

Waveney Community Infrastructure Levy
Infrastructure Study 2012 – 2025
March 2012



Waveney District Council

Serving the Community

Contents

| | | |
|---|--|-----------|
| 1. | Introduction | 2 |
| 2. | Growth Projections | 6 |
| 2.1 | Housing | 6 |
| 2.2. | Economic Development | 9 |
| 3. | Transport..... | 9 |
| 3.1 | Road..... | 10 |
| 3.2 | Rail | 12 |
| 3.3 | Other public transport..... | 13 |
| 3.4 | Pedestrian and Cycle Network | 14 |
| 4. | Education | 18 |
| 4.1 | Pre-School..... | 18 |
| 4.2 | Primary | 19 |
| 4.3 | Secondary and Sixth Form | 21 |
| 5. | Open Space and Green Infrastructure | 23 |
| 5.1 | Play | 23 |
| 5.2 | Outdoor Sport..... | 25 |
| 5.3 | Parks | 27 |
| 5.4 | Cemeteries | 28 |
| 5.5 | Allotments..... | 29 |
| 5.6 | Natural and Semi-Natural Greenspace | 30 |
| 6. | Community and Cultural Facilities | 32 |
| 6.1 | Leisure and Sport Centres | 32 |
| 6.2 | Community Centres and Customer Service Centres | 34 |
| 6.3 | Libraries and Archives..... | 35 |
| 7. | Health Care | 38 |
| 8. | Police..... | 39 |
| 9. | Coastal Protection and Flooding | 40 |
| 10. | Utilities | 42 |
| 11. | Neighbourhood Infrastructure | 43 |
| 12. | Summary of Key Findings | 44 |
| Appendix 1 – Neighbourhood Infrastructure..... | | 48 |
| | Councillor’s Workshop 10 th October 2011 | 48 |
| | Infrastructure identified by Parish Council’s as part of the Draft Infrastructure Study Consultation (Summer 2011)..... | 50 |
| | Infrastructure identified by Parish Council’s at November World of Planning Events | 51 |
| | Beccles Event – 3rd November 2011 | 51 |
| | Wangford Event – 7 th November 2011 | 52 |
| Appendix 2 – Responses to Consultation on Draft Infrastructure Study | | 55 |

1. Introduction

Policy Background

- 1.1 The Waveney Local Development Framework (LDF) sets out the development and regeneration plans for the District. The Core Strategy (Adopted January 2009) forms the most important part of the Waveney Local Development Framework. It sets out the vision and strategic policies to guide the general direction of future development in Waveney. Importantly the Core Strategy identifies that over the period 2001 to 2025, 6,960 new homes will need to be delivered and to 2021, 5000 additional jobs generated. The Core Strategy focuses most new development in the District in the regeneration areas around Lake Lothing in central Lowestoft. The Core Strategy makes clear that this growth and regeneration will need to be supported by new and improved infrastructure.
- 1.2 Policy CS4 of the Core Strategy establishes a principle that developers should contribute towards infrastructure provision to support their developments. The policy states that such infrastructure may include:
- Affordable housing (including supported housing)
 - Open Space (including play areas, sport and recreation)
 - Community facilities (including youth activities and meeting venues)
 - Cultural facilities (including libraries, public art and archaeology)
 - Health and social care facilities
 - Education (including early years provision and community education)
 - Police/crime reduction measures
 - Transport infrastructure (including footpaths, bridleways, cycleways, cycle parking facilities and roads)
 - Public transport (including services and facilities)
 - Surface water management and flood risk management
 - Environmental improvements
 - Waste recycling facilities
 - Fire services
 - Shopping facilities
- 1.3 The policy goes on to identify specific projects which will be required to support development and therefore require developer contributions. These include community centres and one-stop shops in all the market towns and Kessingland, drainage and flood alleviation in Kessingland, and health centres in south and north Lowestoft. Additionally the policy recognises the need for development to contribute to the infrastructure needed to support regeneration in the Lake Lothing area. The Policy also refers to a number of specific infrastructure projects identified in Policy CS14 and CS15 of the Core Strategy that contributions will be required for.
- 1.4 The Lake Lothing and Outer Harbour Area Action Plan (AAP, Adopted January 2012) which aims to deliver the Core Strategy's vision for regeneration in central Lowestoft further recognises the importance of new

infrastructure provision to secure regeneration. Policy HC3 of the AAP states that all new residential development should be supported by appropriate provision of social infrastructure. Policy IMP2 of the AAP sets out the likely strategic infrastructure requirements to support regeneration in the AAP that the public and private sectors will have to work together in delivering.

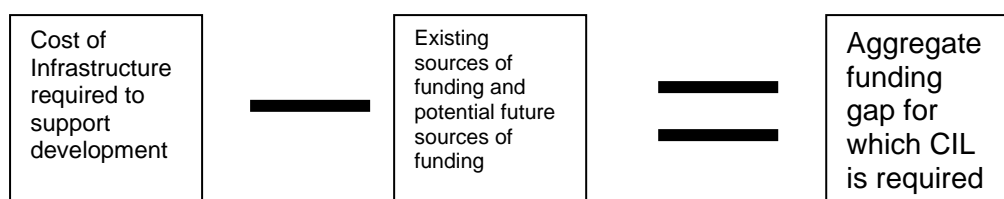
Community Infrastructure Levy

- 1.5 The Community Infrastructure Levy (CIL) is a new standard charge which local authorities in England and Wales can charge on most types of new development in their area. CIL charges will be based on the size, type and location of the development proposed. The money raised will be used to pay for infrastructure required to support development in a District.
- 1.6 The Government believes that a CIL is a fair and transparent way in which new development can contribute to infrastructure provision. It is set locally, in a Charging Schedule by Charging Authorities (Local Planning Authorities, LPA) based upon local evidence of infrastructure need and viability and once adopted is a mandatory charge on all qualifying development except in exceptional circumstances.
- 1.7 Policy CS04 of the Core Strategy was drafted and adopted prior to Government introducing enabling legislation for the CIL. However, the supporting text to the policy anticipates the introduction of CIL, and states that a CIL could be used to supplement Section 106 agreements to help deliver wider infrastructure requirements. The AAP also makes reference to the potential for CIL to be used to fund infrastructure.
- 1.8 The CIL Regulations introduced in April 2010 and amended in April 2011 contain measures to reduce the use of Section 106 agreements to fund infrastructure. The first measure (Regulation 122) which came into force on the 6th April 2010 requires Section 106 agreements to meet the following tests:
 - necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
- 1.9 A second measure introduced in the regulations restricts the use of planning obligations to require funding for pooled contributions towards infrastructure. The regulations only allow for a maximum of 5 planning obligations to contribute to a certain infrastructure project or type of infrastructure. For example, only five planning permissions for development will be able to have planning obligations that require financial contributions to off-site open space in a locality. After this no more pooled contributions towards off-site open space provision would be allowed in the District. This power will come into force in April 2014 or when a LPA's charging schedule comes into force. Where a charging schedule is in place, a planning obligation cannot be used to require funding for a piece of infrastructure that is listed as being funded by CIL.
- 1.10 The above restrictions mean that it will not be possible for the Council to pool developer contributions towards infrastructure provision through the use of Section 106 contributions. Therefore the Council is planning to introduce a

Community Infrastructure Levy to help fund infrastructure delivery in Waveney.

Purpose of this Study

- 1.11 The purpose of this study is to provide evidence to justify the need for a Community Infrastructure Levy in Waveney. Regulation 14 of the CIL regulations states that Charging Authorities, when setting the rate of a CIL, need to aim to strike a balance between the desirability of funding infrastructure through CIL and the effects of the imposition of CIL on economic viability of development. Following from this, guidance set out by the Government in “Community Infrastructure Levy Guidance: Charge Setting and Charging Schedule Procedures” (March 2010) requires Charging Schedules to be justified by evidence of infrastructure need and economic viability.
- 1.12 The Adopted Core Strategy and the adopted AAP demonstrate that new and improved infrastructure will be required in the District to support future development. However, the above documents do not adequately quantify this need in order to support the introduction of CIL. The above mentioned Government guidance states that evidence that outlines an aggregate funding gap for infrastructure provision is needed to support the introduction of a CIL. In identifying a funding gap, the evidence base should identify and cost infrastructure that is needed to support growth along with other existing and likely future sources of funding. The below equation summarises this.



- 1.13 This study therefore looks in detail at the likely infrastructure that is required to support the development planned in the Waveney LDF. It identifies the likely cost of provision and any existing or potential funding for infrastructure. Importantly it identifies a funding gap that CIL will be required to address.
- 1.14 It is important to note that the role of this study is not to provide absolute upfront assurances as to how the Council intend to spend future CIL funds, but rather to illustrate that the Council’s intended CIL target is justifiable given local infrastructure needs. Government guidance makes clear that in the interests of flexibility, Councils may spend their CIL revenues on different projects and types from those identified as indicative in infrastructure studies prepared for the purpose of introducing a CIL. The rationale behind this is that priorities of the Council and its partners may change over time. Clearly many of the projects identified in this study as needing CIL funding will likely be funded through CIL in order to ensure the planned development in the LDF is actually delivered. However, this study does not prioritise how funds will be spent and when. The development plan documents that make up the Waveney LDF all have sections on delivery and outline what infrastructure is needed and when to support development and this will act as a guide on how

CIL funds are spent. Additionally, the Council is working on a corporate infrastructure plan to establish how funds and resources are directed to infrastructure and other projects in the District.

- 1.15 In addition to this study, a further study which examines the economic viability of development in the District has been prepared to ascertain the level of CIL development can afford to pay. These two studies together will form the core of evidence base supporting the introduction of CIL in Waveney.
- 1.16 Please note this study does not cover the Broads Authority area. The Broads Authority is the Local Planning Authority for the Broads Authority area and as such would not be subject to any Community Infrastructure Levy that Waveney District Council introduces.

2. Growth Projections

- 2.1 The Waveney Local Development Framework sets out an agenda for growth and regeneration for the period between 2001 and 2021 (2025 for housing). It sets out targets and allocations for housing and economic development. It also sets out a planning policy framework for delivering sustainable development of all types across the District.
- 2.2 With this in mind, it is likely there will be a considerable level of development within the District over the period to 2025. All development will have an impact on infrastructure to some degree. The following section therefore outlines in detail the likely level of housing and economic development that will occur in the District over the period to 2025. However, it must be remembered that in addition to that which is planned for in the Local Development Framework there will be windfall developments (i.e. those not already identified) which will also impact upon infrastructure and therefore benefit from the infrastructure projects outlined in this plan.

2.1 Housing

- 2.1.1 The Waveney Core Strategy requires the delivery of at least 6960 dwellings between 2001 and 2025.
- 2.1.2 As of 1st April 2010, 3212 dwellings had been completed in the District. In addition, a further 1863 dwellings had planning permission or were under construction. It is likely that the infrastructure impacts of the majority of this completed and permitted development have been addressed through the planning process.
- 2.1.3 In addition to the above, the Site Specific Allocations Development Plan Document (DPD) allocates 528 homes over the period to 2025 and the Lake Lothing and Outer Harbour Area Action Plan DPD allocates a further 1,585 homes. The Core Strategy also includes a planned allowance for 250 windfall dwellings from 2017 onwards in the market towns. The Core Strategy's planned allowance for 250 windfall dwellings from 2017 was informed by the 2007 Strategic Housing Land Availability Assessment (SHLAA). Since the 2007 SHLAA 216 new homes have been permitted on windfall sites. The emerging 2012 SHLAA will provide an update of the windfall potential of District. Preliminary results coming out of the SHLAA suggest there is potential for 202 additional windfall units across the entire District and a further 73 on identified larger sites.
- 2.1.4 Table 2.1.1 shows the total expected amount and distribution of new housing across the District to 2025 (excluding sites already with planning permission). In addition to the figures presented in the table there is a planning permission for 800 new homes on Woods Meadow, Oulton. This planning permission is subject to the imminent signing of a Section 106 agreement which will deal with the infrastructure requirements associated with the development. Therefore, these 800 homes have been left out of calculations throughout this study.

2.1.5 For calculating the impact of residential development on infrastructure it is assumed in this study that each new dwelling will have an average of 2.2 people living in it. This average comes from the 2001 Census.

| | Settlement | Site Specific Allocations DPD (January 2011) | Emerging Lake Lothing and Outer Harbour Area Action Plan (policy CS05 Core Strategy Adopted 2009) | Other identified deliverable sites in 2012 SHLAA (preliminary results) | Windfall potential (preliminary results from 2012 SHLAA) | Total |
|-----------------|---------------------------------------|---|--|---|---|--------------|
| | Lowestoft + Carlton Colville + Oulton | 284 | 1585 | 53 | 202 | 2328 |
| Market Towns | Beccles + Worlingham | 43 | 0 | 5 | | |
| | Bungay | 51 | | | | |
| | Halesworth | 90 | | | | |
| | Southwold + Reydon | 0 | | | | |
| Larger Villages | Barnby + North Cove | 0 | 0 | 15 | | |
| | Blundeston | 0 | | | | |
| | Corton | 0 | | | | |
| | Holton | 0 | | | | |
| | Kessingland | 0 | | | | |
| | Wangford | 0 | | | | |
| | Wrentham | 0 | | | | |
| | Elsewhere | 0 | 0 | 0 | | |
| | TOTAL | 468 | 1585 | 73 | 202 | |

Table 2.1.1 – Forecasted Housing Development as of March 2012

2.2. Economic Development

- 2.2.1 Policy CS07 of the Waveney Core Strategy sets a target of 5000 additional jobs over the period 2001 to 2021. To help deliver this target the Site Specific Allocations DPD allocates 47.3 hectares of land for industrial use. The Lake Lothing and Outer Harbour Area Action Plan allocates approximately 51.2 hectares (although some of this will be replacement provision where existing businesses relocate elsewhere in the District, most probably on sites allocated in the Site Specific Allocations DPD).
- 2.2.2 In addition to the above allocated land, the Development Management Policies DPD (Adopted January 2011) safeguards a number of existing industrial areas across the District. Some of these industrial areas have vacant land within them which will likely be developed within the plan period. As of 1st April 2010 this vacant land equates to approximately 3.6 hectares.
- 2.2.3 This equates to a total of approximately 102 hectares. Using average ratios set out in the Lowestoft and Great Yarmouth Employment Land Evidence Base Report (2009) this would equate to approximately 408,000 sqm.
- 2.2.4 In addition to the above, 44 hectares of land currently has planning permission or is under development for industrial uses throughout the District.
- 2.2.5 There is also likely to be further retail development in the District over the plan period. Policy CS10 of the Core Strategy states that approximately 21,000sqm of new comparison (non-food) floorspace will be provided in Lowestoft as an extension to the town centre. The DTZ Retail Capacity Update (2010) estimates an updated need of between 17,550 and 20,200sqm. Policy SSP3 of the Lake Lothing and Outer Harbour Area Action Plan allocates a proportion of this floorspace to the Peto Square area. The remainder will be developed elsewhere within and adjacent to Lowestoft town centre. There is likely to be additional convenience (food) retail within the plan period. The long-term projection from the Great Yarmouth and Waveney Retail and Leisure Study (2006) indicated a capacity of between 2,300 and 4,700sqm. The DTZ Retail Capacity Update (2010) estimates an updated need of 1,450sqm. There is currently an outstanding planning permission for a 2,000sqm food store in Halesworth.
- 2.2.6 The Waveney Core Strategy and Development Management Policies give favourable consideration to economic development throughout the District including tourism. Therefore, it is also likely that within the plan period there will be a number of windfall developments of various commercial uses.
- 2.2.7 The level of economic development expected to occur within the plan period as described above will likely have an impact on existing infrastructure, particularly transport and utility infrastructure.

3. Transport

- 3.1 New development within Waveney will put additional stress on the District's transport infrastructure. Transport infrastructure includes roads, car parking, rail, buses, and pedestrian and cycle facilities. In order to achieve sustainable development it is necessary to promote a modal change from car-use to more sustainable modes of transport such as public transport and walking and cycling.

3.1 Road

Overview

- 3.1.1 The A12 road that links Great Yarmouth to London runs south through Waveney District. Between Gorleston and Lowestoft the road is a dual-carriageway. South of Lowestoft, between Kessingland and Ipswich, few parts of the road are dualled which inhibits access to Lowestoft from London and the South East. The road goes through the built up area of Lowestoft through residential areas and close to the town centre and as such is used for a high number of local journeys. The A12 crosses Lake Lothing at the Bascule Bridge, one of two crossings in the town. Consequently at peak times the road can get congested and restricts north-south movements within the town. Short local trips within Lowestoft also cause problems to other routes within the town and future development could further increase these problems. Modelling studies have forecast that, by the time the Lake Lothing and Outer Harbour Area Action Plan proposals are implemented, traffic demand could exceed capacity at several places in the central area of Lowestoft and on routes leading to the river crossings. Therefore it appears likely that if existing travel patterns in Lowestoft continue in the future and in the new developments, there will be increased congestion and subsequent traffic delays at busy times on the road network, including junctions with the A12. Therefore town-wide traffic reductions measures will be needed.
- 3.1.2 A long term aspiration for Lowestoft has been the delivery of a third vehicular crossing over Lake Lothing. Core Strategy Policy CS15 states that *“The District Council will continue to promote the creation of a third road crossing of Lake Lothing, as an integral part of dealing with transport problems and issues in Lowestoft and the sub-region.”* The A12 Lowestoft Study Lake Lothing Third Crossing Feasibility Study (Highways Agency, 2009) estimated the cost of this bridge to be approximately £37,809,558. The cost of this bridge together with the lack of funding available means it is unlikely that this project will be delivered in the plan period. Additionally the crossing is not needed to support the planned development of the Lake Lothing area.
- 3.1.3 Other main roads through the district include the A146 which links Lowestoft to Beccles and Bungay, the A145 which links Beccles to the A12 south to Ipswich, and the A144 which links Bungay, Halesworth and the A143 and A146 to the A12 south to Ipswich. The A146 also provides a link from Beccles, Bungay and South Lowestoft to Norwich.
- 3.1.4 The A145 goes through the middle of Beccles and therefore Beccles town centre suffers from heavy traffic from Ellough Industrial Estate travelling to and from the A145 to Ipswich. The A144 goes through the middle of Bungay town centre. As a result, like Beccles, Bungay also suffers from heavy vehicles travelling through the town centre which is damaging the fabric of the town.

Needs

- 3.1.5 Policy CS15 of the Adopted Waveney Core Strategy, the Lake Lothing and Outer Harbour Area Action Plan and the Suffolk Local Transport Plan 3 set out the improvements to road infrastructure required to support the sustainable development and regeneration of Lowestoft and the market towns.
- 3.1.6 The Core Strategy identifies the following road programmes needed to support development:
- Lowestoft Access Project which includes completion of the northern spine road to re-route the A12 through North Lowestoft away from residential areas, improvements to Denmark Road and new access road to development sites within Lake Lothing.
 - Beccles Southern Relief Road to divert heavy traffic from the town centre.
 - Measures to reduce traffic impact in Bungay town centre
 - A146 Barnby to Carlton Colville Bypass
- 3.1.7 The Core Strategy also states that the District Council will continue to promote the creation of a third road crossing over Lake Lothing.
- 3.1.8 In addition to the access solutions to southern development sites, the Lake Lothing and Outer Harbour Area Action Plan also identifies the need to improve the Commercial Road/Station Square junction within the North Peto Square area of Lowestoft.
- 3.1.9 The Suffolk Local Transport Plan 3 (May 2011) identifies all of the above projects with the exception of the A146 Barnby to Carlton Colville Bypass which will now be a longer term proposal.
- 3.1.10 As the A146 Barnby to Carlton Colville Bypass is not identified in the Suffolk Local Transport Plan 3 as a priority now, its delivery is unlikely to be achieved within this plan period and therefore will not require developer funding at present. Additionally, development proposed within the Council’s Local Development Framework will only generate a minor need for this project.
- 3.1.11 With the exception of the southern access to development sites on the south side of Lake Lothing and improvements to the Commercial Road/Station Square junction, none of the above projects are critical in terms of delivering the planned development. However, they will all ensure new development can be more sustainably accommodated within the District. For example, the planned expansion of Ellough Industrial Estate as allocated in the Site Specific Allocations DPD will further increase traffic pressure in Beccles town centre if the Beccles Southern Relief Road is not delivered.

Costs

3.1.12 Table 3.1.1 below summarises the likely costs of the above projects.

Table 3.1.1 – Road Schemes

| Project | Cost | Source |
|---------|------|--------|
|---------|------|--------|

| Project | Cost | Source |
|--|--------------------|--|
| North Lowestoft Spine Road | £4 million | SCC LTP3 |
| Denmark Road Improvements | Unknown | |
| Access road into development sites on south side of Lake Lothing | £1.5 million | Suffolk County Council |
| Beccles Southern Relief Road | £4 Million | SCC LTP3 |
| Bungay Town Centre Improvements | £450,000 | SCC LTP3 |
| Commercial Road/Station Square Junction Improvements | £1,176,500 | Regional Growth Fund bid, Suffolk County Council |
| Total | £11,126,500 | |

Funding

- 3.1.13 The Suffolk Local Transport Plan 3 indicates that Suffolk County Council will invest capital funds to meet the full cost of delivering the Bungay Town Centre Improvements. The Suffolk Local Transport Plan also indicates that Suffolk County Council will either fund the full cost of delivering the North Lowestoft Spine Road or the Beccles Southern Relief Road.
- 3.1.14 For the Commercial Road/Station Square junction improvements, a bid was made to the Regional Growth Fund to cover the cost of the improvements, but unfortunately it was unsuccessful. However, Suffolk County Council indicate that they may be able to fund these improvements in the next five years.
- 3.1.15 The Suffolk Local Transport Plan indicates that Suffolk County Council will seek funding from the Department for Transport major scheme funds for the Denmark Road improvements.
- 3.1.16 The access road into the Sustainable Urban Neighbourhood will be delivered as part of the development of that area. This may be through a section 106 agreement or other collaborative delivery mechanisms within the west part of the Sustainable Urban Neighbourhood allocation in the Area Action Plan. It is likely this road will be built by developers and therefore CIL may not be the most appropriate mechanism for securing its delivery.
- 3.1.17 Considering the above there is likely to be a short term potential funding gap for either the Northern Spine Road or the Beccles Southern Relief Road, depending on what project Suffolk County Council decide to fund in the short-term. However, there is potential that both schemes will receive funding through the lifetime of the plan

3.2 Rail

Overview

- 3.2.1 Network Rail control the rail infrastructure in Waveney and the train service is currently operated by the National Express East of England franchise. The main train line through Waveney is the East Suffolk Line which connects Lowestoft, Beccles and Halesworth to Ipswich and beyond to London.

