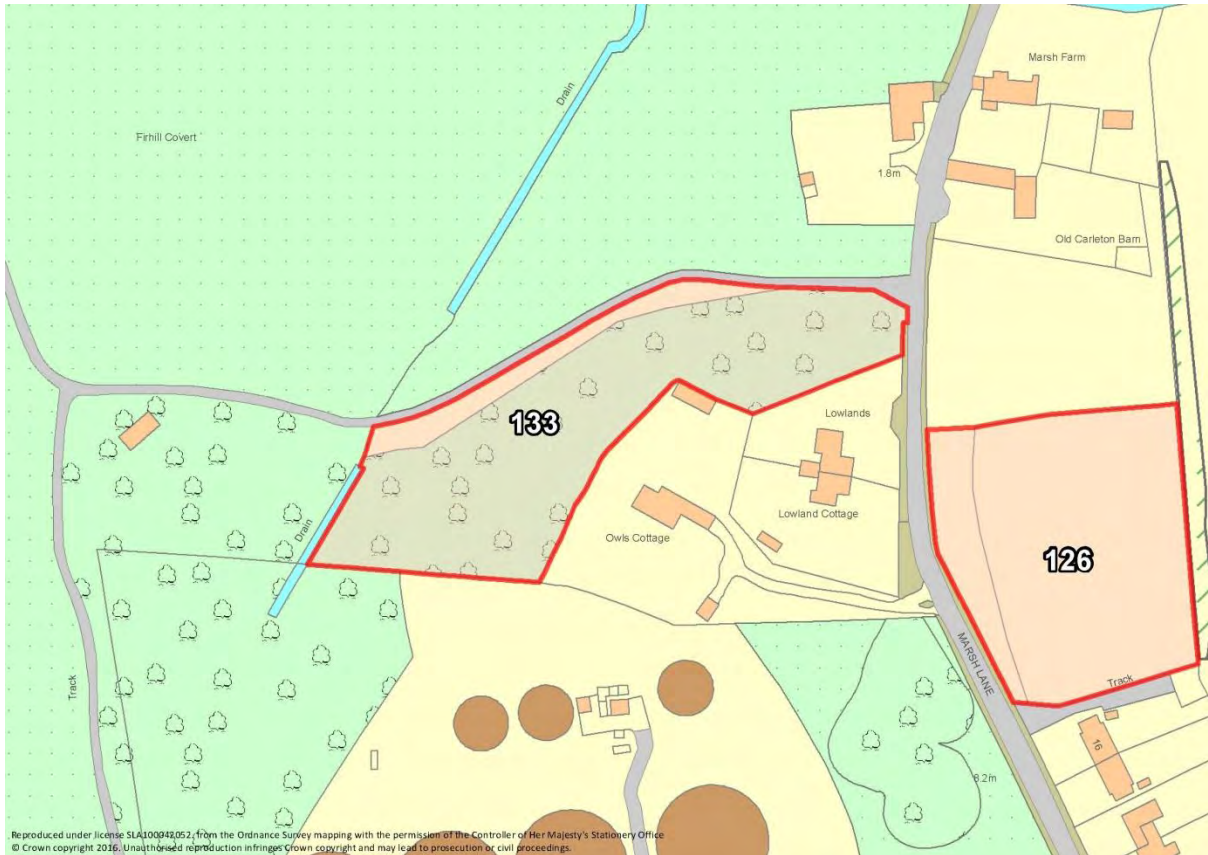
Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation in this Local Plan.

Site 133 - Owls Cottage, Marsh Lane, Worlingham, Beccles

Suggested Use: Housing

Site Area: 0.53



Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that there is a high risk to encroachment of the Water Recycling Centre.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

No Parish or Town Council comments received.

A member of the public objected due to the site being too close to the sewage works and that they have limited capacity. The high density of development would be out of character with the area and there would be an increase in traffic using a narrow lane.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is not accessible to pedestrians and a link back to Worlingham is not feasible.

There is a high risk of encroachment on the Water Recycling Centre which could also generate amenity issues. The foul sewerage network requires improvements and a sewer pipe crosses the site.

The settlement fringe study indicates this area has a very low capacity to accommodate development and makes a major contribution to the setting of the Broads. The site is screened by the surrounding woodland, however this could be lost to development.

Summary of Draft Sustainability Appraisal

A significant negative effect was identified due to the impact on the high value landscape and the setting of the Broads. A minor negative effect was identified in due to the loss of a greenfield site and the potential impact on biodiversity.

Minor positive effects were identified with respect to access to services and facilities and delivering housing.

The appraisal suggested that the design and scale of new development would need to take account of the existing houses and impacts on existing trees.

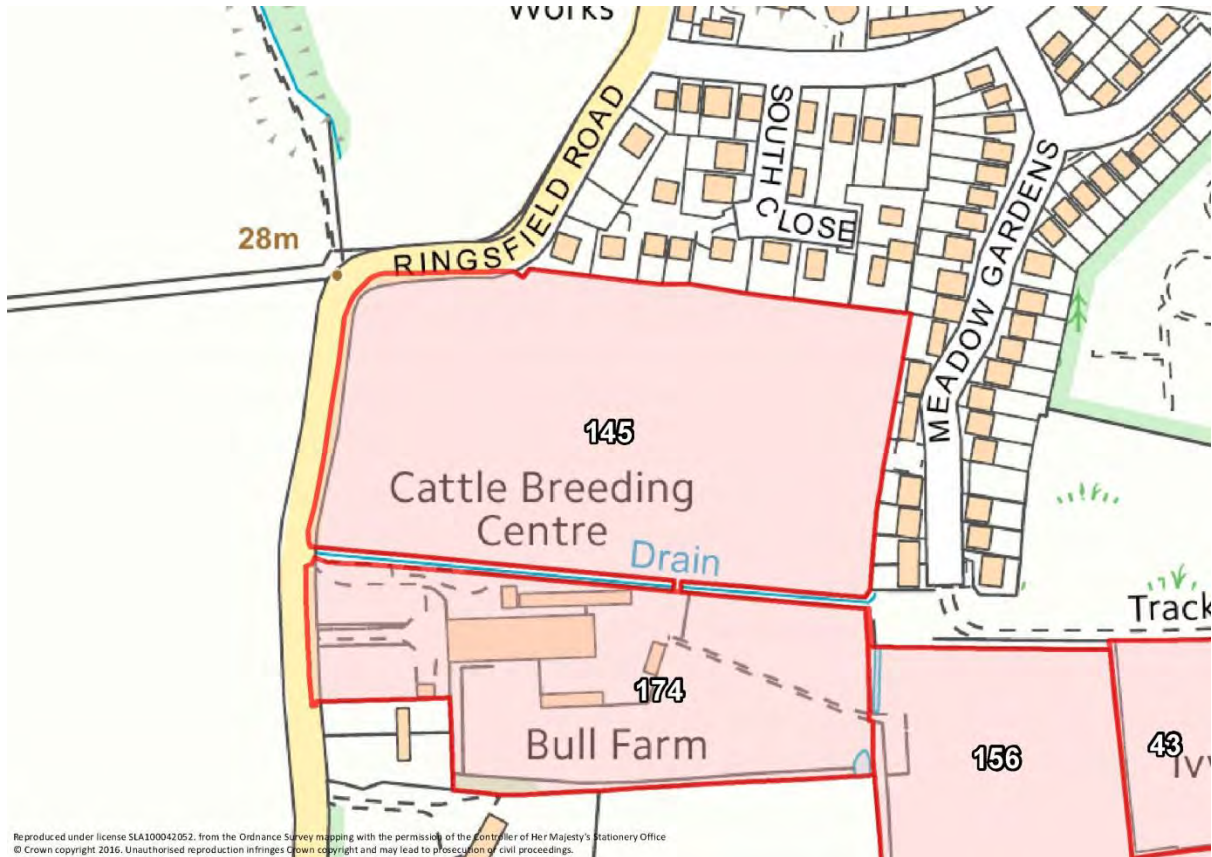
Conclusion

Due to the impact on a high value landscape area which makes up the setting of the Broads and the risk of encroachment to the Water Recycling Centre this site is not considered to be suitable for residential development. The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation in this Local Plan.

Site 145 - The Bull Field, Ringsfield Road, Beccles

Suggested Use: Housing

Site Area: 3.13



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England has commented that there is a potential impact on the setting of a grade II* Listed Building (Ashman's Hall around 500m to the north west) and Conservation Area.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Beccles Town Council recognised the need for development but highlighted that care is required due to the strain on infrastructure. They comment that housing development should be located to the southwest

of Beccles, including site 145, as this would make best use of road infrastructure. New infrastructure would be required including a primary school and convenience store.

Members of the public have objected due to highway safety concerns on Ringsfield Road related to traffic congestion, sharp bends in the road, school traffic, parking problems, the narrow width of the road and impact on the National Cycle Network. There were objections to access from Meadow Gardens although one person has no objection if the access was onto an alternative road. The strain on infrastructure such as the medical centre and schools was highlighted. Objections were raised to the loss of mature trees on the site, harm to biodiversity habitats, and disruption to a quiet area. Concerns are also raised with reference to drainage issues, surface water flooding, water pressure, sewerage capacity and the lack of public transport.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Vehicular access on to Ringsfield Road could be difficult due to limited visibility. This could be improved by linking to another site for development.

The foul sewerage network would require improvements to support development.

Views of the site from the west across open countryside. Settlement Fringe study indicates the landscape has a moderate capacity to accommodate development. This is a flat site which is visible from open countryside to the west but not from the road network or the public right of way.

Boundary ditches and hedges could be providing habitats for local wildlife and could be lost if the site is developed.

The site has high archaeological potential.

Development could increase traffic on Ringsfield Road which is narrow in places.

The site could accommodate 62 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included impact in landscape and loss of greenfield land.

Minor positive effects included health and well-being, access to services and facilities and delivering housing.

The appraisal suggested that the design and scale of new development would need to take account of the visual impact of the site when viewed from open western aspect.

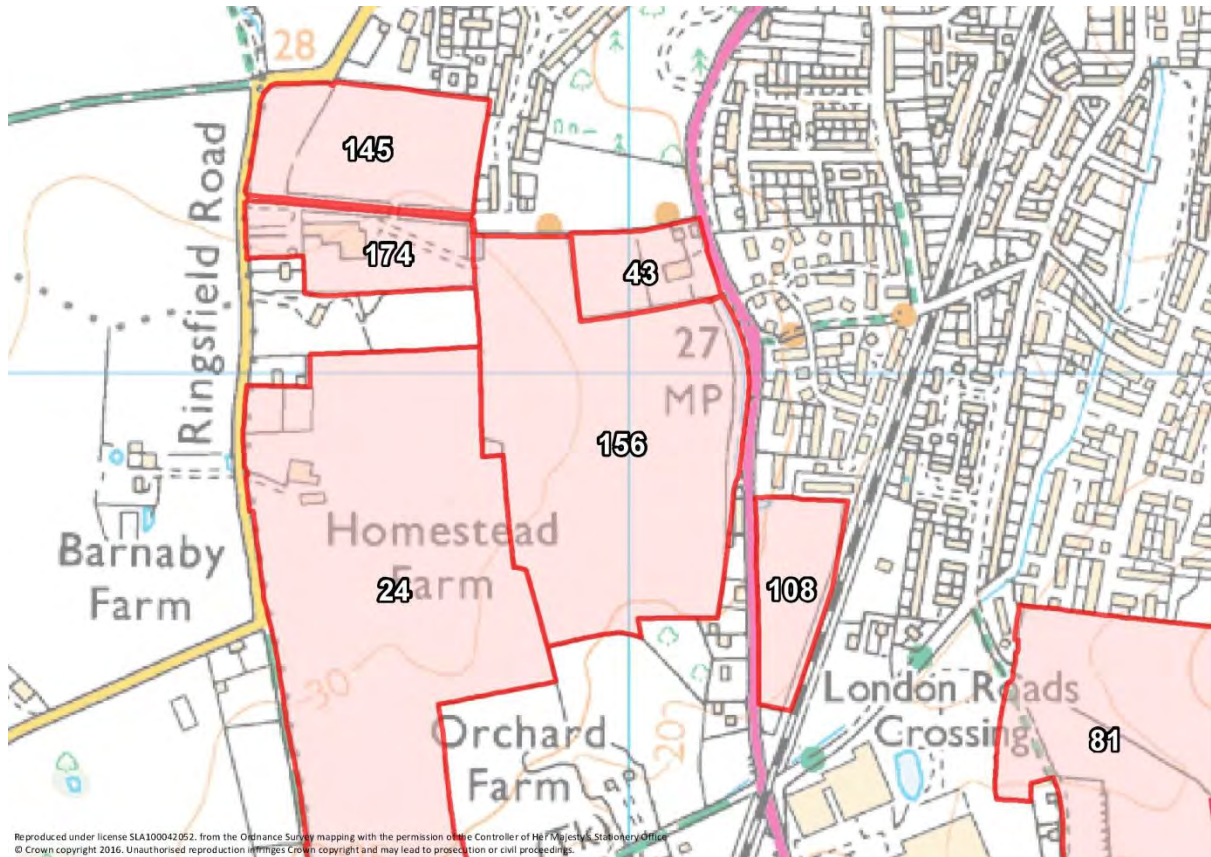
Conclusion

Development of this site would only be possible through access from neighbouring sites. Land to the east is allocated in the First Draft Local Plan, but this site together with land allocated by WLP3.1 to the south of Beccles cumulatively deliver more than sufficient housing for Beccles under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 156 - West of A145 London Road, Beccles

Suggested Use: Housing

Site Area: 9.67



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

The Broads Authority highlighted the need to assess impact in the landscape due to rising ground.

Historic England highlighted the proximity of the site to Beccles Conservation Area.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact.

Beccles Town Council identified the need for development in the area but infrastructure in Beccles is at breaking point, especially the health centre. Housing development should be restricted to the area to the

southwest of the town. Site 156 makes good use of existing and planned road infrastructure. This area would require a new primary school, convenience store and other infrastructure.

Members of the public objected due to traffic congestion, pressure on infrastructure and facilities, harm to peace and privacy, impact on property values and encroachment into the countryside. One member of the public supported this site as it will not cause worsen traffic problems at Ingate/Lowestoft Rd.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The foul sewerage network would require improvements to accommodate development. A sewer pipe also traverses the site as do some overhead lines.

There are some recorded of surface water flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development.

Development would intrude into the open landscape and would be in conflict with the Landscape Character Assessment. Development would project in to the countryside and would require careful treatment.

The site has high archaeological potential.

Traffic from the site could impact on the junctions in the centre of Beccles.

The site could accommodate 240 new dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

A significant negative effect was identified in the loss of grade 2 agricultural land. Minor negative effects included impact in the landscape and the impacts of climate change.

Minor positive effects included health and well being of the population, access to services and facilities, delivering housing and encouraging efficient movement.

The appraisal suggested that sensitive landscaping may mitigate the impact on the edge of the settlement to a limited degree.

Conclusion

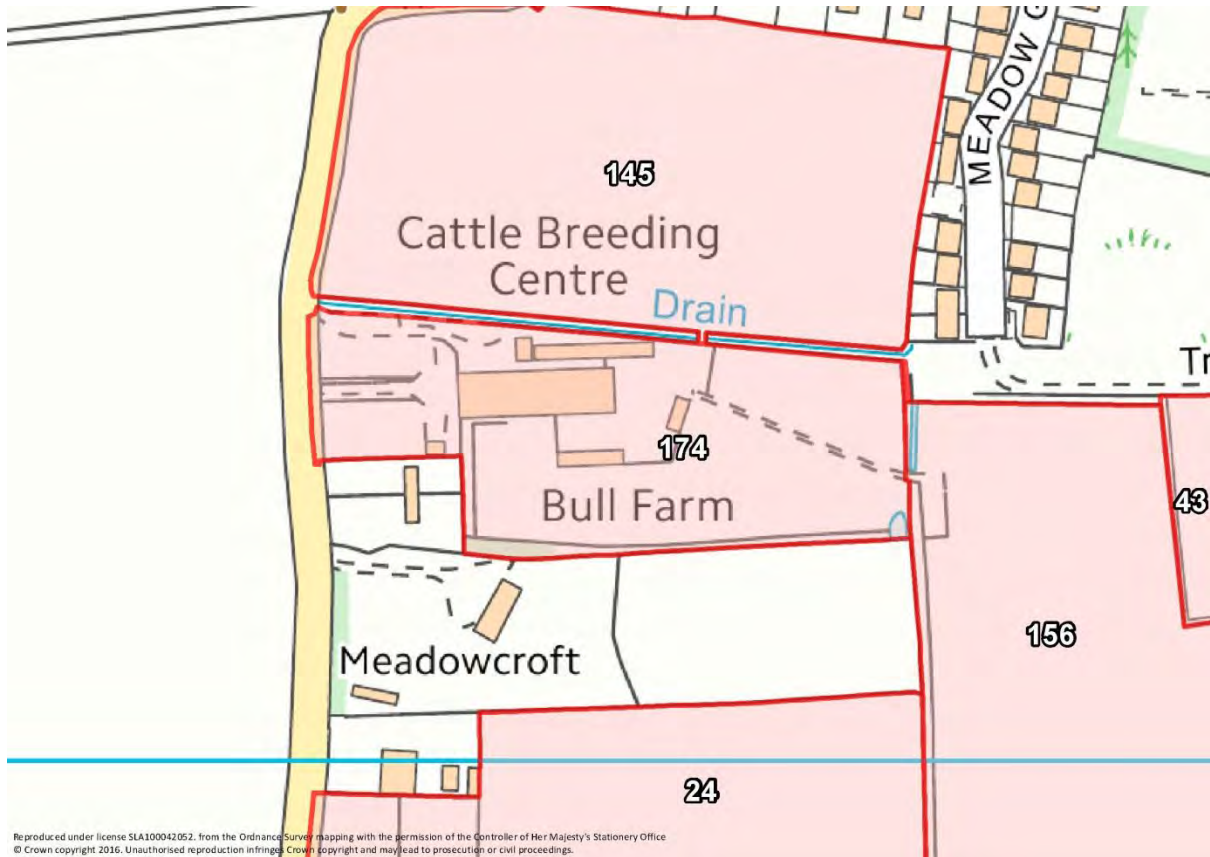
Policy WLP3.2 of the First Draft Local Plan allocates this site as part of an allocation for 250 dwellings. The site has good access to existing services, facilities, schools and employment opportunities in Beccles and the surrounding area via footpath, public transport, cycle and road links. The site offers moderate

landscape value but is considered to be reasonably well contained in the landscape, therefore the impact should be minimal. Redevelopment of this site also provides an opportunity to extend the cemetery.

Site 174 - West of Ringsfield Road, Beccles

Suggested Use: Housing

Site Area: 1.96



Summary of Response from 'Options for the new Waveney Local Plan' Consultation
Submitted after the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access is via Ringsfield Road with twists in the road.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development.

A pond and a hedgerow could have biodiversity potential.

A locally listed building neighbours the site to the south.

The site could accommodate 30 new dwellings at 15 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects identified in respect of landscape impact.

Minor positive effects included health and well-being, access to services and facilities and delivering housing.

The appraisal suggested that sensitive landscaping may mitigate the impact on the edge of the settlement to a limited degree.

Conclusion

Development of this site would only be possible through access from neighbouring sites. Land to the east is allocated in the First Draft Local Plan, but this site together with land allocated by WLP3.1 to the south of Beccles cumulatively deliver more than sufficient housing for Beccles under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 175 - Land to the north of the Evergreens Garden Centre, Weston

Suggested Use: Residential, commercial or light industrial

Site Area: 1.10



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site submitted after the consultation began.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There is no footpath or public transport serving the site. The road is not safe for cyclists.

Existing and proposed employment uses could generate amenity issues for residents. There would be some landscape impact.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified with respect to health and well-being access to services and facilities landscape impact and loss of a greenfield site. There is also a potential impact on biodiversity.

Minor positive effects included creation of employment and delivering housing.

Conclusion

The remote location and its lack of relationship to the existing residential areas of Beccles means that this site is not considered to be suitable for allocation in this Local Plan.

Site 176 - Land to the west of the A145, Weston

Suggested Use: Commercial or light industrial use

Site Area: 0.57



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site submitted after the consultation began.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There are patches of the site that are at risk of flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development. The site is in open countryside and has a poor relationship to existing residential areas.

This site could provide 0.57 hectares of employment land.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects relate to health and well-being, the loss of greenfield land, the impact on biodiversity and potential impacts on landscape, climate change and sustainable movement patterns.

Minor positive effects refer to increasing skills and reducing deprivation by providing new jobs.

The appraisal suggested that landscaping could mitigate some of the effects of the landscape, and that sustainable transport policies could promote sustainable transport incorporation into the site.

Conclusion

It is considered that the employment sites allocated by Policies WLP3.1 and WLP3.3 are in more preferable locations given their proximity to the Enterprise Zone and together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.

Site 198 - Chenery's Loke, Cucumber Lane, Weston

Suggested Use: Housing

Site Area: 0.45



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site submitted after the consultation began.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Access is via a single-width, unmade track with no pedestrian access, making the site unsuitable for development.

Telephone cable traverse the site.

The site is remote from the edge of Beccles and would intrude in to the countryside. No public transport links. The site would project beyond the proposed southern relief road. This site is remote from the nearest settlement and other proposed development allocations. There is the potential for significant landscape impact as a result.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included landscape impact and loss of greenfield land. There is also a potential impact on biodiversity.

Minor positive effects included improving health and well-being and delivering housing.

The appraisal suggested that landscaping may provide some mitigation but it is not considered that impact in the landscape could be fully mitigated.

Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation in this Local Plan.

Site 205 - Old MJ Hales Scrapyard and Landloc, Cucumber Lane, Weston

Suggested Use: Housing

Site Area: 2.33



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Site submitted after the consultation began.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Vehicular access is from Cucumber Lane which is single width for stretches with no dedicated footpath.

The site is likely to be contaminated from the previous scrap yard use.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a high sensitivity, a high value and a low capacity for new development. The site is surrounded by open countryside and development would have an intrusive appearance if the site was developed on its own.

Ponds on site will require care to avoid harm to biodiversity.

Development could impact upon the surrounding roads.

The site could accommodate 70 new dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included landscape impact and the potential impact on biodiversity.

Minor positive effects included health and well-being, delivering housing and encouraging efficient movement patterns.

The appraisal suggested that footpaths should be used to serve the site and that the local ponds should receive protective measures.

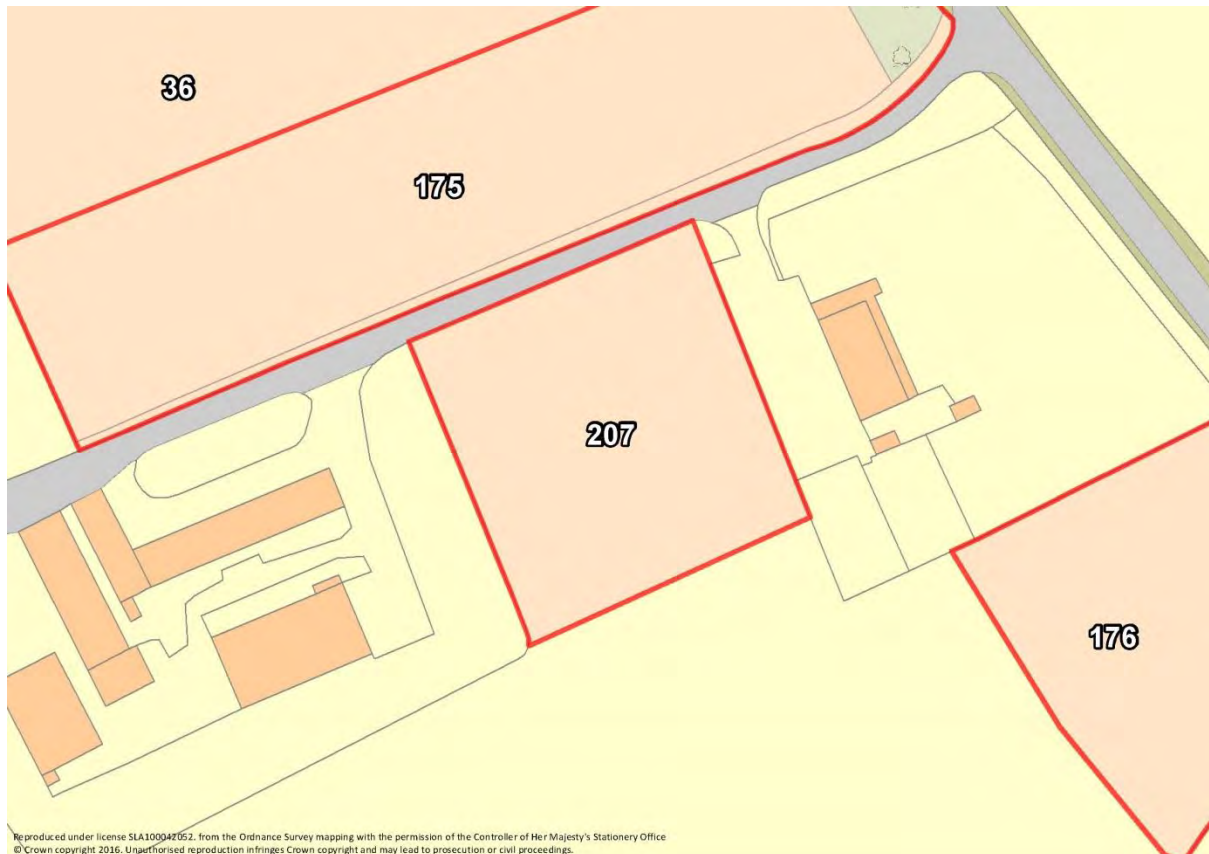
Conclusion

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all.

Site 207 - Land to the west of Evergreens Garden Centre, Weston

Suggested Use: Employment

Site Area: 0.54



Summary of Response from 'Options for the new Waveney Local Plan' Consultation
Submitted during consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. This site is separate from the existing settlement and could impact upon a fairly open area of landscape and has a poor relationship to existing built up area.

Could impact on proposed development on site 175 if development takes place.

The site could accommodate 0.54 hectares of employment land.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects include impacts on health and well-being, as well as potential impacts on the landscape, climate change and sustainable movement patterns.

Minor positive effects include improving skills, reducing deprivation and supporting the economy.

The appraisal suggested that planting and screening could mitigate some of the landscape impacts.

Conclusion

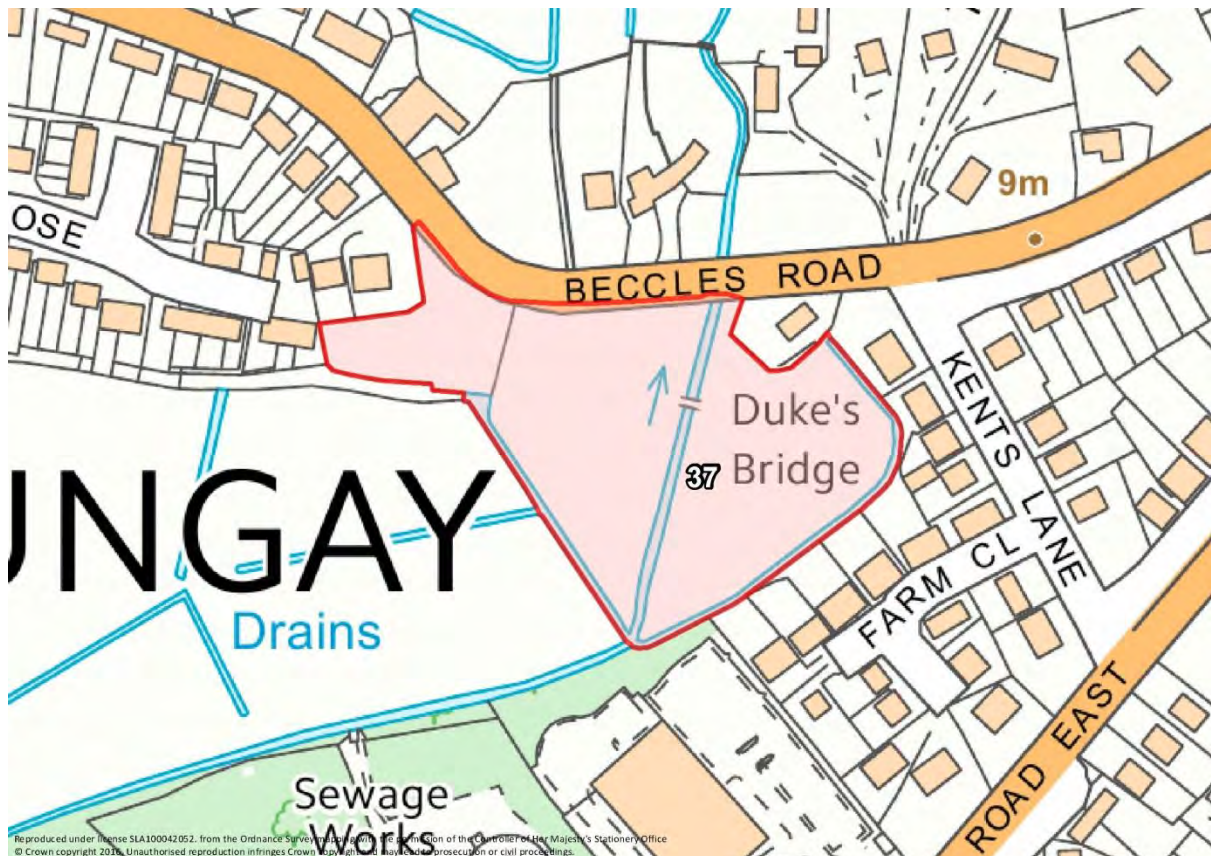
It is considered that the employment sites allocated by Policies WLP3.1 and WLP3.3 are in more preferable locations given their proximity to the Enterprise Zone and together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.

Bungay Area

Site 37 - Land at Dukes Bridge, Beccles Road, Bungay

Suggested Use: Housing

Site Area: 1.58



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and an 'Amber' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They commented that there is a high encroachment risk to the Water Recycling Centre and a Sewer Pipe crosses the site.

The Environment Agency commented the site as being partly in Flood Zone 3 with a flood plain the area that would naturally be affected by flooding if a river rises above its banks, or high tides and stormy seas cause flooding in coastal areas.