Presently only a once every two hour service exists on this line. Lowestoft is also connected to Norwich by rail where a more frequent hourly service operates.

Needs

- 3.2.2 In order to encourage more sustainable methods of travel, there is a need to increase the frequency of the train service between Lowestoft and Ipswich and the market towns between them. Policy CS15 of the Adopted Waveney Core Strategy identifies the need for the Beccles Rail Loop. This project is also identified as a priority in the Suffolk Local Transport Plan 3. The loop together with signalling improvements will mean that an hourly service can operate between Lowestoft and Ipswich. National Express East Anglia has made plans to introduce an hourly service once this project is complete, which is expected to be late 2012.
- 3.2.3 At present facilities at Lowestoft Station are restricted with poor quality passenger facilities and limited interchange with other transport modes. The Lake Lothing and Outer Harbour Area Action Plan promotes the improvement of facilities at Lowestoft Station such as visual information systems, toilet facilities, parking provision (both car and cycle), and canopies. The Area Action Plan also promotes increased interchange facilities for taxis and buses.

Costs

- 3.2.4 The Beccles Loop is forecasted to cost £4 million to deliver. The Lake Lothing and Outer Harbour Area Action Plan forecasts that improvements to Lowestoft Station, including interchange facilities will cost in the region of £2 million. The total cost of rail infrastructure for the plan period is therefore **£6 million**.

Funding

- 3.2.5 The Beccles Loop is being progressed by Network Rail with additional supporting funding from the county council to secure its delivery. The Local Transport Plan 3 states that Suffolk County Council will contribute £1million to its delivery. Network Rail will fund the remaining £3 million.
- 3.2.6 A successful bid has been prepared by Suffolk County Council to the Local Sustainable Transport Fund for a package of measures to support sustainable transport in the town. This bid included the provision of the interchange at the Lowestoft Station. As such there is no funding gap for the station interchange.

3.3 Other public transport

Overview

- 3.3.1 There are no strategic infrastructure requirements for other types of public transport in the District such as buses. However, new development in the Lake Lothing Outer Harbour Area Action Plan Area will require new bus routes, particularly through the redevelopment areas on the south-side of

Lake Lothing. Whether these services will require developer funding to help subsidise the running of new services is not yet known. The level of service provision will be determined through transport assessments and it is envisaged that a Section 106 obligation could be used to require developer contributions if needed.

- 3.3.2 New bus routes throughout Lowestoft and around the Lake Lothing area are included in a successful bid to the Local Sustainable Transport Fund prepared by Suffolk County Council. The £1.5 million package will deliver two new routes, one in North Lowestoft and one in South Lowestoft serving key employment and tourist locations.
- 3.3.3 The Lake Lothing and Outer Harbour Area Action plan promotes the development of water-borne public transport such as water taxis. This will likely be a private sector initiative, however, it will be important that mooring stations are provided on the key development sites.

3.4 Pedestrian and Cycle Network

Overview

- 3.4.1 Key to reducing the transport impact of new development is the promotion of walking and cycling.
- 3.4.2 Part of the National Cycle Route goes through parts of Lowestoft, Beccles and Halesworth. There are proposed extensions to the National Cycle Route north of Lowestoft to link to Hopton. This route had planning permission but due to landowner constraints and lack of funding it has not been delivered to date and the planning permission has now expired. There are also other proposed extensions including a link between Lowestoft and Beccles and through parts of Halesworth. In addition to the national route there are also regional cycle routes that link the main towns of Waveney.

Needs

- 3.4.3 In Lowestoft, 80% of the people who work in Lowestoft also live in Lowestoft which means cycling and walking are feasible forms of transport. However, the majority of journeys made by car in the town are relatively short and could be made by walking or cycling as an alternative. With the development proposed in the Area Action Plan, this will likely get worse unless cycling and walking are made more attractive.
- 3.4.4 The reliance on the car for short journeys within the town significantly contributes to peak time congestion, resulting in delays to journeys as people cross between the north and south of the town at the two bridge crossings at each end of Lake Lothing. The significant north-south movement is related to a large population living to the south of the river and a significant amount of employment being located to the north. Therefore, the Bascule Bridge at the east end of Lake Lothing suffers from heavy traffic. This together with the narrowness of the lanes and proximity of the footways to the carriageway makes it an unpleasant environment for non-motorised users. Due to the narrowness of the carriageway, and low height of the parapets, cycling is not

permitted on the footway. This is ignored by some cyclists because of safety concerns about using the road and can result in conflict.

- 3.4.5 Key measures to address this and encourage walking and cycling include plans in the Area Action Plan to deliver two pedestrian and cycle crossings over Lake Lothing. One of these will be adjacent the Bascule Bridge and the other will link Brooke Peninsula to Normanston Park and the surrounding route network.
- 3.4.6 These two bridges will help improve the north south connectivity of the town and provide a safer, more pleasant route to cycle and walk between the two halves of the town.
- 3.4.7 The bridge provided adjacent to Bascule Bridge will help address some of the specific issue relating to pedestrian and cycle movement over the existing bridge. The bridge provided at Brooke Peninsula will provide a much needed crossing in the centre of Lake Lothing which will serve the large scale residential development proposed in the Sustainable Urban Neighbourhood. The bridge will provide quick and easy access to Normanston Park which will address the open space needs generated by the development. The bridge will also provide access to Oulton Broad North Station and the Oulton Broad shopping area for new and existing residents in South Lowestoft. It will also improve north-south connections within the town and should further reduce the need to travel by car from residents of new development and existing development.
- 3.4.8 In addition to the bridge across Lake Lothing, a new bridge across the railway is also needed to improve cycle connections to Normanston Park. The existing bridge does not enable cyclists to remain on their cycles.
- 3.4.9 Policy TML2 of the Lake Lothing and Outer Harbour Area Action Plan outlines a number of other improvements to the pedestrian and cycle network to help reduce car travel. These include:
- Pedestrian and cycle route through the strategic sites on the southern shore of Lake Lothing.
 - Pedestrian and cycle route from Bridge Road, through Oswalds Boatyard to Normanston Park on the north shore of Lake Lothing.
 - Improved footways on new and existing routes within strategic sites
 - Cycles and pedestrian provision on south Denmark Road.
- 3.4.10 In addition to the above schemes, the Lowestoft Transport Strategy (Suffolk County Council. June 2011) identifies a package of improvements to the Lowestoft cycle network to help promote a modal shift. The cost and funding arrangements for these improvements are currently unclear. It is hoped through this consultation process that this information will be refined.
- 3.4.11 In Beccles, the Site Specific Allocations DPD allocates 14 hectares of land for industrial development at Ellough Airfield. As the site is slightly remote from the main residential areas of Beccles and Worlingham there is a need for improved cycle/pedestrian access to encourage more sustainable forms of transport. A cycle path between the Copland Way Roundabout and Cookes Corner will help link the industrial allocation to Regional Cycle Route 31 and

enable people from Worlingham and Beccles to cycle to the industrial estate without having to cycle on roads with vehicular traffic. This will increase the attractiveness of cycling as a method of commuting and reduce the traffic impact of the allocation.

3.4.12 In Halesworth, 90 new dwellings and 12.25 hectares of new industrial land have been allocated in the Site Specific Allocation DPD. The National Cycle Network goes through Halesworth, however, there is a missing link on Norwich Road which means the network is diverted through Holton. This 0.7km missing link between the Sparrowhawk Road junction and the Harrisons Way junction forms the most direct means of travel between the proposed industrial land and the new housing land. Therefore the provision of this link will reduce the impact that these allocations will have on the local highway network and should encourage healthier lifestyles.

3.4.13 It is noted that there are many other required cycle and pedestrian improvements required across the District ranging from large projects such as the link between Lowestoft and Hopton and small projects that link existing cycle and pedestrian routes. The above projects specifically identified are the only projects that are needed to address the impacts of planned development in the Waveney Local Development Framework. There may be opportunities for neighbourhoods to use the proportion of CIL that is handed back to them to help deliver more localised improvements (See Section 11)

Costs

3.4.14 The cost of providing a new swing bridge over Lake Lothing, adjacent to the Bascule Bridge is estimated to cost **£1.3 million**.

3.4.15 A feasibility study into the pedestrian and cycle bridge across Lake Lothing at the Brooke Peninsula identified and costed three potential options for a crossing. Options 1 and 2 have a higher soffit level of 12m above ordnance datum to allow more craft to pass under the bridge without the need for opening. Options 1 and 2 would also involve the creation of a new bridge across the railway as described above. Option 3 has a lower soffit level of 3.5m above ordnance datum and does not necessarily require the railway crossing, although this will still be desirable. The height of this bridge would be consistent with the Bascule vehicular bridge across Lake Lothing on the A12.

- Option 1: Swing Bridge = £6,668,704
- Option 2: Bascule Bridge = £7,105,052
- Option 3: Bascule Bridge = £4,810,382

3.4.16 The railway crossing would cost an additional £931,480.

3.4.17 Therefore the likely cost of the pedestrian and cycle bridge across Lake Lothing at the Brooke Peninsula is between **£4,810,382** and **£8,036,532**.

3.4.18 The cost of the other improvements identified in Policy TML2 as referred to above are unknown, however, these improvements will likely be delivered as part of the development of the strategic sites, as they are completely within the strategic sites. The exception is a proposed section of an improved cycle path between Oswalds Boat yard and the railway bridge to Normanston Park

on the north side of Lake Lothing. Using costs outlined in Sustran’s “Connect2 Greenways Guide” it is estimated that this would cost approximately **£70,000**.

- 3.4.19 The cycle path between the Copland Way Roundabout and Cookes Corner in Ellough, Beccles is forecasted to cost **£70,000** (Source: Suffolk County Council)
- 3.4.20 The cost of providing a new cycle path on Norwich Road in Halesworth is estimated to be in the region of **£66,000** (Source: “Connect2 Greenways Guide”). This is assuming it would involve converting the existing path to a shared path for part of the way and constructing a new path for part of the length.
- 3.4.21 In summary the total cost of providing the cycle and pedestrian infrastructure required to support development is between **£6,116,382** and **£9,342,532** depending upon what bridge option is selected at Brooke Peninsula.

Funding

- 3.4.22 A successful bid has been prepared by Suffolk County Council to the Local Sustainable Transport Fund for a package of measures to support sustainable transport in the town. This bid included the provision of a pedestrian and cycle swing bridge over Lake Lothing by the Bascule Bridge.
- 3.4.23 There is no funding currently available for the second pedestrian and cycle crossing over Lake Lothing at Brooke Peninsula. There is also no funding for a formalised cycle path between Oswalds Boatyard and the railway bridge by Normanston Park.
- 3.4.24 Other improvements mentioned in Policy TML2 will be delivered as part of the development of the strategic sites in the Lake Lothing area.
- 3.4.25 There is no funding available for the cycle link between the Copland Way Roundabout and Cookes Corner in Ellough, Beccles
- 3.4.26 There is no funding allocated for extending the National Cycle Network between the Sparrowhawk Road junction and the Harrisons Way junction on Norwich Road in Halesworth.
- 3.4.27 In summary the likely funding gap for pedestrian and cycle infrastructure will be between **£5,016,382** and **£8,242,532**.

4. Education

- 4.1 Improving educational achievement is a key objective of the Waveney Core Strategy (Objective 4). It is therefore important that educational provision across the District keeps up with development. Policy CS09 of the Core Strategy also recognises the importance of education in achieving sustainable development. Policy CS04 states that developer contributions will be sought for education facilities (including early years and community education).
- 4.2 Suffolk County Council are the Local Education Authority covering the Waveney District and therefore responsible for the provision of primary and secondary education throughout the District. For many years Suffolk County Council have requested developer contributions towards education provision from large developments to help off-set the impact of new development.
- 4.3 The education system in Waveney is currently a three-tier system comprising of first schools, middle schools and high schools. However, Suffolk County Council is currently undertaking a reorganisation of schools across Suffolk to move towards a two-tier system of primary and secondary schools.

4.1 Pre-School

Overview

- 4.1.1 The Childcare Act 2006 places a duty on Suffolk County Council to play a lead role in facilitating the provision of pre-school childcare within the broader framework of shaping children's services in partnership with the private, voluntary and independent sectors.
- 4.1.2 Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. This means pre-school provision is now not just a market provided facility.

Needs, Costs and Funding

- 4.1.3 The Lake Lothing and Outer Harbour Area Action Plan identifies a need for 2 year groups of pre-school provision to accommodate the 1,585 dwellings proposed. This should form part of the primary school required in the Sustainable Urban Neighbourhood (Policy SSP3). The cost and funding of this primary school is discussed in Section 4.2 below.
- 4.1.4 Suffolk County Council advise that there will likely be a requirement for additional pre-school provision to accommodate other development planned for Lowestoft. Given the deprivation scores for Lowestoft it is likely that there will be increased demand for pre-school provision given the increased eligibility for free pre-school provision for 2 year olds. Suffolk County Council estimate that 0.11 places will be needed for each new home in Lowestoft. In addition to the 1,585 new dwellings referred to above a further 337 homes are likely to be developed over the period to 2025 in Lowestoft. Therefore a further 37 pre-school places will be needed to accommodate new

development. Suffolk County Council estimate that each place costs £5,984. Therefore the cost of providing these places is £221,408. Suffolk County Council would expect developers to fund these places. Therefore the funding gap for pre-school provision for Lowestoft is **£221,408**.

4.2 Primary

Overview

4.2.1 Primary education in Waveney is currently made up of first schools and middle schools. However, as explained above this is now starting to change as the education system moves towards a two-tier system. This means some schools closing and others merging. Despite this, as explained below, there will be a need for additional capacity to serve the increase in population arising from new development.

Needs

4.2.2 New development will increase demand for school places. In some locations there may not be capacity to accommodate this demand. In these cases improvements and extensions to schools will be needed to accommodate the additional pupils.

4.2.3 The Lake Lothing and Outer Harbour Area Action Plan allocates 1,585 new homes across the Area Action Plan area. The majority of these homes (1,505) are on the south side of Lake Lothing (Sustainable Urban Neighbourhood, Kirkley Rise and Western-end of Lake Lothing). The AECOM Social Infrastructure Assessment (2010) estimates that 1500 units will require at least 1.8 forms of primary school provision. This should be in the form of a new 2-form entry primary school as the existing schools in the area do not have the ability to expand. A 2-form entry primary school will also ensure that there is a level of surplus to facilitate parental preference and mid-year admissions, and for contingency planning.

4.2.4 Outside the Lake Lothing area, a new primary school will be developed to serve the Woods Meadow development which has planning permission subject to the signing of a Section 106 agreement. This may be located on the development itself or on land allocated west of Millennium Way by Policy LOW1 of the Site Specific Allocations DPD.

4.2.5 There are no other new primary schools proposed in the District. However, development in some areas of the District may exceed the capacity of the local catchment school. In these circumstances improvements and/or extensions to existing primary schools will be required. Tables 4.2.1, 4.2.2. and 4.2.3 below look at each school and its forecasted surplus/deficit in capacity (Data provided by Suffolk County Council). The tables also show the likely level of development in each catchment based on projections in Table 2.1.1 and calculates the number of extra places needed to support development in that catchment. Suffolk County Council assume that for every 100 dwellings (2 bed and above) there are 25 new primary school children. For the purposes of this study it is assumed that all dwellings developed are 2 bedrooms or above.

Table 4.2.1 – Education Capacity in Lowestoft

| School | Capacity | Average Spare Capacity 2011-2015 | Number of Homes 2012-2025 | Number of new pupils | New places needed |
|--------------------------------|----------|----------------------------------|---------------------------|----------------------|-------------------|
| Oulton Broad Primary | 210 | -126 | 50 | 13 | 13 |
| Woods Loke Primary | 420 | -58 | 124 | 31 | 31 |
| Gunton Primary | 315 | -2 | 60 | 15 | 15 |
| Poplars Primary | 420 | -26 | 0 | 0 | 0 |
| Northfield St Nicholas Primary | 420 | 28 | 0 | 0 | 0 |
| St Margaret's Primary | 420 | 126 | 46 | 11 | 0 |
| Roman Hill Primary | 420 | -84 | 34 | 9 | 9 |
| Carlton Colville Primary | 420 | -13 | 53 | 13 | 13 |
| Pakefield Primary | 420 | -14 | 0 | 0 | 0 |
| Fen Park Primary | 420 | 111 | 0 | 0 | 0 |
| Meadow Primary | 210 | -90 | 50 | 13 | 13 |
| Dell Primary | 406 | 10 | | 0 | 0 |
| Total | | | | | 94 |

Table 4.2.2 - Education Capacity in Beccles

| School | Capacity | Average Spare Capacity 2011-2015 | Number of Homes 2012-2025 | Number of new pupils | New places needed |
|-------------------------------------|----------|----------------------------------|---------------------------|----------------------|-------------------|
| Crowfoot Primary, Beccles | 315 | 48 | 15 | 4 | 0 |
| St Benets Catholic Primary, Beccles | 119 | 26 | 0 | 0 | 0 |
| Ravensmere Infant, Beccles | 67 | 15 | | | 0 |
| Albert Pye Primary, Beccles | 360 | 85 | 28 | 7 | 0 |
| Total | | | | | 0 |

Table 4.2.3 – Education Capacity Elsewhere

| Settlement | Capacity | Average Spare Capacity 2011-2015 | Number of Homes 2012-2025 | Number of new pupils | New places needed |
|--------------|----------|----------------------------------|---------------------------|----------------------|-------------------|
| Bungay | 315 | 73 | 51 | 13 | 0 |
| Halesworth | 315 | 99 | 90 | 23 | 0 |
| Reydon | 210 | 27 | 0 | 0 | 0 |
| Kessingland | 315 | 18 | 15 | 4 | 0 |
| Total | | | | | 0 |

4.2.6 As can be seen from the tables above, there will only be a need for school improvements/expansions to accommodate development in Lowestoft. Elsewhere in the District the levels of development proposed will likely fit within existing capacity. The tables above do not include the forecasts of windfall that have been taken into account in other parts of this study. This is because these are forecasts and are not necessarily based on identified sites. As the location of these developments are uncertain it is not possible to analyse the impact of windfall development on local schools. It could be for example that most windfall development will happen where there is capacity

in schools to absorb it. Should the 202 forecasted windfall homes be developed in areas where there is no or little school capacity than the number of primary places required would be approximately 51.

Costs

- 4.2.7 The Lake Lothing and Outer Harbour Area Action Plan estimates that the cost of providing a new 2 form entry primary school (including a pre-school) within the Sustainable Urban Neighbourhood development to be **£9.5 million**. This figure takes into account the likely higher build costs associated with the previously developed nature of the site and flood risk issues. The primary school will also require at least 2 hectares of land.
- 4.2.8 Suffolk County Council, using Department of Education cost per place figures which are regionally adjusted for Suffolk, estimate that a primary school place costs £11,967. Therefore the cost of improving schools in Lowestoft to take another 94 places as identified above will cost **£1,124,898**.

Funding

- 4.2.9 The new primary school on the Sustainable Urban Neighbourhood development will need to be funded largely through a Section 106 planning obligation from major developments on the site. Given viability constraints on the Sustainable Urban Neighbourhood it is likely that some form of an overage agreement will be needed to ensure the school is funded as viability improves in the future. The 2 form entry school will serve 1,500 houses. Any contribution to the school secured from the Sustainable Urban Neighbourhood needs to be proportionate in order to meet the planning obligation tests set out CIL Regulation 122. As the Sustainable Urban Neighbourhood will likely provide 1,380 new units a maximum of £8,740,000 could be secured through a Section 106 planning obligation. The remaining sum will need to be funded from CIL. It is appreciated that a Section 106 planning obligation cannot be secured for infrastructure that is funded by CIL. Therefore, CIL will not be used to fund the school, until 5 planning obligations have been entered into providing funding for the school. At this point no more section 106 planning obligations can be used to fund the school. The residual funding gap is therefore £760,000. There is no public funding currently available to improve existing primary schools to address the impacts of new development. Therefore the CIL funding gap for new primary school provision to support development is **£1,884,898**.

4.3 Secondary and Sixth Form

Overview

- 4.3.1 Currently there are three high schools in Lowestoft, one in Beccles, and one in Bungay. In September 2011 a new high school opened in Pakefield. A new Sixth Form College opened in Lowestoft in September 2011. There are also sixth forms in Sir John Leman High School in Beccles and in Bungay High School.

Needs

- 4.3.2 The recent re-organisation of secondary school provision in Lowestoft including the opening of Pakefield High and the Sixth Form College means that there is capacity within the District's secondary schools to accommodate the development proposed in the Waveney LDF.