Historic England highlighted Dukes Bridge House, Barn and wall all Grade II to the north. There is potential impact on setting of a Listed Building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

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

Members of the public highlighted issues with the lack of infrastructure, drainage and the site being low-lying land with a water course.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is floodplain grazing marsh which is a Biodiversity Action Plan (BAP) priority habitat. Loss of this habitat could not be successfully mitigated. Large parts of the site are in flood zone 3 (high risk) and further parts in flood zone 2 (medium risk). There is also a high risk from surface water flooding.

The site is also a valuable natural green area which contributes to biodiversity and holds flood water, amongst other things. These functions could not be easily replicated in the town.

Development of the site would undermine the open character of the site which contributes positively to the townscape. Retention of open space on the site would mitigate this harm to some degree.

Development would remove the open space which contributes to the setting to the nearby listed building to the northwest. Retention of open space near to the listed building would mitigate this harm to some degree.

There is a water recycling centre (WRC) less than 100 metres away to the southeast. This may cause issues with smells and there is a high risk of encroachment on the WRC. There is also a sewer pipe crossing the site and foul sewerage improvements have been identified.

Summary of Draft Sustainability Appraisal

A significant negative effect was identified with respect to the loss of a BAP priority habitat. Minor negative effects included harm to the townscape through loss of open space, impacts on the effects of climate change relating to flood risk, loss of natural resources and harm to the setting of a listed building.

Minor positive effects included reasonable good links to services and facilities, improving health and well being (access to meeting places and open spaces), delivering housing and encouraging sustainable movement patterns.

In terms of mitigation, the appraisal suggested building homes that are compatible with flooding and to retain open space near the listed building.

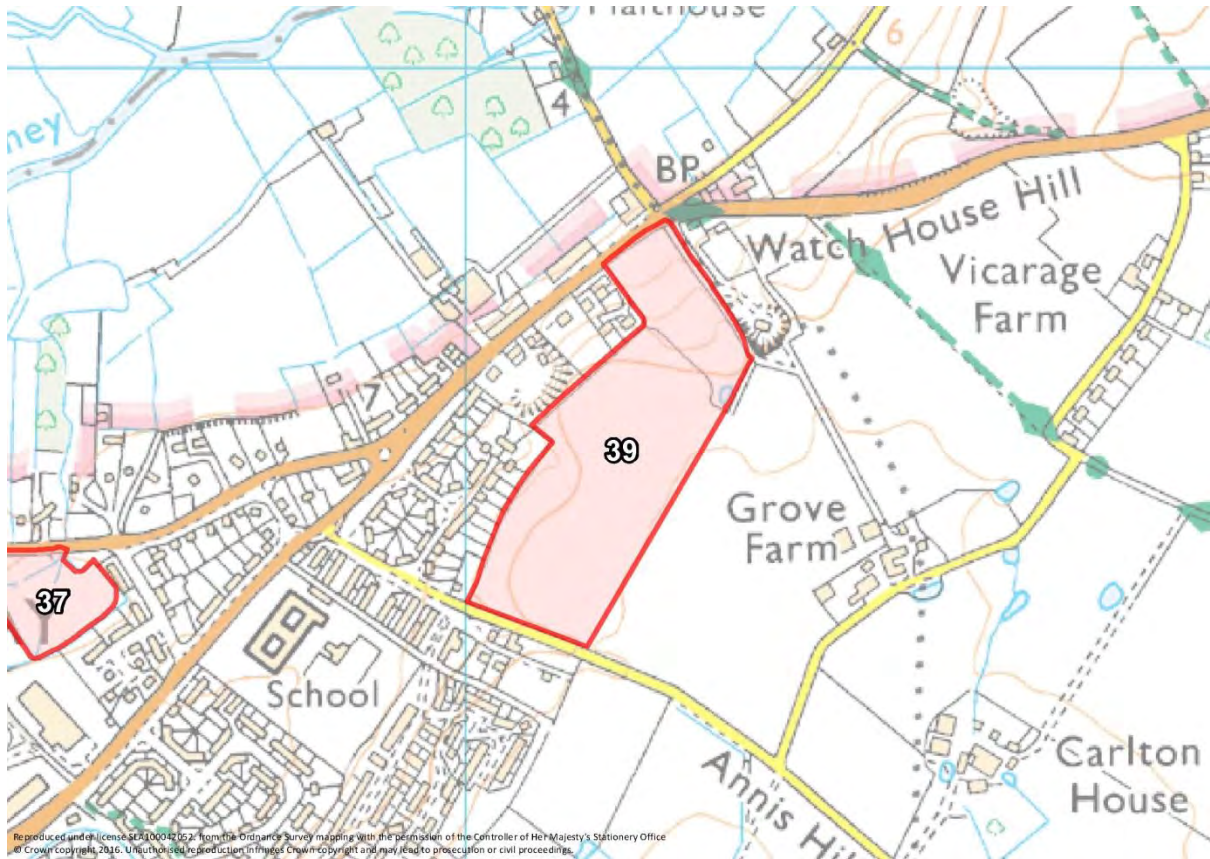
Conclusion

This site is in flood zone 3a. There are alternative sites that are not at risk of flooding and therefore allocation of this site would be contrary to national planning policy. Impacts on biodiversity and open space also undermine the suitability of this site for development.

Site 39 - Land at Grove Farm, Mettingham

Suggested Use: Housing

Site Area: 7.70



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

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

The Environment Agency commented that site lies partly within Source Protection Zones 1 and 3.

Suffolk County Council commented that subject to further assessments through the planning process, the proposed level of development is acceptable in principle. However, access constraints are likely to be

identified on site 39. Any proposed access onto Annis Hill would require widening of the road due to its narrow width and this site should provide its main access from B1062.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Members of the public objected due to:

- Annis Hill is not wide enough for two-way traffic. The brow of the hill restricts visibility. Recently built properties have worsened traffic problems. Annis Hill is well used by runners, cyclists and dog walkers. Traffic on Beccles Road is fast and busy and accesses and junctions can be dangerous;
- lack of mains sewerage, gas and electricity supply;
- sandy ground may be unsuitable for building on;
- development may generate surface water flooding issues for properties downhill;
- current infrastructure such as doctors, dentists, schools and car parks could not sustain an increased population;
- development would be harmful to the landscape viewed in the approach from Beccles. The skyline would be too high for this side of Bungay;
- loss of residential amenity through loss of views, tranquillity and privacy;
- harmful to house prices;
- loss of greenfield site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is within the tributary valley farmland character area. The landscape is very sensitive according to the Settlement Fringe Landscape Sensitivity Study and makes a major contribution to the setting of the Broads. Therefore the landscape impact is a significant constraint which would be difficult to mitigate.

There is a potential impact on biodiversity habitat in the form of a pond adjacent to the site. The site also has archaeological potential.

There would also need to be improvements to the foul sewerage network.

Summary of Draft Sustainability Appraisal

A significant negative effect was identified with respect to the landscape impact. The site is very sensitive, very visible, has a strong sense of place and makes a major contribution to the setting of the Broads. Minor negative effects included the loss of a greenfield site and impact on biodiversity.

Minor positive effects included health and well being (within cycling distance of open space), access to services and facilities, delivering housing and encouraging sustainable movement patterns.

The appraisal suggested that an exposed settlement edge should be avoided and the local pond should be protected.

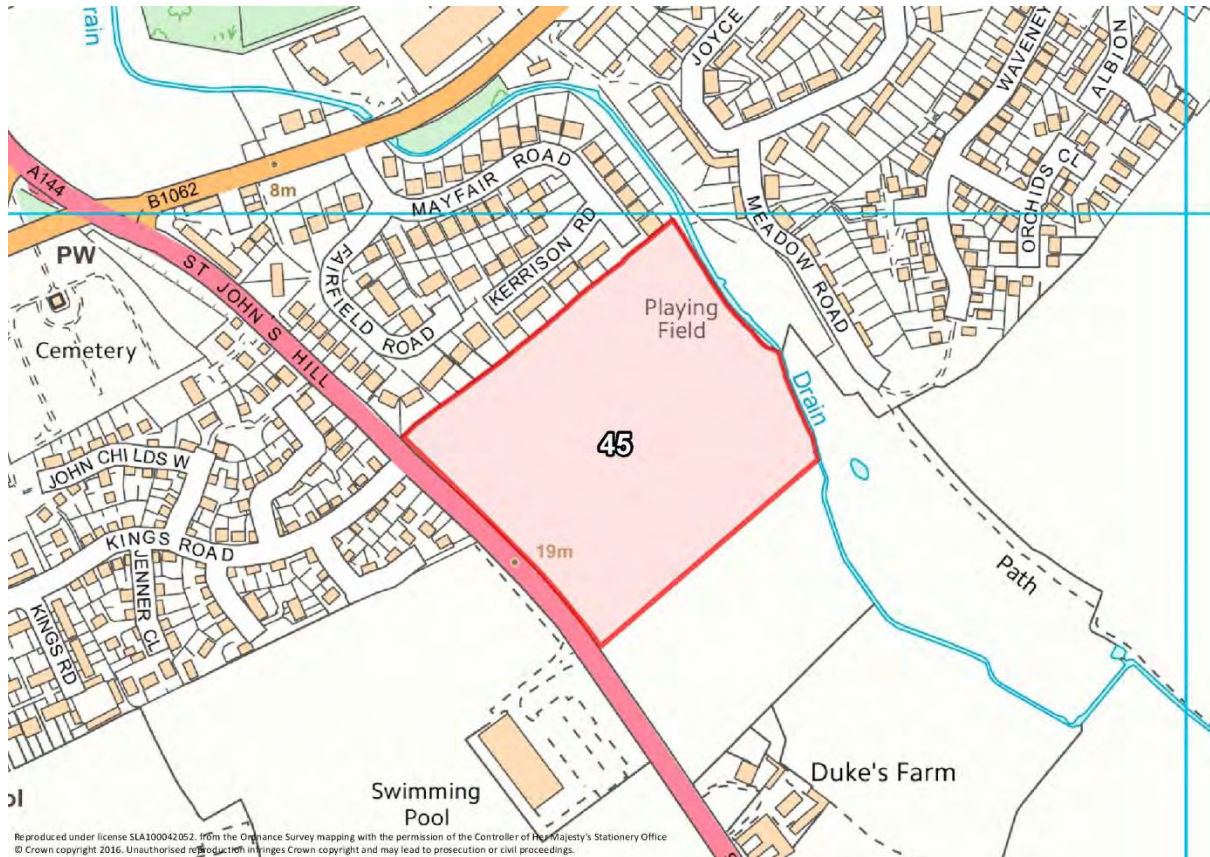
Conclusion

Due to the harmful impact in the landscape and the setting of the Broads this site is not considered suitable for development.

Site 45 - Land at St Johns Road, Bungay

Suggested Use: Housing

Site Area: 4.65



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Red' impact.

The landowner, St John's Hall Farms, confirmed the site is available for development, suitable and deliverable. If required, the landowner will discuss the potential for additional land to the southeast of the site (up towards Dukes Farm) to be included as a comprehensive proposal for the area.

Members of the public objected due to:

- lack of local infrastructure such as a railway station;
- strain on existing infrastructure such as schools, doctors surgery and sewerage system;

- risk of flooding;
- loss of greenfield land which forms a natural boundary to Bungay;
- loss of wildlife habitat;
- nearby roads are too narrow;
- increased traffic congestion;
- proximity to a Listed Building;
- lack of local employment;
- harm to property prices;
- loss of views;
- people have walked along the edge of the field for over 20 years and it should be a designated public right of way.

One person supported development of this site for housing and other leisure facilities.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The northeast edge of the site is in flood zones 2 and 3 and there are records of surface water flooding. The eastern corner of the site is proposed for an attenuation pond as part of the BUN1 development for 150 dwellings, employment land and open space. The site has a moderate capacity to accommodate development. Transport assessment of the site is advisable.

The site has a high archaeological potential and would require foul sewerage improvements to support development.

The site could accommodate 85 dwellings when removing areas at risk from flooding and areas of land needed for surface water attenuation.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified with respect to climate change and the potential effects of flooding, impact on the landscape and loss of a greenfield site. Impact on flooding could be mitigated by developing only parts of the site which are not at flood risk and are not required for the attenuation pond.

Minor positive effects included health and well being, access to services and facilities, delivering housing and encouraging sustainable movement patterns.

The appraisal suggested that the enhancement of hedgerows and streams could help mitigate the effects on biodiversity.

Conclusion

Policy WLP5.1 of the First Draft Local Plan allocates this site for 85 dwellings. The allocation does not include land at risk of flooding. The site represents a natural extension to the south of the town with good access to the road network and public transport. The high school is within walking distance and a primary school is within 1 km. Local services and facilities are within walking distance. Vehicular access to St Johns Road would be possible. The site will be adjacent new employment premises being built around the swimming pool. Development could help formalise pedestrian and cycle connections between Kings Road and Meadow Road. There is no evidence of any wildlife habitats on the site and the Policy requires provision of landscaping to mitigate the impact on the setting of nearby listed buildings.

Site 55 - Land between Pilgrim's Way and Wingfield Street, Bungay

Suggested Use: Housing

Site Area: 1.04



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They commented that there is a low risk to encroachment of the Water Recycling Centre and a Sewer Pipe crosses through.

Historic England commented that the site is adjacent to Bungay Conservation Area, 14 Wingfield Street which is a Grade II Listed Building and is close to 5-11 Wingfield Street which is also a Grade II Listed Building. Therefore there is a potential impact on Conservation Area and setting of Listed Buildings.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact. Full details can be found on the Council's website.

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

Halsbury Homes Ltd commented that the site is presently allocated under Policy BUN5 for Allotments/Open Space in the Waveney Site Allocations Development Plan Document. They noted from the supporting text that the land "has been protected for allotment use and an important open space in the built up area for many years." The supporting text also notes that "most of the site falls within an area of medium flood risk (flood zone 2), taking into account climate change."

The Local Planning Authority's has aspirations to provide allotments on this site, however, the site has stood derelict for many years since the site was last used and efforts to realise these ambitions since the Waveney Site Allocations Development Plan Document was adopted in 2011 have been unsuccessful. Halsbury Homes has the controlling interest in the land at St. Johns Road and there is no realistic long-term prospect of the site being returned to allotment use.

The Environment Agency's Flood Map shows clearly that the whole site is in flood zone 1 (less than a 0.1 per cent (1 in 1000) chance of flooding occurring each year). The Local Planning Authority's concerns about Site 55 are therefore without foundation.

The site is approximately 400m to the south east of town centre, which has a good range of shops and other services and facilities. Site 55 is therefore in a sustainable location within a sustainable settlement and it is considered that there are no sound planning reasons why the site could not come forward during the Local Plan period.

Members of the public have objected due to:

- lack of infrastructure;
- one of the last remaining open spaces in the town and should not be considered for housing. It should be reserved for recreational/amenity use for future generations;
- flooding issues;
- lack of access suggesting Wingfield Street and Pilgrims Way are unsuitable. Dangerous junctions nearby;
- designated as land for allotments and there is unmet local demand for allotments;
- currently provides a green lung and habitat for wildlife.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Part of the site is within 400m of a water recycling centre and a sewer pipe crosses the site. Foul sewerage improvements have been identified for the site.

A petrol pump on the site may mean some contamination on the site.

Much of the site is in flood risk zone 2 identified in the Strategic Flood Risk Assessment. Large areas of the site are at risk of surface water flooding.

The northwest corner of the site is in the Conservation Area and there are a number of listed and locally listed buildings nearby to the north and west. The part of the site adjacent to Wingfield Street is currently untidy and sensitive design could enhance the Conservation Area. An ecology survey of the site would be required – there is potential for habitats and species of conservation value.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included the risk of flooding in relation to climate change, the loss of a greenfield site and potential harm to biodiversity.

Minor positive effects included health and well-being; access to services and facilities; delivering housing; and encouraging sustainable movement patterns.

There were uncertain effects on the historic environment and townscape.

The appraisal suggested retaining hedgerows and trees and that housing design should be flooding compatible.

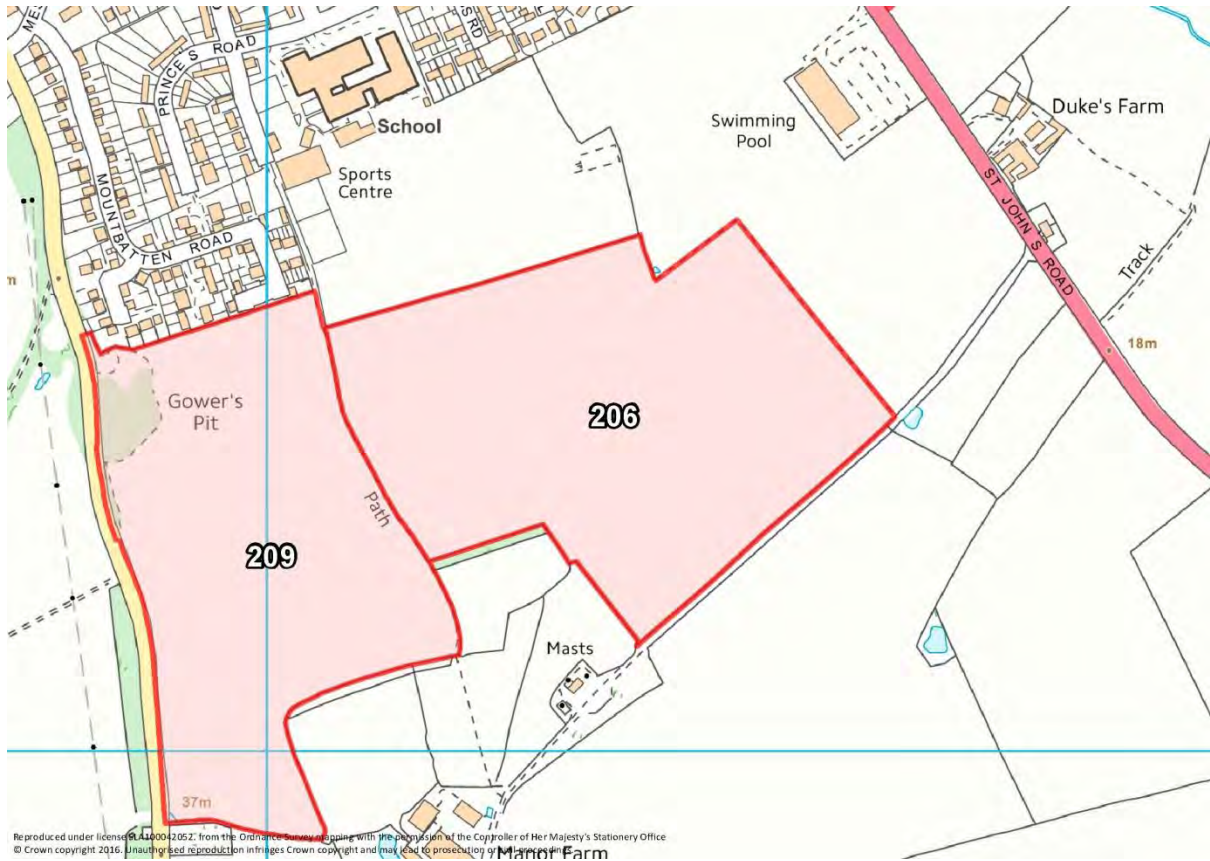
Conclusion

Much of the site is at risk of flooding leaving only 0.2 hectares sequentially preferable for development and safe access/egress would need to be addressed whilst safeguarding heritage assets and neighbour amenity. This level of development is considered too small for allocation in the Local Plan. In any case the site is within Settlement Boundary as defined by Policy WLP1.3 of the First Draft Local Plan. This, in principle will allow for development of housing on this site outside of the flood zone.

Site 206 - Land rear of Bungay High School

Suggested Use: Housing

Site Area: 12.00



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

This site was submitted as part of the consultation exercise. The landowners commented that they considered that sustainable modes of transport can be encouraged by making it safe, convenient and affordable. The development of land to the rear of the High School enables a better solution for bus access to the High School. The roads around the school, particularly Kings Road and Queens Road currently suffer from congestion and traffic conflicts during school opening and closing times. The new access will alleviate the problems caused by school coaches and buses.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site is proposed via the approved development on the BUN1 site to the northeast on to St Johns Rd. St Johns Rd is a main road but traffic modelling would be beneficial.

There are small pockets on surface water flood risk to the south of the site. A drainage strategy will be important due to some sloping on the site.

The site extends in to the countryside although it lacks landscape features and the settlement fringe study indicates a high capacity to accommodate development. Boundary hedges have some biodiversity value. There is a grade II listed building around 300 metres to the south of the site and there is potential for archaeology.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included landscape impact and loss of a greenfield site.

Minor positive effects included health and well-being, access to services and facilities, delivering housing and encouraging sustainable movement patterns.

Good landscaping could help mitigate the impact on the landscape and setting of the listed building.

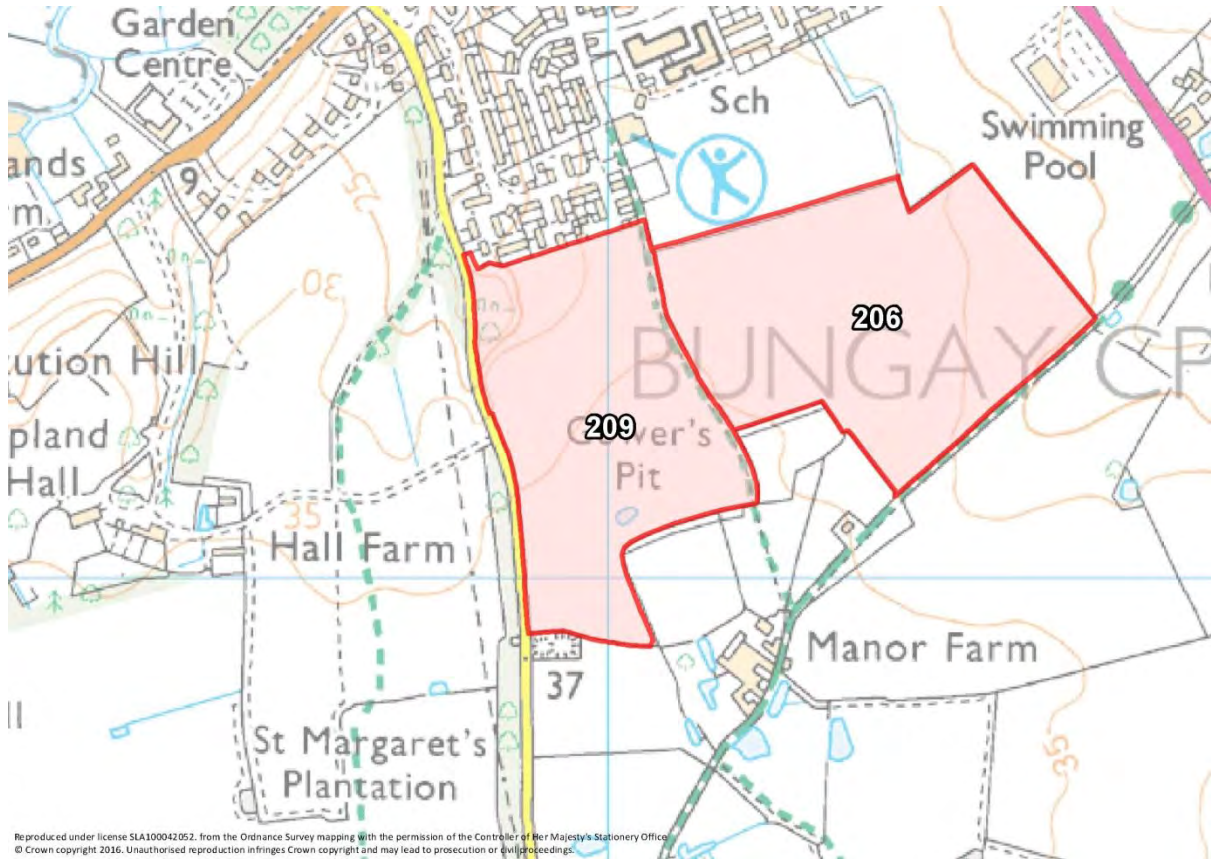
Conclusion

Policy WLP5.2 of the First Draft Local Plan allocates this site for 220 dwellings. The site adjoins the high school and land with planning permission, forming an extension to the built up area of Bungay. The site lacks distinctive landscape features and its landscape value is not high. There is good access to local services, facilities and employment land. The allocation includes a parking and turning area for school buses which will alleviate school traffic in the roads to the north of the high school. An extension to the school playing field is also included along with public open space.

Site 209 - Land south of Mountbatten Road, Bungay

Suggested Use: Housing

Site Area: 10.28



Summary of Response from 'Options for the new Waveney Local Plan' Consultation

The site was submitted during the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site is proposed on to St Johns Rd via the development sites to the east. Cycle and pedestrian access and possibly secondary vehicular access may be possible via Mountbatten Rd to the north.

There are records of surface water flooding on the very fringes of the site.

The site projects in to open countryside although there is little in the way of features to make a contribution to the landscape. The settlement fringe study identifies that the site has a high capacity to accommodate development. Boundary trees and hedges and a small pond in the southwest corner have potential biodiversity value.

There is some archaeological potential on the site and grade II listed buildings to the south and west.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included landscape impact and the loss of a greenfield site.

Minor positive effects included health and well-being, access to services and facilities, delivering housing and encouraging sustainable movement patterns.

Sensitive landscaping will mitigate the impact on the landscape and the setting of the listed building. Surveying and protecting hedges, trees and ponds will mitigate harm to biodiversity.

Conclusion

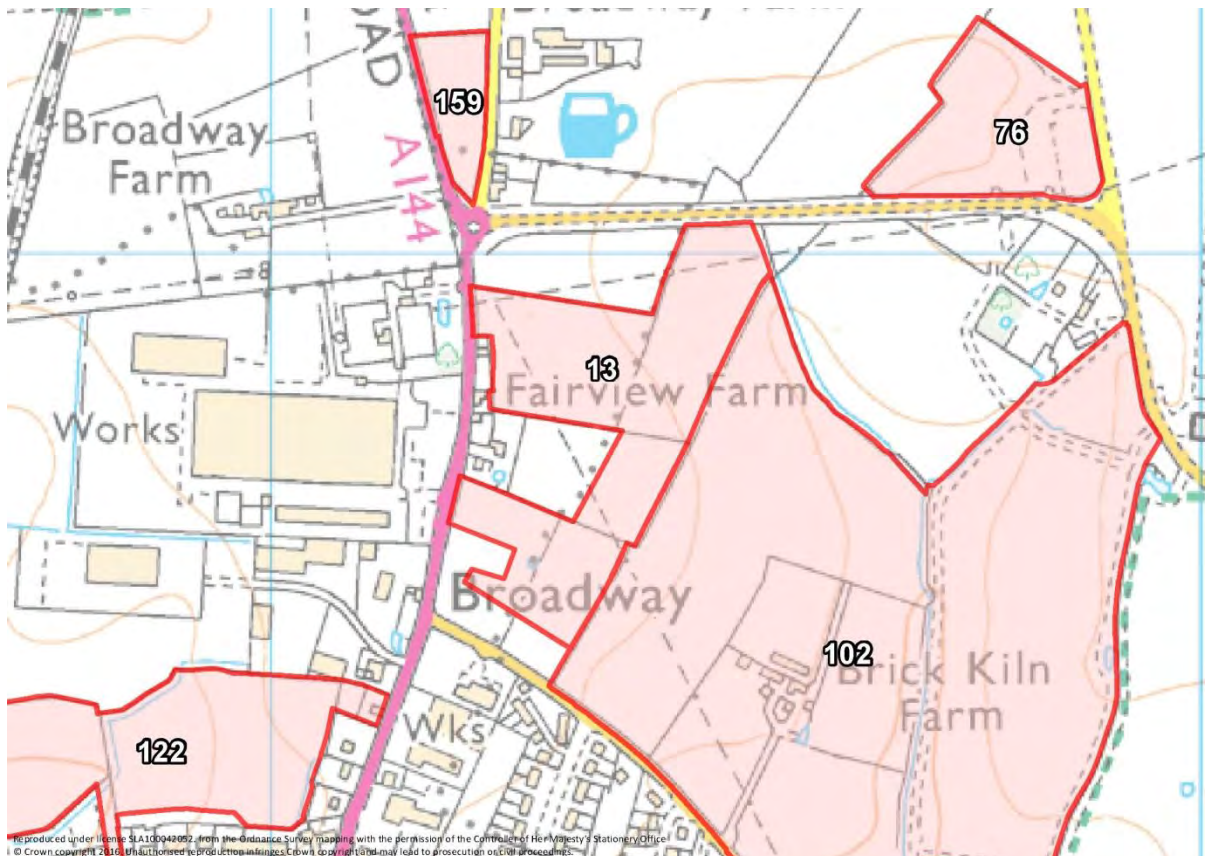
The site is considered less favourably to the sites allocated in the First Draft Local Plan for Bungay. These preferred sites cumulatively deliver more than sufficient housing for Bungay under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Halesworth and Holton Area

Site 13 - Fairview Farm, Norwich Road, Halesworth

Suggested Use: Mixed use

Site Area: 6.78



This site is a thin strip of flat land which stretches between Fair View Road in the south and Sparrowhawk Road in the north. The site is heavily overgrown and there is a county wildlife site located to the north west of the site.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has identified that this site is located within source protection zone 1.

Historic England cautioned that development on this site could impact upon the setting of Archers Cottage, which is a grade II listed building.

National Grid advised the Council that an intermediate high pressure gas main runs under the site.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Halesworth Town Council stated that this site is important for wildlife habitat.

Halesworth and Blyth Valley Partnership stated that this site is an important habitat for diverse flora and fauna. A previous attempt to convert this land for use as a playing field was resisted by Members of the Public and had the support of the then Member of Parliament. Wildlife on this site is still active and must be preserved.

Suffolk Wildlife Trust noted that this site is located next to a county wildlife site and may also contain species and habitats of conservation value. Therefore this site should not be allocated unless it can be demonstrated that species and habitats will not be harmed.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. Surrounding roads are reasonably wide and could accommodate further development. The Sparrowhawk Road roundabout to the north might need to be enlarged if this site is developed. The foul sewer network requires improvement prior to development. However, further work will be needed to provide adequate road access to the site.

This site is part of an area identified in the Settlement Fringe Landscape Sensitivity Study as having high landscape sensitivity and a moderate landscape value. Overall it has a moderate capacity to accommodate new development. The southern edge of this site is close to a sensitive urban edge. This site is not particularly visible because it is fairly flat and overgrown so it makes only a limited contribution to the landscape.

There are electricity lines running along the southern and northern edges of the site.

The northern and western parts of the site are vulnerable to surface water flooding.

Development on this site would likely be highly visible from farmland to the east and Fair View Road to the south.

The site has a high archaeological potential.

The assessment identifies that the site has a potential capacity for 83 dwellings at a density of 30 dwellings per hectare. The assessment also identifies that the site could deliver 4.32 hectare of employment land.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a potential significant negative effect on the setting of grade II listed Archer's Cottage. However the exact impact cannot be ascertained until any plans for development are submitted. Minor negative effects included a loss of agricultural land and biodiversity.

Minor positive effects include close proximity to shops, services, health facilities, and employment opportunities, the provision of additional jobs and housing. Development would support economic growth and would help to create sustainable patterns of movement.

There is uncertainty about the impact of development on the local landscape.

Trees and hedges around the edge of the site should be retained to mitigate landscape impact. Sympathetic design should also be enforced to minimise landscape impact.

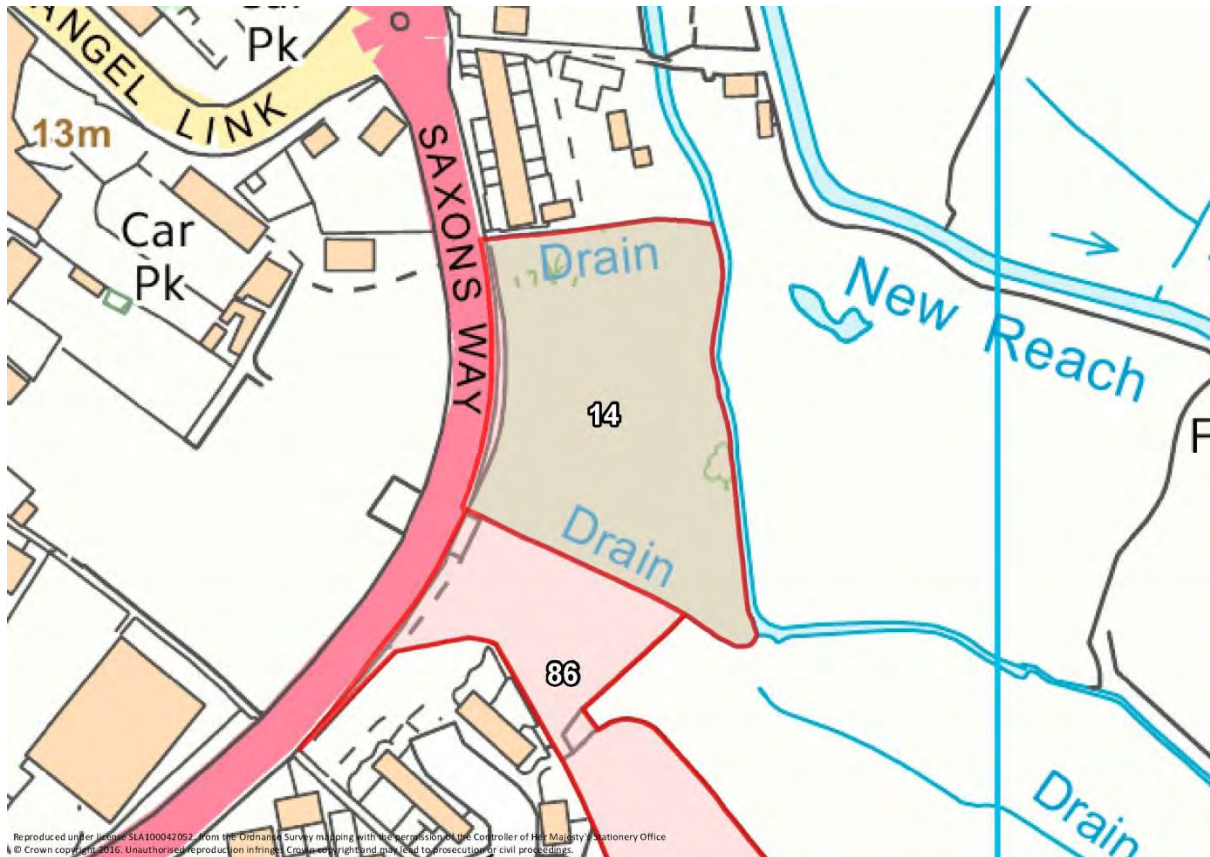
Conclusion

The character of this part of Halesworth is defined by the industrial estates on the west side of Norwich Road. Residential development in this location would result in an unnatural extension to the residential part of the town and could conflict with adjacent industrial uses. Development would also have the potential to impact upon the setting of a listed building and impact upon biodiversity. Alternative sites in Halesworth are more accessible to town centre services and facilities. Considering the above, the site is considered less favourable to the other preferred sites in the Halesworth and Holton area for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.

Site 14 - Field, Saxon Way, Halesworth

Suggested Use: Housing

Site Area: 0.95



This site is a low lying patch of land sandwiched between Saxons Way in the west and the New Reach in the east. The site is heavily overgrown and is located in an attractive area situated close to Halesworth conservation area.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

Historic England cautioned that development on this site would impact upon the setting of the Gothic House, a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

No comments submitted by town or parish councils in response to this site.

Halesworth and Blyth Valley Partnership was concerned that this site has access issues and that development of a care home would increase the age imbalance in the town.

Suffolk Wildlife Trust stated that this site may contain species and habitats of conservation value. Development should not be permitted unless it can be demonstrated that ecological development will not be harmed.

No comments submitted from developers or landowners in response to this site.

Members of the public stated that the site should not be developed because of flood risk and access issues. The neighbouring site at Dairy Farm was considered more appropriate.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. There is not currently any road access to this site, however road access could be provided onto Saxons Way.

There are electricity lines and a sewer pipe crossing the site. The foul sewer network requires improvement prior to development.

The eastern half of the site lies within flood zone 2 and much of the site is also at a high risk of surface water flooding.

Development on this site could impact upon views of the conservation area and along the Blyth valley. Therefore development on this site would require careful and sensitive design. Construction of a junction close to an existing roundabout could cause road safety issues.

This site has the potential for both early and Anglo Saxon remains. Development should be accompanied by archaeological investigation which identifies impacts on remains and measures to manage those impacts, including preservation in situ.

The assessment identifies that this site has potential capacity for 18 dwellings at a density of 30 dwellings per hectare, which is in keeping with housing in surrounding areas. Most of the site cannot be developed due to flood risk.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect on views of the conservation area and Blyth valley. Minor negative effects include the location of the site in source protection zone 2, the impact on biodiversity and the site being located in an area at risk from both flooding and surface water flooding.

Minor positive effects are associated with the accessibility from the site to services and employment. The site would also help to meet the housing needs of the local population.

Mitigation measures identified includes protection against flooding and removal of surface water flood risk from the site. Development should also retain trees and hedges on the site to mitigate landscape impact.

Conclusion

At least half of this site is at risk from flooding. There are sequentially preferable sites in the town at a lower risk of flooding. Meaning only half of the site is potentially suitable for development. However, development of this half of the site would have adverse impacts on the landscape and townscape and could harm the setting of the conservation area through loss of vegetation along Saxon's Way. Therefore the site is not considered suitable for allocation in this Local Plan.

Site 32 - Land adjacent to The Oaks, Beccles Road, Upper Holton, Halesworth

Suggested Use: Housing

Site Area: 0.56



This site is isolated from other settlements and is situated next to the Beccles Road on a gently north facing slope. The site is surrounded by mature trees and hedges and there are houses both to the north and south. Surrounding countryside is flat and interspersed by hedgerows and field boundaries.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Historic England cautioned that development on this site would impact upon the setting of grade II listed Pastures Farm.

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial infrastructure needed to connect to the foul water network, which may not be economically viable. Full details are on the Council's website.

Suffolk County Council Archaeology noted that the development of this site would have a 'Green' impact.

Halesworth Town Council noted that this site is located in Holton.

Halesworth and Blyth Valley Partnership stated that development states that this site is located on a fast, narrow road outside of the village and with no close links to any other settlement.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

There is no pedestrian access to this site which is considered a significant negative effect and this issue could not be mitigated.

There are electricity lines running along the eastern and western edges of the site. Significant offsite infrastructure may be needed to connect this site to the foul sewer network. The foul sewer network requires improvement prior to development.

Parts of the site are at a low risk of surface water flooding.

This is an area of gently rolling countryside but landscape impact could be mitigated through sensitive development. The site is surrounded by trees and hedges on all sides.

The site is located on a busy road with no cycle lanes or pavements. Careful consideration will be needed about how this site can be connected to the road network.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects include poor access to shops, services and facilities, the effects of flooding associated with climate change, the impact on the landscape and the loss of natural resources. Development would be isolated in the countryside and would not be related to any local settlement and so would have a negative impact on sustainable movement patterns.

A minor positive effect is that development would help to meet the housing needs of the local community.

The isolated location of this site means that landscape mitigation would be difficult.

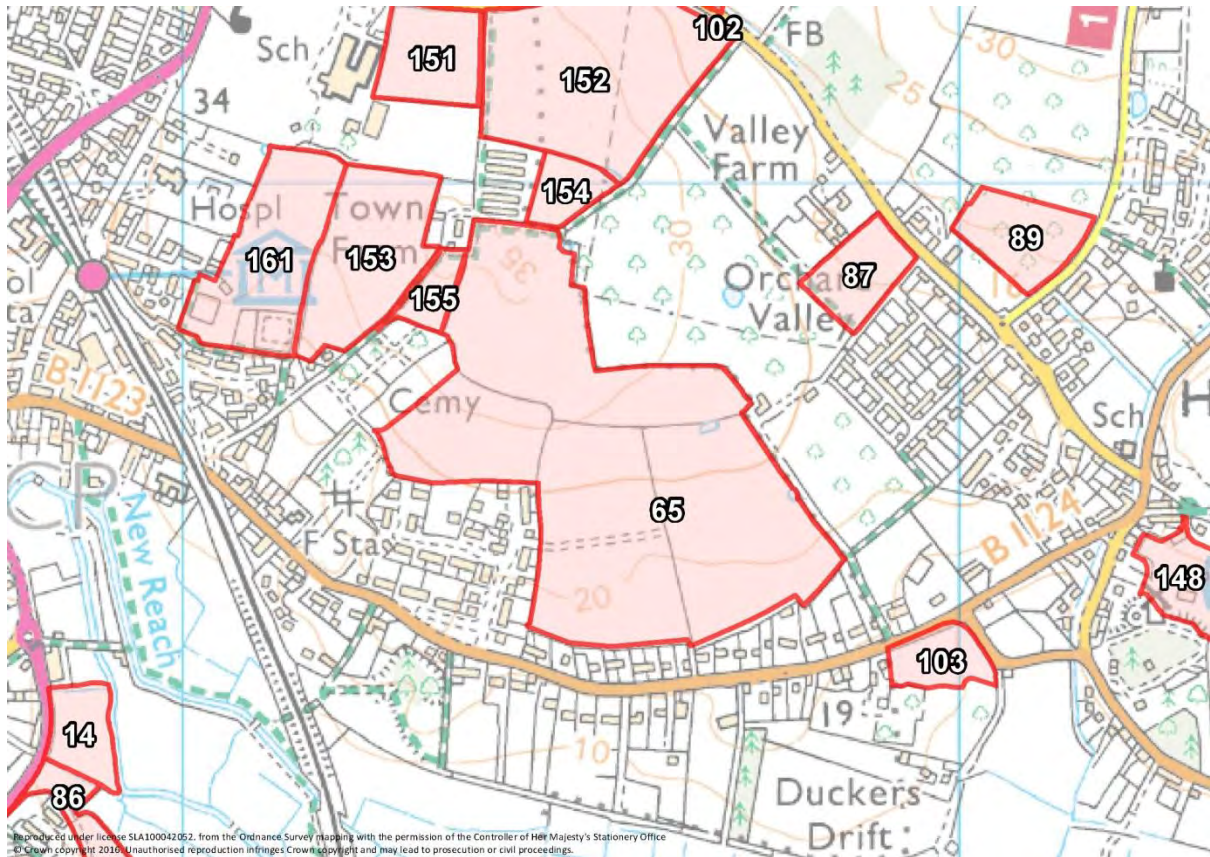
Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation in this Local Plan.

Site 65 - Land north and east of Hill Farm Road Halesworth

Suggested Use: Housing

Site Area: 16.47

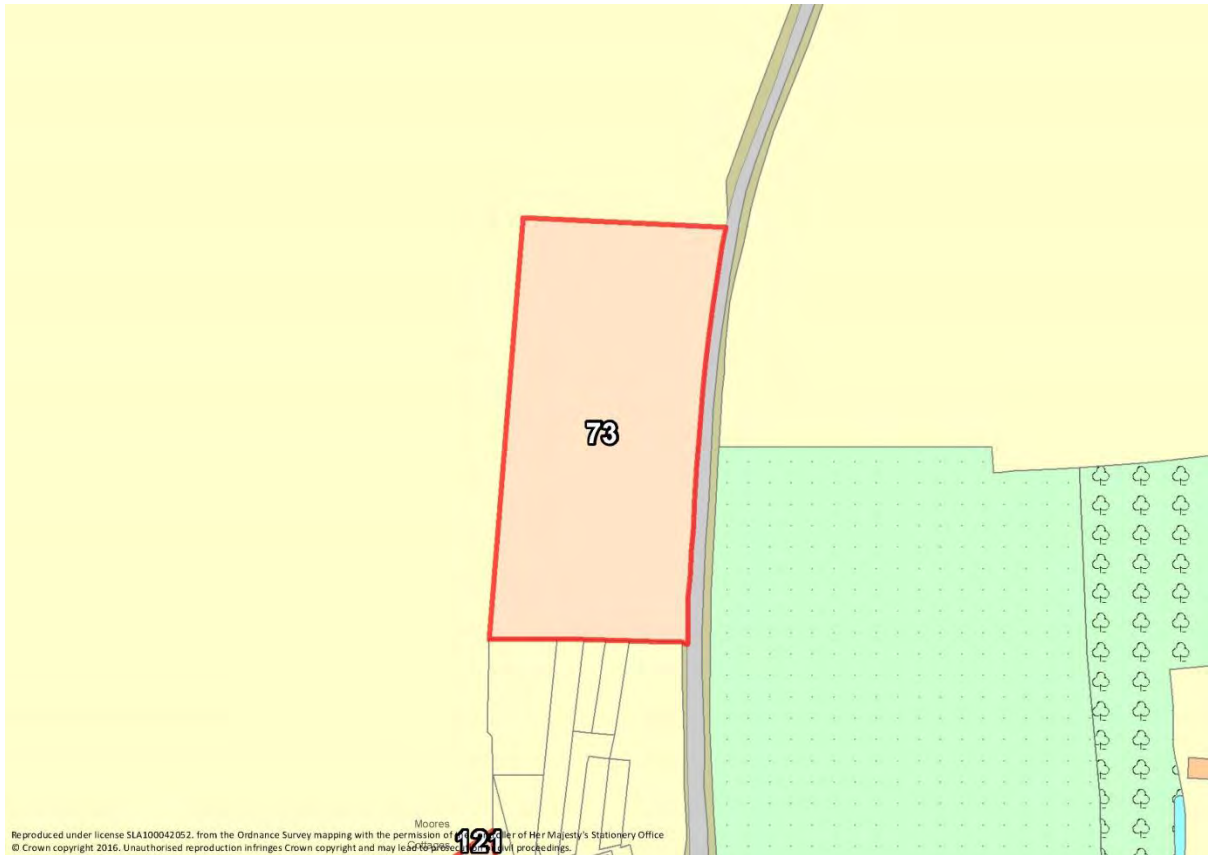


This is a large site flanking the eastern edge of Halesworth. Much of the site is overgrown and is set on the side of a hill which slopes down towards Holton in the east. The site now has planning permission for housing therefore the site will not be considered any further for allocation as part of the Local Plan.

Site 73 - Land north of Moores Cottages, Upper Holton

Suggested Use: Housing

Site Area: 0.69



This is a flat site set on the eastern edge of a large arable field. There is a dense copse to the west and a row of cottages to the south. The site is accessed via a narrow lane.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Historic England cautioned that development on this site will impact upon Moat Farmhouse, which is a grade II listed building.

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Significant infrastructure needed to connect to the foul water network, which may not be economically viable.

Suffolk County Council Archaeology noted that the development of this site would have a 'Green' impact.

Halesworth Town Council noted that this site is located in Holton but that Halesworth Town Council and Holton Parish Council should consider development together.

Halesworth and Blyth Valley Partnership noted that this site is located outside of the village but that there is an established community in the area. An innovative and environmentally friendly scheme could be considered.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

This site is accessed via a narrow lane and there is no pedestrian access, which could not be delivered without significant investment and would render the site unviable.

Significant offsite infrastructure is required to connect to and improve the foul sewer network, which may not be financially viable.

There is a minor risk of surface water flooding in the north and west of the site. Development would be visible from the west but landscape impact could be reduced if it aligned with the existing cottages.

Dense copse to the east could be a rich source of biodiversity. The Settlement Fringe Landscape Sensitivity Assessment identified this site as being of high sensitivity and moderate value, with a moderate capacity for development. This is a small site bordered by a tall hedge on one side and houses to the south.

Although open to a large field to the west it is unlikely that this site contributes significantly to the landscape. The surrounding road network is narrow with few passing places and could become congested if there is a lot of new development. The road to the south is part of the National Cycle Network. The foul sewer network requires improvement prior to development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of agricultural land, the lack of access to services, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects are that proposed development has the potential to meet local housing needs.

There is uncertainty concerning the impact upon the historic environment. Landscape impact is also uncertain although it is likely that this would be a minor negative effect.

Tree and hedge planting to the west of the site might help to mitigate landscape effects.

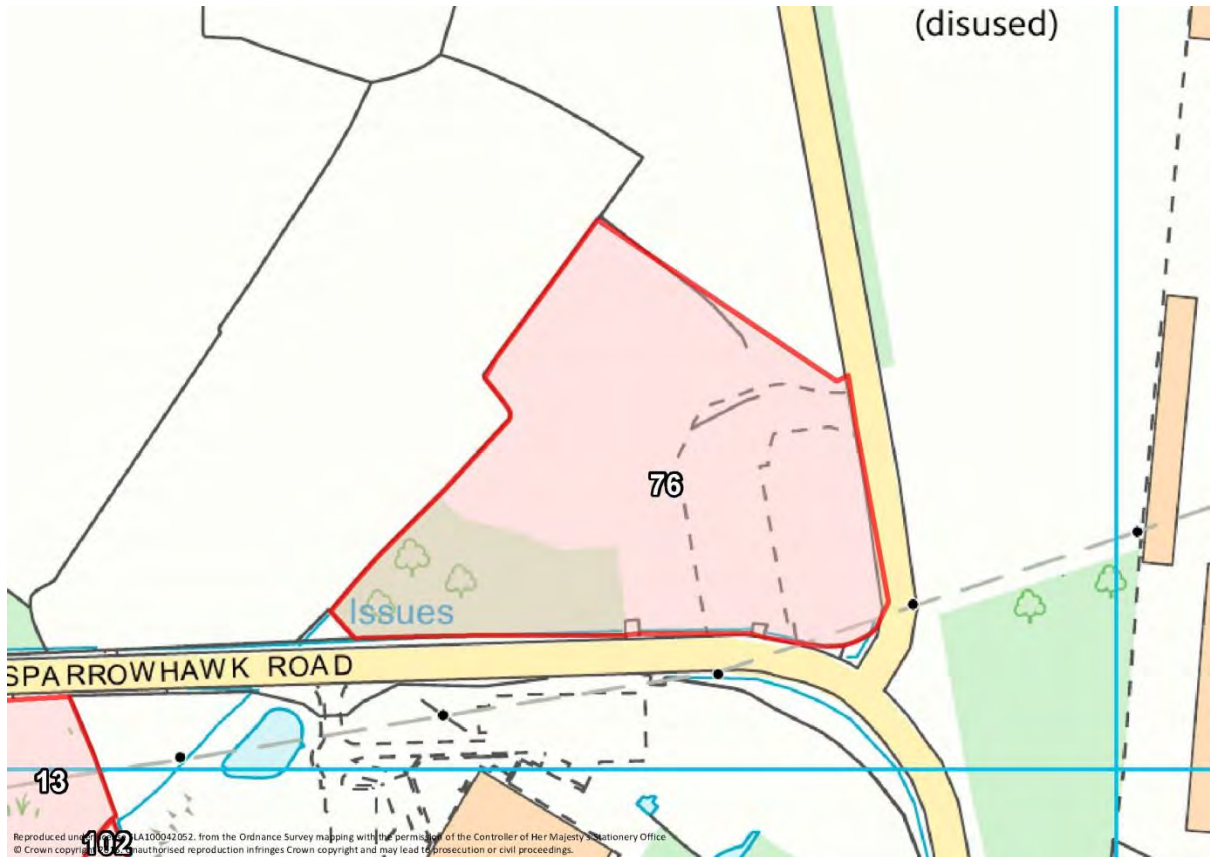
Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation in this Local Plan.

Site 76 - Land north of Sparrowhawk Road, Halesworth

Suggested Use: Employment

Site Area: 3.04



This is a flat site directly to the north of Sparrowhawk Road, close to the Bernard Matthews factory. The site itself is overgrown with tall hedges and trees along the western and southern edges. There is an aggregates breaking yard in the south east corner of the site, which is shielded by a further ring of hedgerow along its northern and western boundaries.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has identified this site as being located in source protection zone 1.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Halesworth Town Council stated that this site is located on the border between Halesworth and Holton. Halesworth Town Council and Holton Parish Council would need to look jointly at the implications of development on infrastructure.

Halesworth and Blyth Valley Partnership stated that this site would be suitable for industrial development because of its close proximity to Sparrowhawk Road. It would be a good location for a household recycling centre and is located close to site 102.

Suffolk Wildlife Trust stated that this site may contain species and habitats of conservation value. Development should not be permitted on this site unless it can be demonstrated that it will not harm ecological value.

No comments submitted by developers or landowners in response to this site.

Members of the Public stated that this would be a good site for office or industrial use and that a development of this sort was necessary to the town.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts that cannot be mitigated. There are points of entry to the site from Sparrowhawk Road and a side road leading off to the north. All of these points of entry would require improvement prior to development. The site is set on a blind bend. There are no pavements but the cycle lane running along the southern edge Sparrowhawk Road, which serves the Spectra factory, could be extended to reach site 76.

Power lines cross the site from the southwest to the northeast and the foul sewerage network would require improvements to support development.

There are possible contamination issues from existing uses on this site.

There are pockets of surface water flood risk in the middle of the site.

The western part of this site is located within an area identified by the Settlement Fringe Landscape Sensitivity Study as being of high landscape sensitivity and moderate landscape value. This area has moderate capacity for development. The site is bordered by mature hedgerows which will be of landscape value and will help to shield development from the surrounding area. The site itself is flat and makes only a limited contribution to the landscape. The eastern half of the site is occupied by an aggregates breaking business. Employment development would have some impact which would need to be mitigated.

These may be a valuable habitat for biodiversity. This site clips the corner of the historic Holton Airfield. The site borders Sparrowhawk Road, which could accommodate significant traffic. However the highway

authority must be consulted about the potential increase in heavy goods traffic resulting from development on this site. The foul sewer network requires improvement prior to development.

This site is located directly to the north of both Iron Age and Roman settlements. Development proposals should be accompanied by archaeological investigation identifies the impacts of development and suggests measures to manage those impacts. This includes measures for preservation in situ.

This site has the potential to deliver 3 hectares of employment land.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects are the loss of agricultural land, the impact on biodiversity and development occurring in a source 1 protection zone.

Minor positive effects are that this development is located close to Halesworth and so would be close to shops, services and medical facilities. It would also support economic growth, the rural economy and sustainable patterns of movement. Creating employment opportunities would help to reduce levels of deprivation.

There was uncertainty about the impact upon landscapes and townscapes due to the flat land surrounding the site.

Hedges and trees surrounding the site should be retained in order to mitigate landscape impact.

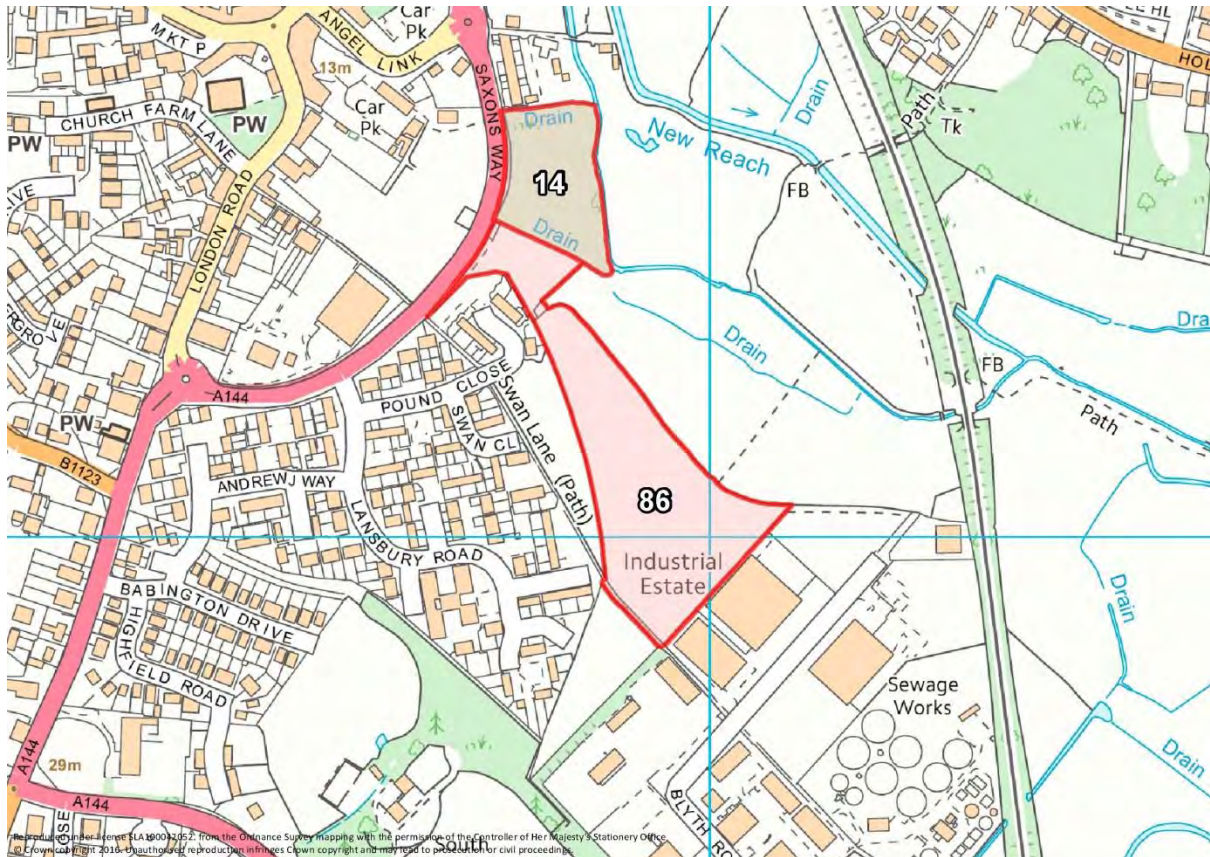
Conclusion

This site is not considered suitable for allocation for employment use because it has poor accessibility to the existing residential areas of the town.

Site 86 - Land off Saxons Way, Halesworth

Suggested Use: Housing

Site Area: 2.60



This site is situated on a banked area of higher ground, which overlooks a river valley and the Halesworth conservation area. An area of open space backed by residential development borders the site to the south and west.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and an 'Amber' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a high encroachment risk to a water recycling centre; a sewer pipe crosses the site.

Historic England cautioned that development on this site could impact upon the setting of Gothic House, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Halesworth Town Council stated that this site is of an unusual shape and so careful and original design would be needed to ensure that development is in keeping with the surrounding areas.

Halesworth and Blyth Valley Partnership noted that this site was part of the proposed route for the phase 2 of Halesworth Relief Road. It borders the London Road estate and Millennium Green and a carefully designed scheme could work very well with access via Bigod Close / Lansbury Road.

Suffolk Wildlife Trust stated that this site may contain species and habitats of ecological value. Development should therefore not be permitted unless it can be demonstrated that it will not impact upon ecological value.

No comments submitted by developers or landowners in response to this site.

Members of the Public stated that this site would be an appropriate location for development (provided it is not at risk from flooding) following the completion of development of Dairy Farm and Dairy Hill.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. There is an encroachment risk to the water recycling centre and a sewer pipe traverses the site. Close proximity to the water recycling centre raises concerns about odour. The site is located within the 400 metre buffer of the water recycling centre. Improvements to the foul sewerage network would also be needed to support development.

Part of the site is also at risk from surface water flooding. This site overlooks the River Blyth Flood Plain but landscape impact could be mitigated by only developing part of the site with low rise, well designed development.

Tall grasses and brambles could serve as a habitat for biodiversity. This is a small site and is unlikely to impact upon the surrounding road network.

There is potential for both early remains and remains of an Anglo Saxon settlement on this site. Development proposals should be accompanied by archaeological investigation which identifies the impacts of development and suggests a programme for managing those impacts.

The assessment identifies this site as having potential capacity for approximately 8 dwellings. Close proximity to the sewerage works would limit development to the road frontage.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect upon the landscape and townscape due to impact upon the conservation area and adjacent river valley. A minor negative effect was that development would be located on undeveloped land and would impact upon local biodiversity.

Minor positive effects are that development would be located within walking and cycling distance of shops, services, employment opportunities and medical facilities. It would also help to meet local housing needs and support sustainable patterns of movement because of its location close to employment opportunities.