5. Open Space and Green Infrastructure

- 5.1 Open space and green infrastructure perform a wide variety of important functions, including, providing space for formal and informal recreation, improving the appearance of towns and villages and providing areas for wildlife. Open space therefore provides a number of benefits, both socially, environmentally and economically, ranging from individual and community health benefits, enhanced property values, and increased biodiversity.
- 5.2 Pressure on existing open space and green infrastructure increases with population and housing growth. It is therefore important that adequate additional open space are provided as growth takes place. Planning Policy Guidance Note 17 together with local policies CS04 and CS14 of the Core Strategy, DM25 of the Development Management Policies and EHC1 of the Lake Lothing and Outer Harbour Area Action Plan set out the principle that new development should contribute to open space provision to meet additional demand. In some cases this provision will be made on the development site itself, in other cases this provision will be provided off-site, either in the form of new facilities or in improving existing facilities. The supporting text to Policy DM25 of the Development Management Policies states that sites of 20 dwellings or more should provide on-site open space.
- 5.3 The following sections detail the different types of open space that will likely be needed to support development across Waveney.

5.1 Play

Overview

- 5.1.1 Play is an important part of the development of young people by providing opportunities to interact and socialise with others, learn about risk taking and improvisation, as well as other aspects of growing up including generating self esteem and independence. It is important that public areas designated for play are accessible to the whole population. Play provision can take the form of equipped areas of open space and more informal unequipped areas.
- 5.1.2 The Fields in Trust (formerly the National Playing Fields Association) have established a national standard for play provision of 0.8 hectare per 1000 people. This is broken down into 0.25 hectares of equipped space and 0.55 hectares of non-equipped informal and amenity space.
- 5.1.3 New development will put increased pressure on existing facilities and will create new demand for additional and improved facilities, hence making the existing deficits more acute. It is important that new and improved play space is provided to support new development.

Needs

- 5.1.4 The need for the new and improved play space can be calculated by using the above standard of 0.8 hectares per 1000 people and applying it to the level of new development expected over the plan period.

- 5.1.5 The 0.8 hectares per 1000 people equates to 17.6m² of play space per dwelling assuming 2.2 people per house¹.
- 5.1.6 The housing growth figures indicated in section 2.1 indicate an additional 2,328 homes will be developed over the period to 2025. Therefore, over this period an additional 4.1 hectares of play space will be required.
- 5.1.7 Some of this need will be addressed by developers providing play space within the development site. Policy DM25 encourages developments of 20 dwellings or more to provide open space on-site. In the majority of cases this will include play space. The standards applied for onsite provision are based on the Fields in Trust standard of 2.4 hectares per 1000 people.
- 5.1.8 It is possible to calculate the likely amount of on-site provision over the period by analysing the size of sites identified in the emerging 2012 SHLAA. There may also be instances where, with sites of 20 or more dwellings it may be more beneficial to have off-site provision. Considering the above, it is estimated that out of the above need, 3.1 hectares will be provided directly by developers on development sites.
- 5.1.9 Therefore the residual need for off-site provision which will need to be funded through a Community Infrastructure Levy is **1 hectare**.

Costs

- 5.1.10 The average cost of providing a play area in Waveney is £83.26 per m². This has been calculated by taking the cost of providing local examples of equipped play space (£115 per m²) and local examples of unequipped open space (£69 per m²)². These figures do not include the cost to purchase land which is estimated to be £4.75 per m² (Source: District Valuer, 2011). Therefore the cost of providing 1 hectare of play space is **£880,100**.
- 5.1.11 New play space will require ongoing maintenance in order for it to continue to be a useful and valuable resource for the community. Maintenance has a considerable cost implication. The Localism Act includes amendments to the Community Infrastructure Levy legislation to allow CIL to be spent on revenue projects. The Council currently requests developer contributions towards the cost of maintaining new open space for a period of 10 years. The Open Space Supplementary Planning Document (2012) estimates that the cost of basic maintenance of open space for a period of 10 years is approximately £3.50 per m². Therefore the revenue cost of maintaining the 4.1 hectares of new play space for 10 years will be approximately **£143,500** (including annual inflation).

Funding

- 5.1.12 Whilst there has been public and lottery funding in the past for play space, this has been to deal with existing deficits of provision. No funding is available to address new demand arising from new development. Therefore

¹ 0.8 hectares per 1000 people = 8m² per person. 8m² x 2.2 people per dwelling = 17.6m² per dwelling

² According to Fields in Trust (FIT) standard for every 1m² of children's play space 0.69m² will be unequipped and 0.31m² will be equipped. (0.69 x £69) + (0.31 x £115) = £83.26. The source of these costs is Waveney Norse

the cost of providing new and improved off-site play space will have to be covered by developer contributions through the Community Infrastructure Levy. Therefore, the capital funding gap which CIL will be required to address is **£880,100**.

5.2 Outdoor Sport

Overview

- 5.2.1 Outdoor sport provision consists of publically accessible, outdoor areas set aside for formal and informal sports. These include sports pitches such as football rugby and cricket as well as informal playing fields with pitches for sport. Other outdoor sports facilities include bowling greens and tennis courts. Informal and formal outdoor sports facilities have a range of community benefits including encouraging healthy lifestyles.
- 5.2.2 The Fields in Trust (formerly the National Playing Fields Association) have established a national standard for outdoor sports provision of 1.6 hectare per 1000 people. This is broken down to 1.2 hectares per 1000 people for playing pitches and 0.4 hectares per 1000 people for other outdoor sports such as tennis, bowls and athletics. The Waveney Playing Pitch Assessment (2002) identified a quantitative deficiency against this standard of 54 hectares for the whole District. This deficit was mainly constrained to Lowestoft. However, deficits were also identified in Bungay, Halesworth and Beccles. The assessment also included a refined assessment based on actual demand for facilities. Under this assessment a deficiency of 15.7 hectares for the entire District was identified. The assessment identified a need for an artificial hockey pitch, more cricket provision in Lowestoft and Bungay, and 12 to 14 additional junior football pitches across the District.

Needs

- 5.2.3 Applying the above Fields in Trust standard of 1.6 hectares per 1000 people, a need for an additional **8.19 hectares** of outdoor sport will be needed to support the development of 2,328 homes over the period to 2025³.
- 5.2.4 To address this need and existing deficits, the Council has identified and is planning to deliver a number of outdoor sport projects.
- 5.2.5 In Carlton Colville, 32.3 hectares of land has been allocated for outdoor sports and leisure uses at Oakes Farm (Policy LOW11 of the Site Specific Allocations DPD). This will likely include new football pitches, cricket, athletics provision such as an athletics track and possibly rugby. The allocation of this site will help address existing deficits and address new demand arising from development across the District.
- 5.2.6 In Halesworth the Council has allocated the existing playing fields in the town for housing in order to secure the delivery of a larger and improved playing field elsewhere in the town (Policy HAL3 of the Site Specific Allocations DPD).

³ This is calculated as follows: 1.6 hectares per 1000 people = 16m² per person. 2.2 people per dwelling x 16m² = 35.2m² per dwelling. 35.2m² per dwelling x 2,328 homes = 8.19 hectares

- 5.2.7 In Kessingland the Council has allocated 2.76 hectares of land for a new playing field (Policy LOW10 of the Site Specific Allocations DPD).
- 5.2.8 It should be noted that the projects in Kessingland and Halesworth identified above deal mainly with existing deficits rather than dealing with deficits arising from future development.
- 5.2.9 It is unlikely that any development will provide new sport facilities on-site as part of their on-site requirement under Policy DM25, given the large size of these facilities. Therefore it is likely that most outdoor sport provision to accommodate new development will be off-site using contributions pooled by CIL.

Costs

- 5.2.10 It is currently uncertain what form future sports provision will take. Therefore using averages from local examples, a grass sports pitch costs £8.29 per m² to set up and lay out. There is no local evidence for the cost of non-pitch sports. Sport England provide average sports facilities costs on their website (http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/planning_kitbag/facilities_costs_-_2nd_quarter.aspx). Using Sport England figures the non pitch average cost is £81.27 per square metre (Quarter 2 2011 Sport England estimates based on Tennis, Bowls and Athletics). The above figures exclude the cost of purchasing open space land which is locally estimated to be £4.75 sqm (Source: District Valuer, 2011). Assuming that of the 8.19 hectares of outdoor sport space required, 6.14 hectares is to be for pitch based sports and 2.05⁴ is to be for non-pitch sports the cost of providing the outdoor sport requirement is **£2,138,469**
- 5.2.11 New outdoor sport facilities will require ongoing maintenance in order for them to continue to be a useful and valuable resource for the community. Maintenance has a considerable cost implication. The Localism Act includes amendments to the Community Infrastructure Levy legislation to allow CIL to be spent on revenue projects. The Council currently requests developer contributions towards the cost of maintaining new open space for a period of 10 years. The Open Space Supplementary Planning Document (2012) estimates that the cost of basic maintenance of open space for a period of 10 years is approximately £3.50 per m². Therefore the revenue cost of maintaining the 8.19 hectares of new outdoor sport facilities for 10 years will be approximately **£286,650** (including annual inflation).

Funding

- 5.2.12 The cost of providing the 8.19 hectares of outdoor sport to support the development of 2,328 new homes across the District will need to be funded by development through the CIL. The remaining hectares of the Council's proposed outdoor sports facilities will need to be funded by other sources. Some of the proposals such as the Halesworth replacement playing fields will be funded through enabling development. The proposed new Kessingland playing field already has some Section 106 funding secured for it which will help deliver the playing field. Some of the Oakes Farm development may be commercially led therefore not requiring public funding.

⁴ Based on the FIT standards of 1.2 ha per 1000 people for pitch sports and 0.4 ha per 1000 people for non-pitch sports.

- 5.2.13 To summarise to provide enough open space for outdoor sport to accommodate the proposed levels of development, **£2,138,469** will be required through CIL.

5.3 Parks

Overview

- 5.3.1 Parks are areas of land normally enclosed, designed and constructed for public use. They are intended to provide accessible, high quality opportunities for informal recreation and community events. There are currently 12 parks in Waveney, 7 of which are in Lowestoft. Together these parks total some 28 hectares. The Waveney Open Space Strategy (2007) reports that the level of provision of parks in Beccles, Bungay and Southwold do not meet the expectations of the local community. However, the overall quality of parks across the District is rated highly with 60% of local people rating local parks as good or excellent.
- 5.3.2 The Core Strategy and Open Space Strategy make a commitment to identify opportunities for the development of new parks as well as improving the quality of existing parks.

Needs

- 5.3.3 The Lake Lothing and Outer Harbour Area Action Plan includes proposals to create a new contemporary park to be known as the East of England Park. The park will be adjacent the North Lowestoft seafront to celebrate the most eastern point of Britain, The park will support the development of the Lake Lothing Area and will be of benefit to people working in the new PowerPark allocation as well as people living in the new residential developments proposed in the area. This 7.8 hectare, destination park, will also be of benefit to local people across the District and visitors from outside the area. The park will consist of space for informal recreation and cultural events as well as equipped play spaces.

Costs

- 5.3.4 Although the Area Action Plan includes information on some of the features the park will have, the exact specification for the park is yet to be determined and therefore the costs of delivery can only be estimates. Waveney Norse estimate that the cost of delivering a new park is approximately £15.32 per m². Therefore the potential cost of delivering the East of England Park will be **£1,194,960**.
- 5.3.5 The East of England Park will require ongoing maintenance in order for it to continue to be a useful and valuable resource for the community. Maintenance has a considerable cost implication. The Localism Act includes amendments to the Community Infrastructure Levy legislation to allow CIL to be spent on revenue projects. The Council currently requests developer contributions towards the cost of maintaining new open space for a period of 10 years. The Open Space Supplementary Planning Document (2012) estimates that the cost of basic maintenance of open space for a period of 10

years is approximately £3.50per m² . Therefore the revenue cost of maintaining the East of England Park for 10 years will be approximately **£273,000** (including annual inflation).

Funding

- 5.3.6 There is currently no funding to deliver the East of England Park although funding sources will be explored as and when they come available. The park will benefit all new development in the Lowestoft area and therefore the CIL could address a proportion of the costs. In terms of working out a reasonable contribution from development the standard of 0.4 hectares of parks per 1000 people standard as identified in the Open Space SPD can be used. This standard identifies a need for 1.64 hectares of parks generated by new development in Lowestoft⁵. Therefore the capital contribution from development via a CIL would be **£251,248**.

5.4 Cemeteries

Overview

- 5.4.1 Cemeteries consist of land set aside for the burial of the deceased. They also are important for wildlife and provide space for quiet contemplation. By their nature, existing cemeteries are a finite resource and additional provision will be needed as the capacity of existing cemeteries is met. New development and the associated increase in population will also increase the need for burial land.

Needs

- 5.4.2 The Council has to make provision of burial land to serve the District. Most parts of the District have adequate land to last many years into the future. However, the Open Space Strategy states that within 15 years it will be necessary to deliver more burial land in Lowestoft and Bungay to meet predicted need.
- 5.4.3 In response to this the Council has allocated 0.33 hectares of land as an extension to Bungay cemetery in the site Specific Allocations DPD (Policy BUN6).
- 5.4.4 Land has not been identified in Lowestoft in the Site Specific Allocations DPD. It is expected that there is capacity for another 10 years in the town, so land will be identified in a review of the DPD. The Open Space Strategy (2007) identified that a site of 2 hectares would be required in Lowestoft. This would also include a crematorium as there is currently no provision of such a facility in the District.

Costs

⁵ 0.4 hectares per 1000 people = 4m² per person. 4m² x 2.2 people per dwelling = 8.8m² per dwelling. 8.8m² x 1869 (total new development in Lowestoft) = 1.64 hectares

- 5.4.5 Until land is identified and proposals worked up, it is not certain what the cost of cemetery and crematorium provision in Lowestoft will be. It is unlikely that the allocated site for burial land in Bungay would have a significant cost implication as it forms a small extension to an existing cemetery. Therefore set up costs should be minimal.

Funding

- 5.4.6 The extension to Bungay Cemetery will be funded by the Council and its partners and will therefore not need contributions from development.
- 5.4.7 It is not currently possible to say presently as to who will fund any future provision of cemeteries as any new provision will be at the very end of the plan period. There may be scope for developer contributions through CIL to help fund part of this, but the scale of developer contributions would need to be reviewed at a later date when further detail is known.

5.5 Allotments

Overview

- 5.5.1 Allotments have been an integral part of the urban landscape in the UK for over a century. Their main use is for growing vegetables and other crops, but they also provide recreational and wildlife benefits. Recently there has been an upsurge in interest in allotments given growing concern about good quality, locally produced food and sustainability. Current trends show an increase in demand regionally and locally. This demand will likely increase with new development.
- 5.5.2 There are currently 32.48 hectares of allotments across the District with highest provision per 1000 people in Southwold (1.08) and the lowest in South Lowestoft (0.13) (The Waveney Allotments, Cemeteries and Church Yards Needs Assessment (2007)). Under Section 8 of the Small Holdings and Allotments Act 1908, Local Authorities have a statutory duty to provide a sufficient number of allotments where they consider there is demand

Needs

- 5.5.3 The Waveney Allotments, Cemeteries and Church Yards Needs Assessment (2007) reports a general need for more allotments in the District. The assessment recommends a standard of 0.3 hectares per 1000 people.
- 5.5.4 Using the above standard, an additional 1.536 hectares of allotments will be required to support the development of 2,328 homes over the period to 2025⁶.
- 5.5.5 To address this need and existing deficits, the Council's Site Specific Allocations DPD has allocated four pieces of land for allotments, these are:
- 0.35 hectares off Monckton Avenue in North Lowestoft (Part of the Policy LOW9 allocation)

⁶ This is calculated as follows: 0.3 hectares per 1000 people = 3m² per person. 2.2 people per dwelling x 3m² = 6.6m² per dwelling. 6.6m² per dwelling x 2,328 homes = 1.536 hectares

- 0.77 hectares south of Nicholson Drive in Beccles (Policy BEC4 allocation)
- 1.02 hectares off Wingfield Street in Bungay (Policy BUN5)
- 0.5 hectares at Dairy Hill, Halesworth (Part of the Policy HAL3 allocation)
- 0.15 hectares at Cucumber Lane, Beccles (Part of the BEC3 allocation)

5.5.6 No land was allocated in South Lowestoft where the greatest shortfall of Allotment provision is. However, there may be potential to provide some allotments as part of the Sustainable Urban Neighbourhood proposal in the Area Action Plan (Policy SSP3). The proposed 0.35 hectares off Monckton Avenue, 0.5 hectares on Dairy Hill and 0.15 hectares at Cucumber Lane will be delivered as part of the development of these sites.

Costs

5.5.7 Local estimates provided by Waveney Norse suggest that the set up cost for allotments is £27.07 per m². The cost of land for allotment use is approximately £4.75 per m² (Source: District Valuer, 2011). Therefore the estimated cost of providing the remaining 1.79 hectares of allotment land allocated in the Site Specific Allocations DPD is £569,578. However, the need for allotment land emanating from 2,328 new dwellings is only 1.536 hectares costing **£488,755**.

5.5.8 It is assumed that the cost of maintaining allotments will be covered by the individual allotment holders.

Funding

5.5.9 There are no current funding sources for the delivery of allotment land. Therefore the funding gap that can be legitimately filled by CIL is **£488,755**.

5.6 Natural and Semi-Natural Greenspace

Overview

5.6.1 Natural and semi-natural greenspaces are areas of undeveloped or previously developed land that contain natural habitats or which have been planted or colonised by vegetation and wildlife including woodland and wetland areas. They are an important resource for wildlife but also have recreational and educational benefits.

Needs

5.6.2 With the exception of a new country park which is being provided as part of the Woods Meadow development, there are no strategic proposals for natural and semi-natural greenspaces. Natural England have set standards for accessibility to natural green space known as the Accessible Natural Greenspace Standards (ANGSt). The standards dictate that:

- an accessible natural greenspace of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home

- at least one accessible 20 hectare site within two kilometres of home
- one accessible 100 hectare site within five kilometres of home
- one accessible 500 hectare site within ten kilometres of home
- one hectare of statutory Local Nature Reserves per thousand population.

5.6.3 The Landscape Partnership on behalf of Natural England undertook a review of ANGSt in Suffolk. The results for Waveney are shown below.

Table 5.6.1

| Local Planning Authority | Number of households* | % of households | | | | | |
|--------------------------|-----------------------|----------------------------|----------------------------|-----------------------------|------------------------------|---------------------------|-------------------------------|
| | | within 300m of a 2ha+ site | within 2km of a 20ha+ site | within 5km of a 100ha+ site | within 10km of a 500ha+ site | meeting all the ANGSt (%) | meeting none of the ANGSt (%) |
| Waveney | 57270 | 21.8 | 47.2 | 13.3 | 13.2 | 0.1 | 34.8 |
| Suffolk averages | 337001 | 18.9 | 45.9 | 25.9 | 28.3 | 3.4 | 32.9 |

*Estimate from 2005 Address Point data checked against 2001 Census data

5.6.4 As can be seen from Table 5.6.1 there are large proportions of households in Waveney who do not have sufficient access to accessible greenspace according to Natural England standards.

5.6.5 The major development sites on Lake Lothing within the District will be within 300m of a 2 hectare site once the Jeld Wen and Brooke Yachts Mosaic County Wildlife Site is opened up as part of the development of the Sustainable Urban Neighbourhood and Kirkley Waterfront Site. Most of other new development planned in the District is currently within 300m of a 2 hectare greenspace. Contributions collected for sports and parks as described above will also help meet these standards. Most new development proposed in the District is further than the distance thresholds identified above for 20ha+, 100ha+ and 500ha+ sites. Without significant extensions to these larger greenspaces it will not be possible to meet these standards locally for new development particularly with respect to the larger greenspaces.

5.6.6 Development across the District may put pressure on existing natural greenspaces. It is not possible to quantify this but it may be necessary to use future CIL funds on improving or maintaining natural greenspaces in certain localities where development may increase impact. Alternatively it may be possible to address local issues through the use of Section 106. The Government is making provision through the Localism Act to require Councils to allocate a meaningful proportion of CIL revenues back to the communities in which the development occurred. There may be circumstances where the community wish to allocate some of their 'local' CIL funds to improving local natural and semi-natural greenspace.

6. Community and Cultural Facilities

- 6.1 Policy CS14 of the Core Strategy gives a strong commitment to protecting and promoting cultural and community facilities. Cultural and community facilities such as leisure, community centres, libraries, theatres, museums and heritage all improve the quality of lives of new and existing residents as well as supporting tourism.
- 6.2 Policy CS04 of the Core Strategy states that contributions from developers may be required to help deliver cultural and community facilities. New development will increase demand for such facilities and therefore put pressure on existing facilities. Therefore it is considered justified that development should contribute towards the provision of this type of infrastructure through CIL.

6.1 Leisure and Sport Centres

Overview

- 6.1.1 Leisure centres and indoor sport facilities are an important recreational resource that complements outdoor sport provision. In Waveney, there are currently leisure centres in Lowestoft, which is currently undergoing refurbishment, and Bungay. Both of these facilities are now managed by the Sentinel Leisure Trust which was established in April 2011. There is also dual use of school leisure centres across the District.

Needs

- 6.1.2 The Council and its partners are planning a number of projects to improve the leisure offer within the District. Whilst these projects are about addressing existing need, it is likely that to some degree, they will help accommodate new development as well.
- 6.1.3 These projects include:
- In Halesworth, the Council is currently exploring options to deliver a new leisure centre, including a swimming pool, gym, sports hall and astro surface on the Middle School site. This will be linked to the replacement playing fields associated with the Dairy Hill (Policy HAL3) allocation in the Site Specific Allocations DPD.
 - In Bungay, the Council is hoping to extend the existing leisure centre to create a new Spa and a refurbished gym.
 - In Beccles, the Council is working with Beccles Town Council and Sir John Leman School to develop their existing sports centre into a new leisure centre plus astro facilities. The Council and its partners are seeking to further develop and open up the facility to the community whilst also developing the schools sports activities and facilities.

Costs

- 6.1.4 The Halesworth leisure centre proposal is currently estimated to cost **£5.5 million** based on the above specification. However, the final specification will ultimately be dependant on the amount of funds available for delivery.
- 6.1.5 The extensions and improvements to Bungay leisure centre are currently estimated to cost **£2.5 million**.
- 6.1.6 The Beccles project is currently forecasted to cost **£6 million**.

Funding

- 6.1.7 The main source of funding for the Halesworth leisure centre proposal will be from the sale of the existing playing fields for housing development in accordance with Policy HAL3 of the Site Specific Allocations DPD. However, there is still likely to be a funding gap to meet the full costs of the above specification of approximately **£2.5 million**.
- 6.1.8 For the Bungay proposal there is currently a funding gap of approximately **£1.5 million**.
- 6.1.9 The Beccles project also currently has a funding gap. This is approximately **£2 million**.
- 6.1.10 As shown above the three main leisure projects the Council are working on all have sizeable funding gaps at present and therefore will need to seek other sources of funding for timely delivery. In some cases the plugging of these gaps may need to be by scaling down the proposals. The above projects are not just to meet the needs of new development, therefore the extent to which the Community Infrastructure Levy can contribute to them is limited. However, it is considered that as development will have an impact on the capacity of existing leisure facilities, future CIL receipts could potentially be used to help address a portion of these funding gaps. In terms of working out a reasonable contribution the Sport England Sports Facility Calculator can be used to give a likely idea of the demand and associated cost arising from new development. Table 6.1.1 below shows the reasonable contribution development can make to addressing these funding gaps.

Table 6.1.1 – Developer Contribution Requirements to Leisure Centre Funding Gaps

| Leisure Centre Proposal | Number of new homes planned in the locality | Reasonable Developer Contribution to Funding Gap |
|--------------------------------|--|--|
| Halesworth | 90 | £61,533 (based on need for swimming pool, halls and synthetic pitches) |
| Bungay | 51 | £34,806 (based on need for swimming pool, halls and synthetic pitches) |
| Beccles | 48 | £32,942 (based on need for swimming pool, halls and synthetic pitches) |

- 6.1.11 As can be seen from Table 6.1.1 a reasonable contribution from development through CIL to addressing the funding gap for leisure centres is **£129,281**.

6.2 Community Centres and Customer Service Centres

Overview

- 6.2.1 Community centres provide valuable space for community uses such as meeting space, childcare, indoor sports and other recreational uses. They can be co-located with other services such as medical services and community safety. New community buildings also provide an opportunity to include other local service provision such as local authority customer services. Co-location of services and community space provides financial efficiencies and can be more customer friendly as all services are in one accessible location.

Needs

- 6.2.2 The Waveney Prospectus (2007) highlights a widespread need for community buildings that provide community space and accommodate a range of local service providers. This is reflected in the Customer Access Strategy (2009) which states the Council will explore options to provide new customer service centres combined with other service providers where opportunities arise.
- 6.2.3 Policy CS04 of the Core Strategy states that developer contributions will be sought for community centres or multi-agency one-stop shops in the market towns and Kessingland. A one-stop shop has already been provided in Kessingland. There is potential that community space/customer service space will be provided within the Policy SOU2 housing allocation in the Site Specific Allocations DPD which now has planning permission.
- 6.2.4 In Beccles, housing allocation Policy BEC2 on Gresham Road of the Site Specific Allocations DPD requires a customer access centre to be provided on the ground floors of two of the residential dwellings.
- 6.2.5 In Bungay, Policy BUN3 on Upper Olland Street of the Site Specific Allocations DPD allocates the existing community centre, which is in a state of disrepair, for housing. This should help secure the delivery of new community facilities and a customer access centre on land allocated by Policy BUN4 on Old Grammar Lane.
- 6.2.6 In Halesworth, Policy HAL4 on Dairy Farm allocates part of the site (0.4 hectares) for a community centre and customer access centre.
- 6.2.7 The need for multi-agency or one-stop shop side of these facilities is currently being reviewed. However, the need for generic community facilities remains.
- 6.2.8 The Lake Lothing and Outer Harbour Area Action Plan sets out an indicative need for 228sqm of community space. This need was established through the AECOM Social Infrastructure Assessment (2010) which applied Swindon standards of 70sqm per 1000 people. It is likely that this need could be addressed through the provision of the primary school by allowing space

within the primary school to be used by the wider community out of school hours.

Costs

- 6.2.9 The Sites Viability Study that informed the Site Specific Allocations (Feb, 2010) estimated that cost of providing a 65sqm one-stop shop on the BEC2 allocation would be £76,375.
- 6.2.10 The proposed community centre on allocation BUN4 is estimated to cost £2,092,000 by Davis Langdon Everest .
- 6.2.11 As the type and function of new community space in Halesworth is not yet determined it is not possible to quantify a cost. The Town Council have recently acquired the Rifle Hall for community uses and this, together with the new leisure centre proposal may address need. If only a one-stop shop is needed on the site, similar to that proposed for the BEC2 allocation, this will likely cost the same as estimated for that allocation (£76,375)
- 6.2.12 The provision of small one-stop shops on allocations BEC2 and HAL4 will be delivered as part of the development and will therefore not need external funding.
- 6.2.13 The total cost of community centre provision will therefore be between **£2.4 million**. This figure could rise should there be a need for new community space on HAL4.

Funding

- 6.2.14 The new community centre proposed on allocation BUN4 in Bungay will be partly funded by the receipts from developing site BUN3. The Sites Viability Study (Feb, 2010) estimates that the development of BUN3 will create a residual land value of £123,813 which would be used to help fund the community centre. This leaves a funding gap of £1,968,187 for delivery of this project. Bungay Town Council and Waveney District Council are currently exploring other possible funding streams to help deliver this project. The above project is not just to meet the needs of new development, therefore the extent to which the Community Infrastructure Levy can contribute to it is somewhat limited. The estimated population of Bungay as of 2009 was 5,126. The proposed community centre is 752sqm and will therefore provide 0.15 sqm of community space per person across the town. The 51 new housing units proposed in Bungay equates to 112 new residents. Therefore the 51 new units creates a need for 16.8m² of floorspace of the new community centre which equates to a contribution of **£46,736**.
- 6.2.15 Therefore the total funding gap for community space which development will be required to address through CIL is **£46,736**

6.3 Libraries and Archives

Overview

- 6.3.1 Public Libraries are an important part of social infrastructure and are often at the heart of local communities. They provide free access to books and

information services such as the internet and provide opportunities for learning and leisure. Libraries are therefore often perceived as a valuable local facility.

- 6.3.2 The provision of public libraries is a statutory requirement under the Public Libraries and Museums Act 1964. Suffolk County Council currently provides library services in Waveney. Table 6.3.1 below sets out the existing provision within Waveney. In addition to the libraries shown below, Suffolk County Council also operates a mobile library service that serves rural areas.

Table 6.3.1

| Settlement | Library |
|-------------------|--|
| Lowestoft | Lowestoft Library, Clapham Road South, Lowestoft, NR32 1DR |
| | Oulton Broad Library, Council Offices, 92 Bridge Road, Oulton Broad NR32 3LR |
| Beccles | Beccles Library, Blyburgate, Beccles, NR34 9TB |
| Bungay | Bungay Library, Wharton Street, Bungay NR35 1EL |
| Halesworth | Halesworth Library, Bridge Street, Halesworth, IP19 8AD |
| Southwold | Southwold Library, North Green, Southwold, IP18 6AT |
| Kessingland | Kessingland Library, Marram Green, Hall Road , Kessingland, NR33 7AH |

- 6.3.3 The Suffolk Record Office is inspected and approved by The National Archives under the Public Records Act 1958 as a place for local records to be deposited with proper security and environmental measures to preserve them. They come from a wide range of sources from councils and churches to schools, hospitals, businesses, estates and individuals dating back from the 12th century. The material all relates to the history of Suffolk and can be in any format from maps and plans to newspapers, parchment or microfilm. It is all made available to anyone who needs to see it in the public search rooms. The collections continue to grow each year as new items are added, with new development increasing pressure on space.

Needs

- 6.3.4 New development increases pressure on local libraries and the Suffolk Record Office. Therefore, to support the new development planned in Waveney, improvements and extensions to existing library provision and the Suffolk Records Office will be required.
- 6.3.5 The Museums, Libraries and Archives Council (MLA) is a non-departmental public body sponsored by the DCMS which promotes best practice in museums, libraries and archives, to inspire innovative, integrated and sustainable services for all. The MLA recommends that a floorspace standard for library provision of 30 square metres per 1,000 population is adopted by local authorities. This follows a survey of space standards used by library

authorities. The MLA also recommends that 6 square metres of archive floorspace per 1,000 population is provided, based on a survey of recent and current archive facilities.

6.3.6 Suffolk County Council uses the standards recommended by the MLA, with the exception that the floorspace standard for archive accommodation, at 5 square metres per 1,000 population is smaller than recommended.

6.3.7 Using the above Suffolk County Council standards it is possible to work out the need for library and archive provision to support development in Waveney.

6.3.8 On this basis an additional 2,328 dwellings within Waveney, assuming a population of 2.2 people per house, will generate a need for an additional:

- 154m² of library space
- 26m² of archive space

Costs

6.3.9 From the Royal Institution of Chartered Surveyors (RICS) Building Cost Information Service data, the MLA recommends a benchmark figure for construction and initial fit out of £3,000 per square metre for libraries and £3,600 per square metre for archive accommodation.

6.3.10 Therefore the cost of providing the library and archive space to meet the needs of new development in Waveney is:

- £462,000 for library space
- £93,600 for archive space

Funding

6.3.11 There is no current funding available to improve and expand libraries and archives to meet the needs of new development in Waveney. Therefore, the funding gap for library and archive provision for which CIL will be required to address is **£555,600**

7. Health Care

Overview and Needs

- 7.1 NHS Great Yarmouth and Waveney PCT commission health care services for the population of Waveney District. Planning has its roots in public health law from the 19th Century and recently health issues are again becoming an increasingly important material planning consideration. A healthy population is also a key factor of sustainable development. It is therefore important that new developments promote and enable healthy lifestyles and do not put undue pressure on existing health care services.
- 7.2 The Core Strategy identifies a need for new health facilities in North and South Lowestoft. The new health facility in North Lowestoft will be provided as part of the residential development at Woods Meadow, Oulton. The proposed health facility for South Lowestoft now has planning permission on the Kirkley Rise allocation in the Lake Lothing and Outer Harbour Area Action Plan.
- 7.3 Using the Healthy Urban Development Unit (HUDU) model, the AECOM Social Infrastructure Assessment (2010), that informed the Lake Lothing and Outer Harbour Area Action Plan, identifies a need for 299sqm of additional primary health care floorspace and 65sqm of dental surgery floorspace to accommodate one dentist to support development in the area. The Kirkley Rise health facility mentioned above will have sufficient capacity to accommodate this need.

8. Police

Overview

- 8.1 The Suffolk Police Authority oversees provision of the police service in Suffolk. In Waveney there are currently police stations in Lowestoft, Beccles, Bungay, Halesworth and Southwold. There are no known strategic police infrastructure requirements to support development in Waveney. The Suffolk Police Authority Three Year Plan (2011) outlines how the police will be based in fewer buildings in the future and how they will look to share facilities with other public authorities. The provision of one-stop shops where opportunities occur as described in Section 6.2 may help deliver this.

9. Coastal Protection and Flooding

Overview

- 9.1 The Waveney coast suffers from some of the most dramatic losses of land in the country through coastal erosion. This has serious implications for local communities, tourism, business and the natural environment.
- 9.2 Decisions on how the coastline is managed are strongly influenced by Shoreline Management Plans (SMP). There are two SMPs covering the Waveney coastline. SMP Sub cell 3b covers the northern part of the Waveney coast from Lowestoft Ness to the border with Great Yarmouth Borough Council. SMP Sub cell 3c covers the area from Lowestoft Ness south to the border with Suffolk Coastal District Council at Southwold Harbour. The purpose of an SMP is to determine appropriate, strategic policies for coastal management that balance the many and often competing aspirations of stakeholders with proper regard for economic and environmental sustainability. The primary output is an 'intent for management' over a 100 year timeframe. This overarching vision is converted to policy statements for discrete lengths of coast with shared attributes broken down into short, medium and long-term time bands.
- 9.3 The SMPs have proposals to 'Hold the Line' for the 100 year period for the towns of Lowestoft and Southwold and the majority of the village of Kessingland. In between the towns there are various policy approaches including 'No Active Intervention' and 'Managed Realignment'. Important to note is that the policy for Corton, which contains a number of tourist and residential properties near the cliff edge, in the 25 -50 year epoch is for managed realignment.
- 9.4 The Lake Lothing and Outer Harbour Area Action Plan proposes to allocate a significant amount of development on land that is at risk from tidal flooding. New flood defences and/or land raising will be required in this area to ensure development remains safe. These measures will be delivered by developers as part of the development sites.

Needs, Costs and Funding

- 9.5 In order not to increase the number of properties at risk from erosion, development is restricted in an area defined as the Coastal Change Management Area (CCMA) in the Waveney Local Development Framework. The CCMA equates to the areas at risk from erosion within 100 years as predicted in the SMP. Areas with a 'Hold the Line' policy do not have a CCMA as the SMP policy if implemented as planned will ensure the area remains safe from erosion. As such some development has been allocated in the Waveney Local Development Framework in areas close to the sea where a 'Hold the Line' policy exists. These are the PowerPark allocation in North Lowestoft (Policy SSP1 of the Lake Lothing and Outer Harbour Area Action Plan) and the CEFAS site in South Lowestoft (Policy LOW8 of the Site Specific Allocations DPD). These allocations will only remain safe from erosion/flooding if the SMP policy is implemented as planned.

Implementation of these policies requires new capital works in the next 10 years which require funding.

- 9.6 Funding for coastal protection schemes is changing to a scheme where funding is based on number of residences that benefit. Commercial and other land uses are given less value under the new scheme. This could mean that for coastal protection schemes for frontages such as those in North Lowestoft around the PowerPark and in South Lowestoft near the LOW8 allocation, central Government funding for capital works could be severely limited and therefore funding from other sources such as CIL will likely be required. The exact likely funding shortfalls are currently uncertain.

10. Utilities

Overview

- 10.1 There are no known strategic utility infrastructure requirements to support development across Waveney. There may be site-specific issues, but these will need to be dealt with by the individual developer concerned.
- 10.2 A Water Cycle Study Scoping Report covering Waveney and Great Yarmouth was completed in March 2009. The study looked at the capacity of water infrastructure to accommodate the growth proposed in the Waveney Local Development Framework. The study concluded that there was capacity in wastewater treatment works at Lowestoft, Bungay, and Halesworth. It identified that there was limited capacity at Beccles and Southwold. Further work with the Environment Agency and Anglian Water as part of the Site Specific Allocations DPD work has confirmed that there is likely to be capacity at Beccles and Southwold to accommodate the proposed level of development. To accommodate the level of development proposed in South Lowestoft there may be a need for a new sewer crossing Lake Lothing or a new Waste Water Treatment Works in South Lowestoft. Further consultation will be needed with Anglian Water as part of the development brief for the Kirkley Waterfront and Sustainable Urban Neighbourhood (Policy SSP3 of the Lake Lothing and Outer Harbour Area Action Plan).
- 10.3 The Water Cycle Study also identified limited capacity in the sewer network in all towns with the exception of Halesworth. However, recent localised events suggest there may be issues in parts of Halesworth as well. These network capacity issues are very site-specific and therefore will need to be dealt with by individual developments.

11. Neighbourhood Infrastructure

- 11.1 The Government announced in November 2010 that it planned to reform the Community Infrastructure Levy to require Charging Authorities to pass back a 'meaningful proportion' of the levy secured in a particular neighbourhood back to that neighbourhood for spending on local infrastructure of their choice. The Government sees this as a way to help incentivise local communities to welcome development in their areas and to ensure the benefits of development are shared with local communities.
- 11.2 During the consultation on the draft of this study Parish and Town Councils were invited to identify small-scale infrastructure requirements in their area that future CIL funds could be spent on. The Council also undertook a series of workshops with District Councillors and Parish and Town Councillors to further identify local infrastructure need. The infrastructure identified is included in Appendix 1 of this report. The exercise will help inform the Council's future spending priorities for CIL receipts. The exercise has also demonstrated the level of small-scale infrastructure required in local communities that CIL could help fund.

12. Summary of Key Findings

12.1 Table 12.1 below summarises all the strategic capital infrastructure requirements needed across the District to support the development allocated in the Waveney Local Development Framework. It identifies the cost of providing that infrastructure and the current total funding gaps to deliver all the projects identified in this study and the funding gap that a Community Infrastructure Levy will need to address

Table 12.1 – Summary of Infrastructure Funding Gap for Capital Projects

| Infrastructure Type | | Project | Cost | Current/Committed Funding | Funding Gap | Funding Gap of which CIL is required to address |
|---------------------|------------------------------|--|-----------------------------------|--|---------------------------------|---|
| Transport | Roads | Northern Spine Road | £4,000,000 | £4,000,000 | £0 | £0 |
| | | Beccles Southern Relief Road | £4,000,000 | Uncertain, will likely receive some funding in later phases of the LTP | Potentially £4,000,000 | £0 |
| | | Denmark Road Improvements | Unknown | Uncertain - SCC to explore the Department for Transport major scheme funds | Unknown | Unknown |
| | | Access road into development sites on south side of Lake Lothing | £1,500,000 | Developer delivered | n/a | n/a |
| | | Bungay Town Centre Improvements | £450,000 | £450,000 | £0 | £0 |
| | | Commercial Road Junction | £1,176,500 | £1,176,500 | £0 | £0 |
| | Rail | Beccles Rail Loop | £4,000,000 | £4,000,000 | £0 | £0 |
| | | Station Interchange | £2,000,000 | £2,000,000 | £0 | £0 |
| | Pedestrian and Cycle Network | Pedestrian/Cycle Bridge by Bascule Bridge | £1,300,000 | £1,300,000 | £0 | £0 |
| | | Pedestrian/Cycle Bridge by Brooke Peninsula | £4,810,382 - £8,036,532 | £0 | £4,810,382 - £8,036,532 | £4,810,382 - £8,036,532 |
| | | New Cycle Path Normanston Park to Oswalds Boatyard | £70,000 | £0 | £70,000 | £70,000 |
| | | New Cycle Path Ellough, Beccles | £70,000 | £0 | £70,000 | £70,000 |
| | | New Cycle Path Halesworth | £66,000 | £0 | £66,000 | £66,000 |
| Total | | £23,442,882 to £26,669,032 | £12,926,500 to £16,926,500 | £5,016,382 to £12,242,532 | £5,016,382 to £8,242,532 | |

| Infrastructure Type | | Project | Cost | Current/Committed/ Proposed Section 106 Funding | Funding Gap | Funding Gap of which CIL is required to address |
|---------------------|------------|--|--------------------|---|-------------------|--|
| Education | Pre-School | Lowestoft-wide improvements. | £221,408 | £0 | £221,408 | £221,408 |
| | Primary | Sustainable Urban Neighbourhood School | £9,500,000 | £8,740,000 | £760,000 | £760,000 |
| | | Other School Improvements | £1,124,898 | £0 | £1,124,898 | £1,124,898 |
| | Secondary | | £0 | £0 | £0 | £0 |
| Total | | | £10,846,306 | £8,740,000 | £2,106,306 | £2,106,306 |

| Infrastructure Type | | Project | Cost | Current/Committed Funding | Funding Gap | Funding Gap of which CIL is required to address |
|---------------------|---------------|--|-------------------|------------------------------|-------------------|--|
| Open Space | Play | Various | £880,100 | £0 | £880,100 | £880,100 |
| | Outdoor Sport | Various including Oakes Farm Development | £2,138,469 | £0 | £2,138,469 | £2,138,469 |
| | Parks | East of England Park | £1,194,960 | £0 | £1,194,960 | £251,248 |
| | Allotments | Various | £488,755 | £0 | £488,755 | £488,755 |
| Total | | | £4,702,284 | £0 | £4,702,284 | £3,758,572 |

| Infrastructure Type | | Project | Cost | Current/Committed Funding | Funding Gap | Funding Gap of which CIL is required to address |
|---|----------------------|---|--------------------|------------------------------|-------------------|---|
| Community and Cultural Facilities | Sport and Leisure | New Leisure Centre in Halesworth | £5,500,000 | £3,000,000 | £2,500,000 | £61,533 |
| | | Extension to Leisure Centre in Bungay | £2,500,000 | £1,000,000 | £1,500,000 | £34,806 |
| | | Improved public sports facilities at Sir John Leman High School | £6,000,000 | £4,000,000 | £2,000,000 | £32,942 |
| | Community Centres | Bungay Community Centre | £2,092,000 | £123,813 | £1,968,187 | £46,736 |
| | Libraries | Various | £462,000 | £0 | £462,000 | £462,000 |
| | Archives | Various | £93,600 | £0 | £93,600 | £93,600 |
| Total | | | £16,647,600 | £8,123,813 | £8,523,787 | £731,617 |

| Infrastructure Type | Project | Cost | Current/Committed Funding | Funding Gap | Funding Gap of which CIL is required to address |
|--------------------------------------|-----------|-----------|---------------------------|-------------|---|
| Healthcare | n/a | £0 | £0 | £0 | £0 |
| Police | n/a | £0 | £0 | £0 | £0 |
| Coastal Protection and Flood Defence | Uncertain | Uncertain | Uncertain | Uncertain | Uncertain |
| Utilities | n/a | £0 | £0 | £0 | £0 |
| Total | | £0 | £0 | £0 | £0 |

| Total for all Capital Infrastructure | Cost | Current/Committed Funding/Proposed Section 106 funding | Total Funding Gap | Funding Gap of which CIL is required to address ⁷ |
|--------------------------------------|----------------------------|--|----------------------------|--|
| | £55,639,072 to £58,865,222 | £29,790,313 to £33,790,313 plus other potential funding for road schemes | £20,348,759 to £27,574,909 | £11,612,877 to £14,839,027 |

- 12.2 As can be seen from Table 12.1 the total funding gap for capital projects that a Community Infrastructure Levy will have to help address is between **£11,612,877** and **£14,839,027**. Please note this is based on the funding gap only generated by the impacts of development. CIL cannot be used to fund existing infrastructure deficits. Some of the 'Total Funding Gap' (£20,332,759 to £27,558,909) is needed to address existing deficits, hence the difference in figures.
- 12.3 In addition to the capital infrastructure funding gap, there is a small revenue funding gap of **£703,150**.
- 12.4 The funding gaps identified above clearly justify the need for the introduction of a Community Infrastructure Levy in Waveney.