Development would have to include measures to mitigate landscape impact, which could be difficult. Housing should also be resilient to flood risk and surface water flooding.

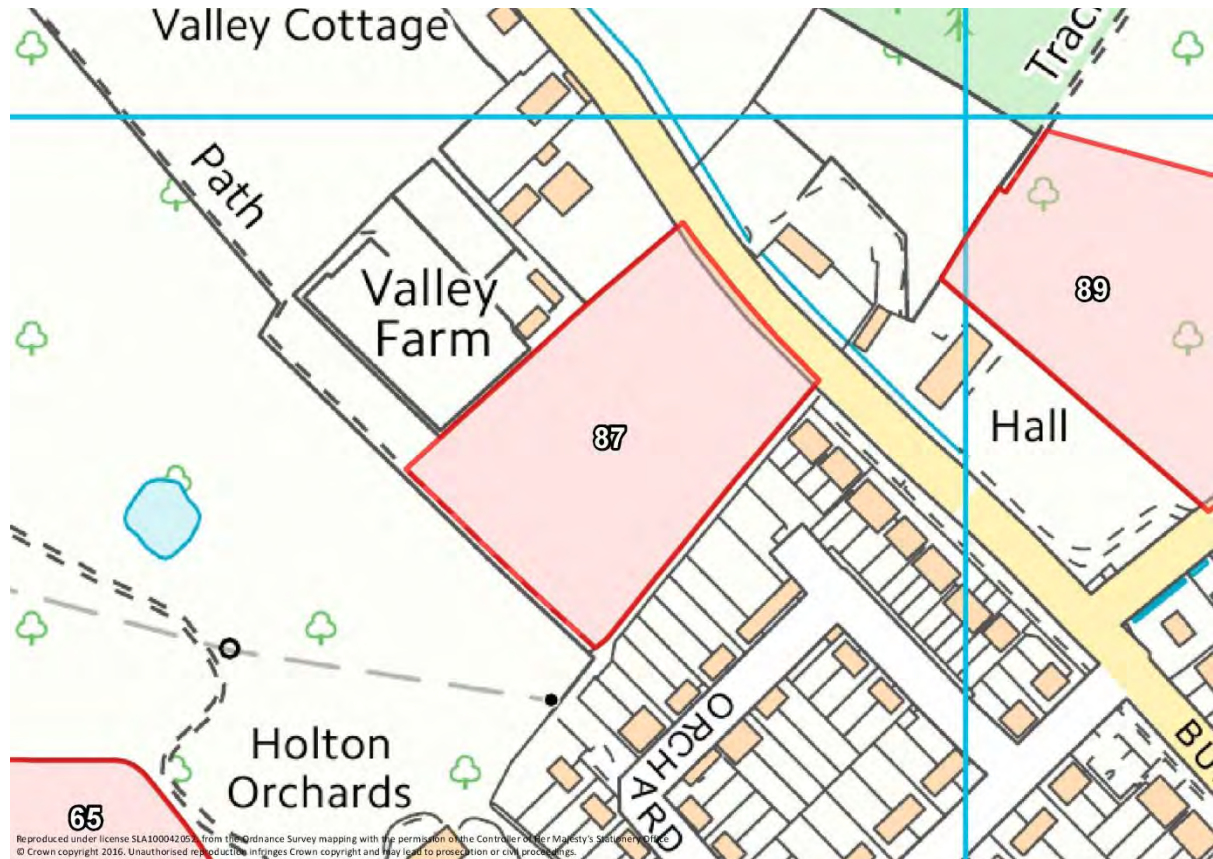
Conclusion

This site can only make a very limited contribution to new housing in Halesworth given the proximity to the sewerage treatment works and the awkward shape of the site. Development would do little to enhance the townscape and would detrimentally impact upon a sensitive landscape. Considering the above, the site is considered less favourable to the other preferred sites in the Halesworth and Holton area for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.

Site 87 - Land on Bungay Road, Holton, Halesworth

Suggested Use: Housing

Site Area: 1.13



This site is a field sandwiched between Holton to the south east and valley farm to the north-west. The site is surrounded by hedgerows and is located within a picturesque valley, which slopes down towards Holton.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site may impact upon the setting of Gavelcroft, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

Halesworth Town Council stated that this site is vulnerable to flooding, which requires thorough investigation.

Halesworth and Blyth Valley Partnership cautioned the scale of development may be too great (together with site 89) given previous issues with flooding.

Wellington Construction discussed scores given to the site in the sustainability appraisal. It stated that negative scores were attributed to:

- A) conserving and enhancing the quality and distinctiveness of landscapes and townscapes;
- B) conserving natural resources;
- C) reducing contributions to climate change and mitigating the effects.

Meanwhile the following categories were attributed positive scores: health and well-being; Improving access to key services and facilities; Meeting housing requirements for the whole community; Encouraging efficient patterns of movement in support of economic growth.

With regard to A) the site is infill between Valley Farm to the north-west and suburban development to the south east. A large residential property is situated on the opposite side to the north east. With regard to A), B) and C) it is likely that there will be negative scores because of its rural location but this will be the case for most sites submitted. There is the potential for strategic planting to minimise landscape impact and enhance future development. This site has no viability issues and could be delivered fairly quickly and this is important at a time when doubts about the deliverability of sites in Lake Lothing raised questions about the ability of the Council to meet its housing targets.

Members of the Public were concerned about the impact of flooding on the site, particularly after rain or snow.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity and a moderate landscape value, meaning that it has a moderate capacity to accommodate new development. This is a moderately sized site sandwiched between Valley Farm to the north-west and Holton to the south east, which makes a limited contribution to the wider landscape.

Road access from Bungay Road is suitable for farm vehicles only.

The eastern half of the site is at a high risk of surface water flooding and there are strips of land elsewhere on the site that are also at risk from surface water flooding.

This site is opposite to the grade II listed Gavelcroft and development could impact upon its setting.

The foul sewer requires improvement prior to development and electricity lines that cross the site will need to be accounted for.

This site has not been investigated for archaeological remains. Archaeological investigation would be required as part of any planning permission granted on this site.

The assessment has identified this site as having capacity for approximately 22 dwellings at a density of 20 dwellings per hectare. This takes into account its position with countryside on two sides and a rural settlement with low density dwellings to the south east.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that development would be located agricultural land. Development on this site would have a minor negative effect on the landscape.

Minor positive effects relating to development on this site are that it would be located close to key services and facilities and employment opportunities, which would support sustainable patterns of movement. Development would also help to meet local housing needs.

Retention of hedgerows bordering the site would help to mitigate landscape impact.

Conclusion

This site is located fairly close to shops, services, facilities and employment opportunities but there are competing sites which are better located. Therefore, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 89 - Land on Lodge Road, Holton, Halesworth

Suggested Use: Housing

Site Area: 1.42



This site is located on higher ground overlooking Bungay Road and Holton. The site is surrounded by tall hedgerows and trees and there is a plantation running along its north-west edge. The south west and south east edges of the site (next to Lodge Road) are currently being developed for a mixture of market and affordable housing.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England cautioned that development on this site will impact upon Gavelcroft, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact. Full details can be found on the Council’s website.

Halesworth Town Council stated that this site is located on Holton and suffers from flooding problems which will require thorough investigation.

Halesworth and Blyth Valley Partnership stated that the scale of development (together with site 87) may be too great given past problems with flooding in the area.

Suffolk Wildlife Trust states that this site, together with sites 8, 9, 44, 62, 81, and 82 forms a large block of land that may be of some value, especially for farmland species. Careful consideration of residential development on these sites is needed to ensure that it does not impact upon wildlife value on these sites.

Wellington Construction discusses scores given to the site in the sustainability appraisal. It states that negative scores were attributed to:

- A) conserving and enhancing the quality and distinctiveness of landscapes and townscapes;
- B) conserving natural resources;
- C) reducing contributions to climate change and mitigating the effects.

Meanwhile the following categories were attributed positive scores: health and well-being; Improving access to key services and facilities; Meeting housing requirements for the whole community; Encouraging efficient patterns of movement in support of economic growth.

Development in this allocation would complement the 11 dwellings that are currently under construction and access could be gained via a y junction granted as part of the last planning permission. The previous permission underlines the fact that landscape impact will be minimal. Negative issues with regard to sustainability scores A), B) and C) will affect most rural allocations and strategic planting could be used to minimise landscape impact. This site offers the potential for 35 dwellings in a sustainable location. The LPA recognises that greenfield development is inevitable as it tries to meet its housing targets. This is particularly the case given the stalled development of sites in Lowestoft. Site 89 and those like it are important because they are available and deliverable.

Members of the Public were concerned that development on this site would increase creeping suburbanisation and there was concern about the risk of surface water flooding on the site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment has not identified any constraints or impacts that cannot be mitigated. The section of the site which fronts on to Lodge Road is being developed for housing, however, access to the remainder of the site has been provided for farm vehicles and this could serve as the point of access for future development.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity and a moderate landscape value, meaning that overall it has a moderate capacity to accommodate new development. The eastern edge is next to a sensitive urban fringe. Site 89 is located in a prominent

position, although some of it is shielded by trees and a plantation. The impact of further development on this site would be lessened by the development taking place in the south and east of the site.

There is a pumping station to the south of the site. The foul sewerage network will require improvements to support development.

The site slopes gently towards Bungay and is located in an area of picturesque landscape. Sensitive design and landscaping is needed to keep landscape impact to an acceptable level. Hedges and trees surrounding the site, particularly along its eastern edge, could support biodiversity.

The site is located in close proximity to the Holton conservation area.

The assessment identifies this site as having potential capacity for approximately 15 additional dwellings at a density of 20 dwellings per hectare. This density is comparable to that found in the development currently being built in the south east of the site.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects include the loss of agricultural land.

Minor positive effects are that development would be located close to shops, key services and employment opportunities, which would support sustainable patterns of movement. Development would also help to meet local housing needs.

Retention of existing hedgerows surrounding the site would help to mitigate landscape impact.

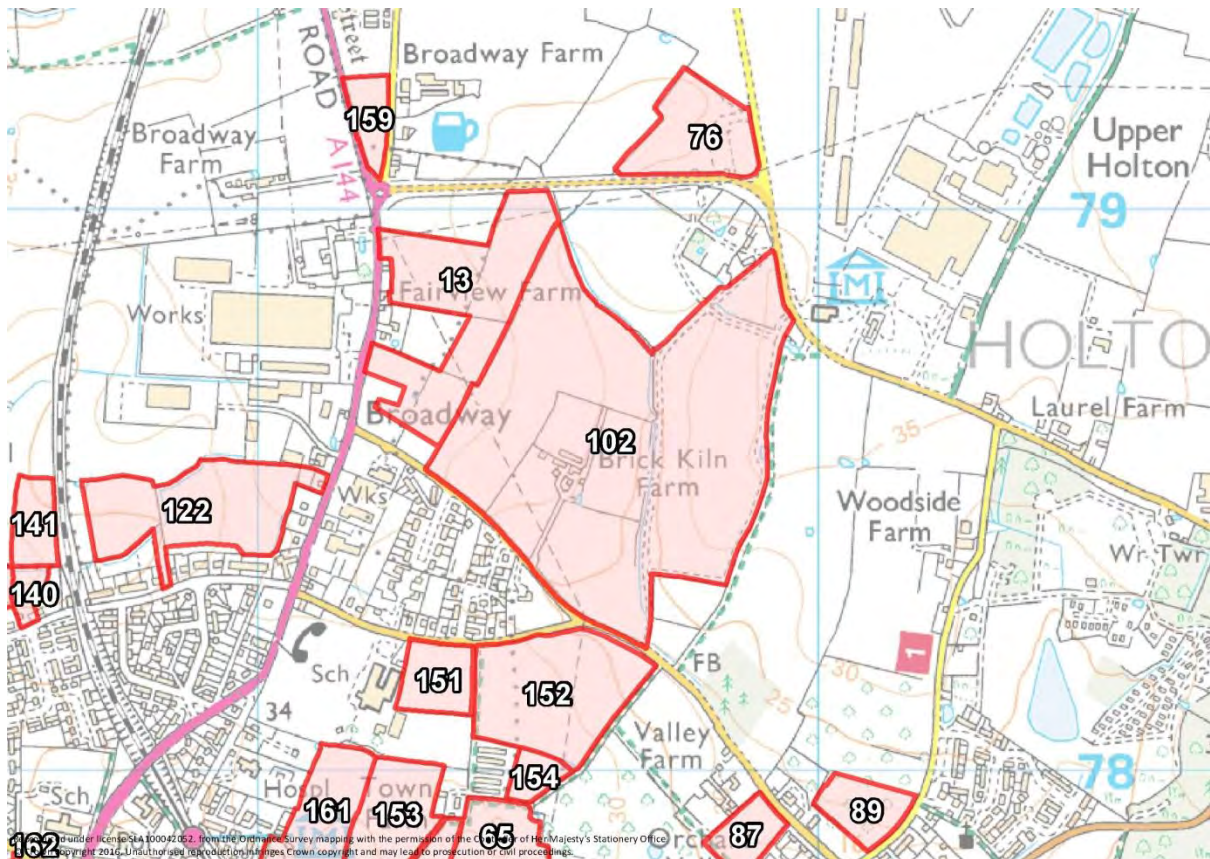
Conclusion

Out of all the sites considered in Holton, this site is the most preferable given that development is already taking place on the site and would therefore have less impact on the landscape and townscape. Any potential impact on the setting of the nearby listed building should be able to be mitigated through design. Any risk of surface water flooding will need to be assessed at the planning application stage and mitigation measure identified. Considering the above site is allocated in the First Draft Local Plan for 15 dwellings.

Site 102 - Land south of Sparrowhawk Road, Halesworth

Suggested Use: Employment

Site Area: 27.27



This is a large site which is located between Sparrowhawk Road in the north and Fair View Road in the south. The site is an area of countryside that slopes downwards towards Holton. Much of the site is made up of pasture, some of which is used to keep horses, but there is a farmhouse in the middle as well as a dense copse of trees.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has undertaken a high level analysis which shows that this site is located within source protection zone 1.

Historic England cautioned that development on site 102 could have an impact on Archers Cottage, which is a grade II listed building to the east of the site.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Halesworth Town Council stated that this site is potentially a good location for industrial development. However its location on the edge of Halesworth and Holton means that Halesworth Town Council and Holton Parish Council must look at the two sites together.

Halesworth and Blyth Valley Partnership stated that employment land is needed in Halesworth but cautions that development included measures to control traffic movement and protect from flood risk.

National Grid has informed the Council that an intermediate high pressure gas main runs under the site.

No comments submitted by developers or landowners in response to this site.

Members of the Public were concerned that without knowing the details of the proposed building works and their duration, the number of people accessing the site during construction and once in use and the hours of operation it would not be possible to form an accurate judgement. One respondent felt that the nearby Holton airfield, which is already used for employment uses, would be a more suitable location for further development. However another thought that the location would be suitable because of its proximity to the main road and the provision of employment opportunities that would reduce the need for people to commute. Careful design (including leaving space near the housing) would be needed to minimise impact on residents and the right of way of the edge of the site must be left intact.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

This assessment did not identify any constraints or impacts that cannot be resolved. There is a narrow track leading from the farmhouse to Fair View Road but this will require improvements, particularly better visibility splays, prior to development.

Electricity lines cross the site from east to west across the site, along the southern edge of the site and connecting the farmhouse. The foul sewer network requires improvement prior to development.

Surface water flooding is possible across the east and southeast of the site. A small stream runs through the site crossing the area of the farmhouse.

The Settlement Fringe Landscape Sensitivity Assessment identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity for accommodating new development. This site is large and sloping with a prominent ridgeline in the north east corner of the site and a sensitive urban fringe along its southern edge. The size and sloping character of this site means that it does make a significant contribution towards the local landscape.

The landscape tilts southwards towards Holton. The site is bordered by mature trees which also run across the site. There is a copse of trees towards the northeast of the farmhouse. Development in the centre, north and east of the site would be exposed in the landscape and poorly connected to the existing

settlement. Development along the southern and western edges of the site would have less of an impact, particularly if developed alongside site 13.

Hedges within the site could support biodiversity as could the copse next to the farmhouse. Site 13 to the west is heavily overgrown and so could be of biodiversity value and there is a county wildlife site to the north west of site 102.

Holton Airfield clips the site and there is a historic farmhouse in the middle of the site. Fair View Road is narrow with no pavements and may be too narrow to accommodate commercial traffic. It contains a national cycle route but there is no designated cycle lane. The junction with Norwich Road may require improvement. Sparrowhawk Road to the north may also require a point of access if the entire site were to be developed. Commercial uses and traffic accessing the site along Fair View Road could disrupt nearby residential development. For this reason entry from the north along Sparrowhawk Road might be better.

There are remains of Iron Age and Roman settlement to the north and a Roman road to the north west. Development proposals should be accompanied by a programme of archaeological investigation which identifies the impacts of development and suggests measures to manage those impacts.

Development on this site could deliver 10 hectares of employment land. One third of the site could be developed along its southern and western edges.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were the impact on the landscape and historic environment, the impact on biodiversity the site being located within source protection zone 1 and the loss of agricultural land.

Minor positive effects are that development would be located close to nearby residential areas and services. This site would also encourage sustainable patterns of movement, support the rural economy and help to reduce levels of deprivation.

Retention of trees and hedges would help to mitigate landscape impact.

Conclusion

The area of this site exceeds the amount of employment land which is likely to be needed during the life of the Local Plan in Halesworth. The size of this site and its position on a slope means that it would have an effect on the landscape but this could be mitigated if development were located only at the western end of the site. Road access for commercial vehicles could also create issues with noise and odour for nearby residents. Therefore, the site is not considered suitable for an employment allocation in this Local Plan.

Site 103 - Land south of The Street, Holton (adjacent to 36 Holton Road, Halesworth)

Suggested Use: Housing

Site Area: 0.85



This site is an open field located next to a sharp bend in the Holton Road. The site is surrounded by hedges along its north and eastern sides and a garden centre borders the site to the south and west. There is a plantation to the south of the site.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewage pipe crossing the site.

The Environment Agency undertaken a high level review of site 103 and has identified that it is located in source protection zone 2.

Historic England cautions that the location of this site could impact upon both listed buildings and a conservation area. This site could impact upon the Holton Conservation area as well as The Homestead, Myrtle Cottage and Millside Cottage, which are grade II listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

Halesworth Town Council notes that this site is located in Holton and the town council would need to consider development on this site in tandem with Holton Parish Council.

Halesworth and Blyth Valley Partnership states that housing on this site should only be considered if it is accompanied by improvements to the corner of the B1123 and junction with the B1124.

No comments submitted by developers or landowners in response to this site.

Members of the Public were concerned that the site suffered from surface water flooding and that there was no way of removing excess water from the site. It was also thought that the site was too dangerous for housing (no reason was given but it was probably because of the blind bend and nearby road junction to the east).

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any issues or effects which could not be mitigated by development.

There is a sewer pipe traversing the site and a pumping station to the south of the site. Foul sewerage improvements have also been acknowledged as necessary for development.

The site is directly adjacent to an area of fluvial flooding. The eastern part of the site is at a high risk of surface water flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this area as being of a high landscape sensitivity study, a moderate landscape value and having a moderate capacity to accommodate development. A plantation to the south of this site would reduce the impact of development on the landscape. Development would increase the coalescence between Halesworth and Holton. Development would take place in an area on the edge of the settlement and careful design would be needed to minimise landscape impact.

The site is on the edge of the Holton conservation area and careful design is needed to minimise impact on the local historic environment. The site is accessed by the B1123, which links Halesworth to the A12. The foul sewer network will require improvements prior to development.

There is potential for early settlement remains on this site. Planning permission should require a programme of archaeological investigation.

This assessment has identified that this site has the capacity to accommodate approximately 17 dwellings at a density of 20 dwellings per hectare. This takes account of the suburban character of nearby housing and the site's edge of settlement location.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significance negative effect upon the landscape. Development on this site would be screened by a plantation to the south but development on this site would fill in one of the last gaps between Halesworth and Holton, which would increase the coalescence between the two settlements. Minor negative effects are that development will result in the loss of undeveloped land.

Minor positive effects are that development would be located close to shops, services and employment opportunities and will encourage sustainable patterns of movement. It would also help to meet the housing needs of the local community.

There is uncertainty regarding the impact of development on the historic environment because the site is close to the Holton conservation area and several historic buildings.

Development should retain existing trees and hedges to mitigate landscape impact. There should also be careful attention to design and landscaping.

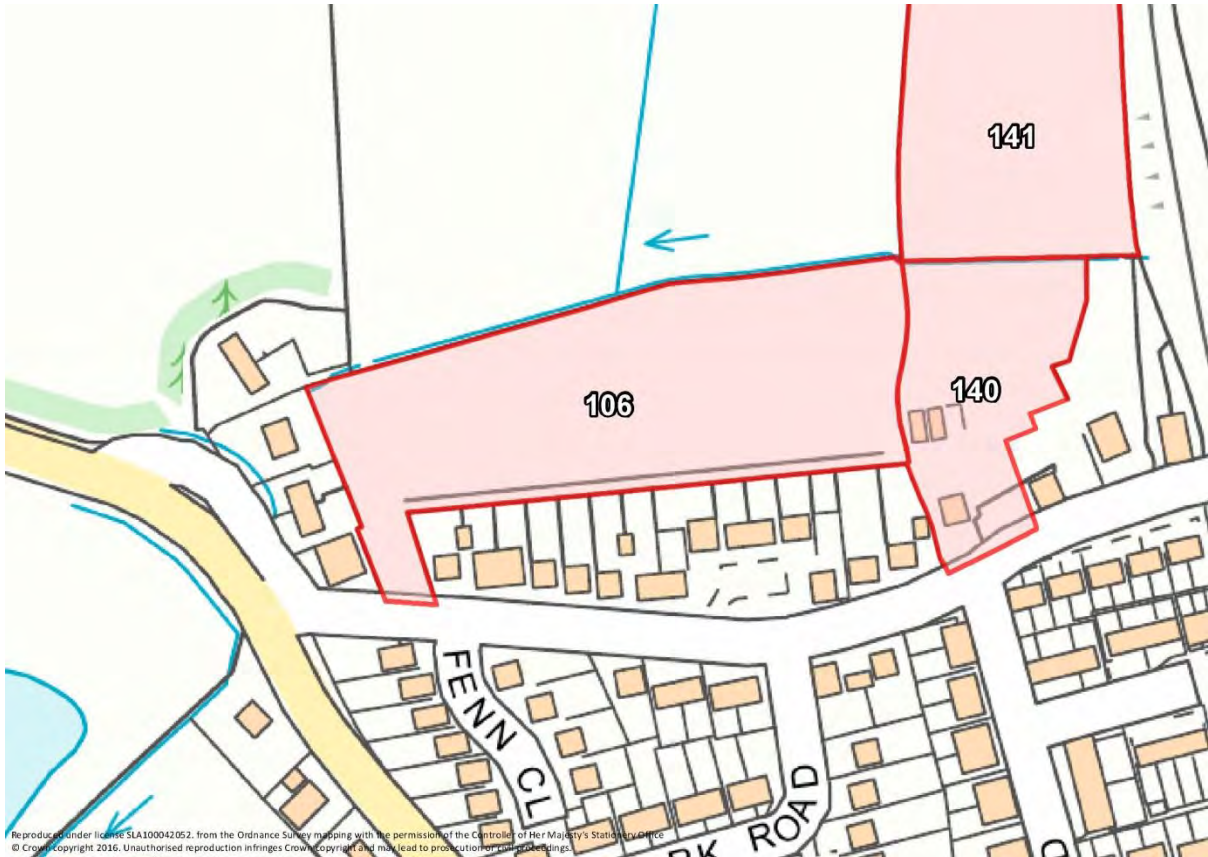
Conclusion

This site is not considered appropriate for allocation in this Local Plan because development of the site would increase coalescence between Halesworth and Holton.

Site 106 - Land to north of 34-48 Old Station Road, Halesworth

Suggested Use: Housing

Site Area: 1.36



This site faces north and is in a prominent location on the edge of Halesworth. The site now has planning permission for housing therefore the site will not be considered any further for allocation as part of the Local Plan.

Site 115 - Land to the west of Halesworth (Block 1)

Suggested Use: Housing

Site Area: 14.40



This site is a large field on the south west edge of Halesworth. The landscape is open and the site is visible from the south and from Walpole Road.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that the proposed development will impact upon the setting of listed buildings: grade II listed Cookley White House to the south and grade II listed The Grange to the south east.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Halesworth Town Council stated that sites 115 and 116 extend beyond the natural edge of the town. Walpole Road is could not support a development of this size. Together these sites would deliver 980 new

dwelling and education and healthcare facilities are inadequate to support this. Such a development would be very unpopular with local people and the town council.

Halesworth and Blyth Valley Partnership stated that sites 115 and 116 together will deliver 980 houses, which is too much for existing infrastructure. These two sites are situated outside of the town envelope, which should end at Duke's Drive.

The landowner referred to the sustainability appraisal noting that the only negative points relate to:

- A) conserving and enhancing the quality and distinctiveness of landscapes and townscapes;
- B) reducing Contributions to Climate change and mitigating the effects;
- C) conserving natural resources.

Point A can be resolved through the provision of a strategic landscaping scheme and the inclusion of attractive open space. With regard to B and C the scale of development on this site and its neighbour (site 116) means that infrastructure can be designed into the scheme to mitigate any impacts. The site is in sole ownership and could be delivered within the next five years. Development on this site would form a natural extension to the town and it is only 14.8 miles from Sizewell, which is expected to see significant employment growth in the near future. It may not be preferable for the whole site to be developed but nonetheless it could accommodate considerable development being both accessible and serviceable.

Members of the Public were opposed to development on this site and raised the following issues:

- major impact upon the landscape to the south west of Halesworth;
- loss of agricultural land;
- increased flood risk;
- sewage network is already at capacity and so cannot support further development
- increased traffic congestion;
- pressure on already stretched healthcare and educational services;
- site is remote from schools, shops, employment and other services and this will increase private car use;
- Halesworth is a 45 minute drive from the nearest hospital in Gorleston;
- town centre shops would be unable to cope with development on this scale;
- the site is a valuable wildlife habitat which could be harmed by the proposed development;
- Halesworth lacks employment opportunities to support an increase in the working age population;
- without jobs to support the additional population many of these houses will be bought by retired people, which will place further strain on local services.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts which cannot be mitigated. Although there is currently no road access this could be provided onto Walpole Road.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity to accommodate new development. There is a key

ridgeline located to the north west of this site. The area is made up of vast arable fields. The size and visibility of this site means that it does make a significant contribution towards the surrounding landscape.

The foul sewer network will require improvement prior to development.

Parts of the site are at risk from surface water flooding.

The site is located in a highly prominent position but landscape impact could be mitigated through careful design.

Large scale development could potentially impact upon the transport and road network.

The site has a high potential for archaeology.

The assessment identifies this site as having the potential capacity to accommodate 288 dwellings at a density of 20 dwellings per hectare. Lower development density would be necessary to help to mitigate landscape impact and to remain in keeping with existing residential development to the north.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect upon natural resources because it would lead to the loss of grade 2 and 3 agricultural. Development would also be in a prominent location that would have a significant negative effect upon the landscape.

Minor positive effects were that development will be in an accessible location for services and will encourage sustainable patterns of movement. The site would also help to meet local housing needs.

This site is in a highly prominent location and adequate mitigation would be difficult.

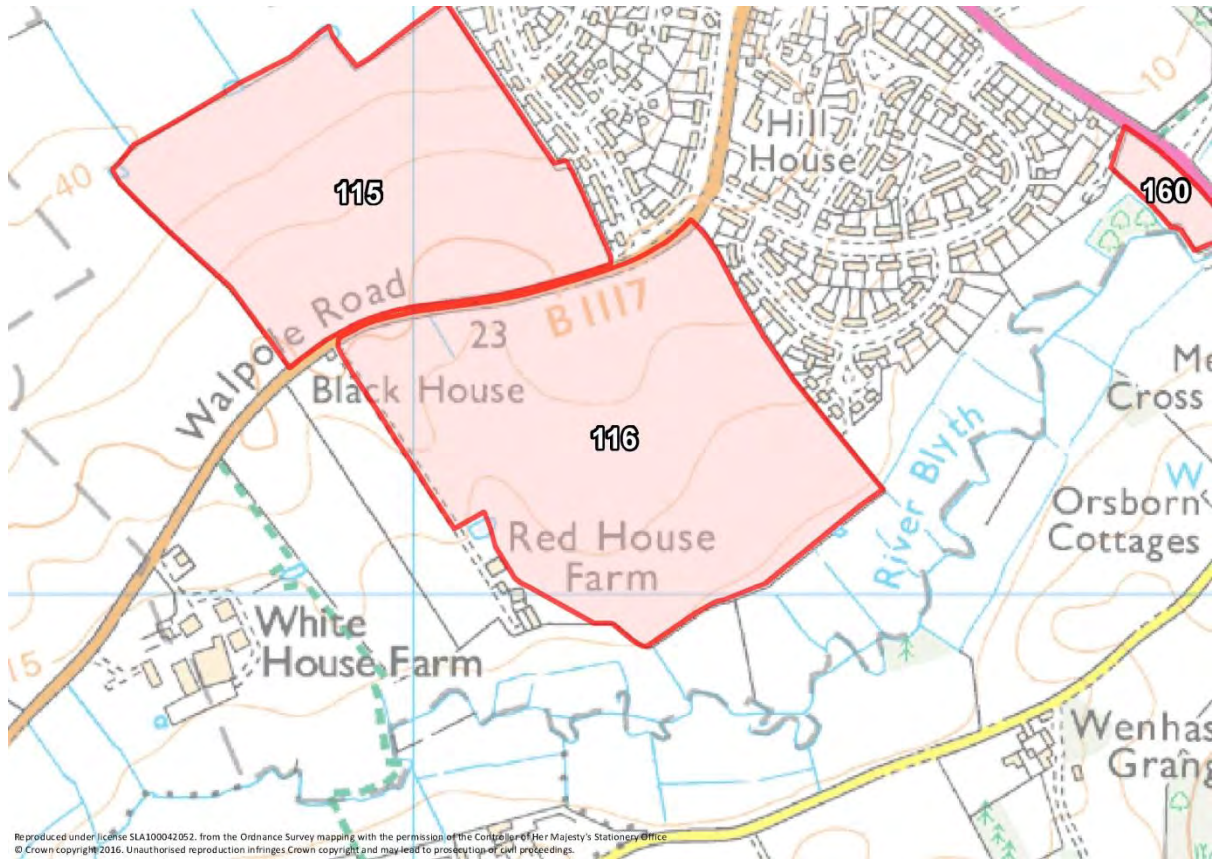
Conclusion

This site is in a prominent location and would have a greater negative effect upon the landscape than some alternative sites. It is also further from the town centre and educational facilities than other sites and is partially located on high grade agricultural land. Therefore, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.