Appendix 1 – Neighbourhood Infrastructure

As part of Waveney's plans to introduce a CIL locally the Council needs to get an idea of local, small-scale infrastructure need across the District. This will help the Council determine how much of the CIL should be passed back to Town and Parish Councils. As part of our consultation on a strategic infrastructure study, the Council asked all Parish and Town Councils to identify what infrastructure was needed in their areas.

Following the consultation three workshops were held to identify local/neighbourhood infrastructure needs, one with District Councillors and two with Parish and Town Councils as part of the World of Planning events. Post It notes and maps were used to identify the type and location of the infrastructure needed.

Some of the infrastructure identified has already been identified in the main sections of this document as strategic infrastructure that is needed to support planned development.

Councillor's Workshop 10th October 2011

Attendees:

| | |
|---------------------------------------|--------------------------------------|
| Cllr Alison Cackett (Blything) | Cllr Chris Punt (Beccles North) |
| Cllr Tony Goldson (Halesworth) | Cllr Paul Light (Carlton Colville) |
| Cllr Mike Barnard (Oulton Broad) | Cllr Simon Woods (Bungay) |
| Cllr David Ritchie (The Saints) | Cllr Martin Parsons (Wrentham) |
| Cllr Sue Allen (Southwold and Reydon) | Cllr Peter Coghill (Normanston) |
| Cllr Malcolm Cherry (Saint Margarets) | Cllr Tess Gandy (Harbour) |
| Cllr Keith Jenkins (Beccles South) | Cllr Bruce Provan (Kessingland) |
| Cllr Yvonne Cherry (Kirkley) | Cllr Mary Rudd (Gunton and Corton) |
| Cllr Ian Graham (Harbour) | Cllr Julian Swainson (Harbour) |
| Cllr Allyson Barron (Saint Margarets) | Cllr Gareth Douce (Kirkley) |
| Cllr Roger Bellham (Saint Margarets) | Cllr Jose Bamonde (Carlton Colville) |
| Cllr June Ford (Kirkley) | |

Lowestoft (including: Carlton Colville, Oulton and Oulton Broad)

- North Lowestoft: Park and ride Scheme to deal with parking pressures arising from Waterlane Leisure Centre and College
- Park and Ride Scheme linking railway station, bus station and town centre etc.
- Create something at Arnolds Bequest (open space)
- More open space in Harbour Ward + improve existing areas anywhere possible, e.g. TA ground
- Jacobs Court on Raglan Street (pedestrian areas) need revamping
- Childrens play area on north side of Normanston Drive
- Open path along railway line for Oulton Broad to Commercial Road
- Redevelop railway station

- Bus shelters for elderly residents on Pound Farm Drive, Somerleyton Road, St Margarets opposite Oulton Community Centre
- Gunton Community Hall Expansion
- Off road parking in St Margarets Ward to avoid on verge parking
- More dog bins in St Margarets Ward
- More greenspace and play areas in Harbour Ward
- Third crossing
- Alleviate traffic pressure points on Commercial Road junction
- Post office on Dell Road
- Bus Shelter on Dell Road
- Public toilets in Kirkley
- Improvement to beaches and Victoria Hotel bathing station
- South Kensington Gardens repairs
- Post office and public toilets in Carlton Colville
- Bus shelter on Kirkley Run
- Kirkley Fen toilet
- Skate park on Kirkley fen
- More toilets on South Lowestoft seafront
- Open iron bridge on Denmark Road
- Play space equipment on Granville Road
- Play space for Ball games in Harbour Ward
- Improvement of Arnold Walk area
- Major improvements to Crown Street Hall
- Maintenance of the Wissett Pond for community use, tidy up area
- Expansion of Gunton Community Hall (very well used facility)
- No adequate bus service in Parkhill – Bentley Drive Area
- Bus shelters in St Margarets Ward
- Pedestrian and disability access in St Margarets – at present wheelchair users/mobility scooters cannot use all of pavement
- Off road parking in St Margarets to avoid parking on verges
- Bus shelters on Gloucester Avenue and Somerleyton Road/Pound Farm Drive
- Park in Oulton
- Bus Shelter at Tesco (Leisure Way)

Beccles and Worlingham

- Beccles Quay – Super Destination Park
- Upgraded Sports Centre at Sir John Leman School
- Worlingham Community Centre
- Improved sports centre, Beccles
- Beccles Quay Destination Park
- Southern by-pass, Beccles

Bungay

- Bungay Library, upstairs modification / fire escape
- Unfunded, urgently needed community/enterprise/play scheme centre
- General consideration of cycle ways round town and destination specific – particularly related to town centre improvement scheme
- Upgraded Meadow Road gardens, common?, playgrounds

Southwold/Reydon

- Rebuilding of Southwold harbour south wall. New harbour master's office.

- Southwold harbour, Caravan site infrastructure.
- New toilets in Southwold
- Road for Pathfinder 'exception sites' in Reydon
- Infrastructure for new playing fields and sports buildings in Reydon

Halesworth

- Health village, campus project (sports etc.) in Halesworth

Kessingland

- Sea defence Benacre / South Kessingland
- Skate park in Kessingland
- Improved cycle path from Kessingland to Pakefield

Other villages and rural areas

- New primary school in Wrentham if significant increase in housing (currently children catch bus to Brampton Primary)
- Speed bumps and speed warning signs on Southwold Road, Wrentham
- Affordable/Social housing in Brampton
- Automatic speed warning signs on the road between Brampton and Stoven
- New open space in Holton
- Improvements to village halls/community centres
- Rugby Pitches, Lound
- The Saints – very few houses built – urgent need to spend CIL on village hall improvements

Infrastructure identified by Parish Council's as part of the Draft Infrastructure Study Consultation (Summer 2011)

Ilketshall St Andrew Parish Council

- Scheduled bus service between Ilketshall St Andrew and Beccles and/or Bungay;
- Mobile library service
- Village hall improvements
- Playground equipment and car park surfacing at village hall
- Young peoples' club. This would be run by volunteers but would need funds for hall hire, equipment and insurance;
- Libraries at Beccles and Bungay (continuation of service)
- Improvements to Bungay swimming pool and gym
- Additional facilities at Sir John Leman School, Beccles to provide public access to the sports centre and swimming pool;
- Recycle centre at Beccles - continuing service.

Oulton Parish Council

- Improved cycle paths to enable children to cycle to school safely, especially now they have to attend high school at an earlier age.
- Local bus service accessing Woods Meadow and also Oulton Village, which has lost services in recent months.
- Traffic calming and safety measures in and around Sands Lane. The road will see a huge increase in traffic when Woods Meadow is developed.

Reydon Parish Council

- More allotments
- B1127 needs attention

Didy Ward (sits on Bungay Town Council Sub-committee dealing with Section 106)

- New community centre and children's play park on the Old Grammar School fields.

Infrastructure identified by Parish Council's at November World of Planning Events

Below are the views of those attending the workshops. It is acknowledged that these views may not necessarily represent the formal views of each Parish Council.

Beccles Event – 3rd November 2011

Attendees:

| | |
|--|---|
| Ian Hinton (Barnby) | Richard Woolnough (Halesworth) |
| Mike Lincoln (Barnby) | Sandra Leverett (Halesworth) |
| P.A. Harris (Barsham and Shipmeadow) | Anne Law (Ilketshall St Andrew) |
| J. Howell (Barsham and Shipmeadow) | J. Pryce (North Cove) |
| N. A. Smith (Barsham and Shipmeadow) | Alan Wheeler (Ringsfield, Weston) |
| P.S. Smith (Barsham and Shipmeadow) | P. Johnson (Ringsfield an Weston) |
| J Bumpus (Barsham and Shipmeadow) | S. Saunders (Ringsfield and Weston) |
| Brian Taylor (Beccles Town Council) | L. Lelean (Spexhall) |
| Bill Mountford Carlton Colville) | R. Gardner (Sotterley, Shadingfield, Ellough, Willingham) |
| Andrew Jones (Halesworth) | L.A Riley (Willingham) |
| Phillip Kidner (Flixton, St Cross and St Margaret) | David Refutes (Wrentham) |
| David Mann (Flixton, St Cross and St Margaret) | Cllr Keith Jenkins (Beccles South) |

Halesworth

- Community Centre on Dairy Farm site
- New access for National Cycle Route from the south
- Bus Station off Angel Link
- New hospital buildings
- Railway station enhancements
- Drop-in youth facility

Barnby and North Cove

- Horse crossing in Barnby

- Playing field equipment in North Cove
- Roundabout access for North Cove and Barnby residents
- Quiet Road surface along A146

Beccles

- Provision of Street Lighting on Benacre Road through Ellough Industrial Estate

Ringsfield

- Refurbish tennis courts
- Village hall improvements
 - Install trim trail
 - Lower ceiling
 - Extend/improve bar
 - Cricket pavilion

Shadingfield

- Shadingfield and Willingham A145, footpath through villages

Shipmeadow

- Footpath and cycleway from Beccles to Bungay via Shipmeadow
- Reduced speed limit from Beccles to Bungay via B1062
- Bus service, Beccles to Bungay return via B1062, designated stops needed

Spexhall

- Foot cycle path to Halesworth from north

Wangford Event – 7th November 2011

Attendees:

| | |
|---------------------------------------|---------------------------------------|
| Gerard Walker (Blyford and Sotherton) | Ann Betts (Southwold) |
| Paul Scriven (Frostenden, Uggeshall) | Kate Flodin (Southwold) |
| Myrtle Boon (Gisleham) | Ian Bradbury (Southwold) |
| Rosemary Moffatt (Gisleham) | Sue Doy (Southwold) |
| Geoffrey Cackett (Holton) | Mike Ryland (Wangford) |
| C. Livermore (Kessingland) | Pamela Blades (Wangford) |
| Moll Robb (Kessingland) | Carol Holland (Wangford) |
| Michelle Mouzer (Kessingland) | Norman Jackson (Wangford) |
| Barry Burden (Kessingland) | Cllr Paddy Flegg (Halesworth) |
| Liam Martin (Kessingland) | Cllr Sue Allen (Southwold and Reydon) |
| Carolyn Gosling (Outlon) | |
| John Grist (Oulton) | |

Kessingland

- Leisure facilities for 11+ age range (cannot access Lowestoft due to reduced buses after school and Sundays)
- Old Ashley Nursery Site for extra green space (poor transport to green sites in Lowestoft)
- Skate Park for teenagers

- Kessingland is devoid of open space CIL should purchase open space.
- Modernise sewerage system
- Road improvements

Oulton

- Improved Oulton broad North Railway Crossing Barriers to reduce waiting times
- Sands Lane/Gorleston Road Junction improvements for Woods Meadow development
- Mobbs Way Traffic Lights or Roundabout
- Dunston Drive junction improvements for Woods Meadow development

Halesworth

- Swimming pool
- Sports field and facilities

Holton

- Recreational facilities for 11-16 years age group

Southwold

- Water in the boating lake needed
- Drainage improvements in the Blackmill Road, Holton Road area.
- Street lighting, Bartholomew Green, Victoria Road and Marlborough Road

Wangford

- Funds to buy / lease facilities if they come up for sale e.g. pub/shop
- Improvement of Rights of Way by foot from village to Reydon and Beyond
- Upgrade Children's play area + adult fitness area and equipment
- Highway improvements to provide footpaths, Elms Lane / Hills Road