Site 116 - Land to the west of Halesworth (Block 2)

Suggested Use: Housing

Site Area: 18.48



This site is located on the edge of the Blyth valley. This is a large site which slopes downwards towards the river to the south east.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

The Environment Agency has carried out a preliminary desktop study and has identified that this site is located within source protection zone 2.

Historic England cautioned that development on this site will impact upon the setting of two grade II listed buildings: Cookley White House to the south west and The Grange to the south east.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red/Amber' impact with high potential significance and a large allocation.

Halesworth Town Council stated that sites 115 and 116 extend beyond the natural end of the town. Walpole Road could not support a development of 980 houses and medical and educational facilities cannot support the proposed scale of development. Development of this site would be very unpopular with local residents and the town centre.

Halesworth and Blyth Valley Partnership stated that sites 115 and 116 extend beyond the envelope of the town, which should end at Duke's Drive. Existing infrastructure will not be able to support development of this scale.

The landowner noted that the sustainability appraisal exercise gave the same results for sites 115 and 116 and so their response to each was the same. Given the scale of the site it was accepted that developing the entire site might not be preferable but its availability and access meant that it would be important to the future growth of south west Halesworth.

Development on this site would form a natural extension to Halesworth. It is noted that the southern edge of the site is prone to flooding but this area need not be developed. Instead it could be used for landscaping or open space.

Members of the Public were concerned that development on this site would place excessive strain on local services:

- an influx of younger families would place pressure on local schools;
- the site is located at some distance from health facilities in the north of the town;
- the town is remote from the nearest major hospital;
- shops would struggle cope to the additional demand;
- there are inadequate job opportunities to support new development;
- lack of facilities for teenagers will lead to antisocial behaviour.

More generally there was concern that development on this site would:

- pose a threat to local wildlife and that it would increase the risk of flooding;
- result in the loss of productive agricultural land;
- have a major impact upon the character and landscape of the area.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. At the moment there is no road access but access could be provided onto Walpole Road.

A sewer pipe traverses the site. The foul sewer network will require improvement prior to development.

The Settlement Fringe Landscape Sensitivity Assessment identifies this area as having high landscape sensitivity, a moderate value and a moderate capacity to accommodate new development. The site gives very good views towards the Blyth Valley and development along its urban edge would require careful design and landscaping. The site is also visible from the surrounding area and makes a significant contribution towards the landscape. The site borders the river Blyth to the north east and there is a risk from surface water flooding to the south east. There area strips of land at risk from surface water flooding running across the site. Development would be in a prominent location but landscape impact could be overcome through sensitive design. Large scale development could impact upon the surrounding road and transport network.

This site has the potential for remains of Anglo Saxon remains and possibly a cemetery. Development proposals should include a programme of investigation which should identify remains and the impacts of development. It should also suggest measures to manage those impacts.

The assessment identifies this site as having the potential capacity to deliver 333 new dwellings at a density of 20 dwellings per hectare. Lower density development is needed to help mitigate landscape impact and too be in keeping with existing development to the north east. It also allows for a 10% buffer next to the river.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect upon natural resources because it would result in the loss of grade 2 and 3 agricultural land. Development would also be in a prominent location that could have a significant negative effect upon the landscape and townscape. A minor negative effect is that the site may impact on Anglo Saxon remains.

Minor positive effects are that development would be located close to shops, services and facilities, and employment opportunities and will encourage sustainable patterns of movement. The site would also help to meet local housing needs.

The prominent location of this site would mean that it would be difficult to mitigate landscape impact. Development on the eastern edge of this site would also have to be resilient to surface water flood risk.

Conclusion

Similar to site 115, this site is in a prominent location and would have a greater negative effect upon the landscape than some alternative sites. It is also further from the town centre and educational facilities than other sites and is partially located on high grade agricultural land. Therefore, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.

Site 121 - Land west of Moores Cottages, Upper Holton

Suggested Use: Housing

Site Area: 0.33



This is a small site in the eastern corner of a large arable field. There is a tall hedge along part of the southern boundary and a row of cottages borders the site to the west.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial infrastructure is needed to connect to the foul water network, which may not be economically viable.

Historic England cautioned that development on this site would potentially impact upon the setting of Moat Farm House, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have a 'Green' impact.

Halesworth Town Council stated that this site is located in Holton and that it would need to consider any future development proposals in conjunction with Holton Parish Council.

Halesworth and Blyth Valley Partnership noted that this site is outside of the settlement limit but that the area contains a local community. A well designed, environmentally friendly development to meet local need could be considered.

No comments were submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

This site is accessed via a narrow lane and there is no pedestrian access, which could not be provided without significant investment which would render the site unviable. There are currently few passing places, as well as no pavements or separate cycle lanes.

Offsite infrastructure would be needed to connect this site to the foul water network, which might not be viable.

High surface water flood risk is located in the middle of the site.

The Settlement Fringe Landscape Sensitivity Assessment identified this site as being of high sensitivity and moderate value, with a moderate capacity for development. This is a small site bordered by a tall hedge on one side and houses to the east. Although open to a large field to the west it is unlikely that this site contributes significantly to the landscape.

Development on this site would be highly visible from the northwest but this could be mitigated through careful design and aligning development with the existing Moores Cottages.

Mature hedgerow bordering the site could act as a habitat for biodiversity.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that development on this site would lead to the loss of agricultural land, would impact upon local biodiversity and would lack access to services and would not encourage sustainable movement patterns.

The one minor positive effect is that development will meet the housing needs of the local community.

There was uncertainty about the impact upon the landscape but it is thought that any impact is likely to be a minor negative effect.

Tree and hedge planting to the south and west of the site will help to mitigate landscape impact.

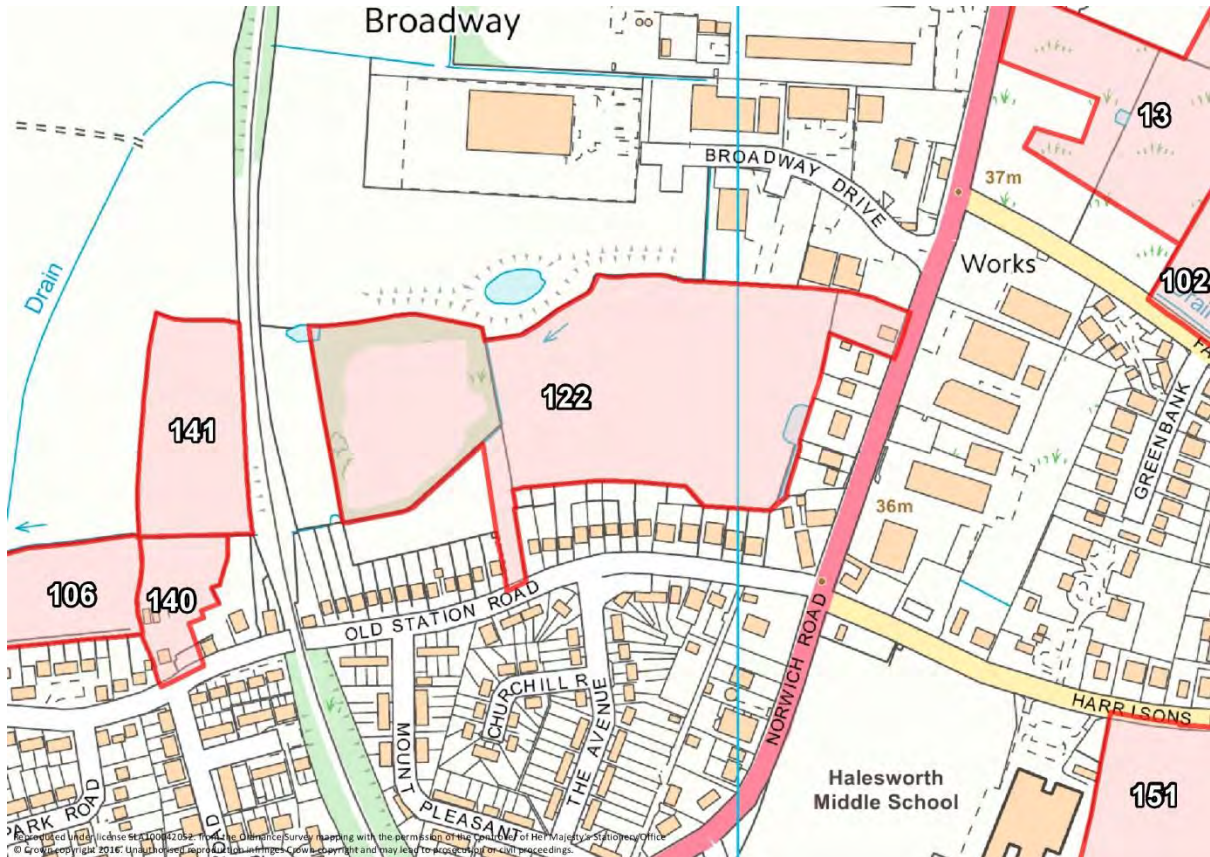
Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation in this Local Plan.

Site 122 - Land west of Norwich Road, north of Old Station Road, Halesworth

Suggested Use: Housing

Site Area: 5.28



This site is a valley that extends westwards between residential development on Old Station Road and Broadway Drive. The eastern half of the site is a large open field and the western half of the site is heavily overgrown. The site is surrounded by hedgerows and is not easily visible from the public road.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development will impact upon the setting of Wissett Place, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Halesworth Town Council was concerned that this site, together with sites 106, 140 and 141 will deliver a

total of 237 houses and that drainage would be inadequate. Wissett Road is already heavily used and could not adequately serve the resulting additional traffic. This would increase safety concerns for the pupils of the Edgar Sewter School. Healthcare, educational and sewerage network would also all need considerable improvement.

Halesworth and Blyth Valley partnership cautioned that development on this site would encroach into the gap between industrial and residential development and there are also major drainage issues on the site.

Hopkins Homes reiterated its claim in the Call for Sites about the suitability of the site for housing and open space. The site is sustainably located, within walking distance of the town centre and railway station and is surrounded by the built environment. The site is 4.9 ha in size and can accommodate 150 dwellings. Access is via the A144 and pedestrian access is possible via the public open space on Old Station Road.

Members of the Public considered this site to be in a reasonably sustainable location that was close to the town centre. Development here would also reduce the need to develop land in the strategic gap or on large sites to the south west of the town. Housing development here would make the town more compact and sustain the town centre.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints which cannot be mitigated. Access to the site can be provided via Broadway Drive or Old Station Road.

Electricity lines cross the site. The foul sewerage network would need improvements to support development.

There are areas of low to medium surface water flood risk on the site.

The Settlement Fringe Landscape Sensitivity Study identifies this site as having high landscape sensitivity and value and a low capacity for development. It is a large site but one that is fairly enclosed in the landscape and not easily visible from the surrounding area. This reduces its contribution to the surrounding landscape. There is low to medium surface water flood risk across the area. This site is heavily overgrown in the western half and a close cropped arable field in the eastern half. The site is surrounded by tall hedges and an area of shrubs and trees divides the eastern and western half of the site.

Hedgerows and trees on the site have the potential to support biodiversity.

The site acts as a buffer between residential development to the south and industrial uses to the north. A small buffer zone should be maintained to separate employment land from new residential development.

The site has a high potential for archaeology.

The assessment identifies this site as having potential capacity to develop approximately 118 new dwellings at a density of 25 dwellings per hectare. This includes a 10% buffer next to the employment area to the north.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects arising from development on this site. Minor negative effects are that that development would lead to the loss of agricultural land and harm local biodiversity. Development would also have a minor negative effect on the landscape.

Minor positive effects are that development would be located near services and facilities and will encourage sustainable patterns of movement. It would also help to meet local housing needs.

There is an unknown impact on the historic environment associated with this site, but this is likely to be negative.

Sensitive design and the retention of trees and shrubs on the site would help to mitigate landscape impact.

Conclusion

Site 122 is located in an area of high landscape value but is contained in the landscape by existing development on three sides and the railway line to the west. The site is close to shops, services and employment opportunities. However, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan which are either closer to the town centre, have more benign impacts or deliver wider benefits. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. In this context, the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan.

Site 140 - Site to the rear of 51 Old Station Road, Halesworth (1)

Suggested Use: Housing

Site Area: 0.51



This site is set on a north facing slope on the edge of Halesworth. The site is bounded by mature hedgerows and is currently made up of pasture.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site will impact upon the setting of Wissett Hall, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

No comments were submitted by town or parish councils in response to this site.

Halesworth and Blyth Valley Partnership stated that sites 140, 141 and 106 will together place too much pressure on Wissett Road. The junction between Wissett Road and Norwich Road is the narrowest in Halesworth and this will increase traffic dangers for pupils at the Edgar Sewter Primary School.

No comments submitted by developers or landowners in response to this site.

Members of the Public stated that development on this site would remove the need to develop land in the strategic gap or on the large sites on the south west edge of the town. Development in this location would make the town more compact and also support the town centre.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. The foul sewer network will require improvement prior to development.

There is a railway line to the east of the site, which could create issues with noise.

The Settlement Fringe Landscape Sensitivity Study identifies this area as being of high landscape sensitivity, a high landscape value and having a low capacity for accommodating new development. The southern edge of the site is bordered by a sensitive urban fringe. This site is located on the southern face of a valley in an area of fields and so is visible in the landscape. Its contribution to the surrounding landscape is therefore significant.

There is a risk of surface water flooding along the north and western edges of the site.

This is a north facing site in a valley surrounded by mature hedges and trees. Landscape impact could be mitigated by sensitive low rise development. Trees and hedges surrounding the site have the potential to support biodiversity.

Entrance to the site is located at the end of Old Station Road, which is a narrow cul-de-sac, which could require improvement prior to development.

There is strong potential for archaeological remains on this site. Proposals for development should be accompanied by a programme of archaeological investigation.

The assessment has identified this site as having the potential capacity to accommodate 10 new dwellings at a density of 20 dwellings per hectare. A lower density is needed to reduce landscape impact.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were the loss of agricultural land. Development would be visible in the landscape but it would only have a minor negative effect.

Minor positive effects are that development would be located in close proximity to services and employment, and will encourage sustainable transport patterns. Proposed development would help to meet local housing needs.

A small development with a sensitive design would help to mitigate landscape impact.

Conclusion

This is small site which is well contained within the landscape and, and development is unlikely to have any significant negative impacts. The site is therefore allocated for 10 dwellings under Policy WLP4.3 of the First Draft Local Plan.

Site 141 - Site to the rear of 51 Old Station Road, Halesworth (2)

Suggested Use: Housing

Site Area: 1.18



This site is a south facing field that faces site 140 to the south. This site is bounded on all sides by mature trees and hedges and the railway line bounds the site to the east.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

No comments were submitted by town or parish councils in response to this site.

No comments were submitted by other organisations in response to this site.

No comments submitted in response to this site.

Members of the Public stated that development on this site would remove the need to develop land in the strategic gap or on the large sites on the south west edge of the town. Development in this location would make the town more compact and also support the town centre.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. Road access would have to be provided via sites 106 or 140.

The foul sewer network requires improvements prior to development.

A railway line runs to the east of the site which could create issues with noise. However the site is compatible with other neighbouring uses.

The Settlement Fringe Landscape Sensitivity Study identifies this area as being of high landscape sensitivity, a high landscape value and having a low capacity for accommodating new development. The southern edge of the site is bordered by a sensitive urban fringe. Development on this site would form an incursion into the countryside but landscape impact could be mitigated through low density development and sensitive design.

There is a moderate to high risk of surface water flooding in the middle of the site. The site is on the northern side of a valley and is not currently connected to the existing settlement.

Development could extend the built area on neighbouring sites 106 and 140 and sensitive design and landscaping could mitigate landscape impact.

Surrounding hedgerows and the railway embankment could serve as wildlife habitat.

There is strong potential for archaeological remains on this site. Proposals for development should be accompanied by a programme of archaeological investigation.

The assessment identifies this site as having potential capacity for 24 new dwellings at a density of 20 dwellings per hectare. This would be consistent with development densities on site 140 to the south and existing residential area along Old Station Road. It would also help to mitigate landscape impact.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect upon the landscape because of the site's prominent location.

Minor negative effects are that development would result in the loss of agricultural land and would impact upon local biodiversity.

Minor positive effects are that development would be located close to shops, services and facilities. It would also be close to employment opportunities, which would support sustainable patterns of movement. Development would also help to meet local housing needs.

There is uncertainty regarding the impact of development upon historic remains on the site.

Low density development and sensitive design would mitigate landscape impact.

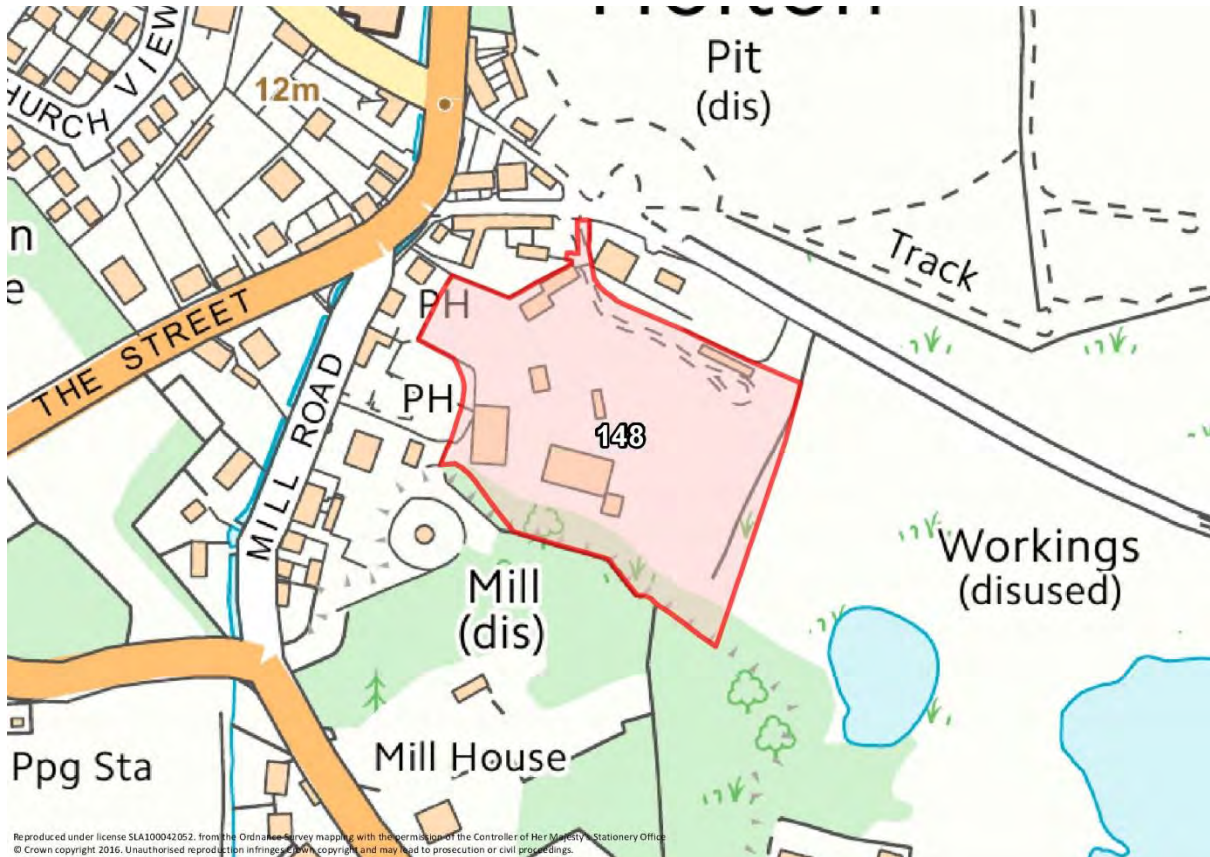
Conclusion

Development on this site would form an unnatural extension into the countryside in a sensitive landscape. The site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.

Site 148 - The Sawmill, Sandy Lane, Holton, Halesworth

Suggested Use: Housing

Site Area: 1.37



This site is the site of a former sawmill which is located close to the historic heart of Holton as well as sites of biodiversity value. The site itself is set in a depression with a wooded embankment to the south.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, a 'Green' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

The Environment Agency identified this site as being located within source protection zone 2.

Historic England cautioned that development on this site could impact upon the setting of the conservation area and the following grade II listed buildings: Montagu Cottage; K6 telephone kiosk; Holton Mill; Millside and Myrtle Cottage.

Suffolk County Council Archaeology noted that the development of this site would have a 'Green' impact.

Halesworth Town Council noted that this site is located in Holton and that Halesworth Town Council and Holton Parish Council should look together at proposals on this site.

Halesworth and Blyth Valley Partnership stated that this site will be difficult to develop because of the restrictions on it. This site is part of an area of natural open space in Holton.

The landowner stated that the number of houses suggested for the site (5) is too low and that 45 – 55 houses would be more appropriate for a house of this size. However the landowner is open to discussion about the final use of the site and would welcome any feedback from the Council.

The landowner's agent stated that this site is located just outside the settlement boundary of a larger village. Development on this site would be in a sustainable location and would help to support the village and local services. Historically the site has been used as a sawmill, but more recently for storage and distribution with ancillary retail use (ref. DC/10/1572/FUL). Development of this site would therefore be in line with local and national policies, which seek to redevelop previously developed land in preference to greenfield sites. It would also protect more sensitive parts of the landscape from development.

Point 11 of the sustainability appraisal matrix identifies the site as agricultural land but contradicts point 14, which states that development of this site would result in the loss of an employment site. This site has not been in agricultural use for more than 200 years – a point recognised by the Council in the committee report in application DC/15/0871/FUL. Although the site has permission for employment uses these have never been implemented and so its development would not result in the loss of employment land.

This site is well screened and contained in the landscape and so would not impact upon the landscape and it would also not erode the strategic gap. Sites 65 and 87 are both located within the strategic gap, which was identified in the Green Infrastructure Strategy as important to the character of both communities and so should be protected. While this site is located adjacent to the Holton conservation area sensitive development would not harm the conservation area or views into or out of it. Sensitive development would not impact upon either the Holton Pit Site of Special Scientific Interest or the nearby County Wildlife Site.

The site is available immediately and could be developed within 3-5 years. The landowner wishes to release the site without delay. Development of the site for residential uses would be viable taking into account requirements for CIL payments and affordable housing.

In conclusion the site is deliverable, viable and available. Development of the site for approximately 20 dwellings would constitute sustainable development. Environmentally it is the least sensitive site put forward on the fringes of Holton, being located on brownfield land outside of the strategic gap, which is well enclosed in landscape terms. Local services are easily accessible on foot and there are good transport links. Development would bring underused brownfield land back into use and would support local services and facilities. It would deliver much needed housing for local people and a policy-compliant level of affordable housing.

Members of the Public stated that it should continue to be used for its existing light industrial use. There was also concern that the site and Holton village were vulnerable to flooding.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. Access is currently too narrow and input from the Highway Authority will be needed prior to development. Road access issues will have to be overcome prior to development taking place.

An electricity line runs across part of the site. The foul sewer network will require improvement prior to development.

There is possible contamination from employment uses that took place in the past on this site.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity to accommodate new development. This site is situated in a depression in the landscape, which is bordered to the south by a steep and overgrown bank. The site is next to designated wildlife sites but is situated away from public roads and as a result and its contribution to the surrounding landscape is limited.

The site is located in source protection zone 2.

The southeast corner of the site is susceptible to surface water flooding.

The site is adjacent to a site of special scientific interest and a county wildlife site, which contains a pond. A hedge borders part of the site and there are trees on the embankment to the south of the site. This site is adjacent to the conservation area and is part of a historic settlement area.

The assessment identifies this site as having the capacity to deliver 27 dwellings at a density of 20 dwellings per hectare. This takes account of the site's rural location on the edge of a village near to a conservation area and will help to mitigate landscape impact.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were the loss of employment land and the loss of agricultural land. Development on this site would have a minor negative landscape and biodiversity effect.

Minor positive effects were that development would be located close to services and employment, would reuse vacant land and will encourage sustainable movement patterns.

There uncertainty regarding the impact of development upon the conservation area. The site is enclosed in a depression in the landscape but the site is close to the conservation area so minor negative effect is possible.

Mitigation measures will be needed to protect the neighbouring county wildlife site and site of special scientific interest.

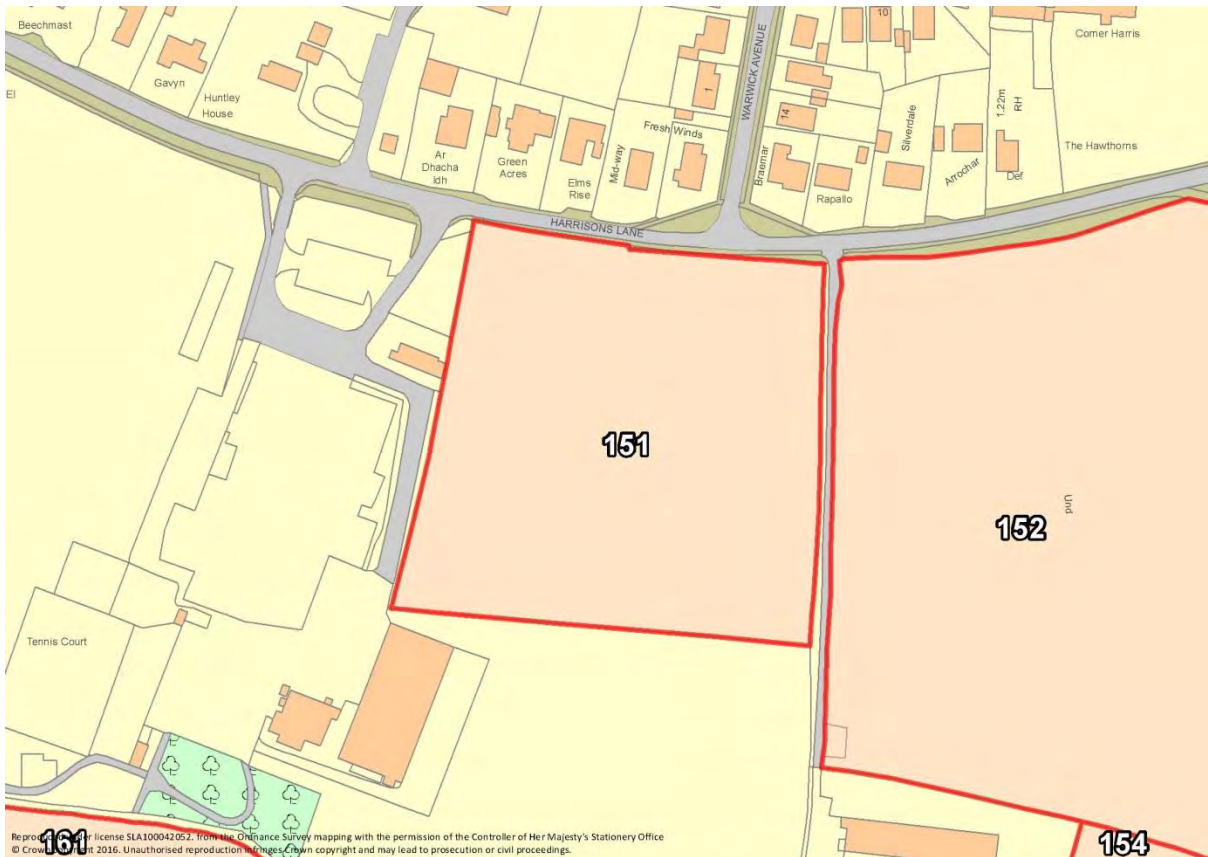
Conclusion

This site is enclosed in the landscape and development would have a minimal impact upon the landscape. While the site is located close to shops, services and employment opportunities in nearby Halesworth there are other sites which are located closer to Halesworth and so would be more sustainably located. Other sites in Holton have a lesser impact on the landscape. This site is a former employment site and so may suffer from contamination issues, particularly as it is located within source protection zone 2. The site also suffers from poor road access. Therefore, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.

Site 151 - Town Farm 1, off Harrison's Lane, Halesworth

Suggested Use: Housing

Site Area: 1.54



This site is a flat field enclosed by the former middle school site to the west and south. Harrison's Lane borders the site to the north and there is a large arable field to the east. Site 151 is surrounded by hedgerows.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site will impact upon the setting of grade II listed Town Farm.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

Halesworth Town Council stated that this site, along with sites 152, 153 and 161, should be allocated for sports and recreational facilities.

Halesworth and Blyth Valley Partnership stated that this site should be designated for sport and recreational facilities.

No comments were received from developers or landowners in response to this site.

Members of the Public were concerned that development on this site would increase pressure on roads, shops, schools and healthcare facilities. It will also increase the risk of flooding. The site was too far from shops and services in the town centre, which will increase traffic on the roads. Development would lead to the erosion of the strategic gap and the creation of urban sprawl. This site is currently productive farmland and so should not be developed. There were preferable sites for development on the northern and western edges of the town.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. The water recycling centre has capacity but the foul sewer network will require improvement prior to development.

There is a small risk of surface water flooding in the south west corner.

This is a flat site surrounded by trees and hedges. Development on this site would be exposed to the landscape to the east. The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity for the landscape to accommodate new development. Site 151 is located next to a sensitive urban edge but is flat in the landscape and surrounded by hedges. It is not visible from the east and its contribution to the landscape is minimal.

Trees and hedges surrounding the site could support biodiversity.

Junctions with Norwich Road may also require improvement if the site is developed.

Operations at Town Farm could create issues with noise and odour.

The site has a high potential for archaeology.

The assessment identifies this site as having potential capacity to accommodate 46 new dwellings at a density of 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects arising from development on this site. Development would have a minor negative effect on the landscape and on natural resources.

Minor positive effects were that development would be located close to services and employment which would also encourage sustainable transport methods. The site could also help meet local housing needs.

Use of landscaping and tree planting would be needed to mitigate landscape impact, particularly along the eastern boundary.

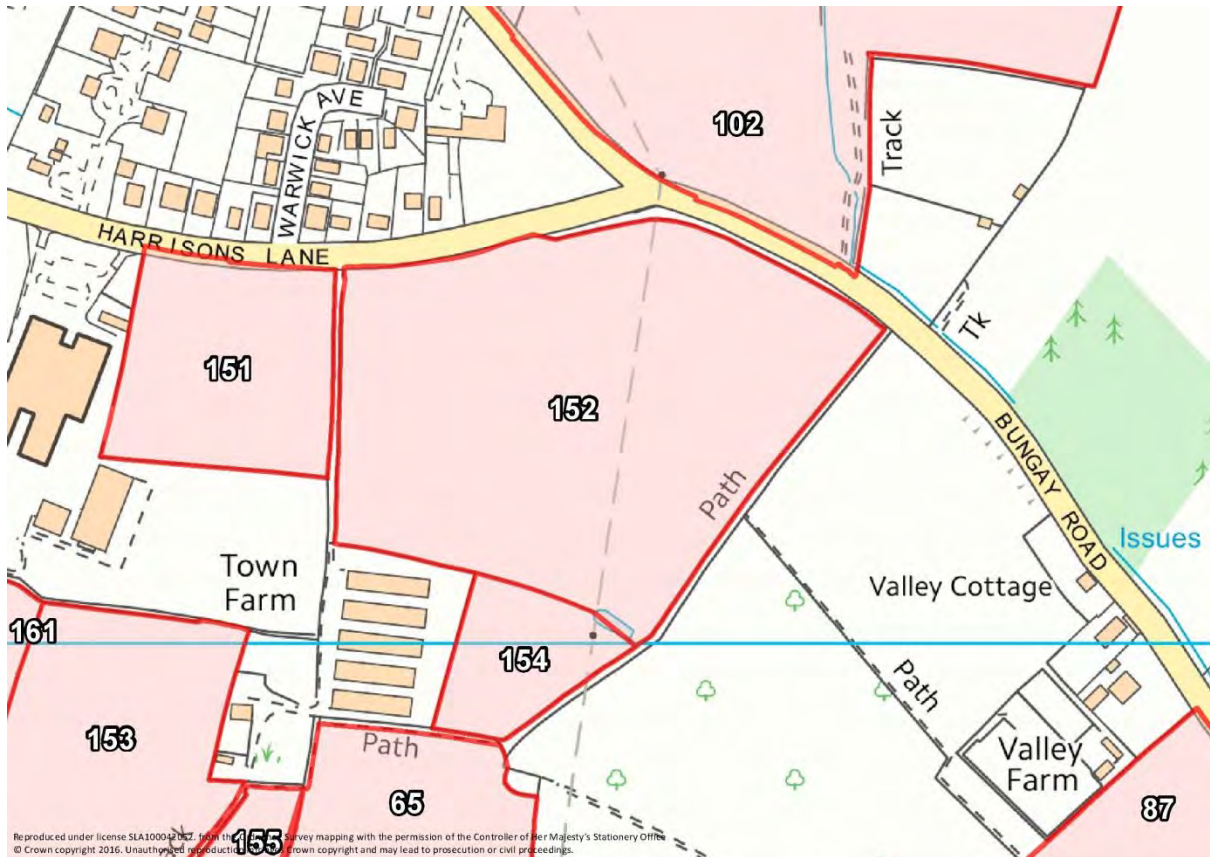
Conclusion

This site is enclosed by playing fields to the south and west and residential development to the north. It is flat and reasonably enclosed in the landscape. Residential development would be unlikely to harm the landscape and would be located close to services, facilities and employment opportunities. This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.

Site 152 - Town Farm 2, off Harrisons Lane, Halesworth

Suggested Use: Housing

Site Area: 5.45



This site is a large arable field that slopes downwards towards Holton to the east. The site is surrounded by mature hedgerows on all sides.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site will impact upon the setting of grade II listed Town Farm.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Halesworth Town Council believed that too many houses have been proposed on this site and that it would encroach upon the strategic gap.

Halesworth and Blyth Valley Partnership stated that the western part of the site should be developed for sport and recreational uses; the eastern part should be used to retain the strategic gap between Halesworth and Holton, as detailed in the Green Infrastructure Strategy.

No responses were received from developers or landowners in response to this site.

Members of the Public drew attention to drainage problems on the site and were concerned about the increased risk of surface water flooding. There was also concern that the location was remote from the town centre, which would encourage increased car use. Development of the site would reduce the size of the strategic gap and create urban sprawl. This site is part of a network of fields and hedges that separates Halesworth from Holton and is important to the character of the area. The site is bordered by a green lane, or 'loke', which is a distinctive landscape feature. In addition the site was identified as productive agricultural land and so should not be developed.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. Road access could be provided directly from Harrisons Lane or via Town Farm.

Electricity lines run across the eastern part of the site. The foul sewer network requires improvement prior to development.

There are areas of surface water flood risk in the middle and northwest of the site.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity for the landscape to accommodate new development. This landscape area is a remnant of ancient landscapes and field patterns. This site is situated on a key ridgeline and is quite visible from public roads. Its contribution to the wider landscape is therefore significant.

Development would be in a highly prominent location but this could be mitigated through sensitive design and landscaping.

Hedges and tress surrounding the site have the potential to host biodiversity.

Harrisons Lane is narrow and does not have a designated cycle path, although it is part of a national cycle route. There is also a pavement running along the southern edge of the road. The junction between Norwich Road and Fair View Road may also require improvement.

There is the possibility of noise and odour issues from Town Farm to the south.

This is a large site in an area of high archaeological potential. Development on this site should be accompanied by a programme of archaeological investigation to identify archaeological remains, development impacts and measures to manage impacts and preserve archaeological remains.

The assessment has identified this site as having the potential capacity to accommodate 110 dwellings at a density of 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects include the loss of agricultural land and the landscape impact.

Minor positive effects from development on this site are that it would be located close to services and employment and will encourage sustainable patterns of movement. The site would also provide housing to help meet local needs.

Proposed development should include tree planting and landscaping to mitigate landscape impact.

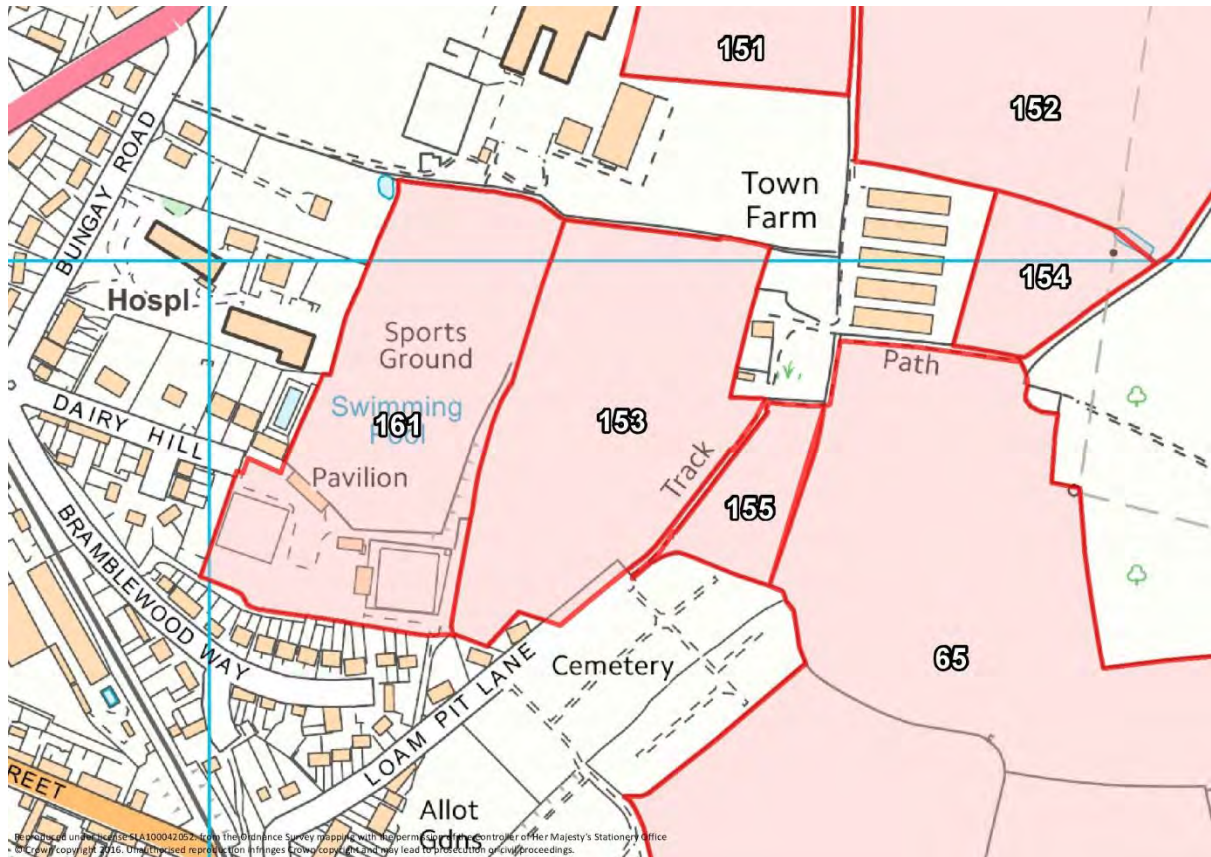
Conclusion

This site would form an incursion into the countryside but mature trees and hedges surrounding the site would help to reduce its impact on the landscape. Development on this site would form a natural extension to that on neighbouring site 151 and would have less landscape impact compared to other sites surrounding Halesworth. Residential development would be located close to services, facilities and employment opportunities. This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.

Site 153 - Town Farm 3, off Harrisons Lane, Halesworth

Suggested Use: Housing

Site Area: 2.92



This is a large site located to the east of the existing sports ground. This site is in a prominent location and slopes down towards Holton to the east.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency identifies this site as being located in source protection zone 2.

Historic England cautioned that development on this site would impact upon the setting of Town Farmhouse, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact. Full details can be found on the Council's website.

Halesworth Town Council believes that sites 151, 152, 153 and 161 should be used for new sports facilities.

Halesworth and Blyth Valley Partnership believed that sites 153 and 155 could both be linked to developments on site 161.

An owner of part of this site expressed concern that the road network could not support further development. This site is currently only accessible via the neighbouring chicken farm and the nearest roads serving the area are quite narrow. Development on this site would be quite prominent and would harm the appearance of the town. The sloping countryside is an important part of the approach to the town and the site is part of an area of fields and ancient hedgerows which are an important part of the landscape character. Development would impact upon the setting of a listed building. This site is productive agricultural land which is not suitable for development.

Members of the public supported the redevelopment of these sites with new health facilities. However there was concern that development on this site would lead to erosion of the strategic gap. There was a feeling that not enough had been done to inform local residents about the consultation and that this should invalidate any land use allocations on the site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access can be provided through nearby sites. This site can be made attractive to the market if road access is installed.

The foul sewer network will require improvement prior to development.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located within an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for accommodating new development. Site 153 is a sloping site which would be visible from the surrounding area and also borders a sensitive urban fringe to the south and is a remnant of ancient field patterns. However the site is less prominent than neighbouring sites to the north and south and so makes a smaller contribution to the surrounding landscape. Development would be in a prominent location and careful design would be needed to mitigate landscape impact.

There is a hedgerow along the boundary together with mature trees.

The surrounding road network is quite narrow and the junction between Fair View Road and Norwich Road may require improvement.

This is a large site in a prominent location with potential for archaeological remains. Development proposals should be accompanied by a programme of archaeological investigation. This should identify remains and the impact of development. It should also suggest a programme for managing that impact, including preservation in situ.

This site could accommodate 88 new dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that development on this site could impact on the landscape in terms of views between Halesworth and Holton. Another negative effect was that development would result in a loss of agricultural land.

Minor positive effects are that development would be located close to services and facilities and would encourage sustainable transport methods. Development would help meet local housing needs.

Retention of existing trees and hedges will mitigate landscape impact. Consideration should also be given to design and landscaping in order to mitigate landscape impact.

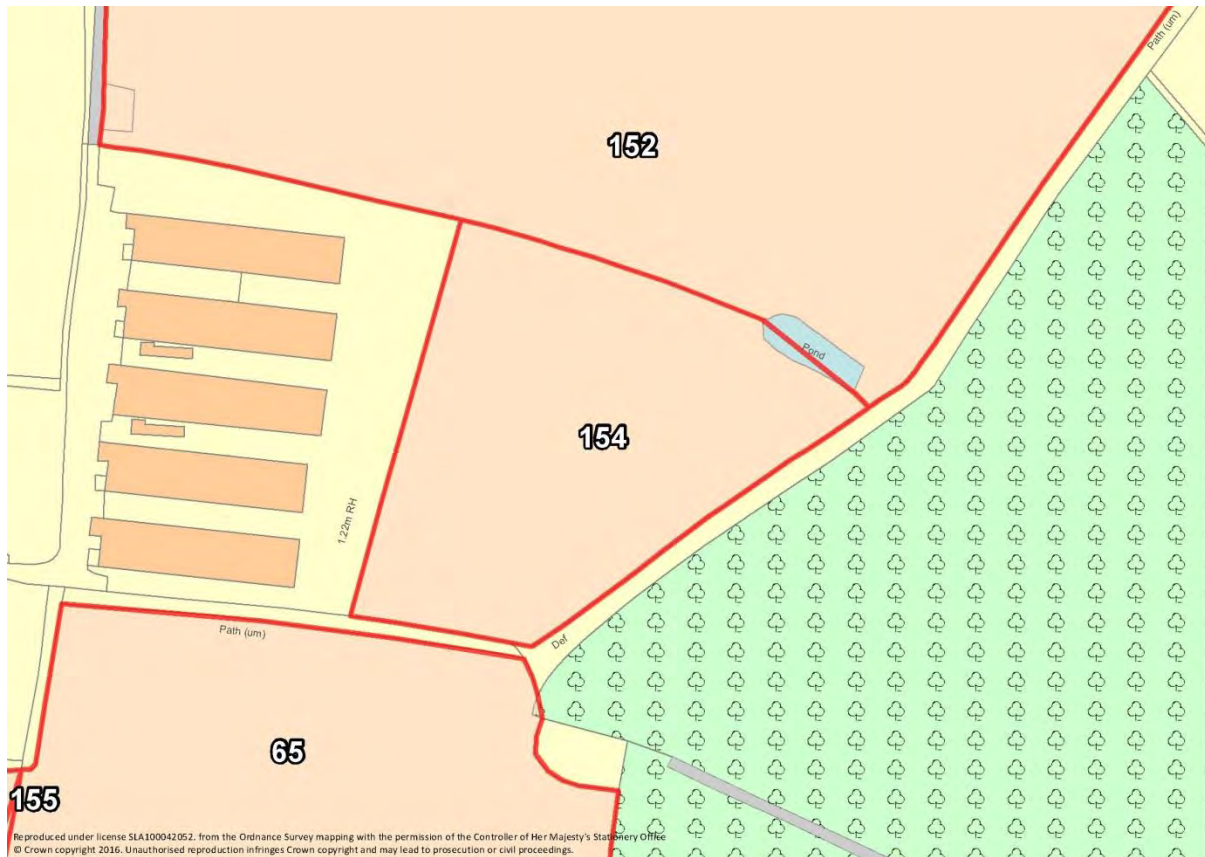
Conclusion

This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.

Site 154 - Town Farm 4, off Harrisons Lane, Halesworth

Suggested Use: Housing

Site Area: 0.69



This site is a small flat field located to the east of Town Farm. The site is isolated from the road and surrounded by tall trees and hedges. The site is in a prominent location with good views to the south and east.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site could impact upon the setting of grade II listed buildings: Town Farmhouse to the west and Hill Farmhouse to the south.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

Halesworth Town Council stated that this is an isolated site but could be considered for development as part of proposed sports facilities on a neighbouring site.

Halesworth and Blyth Valley Partnership states that site 154 will suffer from access problems unless part of site 65 is developed as well.

No comments were submitted by developers or landowners in response to this site.

Members of the public were concerned that development on this site would lead to the creation of urban sprawl between Halesworth and Holton. This site is part of a network of fields and hedges that forms an important part of the local landscape. A nearby 'loke', or green lane, is also an important landscape feature which must be preserved. This site also suffers from inadequate drainage and is prone to surface water flooding. The site is poorly linked to the existing road network and is distant from the town centre, which will increase car use and cause congestion. Sites to the north and west of the town were identified as preferable locations for development. Development of this site will result in the loss of productive agricultural land.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment has not identified any constraints that cannot be mitigated. Access to this site can be achieved through neighbouring site 152, which is in the same ownership.

Electricity lines cross the site from north to south. The foul sewer network will require improvement prior to development.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located in an area of high landscape sensitivity, moderate landscape value and with moderate capacity for new development. The surrounding landscape is an ancient remnant of earlier farming patterns. Although located in a prominent location the site is bordered by tall trees and thick hedgerows which obscure it from the surrounding area.

The trees and hedges surrounding the site make a positive contribution to the landscape and biodiversity and should be retained.

The site is visible from the south and east.

Location of this site means that there is potential for archaeological remains. There is no objection in principle to development on this site but proposals should be accompanied by a programme of archaeological investigation.

Town Farm to the west could create issues with noise and odour.

The assessment has identified this site as having potential capacity for 14 dwellings at a density of 20 dwellings per hectare. This is in accordance with the density on site 152 and would mitigate landscape impact.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Loss of agricultural land would have minor negative effects on the site. Development would have a minor negative effect on the landscape and on biodiversity.

A minor positive effect is that the site located close to services and employment and could encourage sustainable movement patterns. Development would help to meet local housing needs.

Development should retain trees and hedges surrounding the site to mitigate landscape impact. Consideration should also be made in regards to design and landscaping.

Conclusion

This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.

Site 155 - Town Farm 5, off Harrisons Lane, Halesworth, Suffolk

Suggested Use: Housing

Site Area: 0.53



This is a small site located between the cemetery to the south and Town Farm to the north. The site slopes gently towards the south but is fairly flat and is surrounded by mature trees and hedges.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has identified this site as being located in source protection zone 2.

Historic England cautioned that development on this site could impact upon the setting of grade II listed buildings: Town Farmhouse to the north and Hill Farmhouse to the south.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

No comments submitted by town or parish councils in response to this site.

Halesworth and Blyth Valley partnership states that development on this site could be linked to development on site 161.

No comments submitted by developers or landowners in response to this site.

Members of the public were concerned that development on this site would erode the strategic gap and lead to coalescence between Halesworth and Holton. This site is a rare example of an enclosed paddock and so is considerable landscape value. The site is part of the peaceful setting of Halesworth cemetery. It should also be conserved because of its wildlife value. Access to the site would be via Loam Pit Lane which is narrow and already experiences congestion. Sites to the north and west of the town were identified as being preferable for development. Not enough was done to inform members of the public about the consultation and this should invalidate any allocation on the site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to this site is via a narrow track which is too narrow to support development and improvement is not possible.

The foul sewer network will require improvement prior to development.

The Settlement Fringe Landscape Sensitivity Assessment identifies this site as being located in an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for new development. The site is set in an ancient remnant landscape and is surrounded by tall trees. The site is small and sandwiched between the cemetery and farm buildings.

Trees surrounding the site make a positive contribution to the landscape and biodiversity although the site itself is not visible from a distance.

New housing on the site would be visible from the south but landscape impact could be mitigated with low rise, careful design.

Development could impact upon the setting of the cemetery and farmhouse to the north-west. Road access would require significant improvement and there is the risk of congestion along Loam Pit Lane.

Location of this site means that there is potential for archaeological remains. There is no objection in principle to development on this site but proposals should be accompanied by a programme of archaeological investigation.

There is the risk of noise and odour caused by Town Farm to the north.

This site could accommodate 10 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects include the loss of agricultural land and a negative impact on the landscape. Development would also have a minor negative effect upon Halesworth Cemetery and local biodiversity.

Minor positive effects are that development would be located close to services and employment and could help promote sustainable transport. Development would help to meet local housing needs.

Development should retain trees and hedges surrounding the site to mitigate landscape impact.

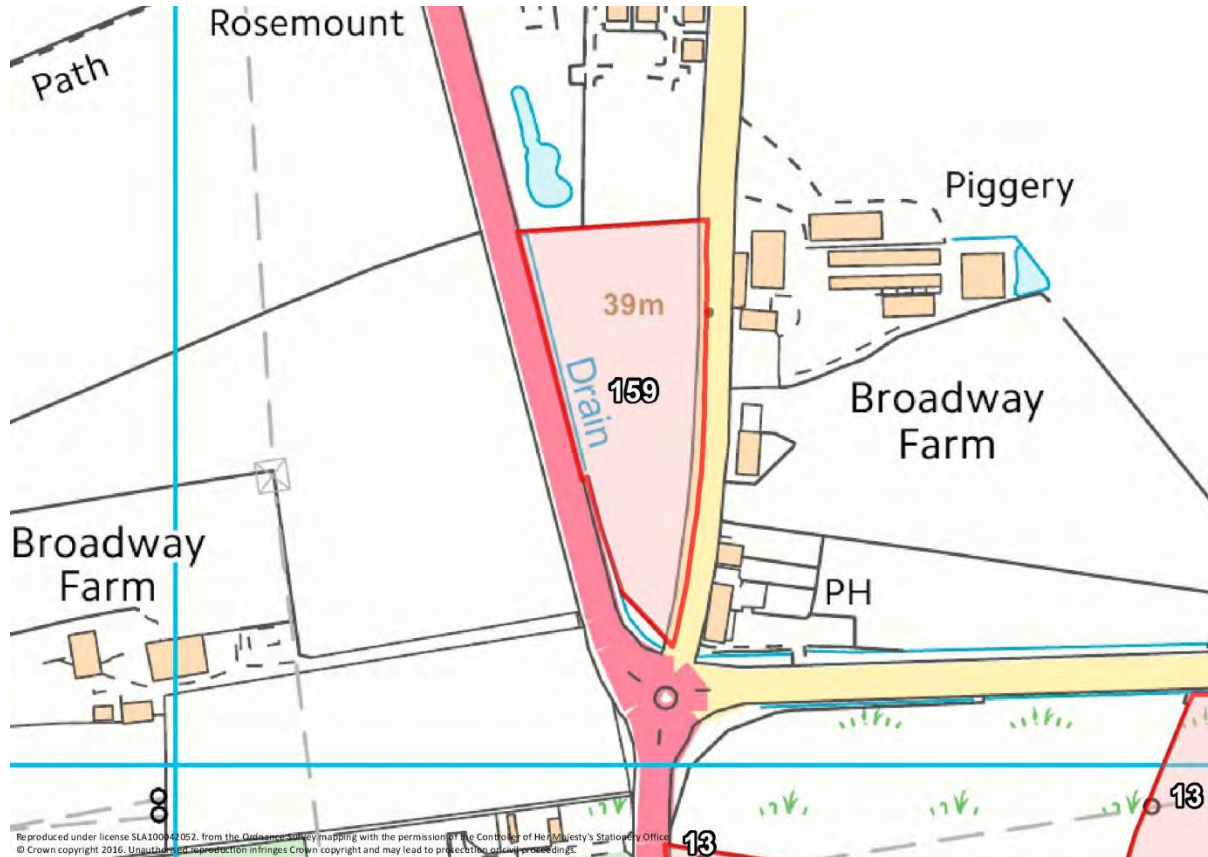
Conclusion

This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.

Site 159 - West of A144 opposite Triple Plea, Halesworth / Spexhall

Suggested Use: Not specified

Site Area: 0.99



This is a flat site surrounded by mature hedgerows and trees. The A144 bounds the site to the west and a narrow lane to the east with the Triple Plea pub facing the southern corner of the site. The surrounding landscape is flat and made up of arable fields. Farm buildings bound the site to the east.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have an 'Amber' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

Halesworth Town Council stated that this is a very small site on the boundary with Spexhall. Halesworth Town Council and Spexhall Parish Council therefore need to look at development on this site together.

Halesworth and Blyth Valley Partnership stated that this site could be allocated for a small housing development, possibly in conjunction with any industrial development to the north of Halesworth.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. Both the water recycling centre and foul sewer network will require improvement prior to development.

There is a minor risk of surface water flooding in the north east corner.

Development on this site would be located in a landscape comprising of flat farmland and would be poorly connected to the existing settlement.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located in an area of high landscape sensitivity, moderate landscape value and moderate capacity for new development. This site set in an ancient remnant landscape and trees and hedges surrounding this site make a significant contribution to the landscape. Low density development and appropriate landscaping could help to mitigate landscape impact.

Hedges and ditches surround the site on all sides.

The public house and farm buildings to the east of the building are of historic value.

The site is bordered by a narrow lane to the east (which is also a national cycle route) and the A144 to the west. The two meet at a small junction, which is considered too small for the volume of traffic it handles and is probably unsafe for cyclists. The nearby A144 could create issues with noise for residential development because part of the road bordering the site has a speed limit of 60 miles per hour.

A Roman road runs along the western side of the site. Development proposals should be accompanied by a programme of archaeological investigation.

This site is no longer available for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that development would lead to the loss of agricultural land and a negative impact on biodiversity.

Minor positive effects are that development would be located close to services and facilities within Halesworth. Proposed development would help to meet local housing need and encourage sustainable patterns of movement.

The landscape impact was uncertain although the flat nature of the surrounding area and visibility of the site may mean that development would have a minor negative effect.

Development should be low rise and retain trees and hedges to mitigate landscape impact.

Conclusion

At present there is no evidence that this site is available for development. Furthermore, the site is poorly connected to the existing settlement and would be highly visible from the surrounding area. Development would also threaten existing trees and hedgerows, which are an important part of the local landscape. As such the site is not considered suitable for allocation in this Local Plan.

Site 160 - Basley Ground, Bramfield Road, Halesworth

Suggested Use: Not specified

Site Area: 0.87



This site is a playing field with a children’s play area and exercise equipment for adults in its north-west and north east corner. The site is surrounded by hedgerows and slopes gently down towards the south east. There is a copse of trees next to the south eastern edge of the site.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a medium encroachment risk to a water recycling centre and a sewer pipe runs across the site.

Historic England cautioned that development on this site could impact of the setting of grade II listed South Lodge.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

No comments submitted by town or parish councils in response to this site.

Halesworth and Blyth Valley Partnership drew attention to successful recent development on a neighbouring site. Limited development on site 160 might be possible, which would provide funding for new sports facilities on the site of the former middle school.

Suffolk wildlife Trust noted that there is the potential for species and habitats of conservation value. No development should be permitted unless it can be proven that these species and habitats will not be harmed.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Development on this site would result in the loss of a sports field, children's play area and sports equipment and it is not clear where a replacement could be located. The site is also poorly related to the existing development and is in a prominent location in an area of open countryside and as such landscape impact would be considerable and could not be mitigated. There is a medium encroachment risk to a water recycling centre and a sewer pipe traverses the site.

The foul sewer network would require improvement prior to development.

Much of the site is located within the flood risk zone and is also at a high risk from surface water flooding.

Mature trees and hedges surround the site and there is a patch of trees to the south of the site.

There is high potential for organic environmental and structural remains on this site and possibly remains on a bridge. Development proposals should be accompanied by a programme of archaeological investigation to identify remains and the impacts of development, as well as to suggest a programme of impact management. This should include preservation in situ where appropriate.

This site is no longer available for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal has identified a significant negative effect on the landscape. Minor negative effects are that development would result in the loss of agricultural land.

Minor positive effects include development being close to services and employment and would help promote sustainable movement patterns. Development would help to meet local housing needs.

Uncertainty surrounds the impact upon the historic environment.

Development should retain trees and hedges to mitigate landscape impact and flood protection measures to mitigate flood risk.

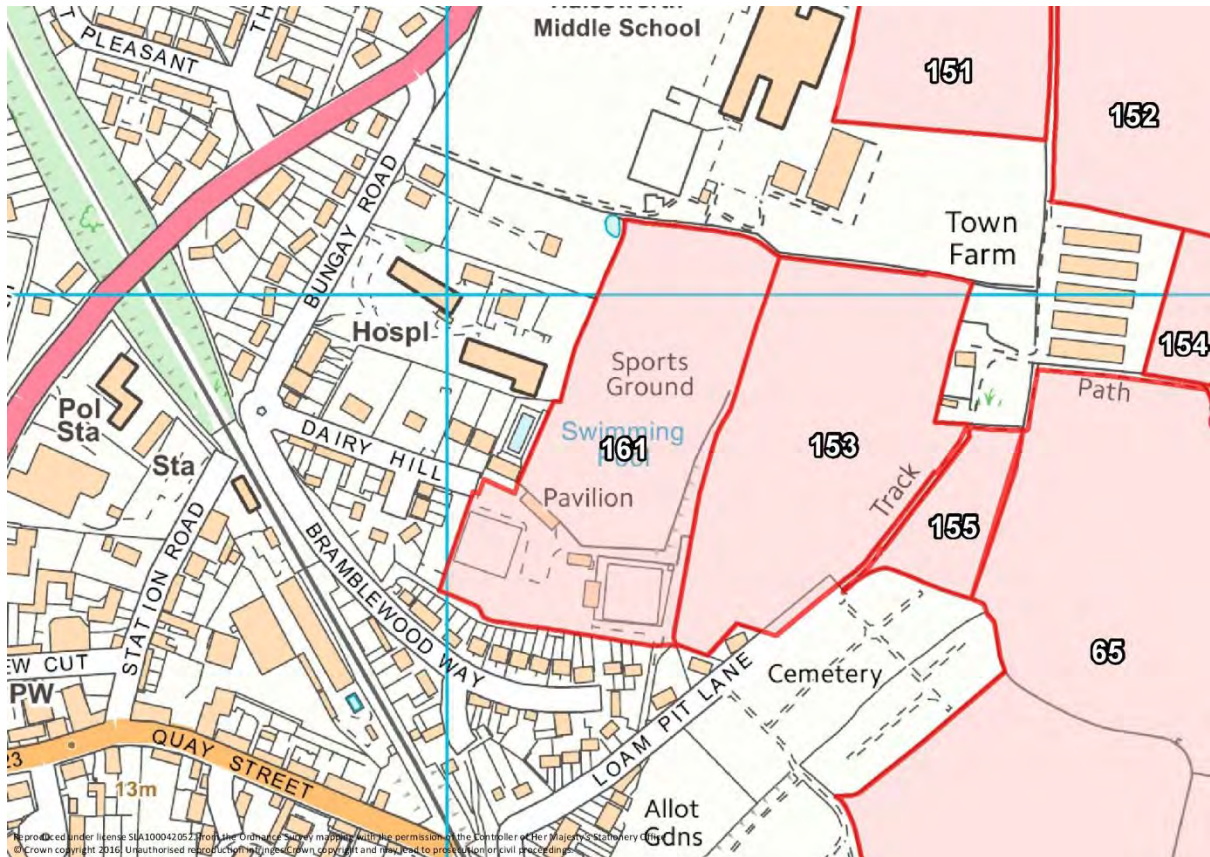
Conclusion

This site is not suitable for allocation in the Local Plan because it would also lead to the loss of a playing field and it is not clear if this would be replaced. Development is also located within the flood zone and there are sequentially more preferable sites in terms of flood risk available for development within Halesworth. As such the site is not considered suitable for allocation in this Local Plan.