Appendix 2 – Responses to Consultation on Draft Infrastructure Study

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|------------------------|------------------------------|--|---|
| 1. Introduction | Carolyn Wilson | Mobile Operators Association | The operators understand the Council's desire to plan for future infrastructure requirements to support future development as identified in the Local Development Framework. Unfortunately, it is not possible for any operator to give a clear indication of what their infrastructure requirements are likely to be in 5, 10, 15 or 20 years time. The technology is continually evolving and ways of improving quality of coverage and/or network capacity may change in the future. Each October the operators submit annual rollout plans to all local planning authorities within the UK. The operators have been issuing these plans since 2001 and from 2005 onwards the MOA has issued them jointly and via email. The plans provide details of all existing base stations within the Council area and an indication of those additional sites each operator anticipates requiring over the coming twelve months. The operators also offer to meet jointly with officers to discuss their plans. If you would like further information on the annual rollout plans please contact me. Please find enclosed a series of MOA factsheets, which I hope will be helpful. > Developing Mobile Networks > Mobile Phones and Base Stations > Mobile Phone Base Stations and Planning > Third Generation - 3G > Mast and Site Sharing > Annual Rollout Plans - Transparency for Local Authorities | Comments noted. |
| 1. Introduction | Southwold Town Council | Southwold Town Council | Southwold Town Council would wish to ensure that as per the intentions of Localism Bill, the CIL is allocated | Comments noted. Provisions within the Localism Act will require the District Council to pass back a |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|--|--|---|--|
| | | | within the immediate community that it has been raised from and not allocated to projects outside of the actual locality. | meaningful proportion of CIL funds raised in a Parish to that Parish Council. |
| 1. Introduction | Barton Willmore (on behalf of Sanyo Industries (UK) Ltd) | Barton Willmore (on behalf of Sanyo Industries (UK) Ltd) | We are instructed on behalf of our client Sanyo Industries (UK) Limited to submit a holding response to this consultation exercise. In short, it would be premature of Sanyo to make a detailed response to this consultation exercise before the Lowestoft Lake Lothing and Outer Harbour AAP is adopted. Discussions with the Council and other parties should also be progressed a lot further in order to establish in greater detail the form and delivery of the Sustainable Urban Neighbourhood (SUN). We are concerned over the extent of the infrastructure items the Council appears to be directing towards the landowners / developers of the SUN for provision or financial contribution. For example, Sanyo questions some of the new road proposals, the proposed pedestrian crossing of Lake Lothing and the primary school etc - some of which still haven't been adequately justified by the Council and the County Council. Indeed, until discussions regarding the implementation of the SUN have been satisfactorily concluded, serious questions marks will remain over the viability and deliverability of the largest development scheme being proposed in Waveney. We trust that these comments will be taken into consideration by the Council and look forward to participating in further discussions with you, your colleagues, key stakeholders and landowners / developers to ensure that the SUN is capable of being delivered in the short term to kick start regeneration in Lowestoft. | Comments noted. The level of development within the Sustainable Urban Neighbourhood and wider Area Action Plan area will necessitate a new primary school to accommodate children within the development. The pedestrian bridge is part of the Area Action Plan proposals and will provide access to Normanston Park for new residents of the Sustainable Urban Neighbourhood, provide better access to Further Education establishments in Lowestoft and help reduce car use across the town. |
| 1. Introduction | Kessingland | Kessingland | In the Introduction to the Policy Background para.1:2 of | Comments noted. As Kessingland does not have |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|--|--|
| | Parish Council | Parish Council | <p>the Core Strategy establishes a principle that Developers should contribute towards infrastructure provisions to support their developments and lists what may be included in the infrastructure provisions. Para. 1:3 goes on to identify specific projects which will be required to support development and therefore require developer contributions. These include one stop shops in the Market Towns and Kessingland. Drainage and flood alleviation in Kessingland. How these developer contributions will be obtained is set out in the Governments Infrastructure Levy which is a new charge which local authorities can charge on most types of new development in their area, and the money raised will be used to pay for infrastructure required to support development in a District. At the moment in some cases, planning development attracts section 106 contributions from developers which Town and Parish Councils use to provide facilities for their community. The proposals contained in the Community Infrastructure Levy (CIL) would be used to supplement s106 and be retained for District use is somewhat concerning. In Kessingland there is only one large scale development - Heritage Green, which at the moment has not yet been completed by the developer. Therefore clarification is required about the classification of s106 and the CIL, as it would appear that if the developer in this case wishes to proceed with the next stage of development, would that attract a s106 payment or a charge under the CIL. The later would, under Government guidelines and District Council policy, mean that any contribution from the developer would go into the "District pot" to be used elsewhere other than providing facilities in the area where the charge has</p> | <p>a housing allocation in the Site Specific Allocations DPD, the only housing development the village will likely see is windfall development within the Physical Limits of the village. It is highly likely that there will be further windfall development in the village over the plan period to 2025. Prior to the CIL being introduced any new windfall residential development will be required to make a Section 106 contribution towards open space provision which is currently £956 a dwelling. Once CIL is introduced all new development within Kessingland will have to pay a standard per square metre charge of a specified rate, but it won't have to pay a Section 106 contribution to open space anymore. The CIL contribution is likely to work out to be higher than the current charge for open space and it can be spent on other items of infrastructure as well . Under the Localism Act, the Government will require a 'meaningful proportion' (yet to be determined by the Government) of the CIL raised in Kessingland to be passed back to the Parish Council. The Parish Council will be able to spend this on infrastructure of their choice (not just open space) as long as it can be reasonably seen to support development rather than addressing existing deficits. The District Council will also be able to pass back a greater proportion of CIL than that required by the Government to the Parish Council if it chooses to do so. Therefore, the amount of developer contributions that Kessingland receives will be dependant on the amount of development and the proportion of CIL</p> |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|---|--|
| | | | <p>been incurred. Under the Site Specific Allocations DPD of January 2011, Kessingland is shown as a NIL return for future housing development. This means that the only funding available for Kessingland would be that which is already being held by WDC under s106 and any additional funds would only come from windfall development. Does this mean that once the s106 allocation is spent that Kessingland Parish Council would have to resort to grant funding to provide community facilities or would we be eligible to a share of the CIL held by District? The majority of this consultation document talks about the Lake Lothing and Outer Harbour Action Plan particularly when it talks about Economic Development, there appear to be no mention of anywhere else in the District. In Kessingland we rely very much on the Tourism industry for our economic survival, and there are two sites that Kessingland Parish Council considers would add to the economy of Kessingland. One of the sites is The Hollies in London Road and the other is the Ashley Nursery site. There has already been contact with the developers regarding The Hollies and it would appear that a Planning Application will be submitted to WDC to develop a Holiday Park. With regards to Ashley Nurseries site, this has been empty for some years, there was sometime ago a plan put forward for some light industrial units coupled with some accommodation, but this never materialised. Again in the interests of Economic Development could some encouragement be made to bring this site into some use as it would make a suitable site for maybe a hotel/motel/travel lodge? Both being Tourism would that be regarded as Economic Development and would that attract any premium from</p> | <p>that is passed back to the Parish Council. Of course, the proportion of CIL retained by the District Council may still be spent locally in Kessingland to address the impacts of those specific developments or may be passed to the County Council for improving the local school etc. The Ashley Nurseries site is not allocated for development in the Site Specific Allocations DPD due to no known deliverable uses for the site. The site was considered for employment use through earlier iterations of the Site Specific Allocations DPD but was discounted as there was no evidence that employment development was deliverable in this location. If tourist development was to come forward on either of the mentioned sites, there is potential for CIL to be charged. This would be dependant on the Charging Schedule identifying a viable rate to charge this type of use and the development consisting of permanent buildings. CIL cannot be charged on caravans. A section 106 contribution could only be made if it could justified that the contribution was needed to offset the impacts of that particular development.</p> |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|--|--------------------|
| | | | <p>the developer either by way of s106 or CIL? Kessingland Parish Council are aware that our opportunity of funding being available either under Housing Development or by Economic Development through s106 or the CIL are limited and would seek from WDC re-assurance that Kessingland will not lose out because the lack of development in the village. A majority of this consultation centres on The Lake Lothing and Outer Harbour Action Plan, with any developer contribution being used to support infrastructure provision in that Action Plan. This means that in other areas of the District communities like Kessingland will lose out from being allocated funding from the CIL for Community projects, where previously under the s106 arrangement we at least had some access to a source of funding. Part of the Government's proposed Localism Bill indicates that with regards to Planning they would like to see developers and local communities working together at a local level, this Policy removes that by having the District "pot" and decisions made at a District level not at a local level. Until the Localism Bill is published setting out the Government plans for their "bottoms up" policy Kessingland Parish Council make no further comments on WDC's proposals for CIL.</p> | |
| 1. Introduction | Badger Building | Badger Building | <p>We note the general requirements of the legislation and are please to receive assurances that CIL cannot be used to make up shortfalls in existing infrastructure but is intended to mitigate the consequences of new development. In conclusion we would make the point that for CIL to retain any degree of credibility, the projects to which the funds are ultimately allocated need to be seen to have some reasonable link to the</p> | Comments noted. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|---|---|---|--|
| | | | <p>developments from which they are derived. There is a risk of a credibility gap developing very quickly, particularly where needed infrastructure, previously provided under Section 106 but now caught up in the "no more than 5 projects rule", either isn't delivered or is delivered out of sync with the development. The emphasis on infrastructure delivery will pass to a Council ill equipped in terms of staffing levels and expertise to deliver projects of some magnitude, which previously would have been the responsibility of the developer and without the promise of any specific level of performance arising from the legislation. We think this process will get messy and litigious!</p> | |
| 1. Introduction | Suffolk County Council (Planning Obligations) | Suffolk County Council (Planning Obligations) | <p>Firstly, the county council is supportive of Waveney District Council introducing a Community Infrastructure Levy (CIL) in Waveney. This is fully in line with the Government's 'direction of travel' as clearly set out in the consultation draft of the 'National Planning Policy Framework (NPPF)'. From the county council's perspective there are some important issues which must be addressed as part of the Waveney CIL, namely: It is strongly suggested that all money collected via the Waveney CIL charging schedule is used to fund infrastructure identified and associated with mitigating the impact of new development, in order to underpin the principles of sustainable development as clearly articulated in the draft NPPF. This is even more important where it is likely that money collected by CIL will still result in a shortfall to fund local infrastructure delivery associated with new development. There needs to be a clear and transparent mechanism whereby sufficient money collected by Waveney District Council via the CIL charging schedule flows directly back to the</p> | <p>Comments noted. Money collected through the Community Infrastructure Levy will be spent on infrastructure needed to support new development as per the requirements of the CIL Regulations. It is agreed that a transparent mechanism for infrastructure delivery is needed. The purpose of the Infrastructure Study is to quantify a funding gap for which CIL will be required to deliver to support development outlined in the Waveney LDF. The Infrastructure Study does not propose a spending plan and does not attempt to prioritise or schedule infrastructure delivery. The study will be reviewed when the Charging Schedule is reviewed. This is likely to be every 3 years dependant on whether market conditions have significantly changed or whether there are plans in place to review LDF DPDs. There may be scope for the continued use of Section 106 agreements on some larger sites and for some on-site mitigation works. At</p> |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|---|--|
| | | | <p>county council (and other infrastructure providers), so that infrastructure for which it is responsible can be funded and delivered in a timely fashion e.g. transport and education. The county council would welcome the opportunity to discuss how this can be achieved and would strongly suggest a county-wide approach in order to agree over-arching principles and a working protocol, which will be common to all districts across Suffolk. By not doing this could seriously compromise the timely delivery of local and strategic infrastructure which is the responsibility of the county council, which would be contrary to the principles of ensuring sustainable development. As you are aware a county-wide working group (led by Ipswich Borough Council) has already been established to progress a countywide approach on general themes and best practice arising from CIL. Regular review mechanism. The Infrastructure Study draft covers the period 2011 to 2025 and clearly over such a long length of time infrastructure priorities and costs will change and certain projects may no longer be needed or new ones emerge. How is this important matter to be addressed? Infrastructure Delivery Plan (IDP). It is suggested that there is the need for an agreed IDP between various stakeholders (to include the county council), which identifies projects, funding and a delivery timetable across Waveney. This needs to link with the CIL money collected by Waveney. Funding gap/shortfall. There are two related issues here. First, is to ensure that all infrastructure costs for the plan period are adequate and comprehensive. Has this assessment been done and how will it be regularly reviewed? Second, is the relationship with viability which will ultimately determine the level of the CIL charging</p> | <p>present it is only foreseen that section 106 will apply to larger sites in Lake Lothing and costs of these agreements will be factored in to viability assessments. However, given the restrictions imposed on Section 106, the Council will avoid using these where possible once CIL is introduced. There are currently no cross-border infrastructure requirements known. Whilst the Council supports the introduction of high-speed broadband, it is not seen how this can be effectively delivered through CIL. Where necessary, section 106 agreements or conditions could be used to secure this. There are no known waste infrastructure requirements in Waveney that are needed to support development. There are no known fire service infrastructure requirements in Waveney that are needed to support development. A new fire station in Lowestoft has recently been completed in South Lowestoft and the North Lowestoft fire station has recently been down-sized and refurbished. Sustainable Urban Drainage systems are very site-specific and will be best dealt with through condition or section 106 agreement rather than CIL.</p> |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|--|--------------------|
| | | | <p>schedule. How will this be approached? Inter-relationship with other funding sources. This is very important in helping to 'plug' any funding gap/shortfall. How will this be approached over the plan period, particularly in light of the severe drop in public sector funding? Increasingly scarce funds will probably be directed to deal with existing needs, rather than being available to mitigate the impacts of further demands being placed upon infrastructure by new development. In principle we would support a CIL charge on all new development (not just residential) in order to widen the charging base, which should also help to reduce the funding gap. Presumably this will be determined by a viability assessment? The county council would encourage Waveney to introduce a simple and transparent CIL charging schedule, rather than a myriad of rates for different parts of the district and for different development types. Implications of the recently announced 'New Anglia' Enterprise Zone on CIL and Section 106 planning obligations. Has a dialogue with the Local Enterprise Partnership for Norfolk and Suffolk been opened? What implications do you envisage for CIL and Section 106 planning obligations? Continued use of Section 106 planning obligations post April 2014? It is our understanding that whilst the intention is to scale back the use of planning obligations from 2014 onwards, particularly around the ability to pool contributions (maximum of five obligations per infrastructure item), it may still be advantageous to use planning obligations in certain circumstances e.g. larger development proposals which in themselves will trigger the justified need for, say, an on-site new primary school or onsite open space. An assessment needs to</p> | |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|---|--------------------|
| | | | <p>be made across Waveney on whether or not there certain circumstances where Section 106 planning obligations should still be used in preference to CIL (and thus those directly related items of infrastructure are excluded from the CIL charging schedule). In particular this may be of relevance for Lake Lothing. Cross border infrastructure issues. A number of infrastructure items have a wider catchment area than the administrative boundaries of Waveney e.g. transport, education, libraries and so on. How is it intended to deal with this i.e. identify and cost? An assessment of the cost of delivering high-speed broadband needs to be included in the Infrastructure Study (refer to paragraphs 95 - 99 of the draft NPPF). An assessment of the cost of ensuring that there is adequate 'Sustainable Waste Management' infrastructure across Waveney needs to be included in the Infrastructure Study. This is on the basis of PPS10 Planning for Sustainable Waste Management, which is also referred to in paragraph 7 of the draft NPPF. There is no mention of Fire Service issues. Please advise how this important infrastructure area is to be covered? Consideration needs to be given to sustainable urban drainage systems (SuDS) and whether that will be included in the CIL charging schedule or dealt with separately. It is anticipated that in April 2012; the sustainable drainage provisions within the Flood and Water Management Act 2010 will be implemented, requiring most developments to seek drainage approval from the county council and/or its agent alongside planning consent. At this time, the county council and/or its agent will be expected to adopt and maintain approved systems and a mechanism for funding this ongoing maintenance is expected to be</p> | |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|---|--------------------|
| | | | <p>introduced by the Government. In the interim, developers are urged to utilise sustainable urban drainage systems (SuDS) wherever possible, with the aim of reducing flood risk to surrounding areas, improving water quality entering rivers and also providing biodiversity and amenity benefits. The National SuDS guidance will be used to determine whether drainage proposals are appropriate. Under certain circumstances the county council may consider adopting SuDS ahead of April 2012 and if this is the case would expect the cost of ongoing maintenance to be part of the Section 106 negotiation. Planning conditions. The general principles of this are set out in Paragraphs B2 and B51 of Circular 05/05. It is important to recognise that, if there is a choice between imposing conditions and entering into a planning obligation, the imposition of a condition which satisfies the policy tests of Circular 11/95 is preferable. Therefore a number of important development management matters can still be covered by planning conditions, rather than Section 106 or CIL. Also refer to paragraphs 67 - 70 of the draft NPPF. It is our understanding that Section 278 Agreements will remain in place. Where a development requires works to be carried out on the existing adopted highway, an Agreement will need to be completed between the developer and the county council under Section 278 of the Highways Act 1980. Examples of such works could be the construction of new access/junction improvement of the highway/junctions, or safety related works such as traffic calming or improved facilities for pedestrians and cyclists. Under the Section 278 Agreement, the county council may provide the works at the developers' expense, or may</p> | |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|------------------------------|--------------------------------|---|--|
| | | | allow the developer to provide the works directly, subject to an approval and inspection process. | |
| 1. Introduction | Kirkley Business Association | Kirkley Business Association | This is not a direct response to the draft Infrastructure Study but it is a relevant point raised by the Kirkley Business Association during its discussion with Peter Aldous about revitalising the High Streets. The issue at the top of the agenda was parking charges and it was suggested that WDC might consider using funds from the Community Infrastructure Levy to subsidise parking in town centre car parks. Can this proposal be put forward at the appropriate time please? | Comments noted. Please note CIL funds can only be spent on infrastructure to support development rather than dealing with existing problems. |
| 1. Introduction | Naji Darwish | NHS Great Yarmouth and Waveney | NHS GWY acknowledges the importance the draft Community Infrastructure levy 2011-2025 document places on spatial planning and health. We support the importance given to sustainable transport and increasing the infrastructure to encourage cycling and walking with less reliance on the car. We welcome the new cycling and walking infrastructure contained within this document. We also note the good work that has been undertaken to increase the use of existing sustainable transport infrastructure. NHs GYW also welcomes the focus on increasing provision of open and green spaces for play, sport, and recreation within the document. We support all efforts to increase the capacity to enable communities to have facilities for healthier lifestyle and recreational activities. We recognise the difficulties with increasing this capacity within existing urban connobations but reflect on the health inequalities, higher levels of childhood obesity, and lower levels of physical activity within these areas. | Comments noted. |
| 1. Introduction | Reydon Parish Council | Reydon Parish Council | 1 It was felt that putting this consultation out during summertime was not a good idea at all 2 The target of | Comments noted. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------------------|------------------------------|--|---|
| | | | 5000 jobs would seem to be wishful thinking. Further the target of building 1885 more homes should follow the creation of more jobs. Reydon is in an AONB area, and therefore can only approve development on brownfield sites. 3 Not enough time for the booklet to be properly read 4 Councils cant create jobs unless they are non-productive bureaucracy. Surely all this will be altered by the new planning regulations as proposed by Government 5 Why do we need so many new houses, when so many stand empty? | |
| 1.2 | Badger Building | Badger Building | Whilst we note that shopping is identified in Policy CS4 as infrastructure, we would expect facilities to be self supporting through owner occupation or viable tenancy agreements. They should not be provided with support from CIL as this is unsustainable. | Comments noted. Local shopping facilities will not be provided through Community Infrastructure Levy funds. |
| 1.15 | Hugh Dowding - Witham Group | Witham Group | The purpose of the CIL is to facilitate projects and presumably to provide a tool whereby projects which may not go ahead have a mechanism by which they could go ahead. However, the danger lies in cynicism in that in concocting the formula for the funding gap any authority could "organise" the figures to show a funding gap in any specific instance - possibly preserving funds for other projects more favoured by the Authority and where they presume funding may be more difficult It is certain that Developers in any Project would expect funds raised against any Proejct by virtue of the CIL would be hypothecated to the infrastructure involved in that specific Project One key issue in the UK is the non-hypothecation of revenue raised to the area concerend and this is a concern of the population at large not merely in the sphere of Development | Comments noted. |
| 1.16 | Colin Campbell, | Savills | Development values in the District are marginal. The | Comments noted. The work on viability included |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------------------------|-----------------------------------|---|---|
| | Savills | | study of viability will therefore be a critical piece of work if the CIL is to be successful and not to stifle development. We suggest a sounding board is established with landowners and the development industry to work in partnership with the Council to ensure the CIL is as robust as possible. | a workshop and consultation with local agents, developers and landowners. |
| 2.1.4 | Oulton Parish Council | Oulton Parish Council | The planning permission on Woods Meadow is subject to the imminent signing of a Section 106 agreement. Is there a time limit on 106 as point 1.8 of the study document states that 106 has been reduced by regulation 122 from April 2011? | Comments noted. There is not a general time limit on a Section 106 unless a claw back period is put into the agreement. The CIL regulations just tighten the use of Section 106 post 2010. |
| 2.1.5 | Colin Campbell, Savills | Savills | The approach to identifying the quantum of infrastructure required is flawed as it is based on the assumption that new homes generate additional population and therefore require additional infrastructure. The need for new homes is driven significantly by household formation without any commensurate increase in population - the Council's own strategic housing market assessment identifies that a major cause of housing need is overcrowding. The evidence base which supported the East of England Plan identified that 60% of the new homes required arose from household need of existing population and only 40% from in-migration. The assessment of infrastructure required should not be based on an assumed population of 2.2 per dwelling as this over-estimates the required infrastructure and hence the amount of money required from CIL. The infrastructure required should be based on an assessment of the newly arising population within those dwellings. | The 2.2 people per dwelling has been used in establishing the need for certain types of open space, contributions to community centres, libraries and leisure centres. Whilst it is appreciated that across the District, population will not rise by 2.2 people per dwelling due to household need from the existing population, in specific localities population will increase as a result of new development. It seems a sensible approach to apply the current average household size to model the likely increase in population in a specific locality As the above infrastructure is local in nature, it will be essential that an appropriate level of infrastructure is provided in the locality of development. |
| 2.1.5 | Suffolk County Council (Planning) | Suffolk County Council (Planning) | Paragraph 2.1.5. Is it possible to use 2011 Census data as soon as available? | The Census 2011 data is not yet available. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|---------------------------|---|---|---|--|
| | Obligations) | Obligations) | | |
| 2.2. Economic Development | Norfolk County Council | Norfolk County Council | The officer level comments below are made on a without prejudice basis and the County Council reserves the right to make further comments on the emerging Community Infrastructure Levy (CIL) Charging Schedule. 2.1 It is understood that the above Infrastructure Study will underpin work on the Waveney CIL, which in turn will support planned growth as set out in adopted Waveney Core Strategy. Norfolk County Council has not raised any soundness objection to the Core Strategy and as such the broad infrastructure projects identified in the Infrastructure Study do not raise any strategic concerns. 2.2 However, since the Core Strategy has been adopted Norfolk and Suffolk have strengthened their close working relationship through the formation of the New Anglia Local Enterprise Partnership (LEP). This has led to the successful bid for an Enterprise Zone/s covering parts of Great Yarmouth and Lowestoft. 2.3 On this basis it might be useful for the Infrastructure Study to consider the wider strategic cross-boundary infrastructure requirements, particularly in terms of transport, which may assist in encouraging economic enterprise in both Great Yarmouth and Lowestoft. 2.4 Should you have any queries on these above matters please call Alison McErlain. | Comments noted. It is not considered that there are any cross-border infrastructure requirements |
| 3. Transport | Kessingland Parish Council | Kessingland Parish Council | On Section 3 dealing with all aspects of Transport, Kessingland Parish Council has no comment to make. | Comments noted. |