Site 161 - Dairy Hill, Halesworth

Suggested Use: Housing

Site Area: 3.12



This site is the existing playing field for Halesworth and the surrounding area. To the south there is a marshal arts school, tennis courts, a bowling green and children’s play area. The hospital borders the site to the east, the former middle school is located to the north and there are open fields to the east. Residential areas border the site to the south.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has identified this site as being located in source protection zone 2.

Historic England cautioned that development on this site could impact upon the setting of grade II listed Town Farm House to the east.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

Halesworth Town Council strongly supported development of this site and the neighbouring site for sport and health facilities. New sports facilities are greatly needed by Halesworth and surrounding parishes, particularly those to the south of the town.

Halesworth and Blyth Valley Partnership strongly supported the allocation of this site for health, welfare and independent living.

No comments submitted by developers or landowners in response to this site.

Members of the public were supportive of development of a health centre to replace the existing facilities at Patrick Stead.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site is via narrow residential roads on steep slopes, including a small roundabout. Work would be needed to ensure that the road network could cope with increased traffic.

The foul sewer network will require improvement prior to development.

There is a small risk of surface water flooding on the site.

The site is in a prominent location and careful design is needed to mitigate landscape impact.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located within an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for new development. The eastern and southern boundaries of this site are set against a sensitive urban boundary and the land itself is part of an ancient remnant landscape. The prominent location of this site overlooking both the town and the countryside means that it makes an important contribution to the surrounding landscape.

The site is bordered by bushes and trees, which are of some landscape value.

Development on this site will result in the loss of playing fields but this will be compensated for by the provision of new facilities at the former middle school site.

The size of this site means that development should be accompanied by a programme of archaeological investigation.

This site is no longer available for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative landscape effect because of the site's prominent location. A minor negative effect was the impact on natural resources.

Minor positive effects include that development would be located close to services and employment and may encourage sustainable movements patterns.

The impact on the effect on housing need is unknown.

Development should be carefully designed and retain vegetation on the site to mitigate landscape impact.

Conclusion

The site is no longer available for redevelopment. Therefore it should not be allocated for residential development as part of this Local Plan. Instead the site has been allocated within the First Draft Local Plan (Policy WLP4.1) as part of wider proposals for housing development and improvement to sports facilities. The indicative masterplan indicates that this site is to continue to be used for sports.

Site 162 - South of Wissett Road, Halesworth

Suggested Use: Not specified

Site Area: 0.20



This is a small overgrown site in a residential area. The site contains the remains of the former guide hut and there is residential development on all sides. Historic buildings and the conservation area border the site to the south.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, a 'Green' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site could impact upon the setting of numbers 15, 16, 17 and 18 Rectory Street, all of which are grade II listed.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

Halesworth Town Council stated that development on this site would provide a few extra houses and

improve the area with minimal impact upon Wissett Road.

Halesworth and Blyth Valley Partnership stated that development would tidy up this site with minimal impact upon the surrounding area.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. The site could be accessed from Wissett Road to the north. Access is currently blocked via a locked gate and would require improvement for development to take place. Wissett Road to the north is narrow and undulating, although it is paved along each side.

There is surface water flood risk in the middle and west of the site.

The site is fairly flat but is located in an area of rolling countryside to the north west of the town centre.

The site is overgrown and so could be of biodiversity value.

There are some older residential buildings to the south and east of the site.

This site has high potential for archaeological remains because of its location on spur of land overlooking the river Blyth. The site is located on the edge of Anglo Saxon and medieval Halesworth. There is no objection to development on this site but proposals should be accompanied by a programme of archaeological investigation.

Landownership is uncertain and so the site cannot be considered available for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on natural resources, biodiversity and the historic environment.

Minor positive effects are that development would be located close to services and employment and could encourage sustainable movement patterns. Development would help to meet local housing needs.

Careful attention to design will be needed to minimise impact on the nearby conservation area. Retention of trees and hedges on the site will help to mitigate townscape impact.

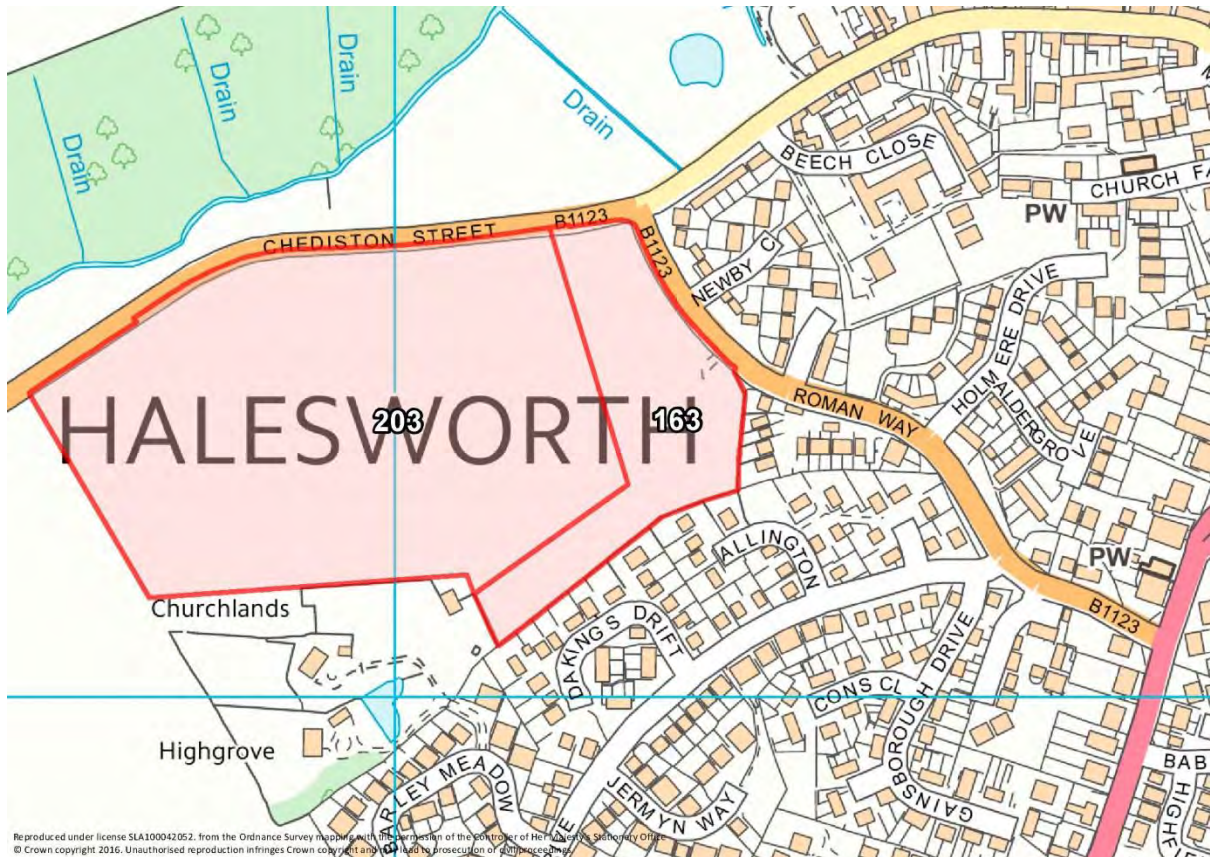
Conclusion

There is no evidence that this site is available for development. As such the site is not considered suitable for allocation in this Local Plan.

Site 163 - West of Roman Way, Halesworth

Suggested Use: Not specified

Site Area: 1.91



This site is the eastern edge of a much larger field that extends westwards along Chediston Street. Halesworth borders the site to the south and east and open countryside to the north and west. The site slopes downwards into a river valley with a line of trees to the north of the site.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

Suffolk County Council Archaeology noted that the development of this site would have a 'Red' impact. There is a possible Roman structure that may require preservation in situ.

Halesworth Town Council stated that development on this site would have good access to the major road network and the town centre and would enhance the area as it is not too big.

Halesworth and Blyth Valley Partnership stated that development on this site has access to good infrastructure along Roman Way and would form a natural extension to the well planned development to the east of the town.

No comments submitted by developers or landowners in response to this site.

One member of the public commented on this site, drawing attention to a large piece of land directly to the west and arguing that it would be a good location for future housing development. This is because it would be inconspicuous in the landscape and would enjoy good access to the town centre and Market Place via Chediston Street.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment has not identified any constraints that cannot be mitigated. Access is currently via a track onto Roman Way.

A sewer pipe traverses this site. The foul sewer network will require improvement prior to development.

The site is adjacent to the flood risk zone and the southern and western parts of the site are at risk from surface water flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located within an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for new development. The southern edge of this site is also bordered by a sensitive urban fringe. This is a very open landscape with long sight lines, which contributes to its sensitivity. Site 163 is small and makes only a limited contribution to the landscape but would be visible from a significant distance to the east.

This site is located on the edge of a sensitive area of countryside. Small scale development of an appropriate design may be acceptable.

Development may impact upon the road network. A national cycle route runs along the northern edge of this site.

Roman remains on the site indicate the presence of a significant structure. Pre-historic, Roman and Anglo Saxon remains discovered to the west of the site. Development proposals on this site should be accompanied by a programme of investigation which identifies archaeological remains, the impacts of development and possible mitigation measures.

This site is not available for development in isolation.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect on natural resources because it would result in the loss of grade 2 agricultural land. Minor negative effects include the impact on the landscape and biodiversity. There is also potential for archaeological remains on this site.

Minor positive effects are that development would be located close to services and employment and would support sustainable patterns of movement. Development on this site would help to meet local housing needs and would support the local town centre.

Proposed development would form a visible incursion into the countryside but sensitive design and landscaping could mitigate impact.

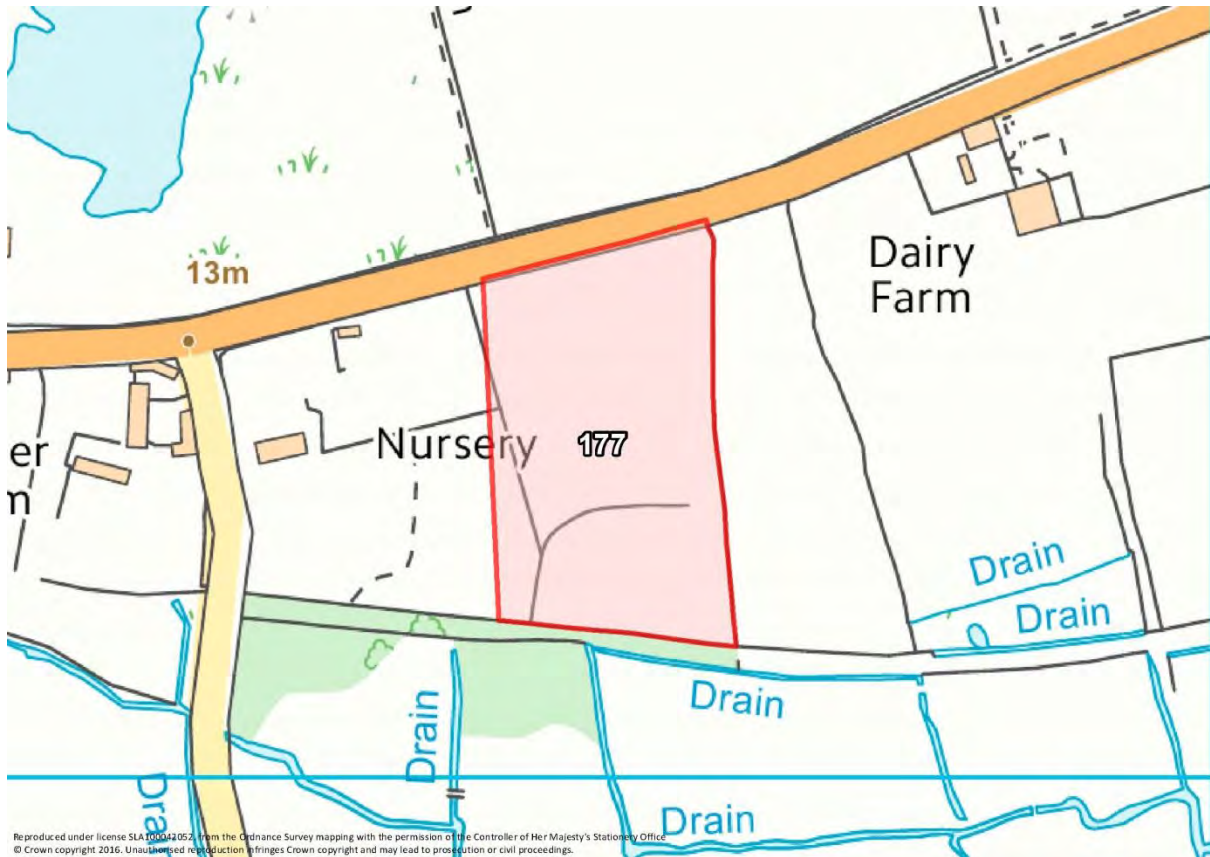
Conclusion

The wider field in which this site sits has been separately submitted for consideration. This small part of the field is not considered available in absence of the larger site. The conclusions for the larger site are found under Site 203 which is allocated as WLP4.2

Site 177 - Southwold Road / Blyford (B1123), Holton

Suggested Use: Housing

Site Area: 1.56



This is a small site to the east of Holton bordering the B1123 to the north. The site slopes away to the picturesque Blyth valley to the south. The site is overgrown and is surrounded by tall trees and mature hedgerows on all sides.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

This site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraint that could not be mitigated. Electricity lines run along the northern edge of the site.

Flood zone 2 borders the site to the south and parts of the site are at high and low risk of surface water flooding.

The Settlement Fringe Landscape Sensitivity Assessment identifies this site as part of an area with moderate landscape sensitivity, value and capacity for new development. This site is part of an ancient

remnant landscape, although one which has seen some more recent changes. The value of this site to the landscape is in the tall trees and hedges that surround it and which must be protected in the event of development. This site is not connected to any existing settlement and would encroach into an area of attractive countryside, particularly to the south and landscape impact could not easily be mitigated.

Access is via a gate onto the B1123 which is a fast road with a pavement but no cycle lanes.

The site is overgrown and surrounded by tall hedges and trees.

There is capacity for 23 dwellings on this site at a density of 15 dwellings per hectare to minimise landscape impact in a remote rural location.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in terms of access to services, the impact on the landscape, the loss of agricultural land and the potential impact on biodiversity.

Minor positive effects are that development would be located close to employment and could encourage sustainable patterns of movement. It would also deliver new housing for the local area.

Mitigation measures could include the retention of trees and hedges to mitigate the effect on biodiversity.

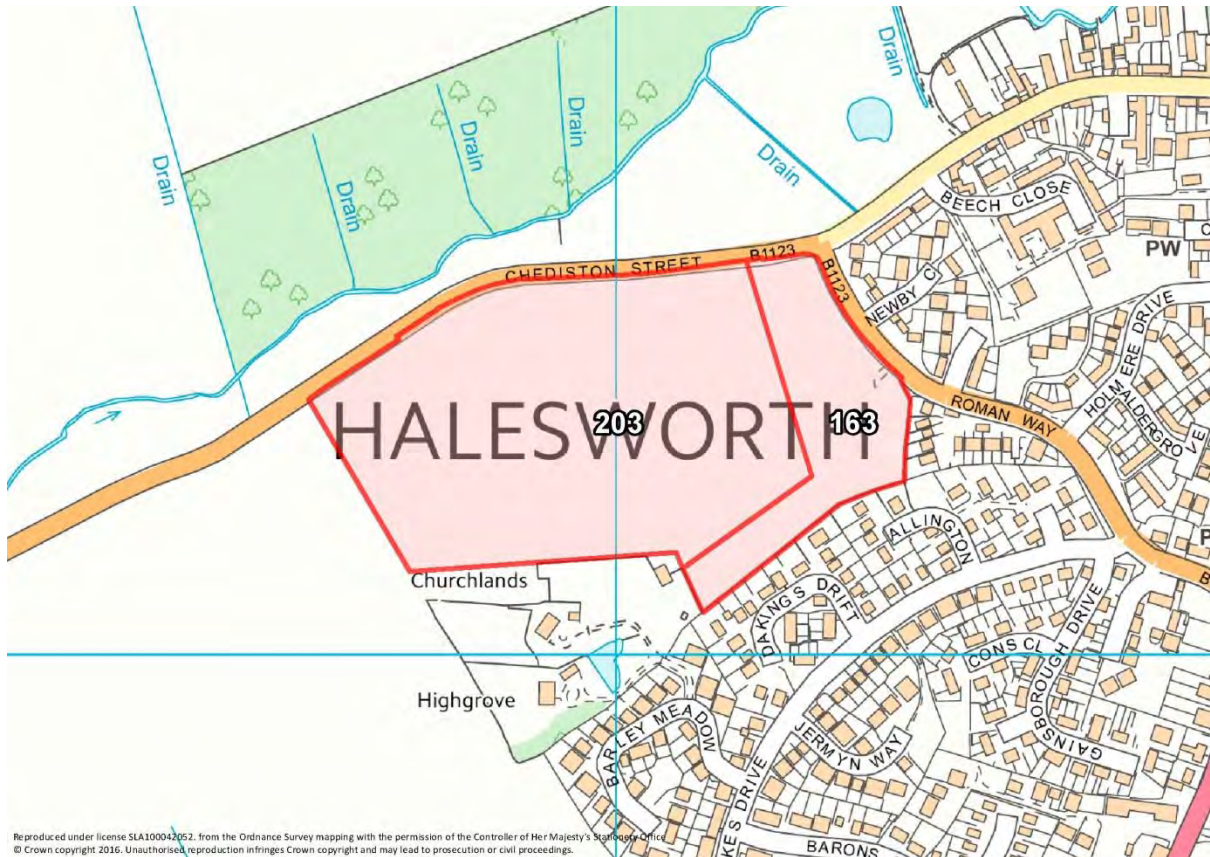
Conclusion

This site is not considered suitable for allocation in this Local Plan. Development on this site would be isolated from existing settlements with poor access to services and facilities compared to other sites in Halesworth and Holton.

Site 203 - Land adjacent to Chediston Street, Halesworth

Suggested Use: Housing

Site Area: 9.17



This site is a large field that extends along the southern edge of Chediston Street. It is bordered by site 163 to the east. The site slopes downwards towards a river valley with a line of trees running parallel to the north of the site.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

This site did not form part of the consultation although comments have been received on site 163, which forms part of this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. Access is via a track that leads through neighbouring site 163 onto Roman Way.

There are areas of low and medium surface water flood risk on this site.

The Settlement Fringe Landscape Sensitivity study identifies this site as being located within an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for new development. The

southern edge of this site is also bordered by a sensitive urban fringe. This is a very open landscape with long site lines, which contributes to its sensitivity. Site 203 is a large site and would be visible from a considerable distance, which has the potential to harm the wider landscape and the urban fringe. However sensitive development that provided a high quality urban edge would be acceptable. Although development would be prominent in the landscape this could be mitigated through landscaping and sensitive design.

There is a hedge along the western edge of this site. The northern edge is overgrown and may be of biodiversity value.

Chediston Street is a fast, busy road. It is part of a national cycle route but there is no dedicated cycle lane.

Archaeological potential on site 163 could also apply to site 203 as well.

The assessment identifies this site as having capacity for 200 dwellings at a density of 25 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect upon natural resources because development would result in the loss of grade 2 agricultural land. Development would have a minor negative effect on the landscape and biodiversity.

Minor positive effects are that development would be located close to services and employment and could support sustainable patterns of movement. Development would help to meet local housing need.

Archaeological effects are not known but Roman artefacts have been found on the site and there is potential for further archaeological content to be found.

Proposed development would form a visible incursion into the countryside but sensitive design and landscaping could mitigate impact.

Conclusion

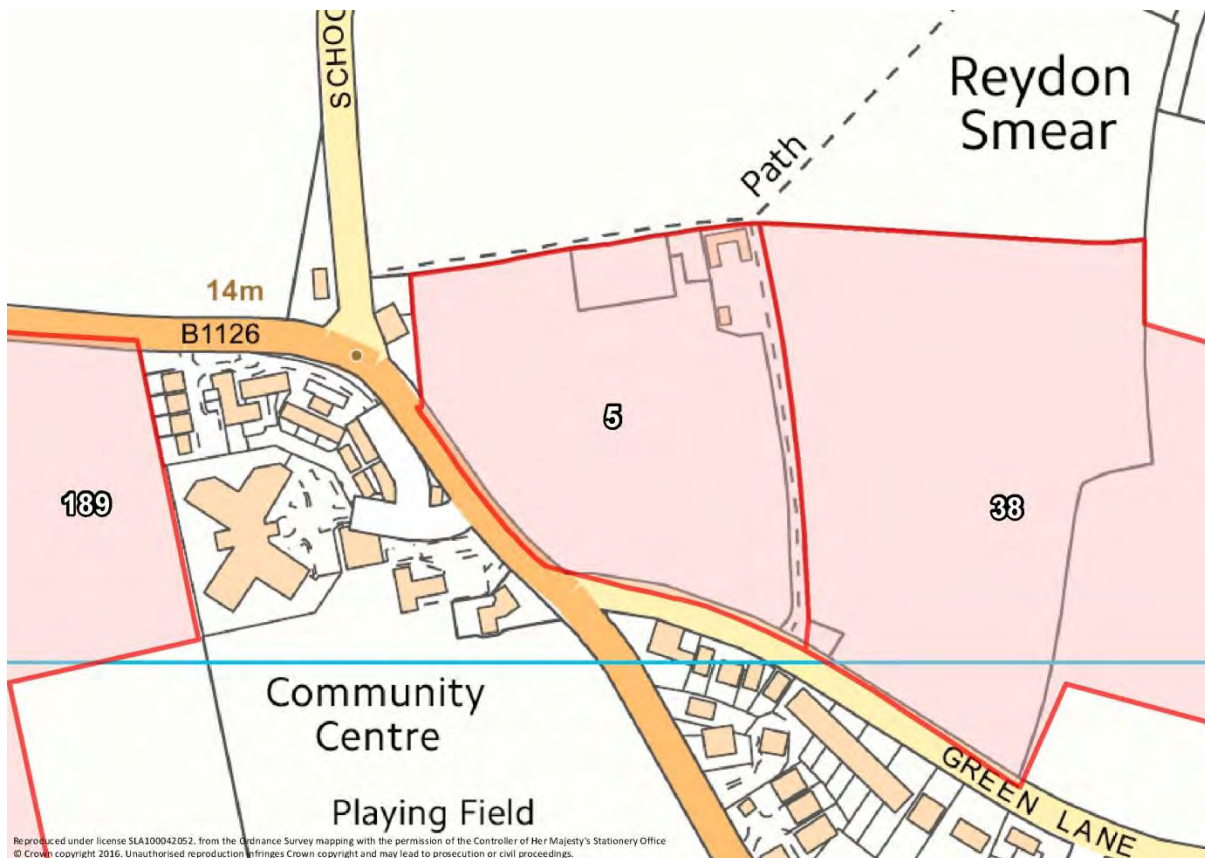
The site is one of closet sites to Halesworth Town Centre and therefore has good access to services and facilities. It is adjacent to development on two sides and any impact on the landscape could be effectively mitigated. As such the site has been allocated in First Draft Local Plan for 200 dwellings.

Southwold and Reydon Area

Site 5 - Brambles Drift, Green Lane, Reydon, Southwold

Suggested Use: Housing

Site Area: 2.53



This is a large flat site used for arable farming that sits on the north-west corner of Reydon, on the corner between the B1126 Wangford Road and Green Lane.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

The Environment Agency identified this site as being located in source protection zone 3.

Historic England cautioned that development on this site would potentially impact upon the setting of the Church of St. Margaret, which is a grade II* listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Reydon Parish Council stated that this site is not needed and should not be included in the Local Plan. Residents opposed the expansion of the village envelope in responses to the Village Plan consultation (2014) and the planning application at St. Felix School. There is no need for a major housing or business allocation given the housing needs analysis provided or the availability of space at Reydon Business Park.

Southwold and Reydon Society stated that this site is unsuitable for development. It is located outside of Reydon in the open countryside and in the Area of Outstanding Natural Beauty. This site is not needed if growth is concentrated in Lowestoft. Local infrastructure, particularly the sewerage network, will not be able to cope with this scale of development.

Suffolk Wildlife Trust stated that this site is located in close proximity to the Benacre to Easton Bavents Special Protection Area and the Pakefield to Easton Bavents Site of Special Scientific Interest. This site should not be allocated unless it can be demonstrated that it will not impact upon either the Special Protection Area or the Site of Special Scientific Interest.

Members of the public were concerned about landscape impact and felt that development should be directed to sites outside areas of high landscape value. Residents feared the loss of the rural character of Reydon, which had first attracted them to the area. There was a fear that any houses would be used as second homes. The sewage network and road network were considered inadequate to support new development. It was feared that new development would place too much strain on healthcare, shops and educational services. The road network is inadequate for supporting further development. In particular the site is close to the junction between Wangford Road and Green Lane, which is dangerous because traffic cannot see round the tight corners. Adding 75 houses would only exacerbate this problem. It was felt that development should be located outside of this area with its high landscape value. A new settlement was suggested in an area outside of the Area of Outstanding Natural Beauty.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. The main issue confronting development on this site would be to ensure that it does not have an impact upon the surrounding landscape. This has been identified by the Settlement Fringe Landscape Sensitivity Study as an area with low capacity for development because of its low landscape sensitivity and very high value, with a sensitive urban edge to the south. This site makes an important contribution to this landscape area because it is visible in an area of flat open landscape and next to the settlement fringe. Development would form an encroachment into the AONB and would be highly visible from the surrounding countryside.

Other issues to resolve are the possible improvements needed to the road network, particularly to Green Lane, which is narrow and may require widening to serve additional housing.

In addition there is a sewer pipe crossing the site. This infrastructure will need to be redirected or development will need to be designed and built to take account of it. Foul sewerage network improvements would be needed to accommodate development

The site has a high archaeological potential.

The assessment has identified that this site has capacity for 75 dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal

A significant negative effect was identified in the appraisal relating to the impact on the landscape. There is concern that the proposal would significantly encroach upon into the AONB as outlined above. Other negative effects included the loss of undeveloped land.

Minor positive effects included that the development would be located close to health facilities, open space, shops and employment opportunities. It would also help to meet the housing needs of the whole community and could encourage sustainable movement patterns.

In terms of mitigation proposed development should retain existing hedgerows and use low rise, high quality design in order to reduce landscape impact. Development could be used to protect and enhance hedgerows on the edge of the site and to enhance the urban edge to the north of Reydon.

Conclusion

Development on this site is considered to have a greater material impact on the Area of Outstanding Natural Beauty than the preferred site allocated to the west of Copperwheat Avenue in the First Draft Local Plan (Policy WLP6.1). It also has poorer access to services and facilities in Reydon and Southwold. The preferred site can deliver sufficient housing for the Southwold and Reydon area under the strategy outlined under Policy WLP1.1. As such this site is not considered suitable for allocation in this Local Plan.

Site 6 - Broadside Park Farm, Reydon, Southwold

Suggested Use: Housing

Site Area: 2.95



This site is a rectangular strip of land that runs in parallel to the coast. It is located to the west of Broadside Park Farm and overlooks Buss Creek to the south. Scattered dwellings border the site to the east.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Reydon Parish Council stated that development on this site is not necessary and should not be included in the Local Plan. Residents oppose the expansion of the village envelope as evidenced in responses to the Village Plan consultation (2014) and the planning application at St. Felix School. There is no need for major

housing or business allocations given the housing need assessment provided and the availability of unused employment land at Reydon Business Park.

Southwold Town Council stated that this site is not suitable for development because it lacks infrastructure, is in a prominent location in the Area of Outstanding Natural Beauty and Suffolk Heritage Coast, and is at risk from coastal erosion. Coastal erosion is progressing more quickly than expected and new surveys should be undertaken to revise estimates of the rate of erosion for Easton Bavents.

Southwold and Reydon Society stated that this site is wholly unsuitable for development because it is remote from the existing settlement and is located in the open countryside within the Area of Outstanding Natural Beauty and close to a site of reed beds which are of national significance. Access of traffic from this site onto Lowestoft Road would be dangerous. If this site was allocated for development then traffic would increase still further. The society believes that Lowestoft is the best location for development and that means that development on this site would be unnecessary.

Suffolk Wildlife Trust stated that this site partly includes the Pakefield to Easton Bavents Site of Special Scientific Interest. This site should not be allocated for development unless it can be demonstrated that it will not harm the site of special scientific interest.

No comments submitted by developers or landowners in response to this site.

Members of the public were mostly opposed to development on this site because of its location in an area of high landscape value, which is also vulnerable to coastal erosion. Development of this land as a traveller or holiday site would harm the appearance of the landscape and would create issues with noise. The site is remote from Reydon, the road network only has limited capacity to support future development and access onto Lowestoft Road would be dangerous. The sewage network only has limited capacity to support future development.

However there was some support for development on the site. Some Members of the public thought that a temporary use might be appropriate and the site could also be developed for a nursing home or holiday homes.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Development on this location would have a significant adverse impact on the landscape and this could not be mitigated. This site is situated in a highly prominent location with views towards Southwold to the south. The Settlement Fringe Landscape Sensitivity Study identifies this as an area with low capacity for future development because of its low sensitivity and very high landscape value. This site is an important part of the landscape because of its prominent and exposed location. There are also views from Southwold facing northwards towards the site.

There is also no suitable road access to this site. The closest public access is an unmade track leading to Euston Lane, which would require significant improvements.

Part of this site is located within 30 metres of a coastal change management area and a coastal erosion vulnerability assessment will be required.

The foul sewer network would require improvement. Electricity lines run across the site from north east to south west. Phone lines cross on the northern and eastern boundaries.

Hedgerows surrounding the site could be supporting biodiversity as could the heathland to the east. This could be lost or significantly harmed if development did occur.

There is archaeological content on this site, which was part of a World War 2 military strong point, with a pill box, trenches and gun emplacement. Proposals on this site should be accompanied by a programme of investigation, including an assessment of the impact caused by development and mitigation measures, including for preservation in situ where appropriate.

There is also potential risk of smells and noise coming from the nearby pig farm.

There is no capacity for development on this site.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect upon the landscape. Development would be situated in an exposed and prominent position in the landscape with views towards Southwold. Impact of development on this site could not be mitigated. Minor negative effects were that development would be poorly connected to services and shops, there would be a loss of natural resources and a loss of biodiversity.

A minor positive effect was that housing development would help to meet the housing needs of the local community.

A potential significant negative effect is that some properties would become vulnerable to coastal erosion in the future.

Mitigation measures for landscape impact are not considered possible.

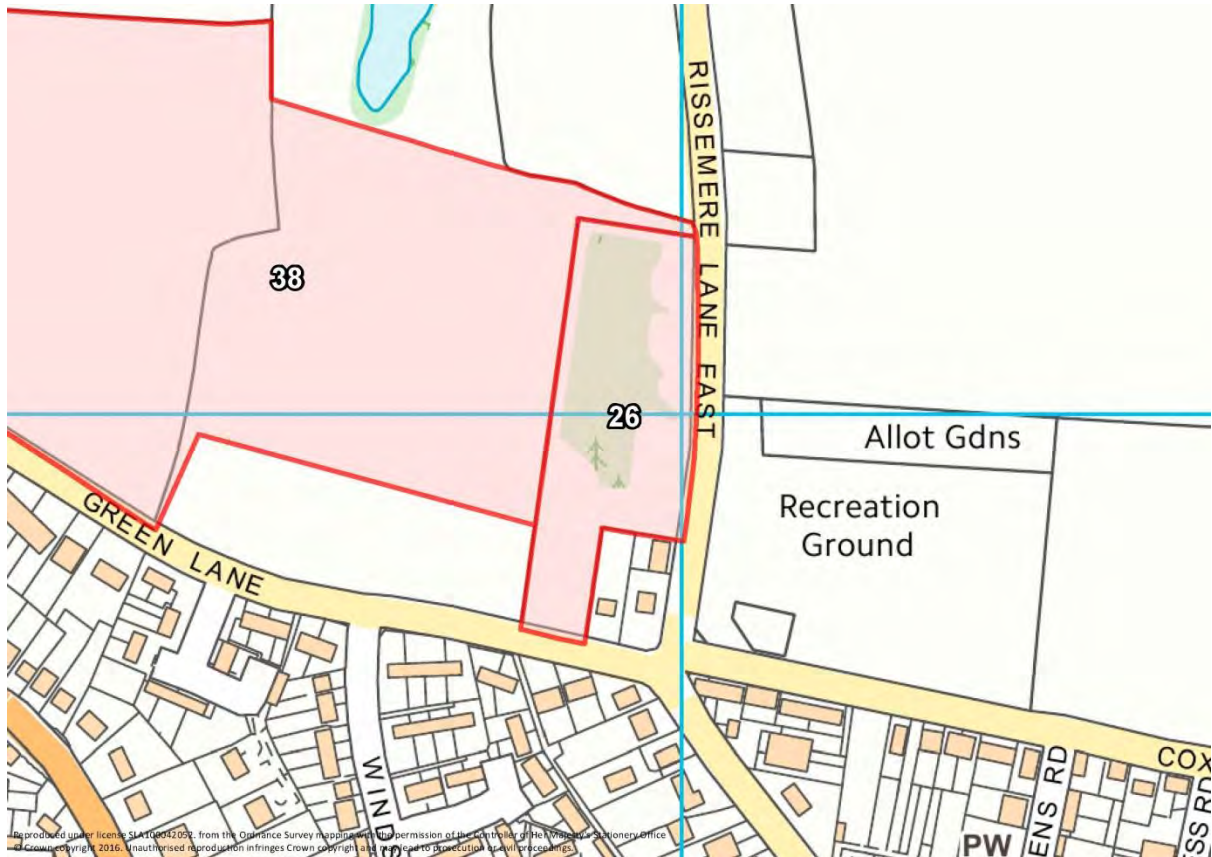
Conclusion

This site is not suitable for development because of its significant negative effect upon the Area of Outstanding Natural Beauty and Heritage Coast, which could not be mitigated. In addition providing road access would not be viably possible and the site is potentially at risk from coastal erosion.

Site 26 - Jubilee, Green Lane, Reydon

Suggested Use: Housing

Site Area: 1.22



This is a small site to the north of Green Lane, opposite the recreation ground. The site is surrounded by mature trees and is used as a caravan park.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

Historic England cautioned that development on this site has limited potential for impact upon the Church of St. Margaret to the west, which is a grade II* listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber/Green' impact.

Reydon Parish Council believes this site is suitable for a mixed development of affordable and low cost housing.

Southwold and Reydon Society notes that this site is located next to the existing settlement and adjacent to the site agreed for housing under the exceptions policy in DM22. There are also three houses on the corner of Green Lane / Rissemere Lane, which this site surrounds. The site is in the countryside and the Area of Outstanding Natural Beauty. Despite this there is the possibility that the site could accommodate small scale development of affordable housing or small low cost commercial development. If growth is concentrated in Lowestoft then small scale developments such as on this site will be adequate to meet housing targets in Southwold and Reydon. Development here must be carefully planned to minimise landscape impact on visual amenity and the environment of the Area of Outstanding Natural Beauty. Infrastructure will need to be improved, in particularly the sewerage network, which is already operating at or above capacity. A footpath will need to be provided along the part of Rissemere Lane which will be developed under this proposal.

Suffolk Wildlife Trust notes that this site is situated in close proximity to the Benacre to Easton Bavents Special Protection Area and the Pakefield to Easton Bavents Site of Special Scientific Interest. This site should therefore not be allocated for development unless it can be demonstrated that it will not harm the Special Protection Area of the Site of Special Scientific Interest.

No comments submitted by developers or landowners in response to this site.

Members of the public were concerned that development on this site would form a prominent incursion into countryside to the north of Reydon. It could set a precedent for further development elsewhere. This would also threaten local areas of conservation value and would change the character of the village. Residents feared that the character of Reydon would change and become more urban. There was concern that the road network would not be able to cope with additional housing and that Green Lane and Rissemere Lane East were too narrow. In addition the sewerage network would struggle to cope with additional development. Local services, in particular schools and healthcare, will not have the capacity to cope with new housing and there are not enough jobs for new residents. If new development was allocated on this site then it should be reserved for local people.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. This site is accessed via a narrow track from Rissemere Lane East, which is itself quite narrow. One of the main issues surrounding development would be the need to provide adequate road access.

In addition development on this site would form a small incursion into the open countryside, which is part of the Area of Outstanding Natural Beauty. The Settlement Fringe Landscape Sensitivity Study identifies this site as part of an area of historic farmland, with low landscape sensitivity but very high landscape value and a low capacity for future development. This site is surrounded by trees and hedges which contribute towards the appearance of the landscape but would help to shield future development, provided it is fairly low density and low rise.

The foul sewer network would require improvement.

There is high potential for archaeology on the site.

The assessment identifies this site as having potential capacity for 12 dwellings on this site.

Summary of Draft Sustainability Appraisal

A significant impact on the landscape was identified in relation to the impact on the AONB. Minor negative effects include the loss of grade 3 agricultural land and the loss of tourist accommodation.

Minor positive effects are that development would have good access to shops, services and health facilities, meeting the housing needs of the local community and the promotion of sustainable movement patterns.

Mitigation measures include the retention of trees and shrubs on the site and the use of low rise, well designed buildings. Development on this site should include measures to protect trees and hedges on the site and to improve and strengthen the urban frontage along the northern boundary with Reydon.

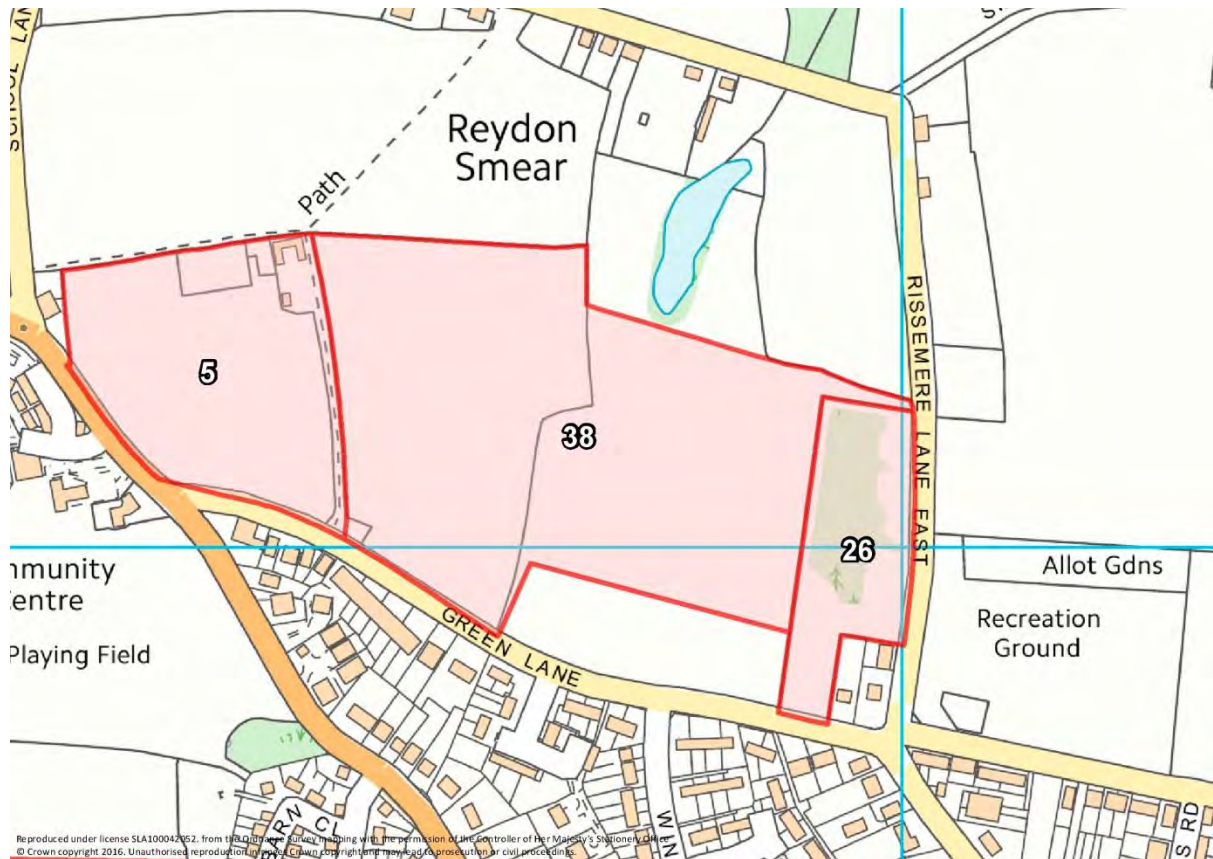
Conclusion

Development of this site would form an unnatural incursion into the Area of Outstanding Natural Beauty. Additionally it would result in a loss of tourist accommodation. As such this site is not considered suitable for allocation in this Local Plan.

Site 38 - Land at Green Lane, Reydon

Suggested Use: Mixed use

Site Area: 6.11



This site is the largest of the sites located to the north of Green Lane. It is a large, flat site that extends to the north of Reydon and is bounded by mature hedgerows on all sides.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency states that this site is located on a former landfill site.

Historic England cautions that development on this site would potentially impact upon the Church of St. Margaret to the west, which is a grade II* listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Reydon Parish Council believed that this site and the others around Reydon are not needed for development and should not be included in the Local Plan. Local residents were strongly opposed to large scale development, as evidenced in the responses made to the Village Plan Consultation (2014) and the planning application at St. Felix School. Given the analysis of housing market need provided and the vacancies at Reydon Business park there is no justification for further large scale housing or industrial allocations.

The Southwold and Reydon Society stated that this site is not suitable for development. It is situated outside of the development limits in the Area of Outstanding Natural Beauty. The local road network would not be able to cope with additional traffic created by business uses and the sewerage network is already operating at or above capacity. This site is not needed if development is to be focused in Lowestoft, which the society considers to be the preferable option. Other smaller sites could accommodate additional development without impacting upon the countryside or infrastructure. There is unused land at Reydon Business Park which could be used for light industrial development.

Suffolk Wildlife Trust states that this site is in close proximity to the Benacre to Easton Bavents Special Protection Area and the Pakefield to Easton Bavents Site of Special Scientific Interest. This site should not be allocated unless it can be demonstrated that neither the Special Protection Area nor the Site of Special Scientific Interest will be affected.

No comments submitted by developers or landowners in response to this site.

Members of the public were concerned that allocating this site for development would harm valuable protected landscapes and wildlife habitats. Respondents were concerned that the character of Reydon would change. The road network would not be able to cope, in particular because there are a number of junctions nearby which have poor visibility: Green Lane / Wangford Road; Green Lane / Rissemere Lane East / Cox's Lane / Covert Road. This is a particular problem because Cox's Lane is used as a rat run during rush hour times. Allocated development on this site would potentially place considerable strain on local healthcare services. The sewage network would also be unable to cope with the proposed allocation. Reydon also does not have adequate schools or shops to support the proposed development allocation. It was also felt that development would be better located Lowestoft or in a purpose built settlement located outside areas of landscape value, which would make allocated sites in Reydon surplus to requirements.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. The main concern about development on this site is providing road access for employment related traffic. Green Lane is narrow and may need to be widened. There is also the risk that employment related uses could cause a nuisance to nearby residential areas.

Development on this site has the potential to form a major incursion into the open countryside, which could harm the appearance of the AONB. The Landscape Sensitivity Study identifies this site as being part of an area of historic farmland. The Settlement Fringe Landscape Sensitivity Study identifies this area as

having a low sensitivity to new development and a very high value. Capacity to accommodate new development is therefore low. The northern edge of Reydon is a sensitive urban fringe in a landscape area that is considered to have a low capacity for development. This is a large site in an area of fairly flat farmland and its size means that it forms an important part of the landscape. Development would be quite visible on this site and the hedgerows also make an important contribution to the landscape. Careful design and landscaping are therefore needed to mitigate landscape impact. This would probably be best achieved by developing this site along with others on the northern edge of Reydon. There were no significant positive effects from development on this site.

The foul sewer network would require improvement.

This site is situated in an area of archaeological importance, recorded in the County Historic Environment Record. This is a multi era complex with strong potential for archaeological content. Proposals for development should include a programme of archaeological development that demonstrates the impact of development and suggest proposals to manage those impacts.

The Environment Agency has also identified this as a former landfill site, which may require mitigation work.

The assessment has identified this site as having potential capacity for 100 dwellings.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified that development on this site would have a significant negative effect upon the landscape. Development would form a major incursion into the open countryside and would be highly visible from the surrounding area. Minor negative effects included the loss of grade 3 agricultural land and the impact on biodiversity.

Minor positive effects included providing housing in an area with accessible services and facilities. Proposed employment development would also help to reduce levels of deprivation and support the economy. This site could also encourage sustainable movement patterns.

Mitigation measures include the use of low rise, high quality designs and the retention of existing hedgerows on the site to reduce landscape impact. Development should preserve and enhance the network of hedgerows which surrounds and bisects this site. It should also improve the urban fringe along the northern edge of Reydon. Residential development of Reydon should include adequate provision of play space and should help to ensure that residents have access to surrounding footpaths and countryside.

Conclusion

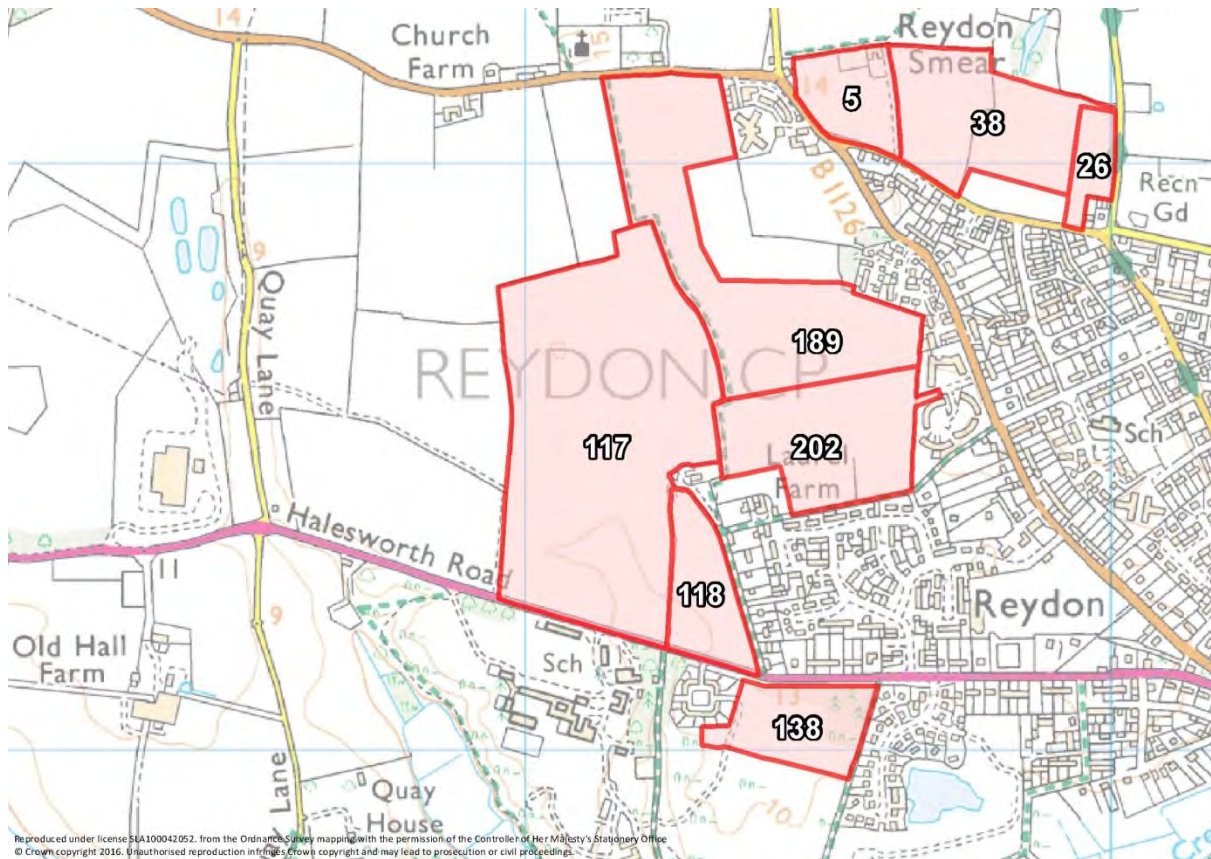
Development on this site is considered to have a greater material impact on the Area of Outstanding Natural Beauty than the preferred site allocated to the west of Copperwheat Avenue in the First Draft Local Plan (Policy WLP6.1). It also has poorer access to services and facilities in Reydon and Southwold. The

preferred site can deliver sufficient housing for the Southwold and Reydon area under the strategy outlined under Policy WLP1.1. As such this site is not considered suitable for allocation in this Local Plan.

Site 117 - Land to the west of Laurel Farm Reydon, Reydon

Suggested Use: Housing

Site Area: 19.80



This is a large site flanking Reydon to the west. The site is flat and is bounded by mature hedgerows on all sides. There is a small depression in the southeast corner of the site which gives the southern portion of the site an undulating appearance.

Summary of Response from 'Options for the new Waveney Local Plan' Consultation

Anglian Water stated that the development of the site would have a 'Green' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council's website.

The Environment Agency has identified this site as being located in source protection zone 1.

Historic England cautioned that development on this site will impact upon Gorse Lodge Farmhouse, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an 'Amber' impact.

Reydon Parish Council stated that none of the sites proposed in the village will be needed and so should not be designated in the local plan. Public responses to the Village Plan consultation in 2014 and to the planning application at St. Felix School indicated strong opposition to expansion of the village envelope. There is no case for major housing or industrial allocations in Reydon given the spare capacity at Reydon Business Park and analysis of housing needs.

Southwold and Reydon Society stated that this site is remote from the settlement and forms an incursion into the Area of Outstanding Natural Beauty. Development would only make sense if the neighbouring site to the east was also developed. This would create a development of 700 houses which is extremely large for a settlement of this size. Road and sewerage infrastructure are inadequate to support development on this scale. There is no need for development on anything like this scale if most development is to be focused in Lowestoft. The needs for housing can be met by small scale development within the settlement boundaries or along the edge of the settlement in line with the exceptions policy detailed in DM22.

The landowner (AR Hall) noted that the same sustainability appraisal issues have been identified for this site as the neighbouring site 118. Site 117 is 19.80 hectares in size and could accommodate 600 houses at a density of 30 dwellings per hectare. The landowner accepts that it would not be appropriate to develop a site of this size in its entirety. However the availability of this site is important in facilitating future development to the north of the Halesworth Road. The site is in the landowner's sole ownership and is considered available, suitable and deliverable in the next five years.

Members of the public were opposed to development on this site for the following reasons:

- development of the whole site would form a major incursion into the open countryside;
- scale of development is inappropriate for a village of this size and would make it feel like a town;
- there is a range of wildlife in the area which would be threatened by development;
- impact upon local infrastructure and services;
- the sewerage system is already at capacity and frequently backs up, which causes flooding;
- drains will also not be able to cope;
- the junction between Keen's Lane and Halesworth Road is dangerous, being close to a blind bend and a dip in the road. This is a safety issue that would be exacerbated by further development;
- health services and schools would not be able to cope with the extra demands placed on them;
- new houses would be used by second homeowners or rented out to tourists, rather than providing accommodation to local people;
- Southwold already accommodates a lot of tourists, particularly during the summer months, which leads to congestion and parking problems.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The impact of development on the landscape is considered to be a significant constraint. Development of the entire site would have a major impact upon the Area of Outstanding Natural Beauty and the urban fringe of Reydon, which is considered to be sensitive. The Settlement Fringe Landscape Sensitivity Study identifies this as an area of historic farmland with a low sensitivity and a very high landscape value,

meaning that there is low capacity for development on this site. This site makes an important contribution to the landscape partly because of its size, but also because of the open and slightly undulating character of the landscape. It is also close to the edge of Reydon, which the study identifies as a sensitive urban edge. It is considered that the significant impacts would be difficult to adequately mitigate.

The foul sewer network would require improvement prior to development on this site.

The site has high archaeological potential.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified that development would have a significant negative effect upon the landscape. Development on this site would form a major incursion into the open countryside of the Area of Outstanding Natural Beauty. Minor negative effects are that it would lead to the loss of an area of grade 3 agricultural land.

Minor positive effects are that development would be well located for health services, shops, employment opportunities and open space. Development would also encourage sustainable movement patterns and help to meet the housing needs of the local community.

It is important that development conserves the trees and hedgerows surrounding this site and that it improves the urban fringe along the western edge of Reydon. Development should also include adequate provision of play space and improve access to local footpaths and countryside.

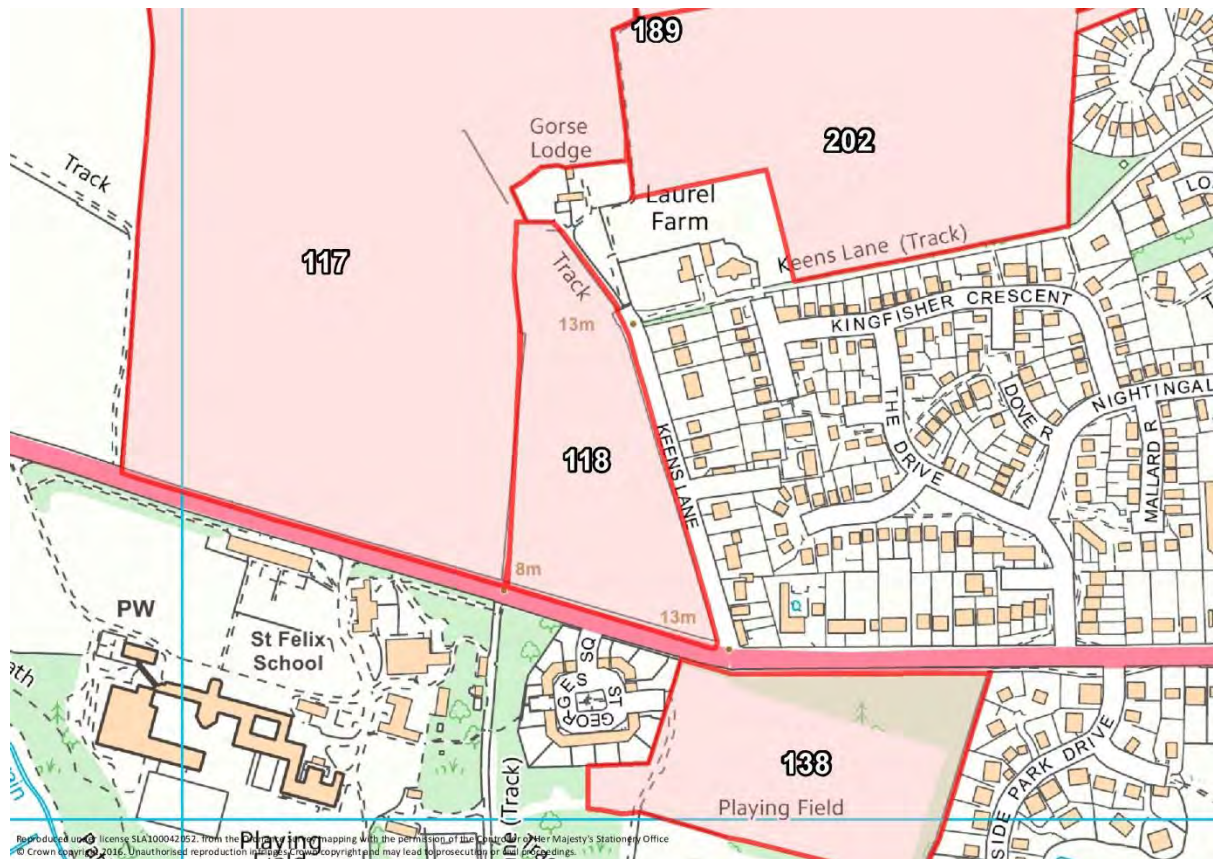
Conclusion

This site is not considered suitable for development because of its significant impact on the Area of Outstanding Natural Beauty which would be difficult to adequately mitigate.

Site 118 - Land to the west of Laurel Farm, Reydon (primary area)

Suggested Use: Housing

Site Area: 2.95



This is a small site sandwiched between the much larger site 117 and Keen’s Lane. St. George’s Square and Halesworth Road flank the site to the south and residential development to the east. The historic Gorse Lodge is located to the north and the site is surrounded by open agricultural land to the west. Trees and hedges border the site on all sides. A small depression in the southwest corner lends the landscaping an undulating character.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site could impact upon the setting of Gorse Lodge Farmhouse, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Reydon Parish Council believed that none of the sites submitted for Reydon are necessary and should not be included in the local plan. Responses to the 2014 Village Plan consultation and the planning application at St. Felix School indicated strong opposition to expansion of the village envelope. There is no case for housing or business development given the existing capacity at Reydon Business Park and the housing needs analysis.

Southwold and Reydon Society noted that this site is located on one side of an unmade road which forms part of the Area of Outstanding Natural Beauty. For this reason, together with safety concerns about traffic access, this site is not suitable for development. It is also noted that the sewerage capacity is already operating at or above capacity. Moreover no development on this scale is needed if the option of concentrating most growth in Lowestoft is pursued, which the Southwold and Reydon Society considers the most suitable option.

The Landowner (AR Hall) discussed the sustainability appraisal for site, noting that the only negative points related to:

- A) “conserving and enhancing the distinctiveness and quality of landscapes and townscapes”;
- B) “reducing contributions to climate change and mitigating effects”;
- C) “conserving natural resources”.

It was thought that A) could be overcome through landscaping and the provision of open space; development could also be designed so as to overcome the negative points in B) and C). This site could deliver up to 90 dwellings and is available and deliverable. The site is bordered by development to the east, public highway to the south and would form a natural extension to the existing settlement. Site access and services could be easily provided and the site’s location on the western edge of the village would minimise congestion. In addition the site is close to local employment opportunities, notably at Sizewell.

Members of the public were opposed to development on this site for the following reasons:

- it would form a significant incursion into the countryside and would harm the appearance of the local landscape;
- development of sites 117 and 118 would be out of proportion with the scale of Reydon and would change the character of the village;
- the water supply and sewerage networks are already overstretched;
- the junction between Keen’s Lane and Halesworth Road is close to a blind bend and a dip in the road;
- congestion is an issue, particularly during the summer months;
- healthcare services and schools would not have the capacity to deal with population growth;
- there is a lack of employment opportunities to support new housing, in particular, there are not enough jobs for young people;
- housing development would be best focused in Lowestoft, which would mean that development on this site is surplus to requirements.