| 3. Transport | Suffolk County Council (Planning Obligations) | Suffolk County Council (Planning Obligations) | Transport minor works capital programme. There is a potential gap regarding the assessment of transport infrastructure costs which are either not currently identified in the CIL consultation documents or can not | Given the lack of development proposed for rural areas there are no strategic infrastructure requirements for sustainable transport in these areas. Should unforeseen windfall development |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------------------|------------------------------|--|--|
| | | | be dealt with on an individual site basis by using Section 106, Section 278 or planning conditions. The LTP3 identifies the more strategic transport projects but there will be a large number of minor transport projects, for which CIL funding should be secured. For example, in the more rural parts of Waveney there may be the justified need to provide sustainable transport solutions associated with new development e.g. pooling contributions to enhance local bus service provision, which are neither currently included under CIL or can be dealt with by Section 106. This is an important issue that needs to be fully considered and the county council would welcome a discussion on how this can be addressed. | occur in rural areas there may be potential to pool contributions for this type of infrastructure. It should be noted that just because a piece of infrastructure has not been identified in the infrastructure study it does not mean that CIL cannot be spent on it in the future. |
| 3.1 | Hugh Dowding - Witham Group | Witham Group | Philosophically desirable However in reality all studies seem to show that the practical introduction of these concepts is radically more difficult Lowestoft suffers from unique challenges in this respect, divided by Lake Lothing and into the two communities of Lowestoft and Outlon Broad the existing infrastructure is challenging to the completely flexible animal which is the internal combustion engine motor car An integrated strategy such as this needs carbon neutral public vehicles to lead the way, electric, hydrogen or at least CNG for buses, taxis etc, an electric charging infrastructure, incentives for companies to install electric charging, a link to carbon neutral offshore wind energy for that infrastructure.... Not a bicycle path which seems to be the current answer!!!!!! However, does WDC really have the skills, knowledge, commitment and resources to consider an integrated project on this scale | Comments noted. New and enhanced cycling and pedestrian links should provide a positive contribution to lessening the traffic impacts in Lowestoft. However, it is noted that these will need to be combined with other measures. |
| 3.1 | Badger Building | Badger Building | The assertion at Section 3.1 that the new allocation will | Comments noted. One of the main purposes of |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-------------------------------------|-------------------------------------|--|--|
| | | | increase the congestion in the town to the extent that mitigation is required is a cause for concern in terms of the issue of mitigation using CIL. All this can do without additional resources is allow the situation to stand still. In our view it raises the issue of the suitability of the allocated sites as without sufficient additional funding through the LTP process solutions to the existing problems will not be found. | CIL is to mitigate the impacts of development to allow development to proceed. |
| 3.1.1 | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | What "town-wide traffic reductions measures" will be introduced in Lowestoft and how will they be feasible alongside the Lake Lothing development? | Town-wide traffic reduction measures will include new cycle and pedestrian provision (including two new cycle/pedestrian bridges over Lake Lothing), new bus routes, improvements to the Commercial Road junction and a new station interchange. |
| 3.1.2 | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | "The [3rd] crossing [over Lake Lothing] is not needed to support the planned development of the Lake Lothing area." How can this be so? Is data available to show how this conclusion has been made? | The traffic reduction measures outline in the Lake Lothing and Outer Harbour Area Action Plan will help ensure that the impact of new development on transport infrastructure is mitigated. Therefore, a new vehicular crossing over Lake Lothing is not needed to support the development of this area. The Waveney Core Strategy was found sound on the basis that the delivery of identified growth is not dependent upon the delivery of the third crossing. |
| 3.1.6 | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | What are the proposed "measures to reduce traffic impact in Bungay town centre"? | These improvements are essentially minor tweaks to the road network, environmental improvements and measures to make the area more pedestrian and cycle friendly. |
| 3.1.6 | Badger Building | Badger Building | A12 Extension - This is badly needed to relieve the Persimmon development of lorry traffic in particular. The Council really should grasp the nettle here and make a housing allocation on the available land to the north to | Comment noted. The Northern Spine Road is likely to receive LTP funding in the short-term. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------------|------------------------------|--|--|
| | | | ensure that this link can be built as part of the development. | |
| 3.1.8 | Highways Agency | Highways Agency | The Highways Agency's interest is the impact on the A12 trunk road arising from the Core Strategy and the Lake Lothing and Outer Harbour Area Action Plan (AAP) proposed growth. My comments relate to Paragraph 3.1.8 of the draft Infrastructure Study and the potential carry forward to Tables 3.1.1 and 12.1. Para 3.1.8 refers to the need to improve the Commercial Road/Station Square junction within the North Peto Square area, as identified in the AAP. The AAP, through proposed changes following representations by the Highways Agency, also identifies the requirement for development at PowerPark to include any necessary improvements to A12 junctions in the vicinity and the potential need, subject to detailed assessment, for changes to the access into the site from the A12 trunk road (Policy SSP1 and Table 5.2.1). Our particular concern was the A12 Battery Green Road/Suffolk Road/A12 Waveney Road junction. The potential trunk road junction improvements to facilitate PowerPark development have been omitted from the draft Infrastructure Study. It may be that Waveney District Council has decided that those improvements should be delivered solely through individual planning consents for development at PowerPark. If not, I would ask that consideration is given to their inclusion in the Community Infrastructure Levy. | Any site specific upgrades to junctions arising from new development of the PowerPark would be better dealt with through Section 106. As the nature of these requirements are not yet known and will not be known until there are more specifics on the nature of development within the PowerPark it is not possible or necessary to refer to them in this study. |
| 3.1.10 | Oulton Parish Council | Oulton Parish Council | As the A146 Barnby to Carlton Colville Bypass is not identified in the Suffolk Local Transport Plan 3 as a priority (point 3.1.10) there is no requirement for developers to contribute to this major road. How will | Comments noted. The Community Infrastructure Levy will allow for funds to build up to pay for some road proposals. An example might be the Beccles Southern Relief Road. As the A146 |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|---|---|---|---|
| | | | there ever be enough money for major road improvements if developers are not asked to contribute? Surely a fund for major road improvements with an extended time scale for using the money is the way forward? If every development creating additional traffic in Lowestoft and Oulton Broad was required to pay a contribution to major road infrastructure this would surely be of benefit when Suffolk County Council were making decisions on which projects to put forward in their next Suffolk Local Transport Plan. | bypass is not in the Suffolk Local Transport Plan, the project's deliverability over this plan period is questionable and therefore it is unlikely to be justifiable to reserve CIL funds for this project. If the A146 improvements become a priority in future revisions of the Local Transport Plan, it may be possible to use future CIL receipts to aid its delivery (provided it will benefit new development). |
| 3.1.11 | HM1 | Associated British Ports | Very pleased to see improvements to Commercial Road included, believe this would also result in improved traffic flow over and off the Bascule Bridge. | Comments noted. |
| 3.1.12 | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | What are the proposed "measures to reduce traffic impact in Bungay town centre"? | These improvements are essentially minor tweaks to the road network, environmental improvements and measures to make the area more pedestrian and cycle friendly. |
| 3.1.12 | Badger Building | Badger Building | There is a summing error in the total as previously advised. | Comment noted. Error has been corrected in the table |
| 3.1.14 | Suffolk County Council (Planning Obligations) | Suffolk County Council (Planning Obligations) | We would anticipate seeking to secure 100% funding of the Beccles Southern Relief Road from developer contributions/CIL (Section 3.1). | Comments noted. It is unlikely that the development planned in the Beccles area will be dependant on the construction of the road. Therefore it will be difficult to justify developer contributions funding 100% of the cost of the road. |
| 3.2.2 | Badger Building | Badger Building | The need for this is clearly established regardless of new development. It should not receive CIL funding. | The Rail Loop is fully funded and is only in this document for completeness as it will benefit new development in Lowestoft. It will not require CIL funding. |
| 3.2.3 | Badger Building | Badger Building | The need for this is clearly established regardless of | The station improvements are fully funded |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|-----------------------------------|---|---|---|--|
| | | | new development. It should not receive CIL funding. | through the Local Sustainable Transport Fund and therefore will not need CIL funding. Due to traffic issues in Lowestoft which may be made worse by new development in the town, a number of town-wide car traffic reduction measures are needed to support development. |
| 3.2.4 | Badger Building | Badger Building | The need for this is clearly established regardless of new development. It should not receive CIL funding. | The Rail Loop is fully funded and is only in this document for completeness as it will benefit new development in Lowestoft. It will not require CIL funding. The station improvements are fully funded through the Local Sustainable Transport Fund and therefore will not need CIL funding. Due to traffic issues in Lowestoft which may be made worse by new development in the town, a number of town-wide car traffic reduction measures are needed to support development. |
| 3.3. Other public transport | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | Is there a strategic infrastructure requirement to provide a scheduled bus service to every village in Waveney District? If not, there should be and the funding identified and allocated to make this possible. | There is no strategic proposal to provide a scheduled bus service to every village in Waveney. However, Suffolk County council do operate 'demand responsive' transport to every village. |
| 3.4. Pedestrian and Cycle Network | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | 3.4.5 to 3.4.13: Improvements of and additions to the cycle network are all good plans and should be a priority. | Comments noted. |
| 3.4. Pedestrian and Cycle Network | Suffolk County Council (Planning Obligations) | Suffolk County Council (Planning Obligations) | Cycle network improvements are currently estimated at £1.75m for Lowestoft, £0.75m for Beccles and £0.45m for Bungay (2011/12 prices). For major development proposals being promoted these will normally require a Transport Statement or Transport Assessment (refer to paragraphs 82 - 94 of the draft NPPF). A comprehensive assessment of highways and transport | Comments noted. Further information is required about the nature of schemes proposed above and how they relate to new development. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-------------------------------------|-------------------------------------|---|--|
| | | | issues will be required as part of a development brief and/or any planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). We would anticipate that site specific matters will still continue be dealt with by Section 106 (on the basis of the three statutory tests set out in Regulation 122 of the CIL Regulations 2010), Section 38 and Section 278. | |
| 3.4.5 | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | Two new pedestrian and cycle crossings over Lake Lothing are a good plan. However a 3rd vehicle crossing is also necessary. | Comments noted |
| 3.4.5 | HM1 | Associated British Ports | The Brooke option is likely to be expensive to build and have significant operating costs - not convinced this is a realistic solution. | Comments noted. Comments noted. A draft feasibility study has been prepared and the Council will be considering options on how the bridge can be operated efficiently. |
| 3.4.5 | Badger Building | Badger Building | The costs of bridging Lake Lothing from Normanston Park to Brooke Marine, including crossing the railway line are excessive for the benefit. This figure alone could add up to 10% to the total infrastructure bill (see costing at 3.4.17) Based on the Newcastle "Blinking Eye" and other bridges spanning similar distances we think this figure is an underestimate. This project needs to be the subject of a proper feasibility study - we are still not convinced of the practicalities in relation to a landing on the north side of the railway due to space limitations and would suggest that much greater and more widespread benefits to the cycle network could be achieved with this money. | Comment noted. A draft feasibility study had been undertaken leading to the likely costs discussed in the document. The bridge is a piece of strategic infrastructure identified in the Lake Lothing and Outer Harbour Area Action Plan and will help contribute to town-wide measure to reduce car traffic which will mitigate the impact of new development. |
| 3.4.13 | Badger Building | Badger Building | Land ownership constraints make delivery of the Lowestoft to Hopton cycle route along the old railway | Comment noted. This project is not considered necessary to support new development and |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|------------------------|------------------------------|---|--|
| | | | line almost impossible without the use of CPO. Given the real level of usage here and the availability of adequate local roads, which are every bit as good as the Sustrans route between Lowestoft and Beccles for example, we have to ask why this remains an ambition? | therefore is not costed as part of the infrastructure study. Its inclusion is for reference only. |
| 3.4.15 | HM1 | Associated British Ports | Operating costs would be significant - likely to need an operator on duty 24/7 could result in the need for 5 full time staff = between £100k and £150k pa. | Comments noted. The detail around implementation of this project will be further discussed with Associated British Ports and other Lake Lothing users in due course. |
| 4. Education | Norfolk County Council | Norfolk County Council | The officer level comments below are made on a without prejudice basis and the County Council reserves the right to make further comments on the emerging Community Infrastructure Levy (CIL) Charging Schedule. 3.1 Given the close proximity of some of Norfolk's schools with settlements in Waveney, the following issues ought to be considered as part of the Infrastructure study process; 3.2 Two primary sector schools could potentially be affected: (a) Earsham Primary in Bungay; and (b) St Michaels Primary in Gillingham/Beccles These schools feed into a Norfolk High school, Hobart High in Loddon. 3.3 Both primaries have recently been reorganised from first schools. It is expected that the St Michaels Primary would be able to meet catchment demand given the relatively low level of housing proposed in Beccles. However, it should be noted that once Earsham Primary School reaches its full complement of seven year groups, it is expected to be full. While only around 50 houses are anticipated in Bungay, if any of these are located in Earsham's catchment, there could be some minor capacity issues. 3.4 Similarly, Hobart High is currently full and expected to exceed capacity under the Greater Norwich Joint | Comments noted. All development planned within the Waveney District is within the catchment areas of Suffolk schools. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|---|---|---|---|
| | | | Core Strategy proposals. Again, depending on where the new housing for Beccles and Bungay is located, there could be capacity issues arising and the need for developer contributions. 3.5 The Infrastructure Study should make reference to the potential for development in Waveney needing to provide developer funding for schools across the border in Norfolk. 3.6 Should you have any queries with the above comments please call Helen bates. | |
| 4. Education | Kessingland Parish Council | Kessingland Parish Council | Dealing with Section 4 - Education, again it is noted that apart from the Lake Lothing and Outer Harbour Area Action plan, there are no new primary schools proposed in the District, albeit some work may take place at existing schools as and when required. On page 22 Tables 4.2.1, 4.2.2 and 4.2.3 there is no mention about Kessingland Primary School. Is that because it is considered the existing school capacity is adequate for present and future requirements? | This is an error and is addressed in the revised Table 4.2.3 . It is likely that Kessingland Primary School will have capacity to accommodate any windfall development. If there is a significant amount of windfall development in Kessingland, some CIL revenue will need to be used to expand the school as necessary. |
| 4.1. Pre-School | Suffolk County Council (Planning Obligations) | Suffolk County Council (Planning Obligations) | Early years provision. We assume that for every 100 dwellings (2 bed and above) there are 7 new early years children ages 3 & 4. On this basis we estimate that against housing growth projections (excluding Lake Lothing which is already included in paragraph 4.1.4) we will require additional provision for up to 47 new places at a cost of £5,984 per place, giving a cost of £281,248 (2011/12 prices). | Comments noted. Following further advice from Suffolk County Council the section on Pre School provision has been amended accordingly. |
| 4.2. Primary | Badger Building | Badger Building | We make the general point that capital receipts derived from the sale of redundant school assets arising from reorganisation should be recycled in to new provision in the town before there is any education charge to new developments. We note the figure quoted for the provision of a new school to serve the Brooke peninsula | Comments noted. Generally, any capital receipts derived from the sale of surplus education assets are usually ring-fenced to reinvest in providing and/or improving education provision to meet existing needs i.e. they are not available to mitigate the impacts of pupils arising from new |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-------------------------|------------------------------|--|---|
| | | | <p>development at para 4.2.9. However we note that the text at para 4.2.3 refers to the provision of a level of surplus to facilitate parental preference and for contingency planning; this additional cost should not be taken in to account It exceeds the level of need derived from the development and the exercise of parental preference then creates unused space in existing schools which is wasteful of resources. Whilst we appreciate that it is not possible to build half a school - the whole cost should not be chargeable to development.</p> | <p>development which places additional burdens on the local education system. With regard to the new primary school requirement to serve the Sustainable Urban Neighbourhood development, it is recognised that there may be an element of over-capacity but that is because it is not possible to build part of a school classroom. There is a need to ensure that sufficient local education provision to meet needs arising from the 1,500 units is provided, but the 2 form entry primary school will not be required from day 1. So the likely plan will be to build the new school in 2 phases. The first phase is likely to be a 1 form entry (210 places) school, which has the ability to have additional classrooms added when required to eventually cope with a maximum of up to 420 pupils. If it transpires in the medium to long term that we do not require the full 2 form entry school in connection with the development the County Council will either build slightly fewer classrooms, seek funding from any other development which creates education need or fund it themselves.</p> |
| 4.2.3 | Colin Campbell, Savills | Savills | <p>If developers within the Lake Lothing Area are required to make provision for a primary school within the development it will be important that a financial contribution towards primary provision elsewhere is not made via the CIL, or the developer will be contributing twice toward school provision. In bringing forward the CIL the council will need to introduce a mechanism to ensure developers providing infrastructure on-site and in-kind do not contribute twice.</p> | <p>Comments noted. The provisions of CIL Regulation 123 limit to some extent the possibility of this happening as a Section 106 contribution cannot be a legal material consideration if it provides funding for a piece of infrastructure that is being funded by CIL. On adoption of CIL the Council will produce a Regulation 123 list to state what infrastructure will be funded by CIL. The important point to note is that CIL breaks the link between a development and spend on infrastructure. This gives the Council flexibility to</p> |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--|---|---|---|--|
| | | | | target infrastructure priorities such as those in Lake Lothing. |
| 4.2.4 | Oulton Parish Council | Oulton Parish Council | The Study Document states the Primary school at Woods Meadow is also subject to the 106 Agreement. Again does the 106 agreement have a default period before the Community Infrastructure Levy comes into force in 2013? Would it not be fairer for all developers to be able to pay the community levy in a default period so councils, parish or otherwise, would be on a level playing field with the amount of monies being returned to said councils for infrastructure maintenance. At the moment the two systems would cause conflict for planning applications in local councils as both would not be available at the full amount for councils, with the return of 106 to developers after a period of years. With the Woods Meadow area taken out of the equation it does not leave Oulton parish, which is growing to become a very large village, any monies returned for Infrastructure maintenance or projects. | Comments noted. The introduction of the Community Infrastructure Levy will not affect any section 106 agreement signed for the Woods Meadow development. |
| 4.2.8 | Suffolk County Council (Planning Obligations) | Suffolk County Council (Planning Obligations) | Paragraph 4.2.8. The cost per primary school place for 2011/12 has increased to £11,967, giving a revised cost of £1,220,634. The county council will next review the costs per school place (early years, primary, middle, secondary and sixth form) for 2012/13. | Comments noted. Costs of primary school provision updated. |
| 5. Open Space and Green Infrastructure | Sport England | Sport England | Sport England is supportive of the identification of both indoor and outdoor sports facilities as legitimate community infrastructure that can be funded through the CIL process. This is in line with both national guidance introduced in April 2010, and local Core Strategy Policy CS4. We are also supportive in broad terms of the methodology used to calculate levels of funding that can be reasonably secured through the CIL process, and | Comments noted |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--|-----------------------------|------------------------------|--|---|
| | | | the identification of priority projects that will hopefully be funded. | |
| 5. Open Space and Green Infrastructure | Kessingland Parish Council | Kessingland Parish Council | Section 5 deals with Open Spaces and Green Infrastructure. A recent document prepared by WDC regarding Open and Play Area Provision in the District shows Kessingland to be good in all aspects, except for teenage provision, and that play provision is an important part of development in young people. There is however a shortfall in playing field space. | Comments noted. |
| 5.2 | Hugh Dowding - Witham Group | Witham Group | Given the grey land mass in the SUN the land mass devoted to public, and especially environmentally focussed land seems to be underestimated The likelihood of the AAP being achieved in the medium term is highly unlikely - even in the interim, rather than undeveloped grey land the land should be allocated to open environmentally friendly space | Comments noted. The Sustainable Urban Neighbourhood will include new public open space. However, the land is unlikely to be available until development is commenced. |
| 5.2 | Colin Campbell, Savills | Savills | Where provision for open space is being made on-site it will be important that a financial contribution towards such provision elsewhere is not made via the CIL, or the developer will be contributing twice. In bringing forward the CIL the council will need to introduce a mechanism to ensure developers providing infrastructure on-site and in-kind do not contribute twice. | Comments noted. The provisions of CIL Regulation 123 limit to some extent the possibility of this happening as a Section 106 contribution cannot be a legal material consideration if it provides funding for a piece of infrastructure that is being funded by CIL. On adoption of CIL the Council will produce a Regulation 123 list to state what infrastructure will be funded by CIL. The important point to note is that CIL breaks the link between a development and spend on infrastructure. This gives the Council flexibility to target infrastructure priorities such as those in Lake Lothing. |
| 5.1.11 | Badger Building | Badger Building | We are still awaiting a plausible explanation as to why the maintenance costs of open space are not covered | Comment noted. New open space provided to mitigate new development has a significant |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|--|---|
| | | | by the additional Council Tax revenue received from newly constructed properties. We believe that there is an element of double counting here which needs explaining. NB.The revenue funding figure appears to have been omitted from the final table. | maintenance cost attributed to it. The Council considers therefore it is only fair for developers to make a small contribution towards this cost. The maintenance cost identified in the infrastructure study only covers basic maintenance (such as grass cutting) for 10 years. Eventually extra council tax receipts will cover the ongoing maintenance costs in perpetuity. |
| 5.2. Outdoor Sport | Sport England | Sport England | Sport England would not advocate using the evidence from a 2002 playing pitch assessment to identify key deficiencies in provision, as it is recommended that only assessments/strategies carried out within a 3 year period can be classed as a robust evidence base. It is also not recommended to use that national Fields in Trust standard for open space provision, as this does not take into account local factors that will affect demand for sports pitches. However, notwithstanding our reservations regarding the evidence based used, we are supportive of (a) the identification of the priority projects that will deliver new playing fields within the district; (b) the methodology used to calculate the level of provision that can be reasonably secured through the CIL process; and (c) the calculation of the costs to deliver this provision. Our only query is that in Para. 5.2.13 it states that £2,629,452 can be secured through this process, but this does not include the £295,470 revenue funding identified in Para. 5.2.11 despite this paragraph confirming that CIL money can be spent on revenue projects. | Comments noted. The Council has identified shortfalls in the provision of playing pitches across the District in the Pitch and Non-Pitch Assessment. It is acknowledged that some of these shortfalls have yet to be fully rectified since the study was finalised in 2002. Despite this, the Pitch and Non-Pitch Assessment still provides useful guidance as to what is required in different areas of the District. In the absence of local standards, the NFPA/FIT Six Acre Standard provides accepted guidance to meet the needs of the community. It is intended to keep the capital funding gap separate from the revenue funding gap. |
| 5.2. Outdoor Sport | Badger Building | Badger Building | There is no case for public subsidy of playing fields let to sports clubs particularly where those benefiting from the facilities may not be local residents. The rental | Comment noted. New sports facilities provided through developer contributions will be open for all the public to use as well as sports clubs. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-------------------------------------|-------------------------------------|--|--|
| | | | charges for publically owned pitches should properly reflect the cost of their provision NB.The revenue funding figure appears to have been omitted from the final table. | |
| 5.2.7 | Kessingland Parish Council | Kessingland Parish Council | Paragraph 5.2.7 states that under Policy LOW10 of the Site Specific Allocations DPD, WDC has allocated for Kessingland 2.76 hectares of land for a new playing field. | Comments noted |
| 5.2.12 | Kessingland Parish Council | Kessingland Parish Council | In Paragraph 5.2.12 it states that the new proposed Kessingland playing field has enough s106 funding secured for it, this is complete nonsense. The only funding secured which could be used for LOW10 is a contribution of £25,000 which came about when Marram Green was developed and play area space was lost. Using the costing figures contained within paragraph 5.2.10, the cost of acquiring 2.76 hectares of land in LOW10 is as follows:- 2.76 hectares = 27,600 sq.metres @ £4.75 per sq metre = £131,100 To develop the land making it suitable for an open playing field space the cost is calculated as:- 2.76 hectares = 27,600 sq.metres @ £8.29 per sq. metre = £228,804 Making the total cost for LOW10 - £359,904 Therefore this is not financially viable - there would be a £324,904 shortfall - would that come from a CIL contribution? | Comments noted. This paragraph will be revised to update the facts. Future development in Kessingland could generate CIL funds to help deliver this project. |
| 5.3.1 | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | As the parks in Beccles and Bungay "do not meet the expectations of the local community", why are there no strategies to improve the parks? Neither town has a park of sufficient quality for residents or visitors. | There are currently no strategies to improve park provision in Beccles and Bungay in the Waveney Open Space Strategy. However, if future revisions of the Waveney Open Space Strategy identify specific projects there may be potential for future CIL funds raised in those communities to contribute towards those projects. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|----------------------------|------------------------------|--|---|
| 5.3.3 | Badger Building | Badger Building | The park referred to will make no measurable contribution to the lives of the majority of residents of the Brooke Peninsula development as it is too far away. Research suggests that facilities of this sort need to be within 1000m for people to be prepared to walk to them. More careful consideration needs to be given to how the open space needs of the Brooke Peninsula can be properly met. NB. The revenue funding figure at 5.3.5 appears to have been omitted from the table. | Comments noted. The East of England Park is not just to serve the Brooke Peninsula development but all of the development within the Area Action Plan area and Lowestoft as a whole. As a destination park it can be further away than 1000m. However, it is appreciated that the project does not just support development, therefore extra text about sourcing other funding has been added. In addition an appropriate contribution from CIL has been calculated using the parks standard in the Open Space SPD. |
| 5.5. Allotments | Kessingland Parish Council | Kessingland Parish Council | Paragraph 5.5 deals with Allotments - Kessingland Parish Council agree that allotments have been an integral part of the urban landscape and current trends show an increase in demand regionally and locally and note that WDC recommends a standard of 0.3 hectares per 1000 people. Kessingland has a population of just over 4000, which means that using that standard we should have 1.2 hectares, unfortunately we have no figures relating to the existing allotments, but during recent discussions the open space play area at Rider Haggard Lane was identified as a possible allotment site. There is a shortfall in Kessingland and this would fulfil that demand, the parish council are shortly due to undertake a consultation with the local residents. | Comments noted. |
| 5.5.6 | Badger Building | Badger Building | The failure to identify and allocate allotment land in South Lowestoft rests with the Council. There are sites available but they would need to be purchased. | Comments noted. |
| 5.5.7 | Badger Building | Badger Building | The cost of allotment provision should be properly borne by users. Allotments are a privilege enjoyed by the few; they should not be funded by the community at large, particularly given the length of current waiting lists, | Comments noted. Despite the waiting lists, allotments are for the benefit of the entire community and are available to all local people. Under the Small Holdings and Allotments Act |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-------------------------------------|-------------------------------------|--|--|
| | | | where the majority have little or no chance of achieving access. | 1908, the Council has a duty to provide allotments if there is evidence of demand. |
| 5.5.9 | Kessingland Parish Council | Kessingland Parish Council | Paragraph 5.5.9 states that the CIL will fill the funding gap with a figure of £498,619 - would this mean that Kessingland be able to draw down funding from the CIL to develop additional allotment capacity? | Comments noted. The figure referred to will help deliver the allotment projects mentioned in the study and other projects in the locality of new developments. If new development occurs in Kessingland, Kessingland will be able to use CIL funds to help deliver allotments locally. |
| 5.6.1 | Simon Amstutz | Suffolk Coast and Heaths AONB | WDC should consider the part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) in the Waveney District as an important area of Green Space and recreation. A 2006 Tourism Study (Commissioned by East of England Tourism) noted that Tourism is worth £166m a year and that this high value Green Space is important to the local economy and that CIL should be used to maintain its quality | Comments noted. There is no evidence to suggest that new development proposed in Waveney will have a significant impact on the ability to maintain the quality of the AONB. |
| 5.6.2 | Simon Amstutz | Suffolk Coast and Heaths AONB | There is a long distance footpath through Waveney district in part of the Suffolk Coast and Heaths AONB, The Suffolk Coast Path, which provides economic benefits to the area and recreational opportunities and CIL should be considered for maintenance of this route and interpretation. | Comments noted. There is no evidence to suggest that new development proposed in Waveney will have a significant impact on the ability to maintain this route. There is no development planned in Waveney in the vicinity of this route. |
| 5.6.2 | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | The needs described for semi-natural open spaces in Waveney District do not reflect WDC's overview of the importance of these sites, described in the study's previous paragraph. The strategy to conserve and expand such areas needs to be pro-active. Suffolk Naturalist Society (SNS) is identifying existing and potential areas of importance for nature conservation that are strategically placed to link landscapes and create "wildlife corridors". WDC would learn about this | This section will be revised to consider Natural England Accessible Natural Greenspace Standards (ANGSt). |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|---------------------------|------------------------|------------------------------|--|--|
| | | | approach by contacting SNS enquiries@sns.org.uk and by attending their Linking Landscapes Conference in Woodbridge on Saturday 22 October, 09.30 -17.00. | |
| 5.6.2 | Suffolk Wildlife Trust | Suffolk Wildlife Trust | Paragraph 5.6.2 states that "it is not possible to quantify the likely need for this type of open space". We query this statement as Natural England has produced a nationally recognised standard for natural greenspace provision, the 'Natural England Standards for Accessible Natural Greenspace - ANGSt'. This standard provides a set of benchmarks for ensuring access to places near to where people live. We would recommend that, as a minimum, provision is made to meet the requirements of identified in these standards. It is noted that reference to ANGSt and provision levels for natural and semi-natural greenspace is made in the draft Waveney Open Space Provision and Developer Contributions Supplementary Planning Document; there should therefore be parity between these two documents. With regard to further identifying specific needs and opportunities, we would recommend that consideration is given to the production of a Green Infrastructure Strategy for the District. Such a strategy would offer a good opportunity to quantify the existing green infrastructure resource in the District, to recognise any deficiencies in the green infrastructure network and to identify opportunities to correct any deficiencies and enhance the existing provision. The production of such a strategy would also allow for more accurate requirements and costs to be estimated, therefore resulting in a more robust CIL charging schedule. | Comments noted. Section 5.6 will be revised to consider Natural England Accessible Natural Greenspace Standards (ANGSt). The Open Space Needs Assessment and Open Space Strategy cover open space provision and needs to an extent . However, it is agreed that a more comprehensive strategy such as a green infrastructure strategy would be beneficial but subject to resources being available. There is potential to address this when the existing Open Space Strategy is reviewed. However, the strategy is unlikely to be complete to in advance of introducing a Charging Schedule. |
| 6. Community and Cultural | Suffolk County Council | Suffolk County Council | We would recommend strongly that there should be a section 6.4 Museums (after 6.3). Museum provision in | Comments noted. There are currently no District level plans for museum expansion to |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------------------------|------------------------|------------------------------|--|---|
| Facilities | Archaeological Service | | <p>Suffolk has not been satisfactory since 1974 and is under considerable pressure during this period of public service funding crisis. In particular, the huge expansion of archaeological work, undertaken since the introduction of Planning Policy Guidance 16 on the Historic Environment in 1991 - replaced by PPS 5 in 2010 - has led to a large volume of archaeological finds of local regional and national importance with no designated museum to store or curate them. Suffolk County Council continues to curate the archaeological archives (finds and records) made outside of Ipswich (which are stored by the Colchester and Ipswich Museum Service). The current storage facilities are inadequate, and they do not meet national standards, and the requirement for these finds will continue to increase, as further development-led investigation (preservation by record) takes place. This work is also unfunded. There is also a requirement for the public to have access to the finds through open stores and display, either in the many independent museums in each district or at a central facility. As these finds derive directly from development (a requirement of the planning system), it is reasonable that that the levy should provide funding to improve these facilities and make them publically accessible. If this proposal is accepted, more detailed work could be undertaken to establish the cost of such provision going forward and quantify Waveney's share.</p> | <p>accommodate new development. The CIL funds cannot be spent on addressing current deficits in provision. There needs to be a clear justification that what CIL is spent on supports new development. It is noted the link between development and archaeological finds. However, not all sites will have a archaeological interest and therefore this issue may be better dealt with through Section 106 for those sites where there is a high archaeological interest with a real chance of archaeological finds. For this to happen though there would ideally need to be a Suffolk -wide project for museum expansion to accommodate archaeological finds that any funds raised could be spent on.</p> |
| 6. Community and Cultural Facilities | The Theatres Trust | The Theatres Trust | <p>The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that 'The Theatres Trust exists to promote the better protection of theatres. It currently delivers statutory planning advice on theatre buildings and theatre use</p> | <p>Comments noted. Add 'theatres' to list of cultural facilities under Paragraph 6.1.</p> |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------------------|-----------------|------------------------------|--|---|
| | | | <p>through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre.' Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate matters relating to cultural facilities. As this document reflects Policies CS4 and CS14 of the Core Strategy we have no particular comment to make but suggest that paras.6.1 and 6.2 could include further details with regard to cultural facilities. We are concerned that theatre buildings do not benefit appropriately under the terms of S106 and other agreements, and that it will increasingly be necessary to unlock new sources of funding to help pay for significant improvements to them. Theatres always need improvements to keep pace with public expectations and the needs of performers and producers. For example, art spaces may be stand alone facilities or part of educational establishments, civic complexes or local community facilities - there is clear link with these types of facilities and co-locating with other services. Arts and performance spaces can comprise three different types - galleries housing permanent collections and temporary exhibits; multi-use arts venues and theatres, and production, rehearsal and education space for arts. As the recommended standard is 45 msq per 1,000 population these types can be divided respectively into - 30 msq, 5 msq, and 10 msq.</p> | |
| 6.1. Leisure and Sport Centres | Sport England | Sport England | Sport England are supportive of the identification of the priority projects identified to fund through CIL process, | Comments noted. It is unlikely that the new leisure facilities planned for Beccles will attract |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|-----------------------------|-------------------------------------|-------------------------------------|--|---|
| | | | and the methodology used to calculate how much can be secured through this process. We are particularly pleased to see the use of the Sport England Sport Facilities Calculator (SFC) to help estimate the levels of contribution that can be reasonably be secured through this process. These calculations are relatively limited due to the fact that the identified priority projects are not in the Lowestoft urban area which will be taking most of the proposed housing growth. Our only query with regard to this approach is whether it could be argued that some of the proposed housing growth in the Lowestoft area will be within the catchment area of the proposed new sports facilities in Beccles, therefore supporting the view that additional contributions associated with these developments could be secured to help fund the new facilities in Beccles? Sport England would normally suggest that a 15 minute drive time can be used to estimate the catchment area of a facility. I would be happy to discuss this issue further if this would be helpful. | users from new development in Lowestoft. Most development planned in Lowestoft is near the centre of the town or north of Lake Lothing in close proximity to the Lowestoft Waterlane Leisure Centre which is undergoing refurbishment and is likely cater for the needs of new development. |
| 6.3. Libraries and Archives | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | There is no mention of the mobile library service that is provided by SCC. | Comments noted. Reference will be made to the mobile library service. |
| 6.3. Libraries and Archives | Kessingland Parish Council | Kessingland Parish Council | Section 6 makes reference to Libraries and Archives. Kessingland has a new Library which is under threat from SCC and the Parish council are currently waiting on the outcome of S.C.C's 8 pilot schemes in the County that deals with the future administration and running of the Counties Libraries. | Comments noted. |
| 6.3. Libraries and Archives | Badger Building | Badger Building | Comments noted. Whilst concern remains about the future level of provision in the district we do not think that any shortfall in provision should be allocated to the | The Infrastructure Study only identifies additional need for libraries arising from new development. CIL cannot be used to make up for current |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|--------------------------------|---|--|
| | | | CIL budget. | shortfalls in provision. |
| 7. Health Care | Badger Building | Badger Building | Doctors and Dentists are self employed contractors to the health service and would normally be expected to provide their own premises. There are a number of companies who do this on a commercial basis, building surgeries and leasing them to practitioners; some practitioners build their own. Surgery facilities should not be charged to the CIL budget. | Comments noted. |
| 7.1 | Naji Darwish | NHS Great Yarmouth and Waveney | NHS Great Yarmouth and Waveney PCT commission health care services for the population of Waveney District. Planning has its roots in public health law from the 19th Century and recently health issues are again becoming an increasingly important material planning consideration. A healthy population is also a key factor of sustainable development. It is therefore important that new developments promote and enable healthy lifestyles and do not put undue pressure on existing health care services. NHS GYW agrees with this statement. | Comments noted |
| 7.2 | Naji Darwish | NHS Great Yarmouth and Waveney | The Core Strategy identifies a need for new health centers in North and South Lowestoft. The new health centre in North Lowestoft will be provided as part of the residential development at Woods Meadow, Oulton. The proposed health centre for South Lowestoft now has planning permission on the Kirkley Rise allocation in the emerging Lake Lothing and Outer Harbour Area Action Plan. NHS GYW would prefer the term "Health Centers" is replaced with the term "health facilities" but it is acknowledged that the health needs of Lowestoft maybe best served by a North and South Lowestoft health solution. The phased development at Kirkley Rise is planned subject to funding with construction | Comments noted. 'Health centres' have been renamed 'health facilities' |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|--------------------------------|---|---|
| | | | <p>commencing 2012. It's also acknowledged that opportunities do exist if further phases of development are required to support a single Public Sector facility serving South Lowestoft. This is however at very early stages and no commitment or detail is available at present, but the opportunities are noted. The North Lowestoft solution is at an earlier stage of development but is likely to involve the existing Lowestoft Hospital site.</p> | |
| 7.3 | Naji Darwish | NHS Great Yarmouth and Waveney | <p>Using the Healthy Urban Development Unit (HUDU) model, the AECOM Social Infrastructure Assessment (2010), that informed the Lake Lothing and Outer Harbour Area Action Plan, identifies a need for 299sqm of additional primary health care floorspace and 65sqm of dental surgery floorspace to accommodate one dentist to support development in the area. Whether this requirement is delivered within the main development sites on the south-side of Lake Lothing or off-site as part of an expansion of existing provision still needs to be determined. As this need figure is theoretical and does not take into account local circumstances further engagement with the Primary Care Trust is needed to refine the likely need arising from development. NHS GYW is aware of the Lake Lothing and Outer Harbour developments and has been factored into our strategic estates planning. As such the Kirkley Rise development has factored in sufficient capacity and is strategically located to serve this area.</p> | Comments noted. Text will be amended to reflect the comments. |
| 7.5 | Naji Darwish | NHS Great Yarmouth and Waveney | <p>The Lake Lothing and Outer Harbour Area Action Plan estimates that the provision of the above need of 299sqm of additional primary health care floorspace and 65sqm of dental surgery floorspace will cost £700,000.</p> | Comment noted |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|----------------------------|-------------------------------|---|---|
| | | | As the above need is generated entirely by new development there will be no funding from the Primary Care Trust to meet this need, except that which comes from development. Therefore the current funding gap for health infrastructure to meet the needs of development is £700,000. As stated previously this is an indicative figure and will need to be refined in discussions with the Primary Care Trust. NHS GYW believe that this figure is a reasonable estimate, the PCT can support further discussions on the exact cost of health facilities. | |
| 9.1 | Simon Amstutz | Suffolk Coast and Heaths AONB | Coastal change is not all about loss there is accretion too. The Beech in front of Kessingland has grown considerably in the last 25 years | Comments noted |
| 9.2 | Simon Amstutz | Suffolk Coast and Heaths AONB | Consideration should be given to assets in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) that form part of the Waveney District Council administrative area including assets such as the Suffolk Coastal Path that contribute to economic activity in the district and provides a recreational resource that will be impacted by coastal change processes | Comments noted |
| 9.3 | Kessingland Parish Council | Kessingland Parish Council | Section 9 dealing with Coastal Protection and Flooding states in paragraph 9.3 -" The Shoreline Management Plans (SMP) have proposals to "Hold the Line" for 100 year period for the towns of Lowestoft, Southwold and the village of Kessingland" The Policy for the Kessingland SMP does not include the whole of Kessingland. The area around Benacre Sluice (Kes 5.1) and Kessingland Cliff (Kes.5.2), which includes the existing holiday camp and residential properties in Beach Road, is shown as N.A.I (No Active Intervention) from 2025 to2105. Therefore this CIL Policy should be amended to reflect the policies as set out in the SMP. | Comments noted. Text amended to reflect comments. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|----------------------------|------------------------------|--|---|
| 9.6 | Badger Building | Badger Building | Funding flood protection for sites proposed for development with additional money from CIL is not sustainable and amounts to a cross subsidy from economic sites to uneconomic ones. New development should fund its own costs or should be allocated in areas where the risk is lower and protection is not required. | Comments noted. Under the principles of CIL, where development needs flood/coastal erosion protection measures, it is appropriate for development to contribute towards the cost of those measures. |
| 10. Utilities | Anglian Water | Anglian Water | There would appear to be no proposal for provision within the CIL for water and wastewater infrastructure. We would be pleased to engage in further discussion should wastewater network infrastructure be considered for inclusion. Wastewater infrastructure is currently funded by Anglian Water (by seeking appropriate funding approved by OFWAT) and by developer contribution through the appropriate sections of the Water Industry Act 1991. Please do not hesitate to contact me should you wish to discuss. | Where upgrades are needed as a result of development this will be better dealt with through the provisions of Water Industry Act rather than Community Infrastructure Levy. No changes required. |
| 10.1 | Kessingland Parish Council | Kessingland Parish Council | Section 10 - Utilities - Kessingland Parish Council would seek clarification in the statements at paragraphs 1.3 and 10.1 In 1.3 WDC talk about developers contributions to alleviate drainage and flooding issues and 10.1 states "There are no known strategic utility infrastructure requirements to support development across Waveney. There may be site specific issues but these will have to be dealt with by the individual developer concerned." In fact Kessingland does not feature in this CIL consultation (10.2). With no development in Kessingland planned for the future will Kessingland be able to draw down funding from the District CIL to resolve the issues mentioned in 1.3? | Comments noted. It is appreciated that in certain areas of Kessingland there are drainage issues. Any development within these areas will need to deal with these issues. This may be via on-site sustainable urban drainage solutions or by off site works. These can be secured through developer contributions. Under the provisions of the Localism Act, a meaningful proportion of CIL which is generated by development in Kessingland will be passed back to the Parish Council for spending on infrastructure projects of their choice. |
| 11. Neighbourhood | Oulton Parish Council | Oulton Parish Council | Suggestions for small scale infrastructure in and around Oulton: Local bus service accessing Woods Meadow | Comments noted. Suggestions of local infrastructure need welcomed. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|----------------------------------|-----------------------|------------------------------|---|--|
| Infrastructure | | | and also Oulton Village, which has lost services in recent months. | |
| 11. Neighbourhood Infrastructure | Oulton Parish Council | Oulton Parish Council | Suggestions for small scale infrastructure in and around Oulton: Traffic calming and safety measures in and around Sands Lane. The road will see a huge increase in traffic when Woods Meadow is developed. | Comments noted. Suggestions of local infrastructure need welcomed. |
| 11. Neighbourhood Infrastructure | Oulton Parish Council | Oulton Parish Council | Suggestions for small scale infrastructure in and around Oulton: Improved cycle paths to enable children to cycle to school safely, especially now they have to attend high school at an earlier age. | Comments noted. Suggestions of local infrastructure need welcomed. |
| 11.4 | Reydon Parish Council | Reydon Parish Council | 6 Personally I can't see that much of this applies to Reydon as usual it is all centered around Lowestoft however it we are to suggest some infrastructure project I would agree with Richard that road does need upgrading. If the plans go ahead for the A12 at Blythburgh the other road at Wolsely Bridge will start flooding and both Southwold and Reydon could well end up cut off. I know some work it to be done on Potters Bridge but it is not a long term solution. My only other thought is perhaps WDC would like to provide some more land for allotments in Reydon. Apart from that everything I can think off would cost millions so what is the point in even going there. 7 As this refers to infrastructure based i.e. all large projects in Waveney, there is little apart from the mooted 30 homes in Southwold and Reydon that seems to directly affect this parish. The objective of creating 5000 jobs seems aspirational in the extreme and there is little here to define how this will be achieved other than vague promises of land for industrial sites. the CI I is scary because developers will obviously seek to maintain their margins, and to get this back by reflecting the cost in | Comments noted. Indications of local infrastructure need welcomed. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-------------------------------------|-------------------------------------|---|--|
| | | | their selling prices. 8 The B1127 needs attention and should be part of this plan. | |
| 11.4 | Didy Ward | Bungay Town Council | As part of Bungay Town Council's sub-committee dealing with administering the funds deriving from Section 106 we were frustrated to learn that funds which had accrued from past developments could only be applied in a very limited way and very local to the particular development, regardless of need. I welcome the new proposals which will allow a more holistic view. Bungay has a large development planned, a new community centre and children's play-park on the site of the Old Grammar School fields. Both of these projects will require substantial investment to the benefit of the whole town. A community infrastructure levy to replace the Section 106 levy will enable funds accrued from other developments to be deployed here. | Comments noted |
| 11.4 | Ilketshall St Andrew Parish Council | Ilketshall St Andrew Parish Council | These are all infrastructure items that the Parish Council thinks will need funds during the next 15 years. Some are very local while others, though more distant, are nevertheless important for the quality of life in the village. WDC has identified some of these as requiring funding but it will do no harm for us to identify them as important to our residents. - Scheduled bus service between Ilketshall St Andrew and Beccles and/or Bungay; - Mobile library service - Village hall improvements - Playground equipment and car park surfacing at village hall - Young peoples' club. This would be run by volunteers but would need funds for hall hire, equipment and insurance; - Libraries at Beccles and Bungay (continuation of service) - Improvements to Bungay swimming pool and gym - Additional facilities at Sir John Leman School, Beccles | Comments noted. Indications of local infrastructure need welcomed. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|---|--------------------------------------|---|--|
| | | | to provide public access to the sports centre and swimming pool; - Recycle centre at Beccles - continuing service. | |
| 11.4 | Kessingland Parish Council | Kessingland Parish Council | Paragraph 11.4 sets out the request from WDC to Town and Parish Councils to identify small scale projects that could benefit from funding from the CIL. In this response Kessingland Parish Council have asked a number of questions that seek clarification around s106 and the CIL, and any future development in Kessingland. We have also shown particularly with regard to Open Spaces (para 5.2.12) that the information is incorrect. | Comments noted |
| 11.4 | Mrs J Lawson (Kessingland Sports and Social Centre) | Kessingland Sports and Social Centre | As the Charity responsible for the provision, maintenance and management of the Community centre and the Recreation ground with its associated buildings we would welcome the chance to discuss with you our future plans for our site with a view to securing funding through your Community Infrastructure Levy. Our next project for the Community Centre building is to renew the ceiling and I enclose a copy of our preferred estimate to undertake a basic replacement. However as we now have 2 drama groups using the Hall and putting on regular performances it is our hope to renew all the lighting and add stage lighting. Financial assistance with one or both parts of the project would allow us to enhance the improvements we have already made since 2008. Those include new windows to the front of the building (with guards), internal decorating, replacement lounge furniture, plus a complete refurbishment of our semi sprung floor. For outdoor facilities we have just purchased a £1K grass cutting machine a line marker and have decorated the changing rooms and the toilet block. However we now | Comments noted. Indications of local infrastructure need welcomed. |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|---|---|---|---|
| | | | need to replace some of the fixings. We have installed new low level safety and security fencing and have now begun to replace the perimeter fencing. Childrens swings and new adult league football goal posts are on our wish list but we are seeking funding elsewhere for those. We would welcome guidance and the relevant paperwork to allow us to take advantage of the Community Infrastructure Levy funding. Enc. Quote Charity "Scheme" Document. | |
| 12.2 | Colin Campbell, Savills | Savills | The CIL should be used to deliver new infrastructure required to support development and not used as revenue funding for the maintenance facilities which should be funded through local taxation by the people who use/benefit from the facilities. Given the marginal land values in the District, it is likely that CIL will not provide sufficient funding for the infrastructure identified. As such we consider that the receipts from CIL should be used to fund new infrastructure and not to be spent on maintenance of new or existing infrastructure as this should be funded out of taxation. | Comments noted. New open space provided to mitigate new development has a significant maintenance cost attributed to it. The Council considers therefore it is only fair for developers to make a small contribution towards this cost. The maintenance cost identified in the infrastructure study only covers basic maintenance (such as grass cutting) for 10 years. Eventually extra council tax receipts will cover the ongoing maintenance costs in perpetuity. The Council appreciates that spending of CIL funds will need to be prioritised to ensure development takes place in a timely fashion. |
| 12.2 | Badger Building | Badger Building | This revenue funding figure appears to have been omitted from the tables. | Comments noted. Capital and revenue funding gaps will be kept separate for clarity. |
| Table 12.1 | HM1 | Associated British Ports | Have significant concerns that the levy may result in development not taking place. It will be very important that the levy does not encourage organisations to favour other locations. | Comments noted. A Viability Study has been prepared to ensure any levy does not put the majority of development at risk. |
| Table 12.1 | Suffolk County Council (Planning Obligations) | Suffolk County Council (Planning Obligations) | Table 12.1. What is the mechanism for ensuring that these costs are current? For example, the county council reviews the costs per school place every 01 | Comments noted. The purpose of the Infrastructure Study is to identify a funding gap for infrastructure which CIL is needed to fill. It can |

| Document Part Name | Respondent Name | Respondent Organisation Name | Comment | Officer's Response |
|--------------------|-----------------|------------------------------|--|---|
| | | | April for the following year. | only ever be a 'moment in time' and it is appreciated that the costs of infrastructure change over time. The CIL Regulations have an inflation index built in where the rate of CIL will increase with inflation. |
| 12.4 | HM1 | Associated British Ports | Affordability and willingness to pay will be big issues. | Comments noted. |

If you, or someone that you know, requires this document or a summary of it in an alternative format or language please contact the Waveney District Council Planning Policy Team: Telephone 01502 523029 or email planningpolicy@waveney.gov.uk