



Halesworth Neighbourhood Plan Referendum

Summary of Representations

This document contains summaries of the representations made in response to the consultation on the Submission Halesworth Neighbourhood Plan which was held between 22 June 2022 to 3 August 2022. The representations were submitted to the Examiner for consideration during the Examination of the Halesworth Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/halesworth-neighbourhood-area/>

Respondent	
East Suffolk Council	<p>The plan was considered to be well written and presented which contains many thoughtful and carefully written policies and actions that respond to a wide range of local topics and issues. It was clear that there was good local engagement and a wide evidence base which supports the Neighbourhood Plan.</p> <p>There were some corrections in the form of typographical errors and suggestions such as page numbers and hyperlinks to policies and clarity over what pictures they were trying to convey.</p> <p>There were some amendments to policies suggested, to help give clarity to the policy and clearly convey what they are trying to achieve. These amendments included:</p> <ul style="list-style-type: none"> • Para. 4.16 changes to wording for better clarity • Policy HAL.ENV2 Protection of Open Spaces; First sentence: To make it clear that the plan is providing a new designation • Policy HAL.ENV4: Verges; e ‘appropriately designed attractive green verges’ could be better approach to the wording. • Policy HAL.HSG2: Small Housing Sites; The objectives a, b and c will not apply in all circumstances, therefore the

	<p>addition of the wording ‘as appropriate’ would help the application of this policy</p> <ul style="list-style-type: none"> • Policy HAL.ED1: Small-Scale Commercial Workspaces and Employment Areas; there were a number of recommendations made by the council including some minor re-wording and some clarification which were accepted by the Neighbourhood Plan Group • Policy HAL.ED3: Major Development Opportunities is supported by East Suffolk Council and reference should be made to the design policy HAL.DH1 <p>Finally, some of the referencing needed to be updated and the inclusion of recently adopted Supplementary Planning Documents (such as the Historic Environment Supplementary Planning Document) to help support the protection of heritage in Halesworth.</p>
Historic England	No specific comments to make regarding the Neighbourhood Plan
Natural England	Whilst there was some general guidance given, no specific comments were made regarding the Neighbourhood Plan
Suffolk County Council	<p>Suffolk County Council (SCC) made a number of comments and welcomed the changes made to the plan in response to comments made at Regulation 14 consultation stage.</p> <p>Archaeology SCC requested that the section relating to heritage should mention archaeology and have given some suggested wording which would provide direction and guidance to developers and should therefore be included in the plan.</p> <p>With regards to flooding, drainage and SuDS, this had not been mentioned in previous iterations of the plan however a section was added upon advice from SCC as Lead Local Flood Authority and it recommended that the Neighbourhood Plan should state that all developments should include the provision of SuDS not just developments of 10 or more dwellings. As such they recommended additional wording to be added to policy HAL.DH1 Design.</p>
Elizabeth Adnett	Mrs Adnett stated that a narrow-gauge railway linking Halesworth to Blythburgh would be a welcome asset to the area

Bernard Lark	Mr Lark stated that Halesworth would benefit from the reinstatement of the narrow -gauge railway.
Chris Johnson	Mr Johnson commented that reinstatement of the Southwold Railway should be identified as an important objective in the plan. Would benefit tourism and traders without impacting on traffic.
East Suffolk Internal Drainage Board (Water Management Alliance)	<p>Recommended that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency.</p> <p>In order to avoid conflict between the planning process and the Board's regulatory regimes and consenting process, please consider the recommendations provided concerning the potential requirements for Land Drainage Consent from the Board.</p>
Doreen Hale	Mrs Hale supported the reinstatement of the Halesworth to Southwold narrow gauge railway
Environment Agency	<p>Welcomed the designation of Local Green Spaces, which are largely covered by Flood Zones 2 and 3, so the preservation of the floodplains and the prevention of development in this area would be in line with the Sequential Test in the National Planning Policy Framework (NPPF)</p> <p>All development proposals within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment. They also suggest setting out the requirement of locating new development outside of the present and future flood zones 2 and 3, in line with the Sequential Test.</p> <p>The Environment Agency did suggest that there were some changes that could be included such as adding the words 'and responsibilities' at the end of "collaborate with the Environment Agency to provide up-to-date information to residents on flood risk and river maintenance programmes". Furthermore, they stated that the Neighbourhood Plan should apply the sequential test and use a risk-based approach to the location of development. The plan should be supported by the local Strategic Flood risk Assessment (SFRA) and should use the NPPF Planning Practice Guidance (PPG).</p>

	<p>They also suggested considering finished floor levels, safe access, emergency flood plans, flood resilience and resistance measures to manage climate change and flood risk. Finally, they noted the need for permits for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. They advised that the neighbourhood Plan should consider this need when allocating development sites adjacent to a 'main river'.</p>
Gerald Burns	<p>Mr Burns stated that he did not accept that Halesworth needs more space for wildlife given that it already has 50 acres of wildlife provision. More should be done to attract visitors and tourists to hopefully a thriving retail and commercial centre, with good transport links and adequate parking provision.</p>
Graham Kerridge	<p>Mr Kerridge supported reference in the neighbourhood plan to the restoration of this railway.</p>
Halesworth Business Group	<p>There were a number of comments made by the group in relation to the Neighbourhood Plan. It was stated that proposals which enhance the quality and accessibility of the public realm in Halesworth Town Centre will be supported.</p> <p>The Group supported further consultation with key stakeholders with respect to Town Centre matters. They also expressed concern that limited options from the 'We Made That' report were included in the neighbourhood plan.</p> <p>The Group stated that they are supportive of improved connectivity in the town but have raised concerns on a number of issues such as operational accessibility for business properties and customer access /parking. These concerns were raised at each stage of the consultation process in 2021 but the 'We Made That' connectivity report remains unchanged.</p> <p>The group also included comments that had previously been made in response to earlier versions of the draft plan dated November 2021, the Halesworth Town Centre report dated November 2021, and the 'We Made That' connectivity study dated June 2021.</p>
Halesworth to Southwold Narrow Gauge Railway Society	<p>The Railway Society were very supportive of the restoration of the unique Victorian branch line, and believe it would create a</p>

	<p>major asset to the town, and that a restoration would attract tourists.</p> <p>The group believes that the restoration of the historic Southwold Railway in Halesworth should be protected within the aims of the Halesworth Neighbourhood Plan.</p>
Hopkins Homes	<p>Hopkins Homes acknowledged the considerable level of work and research which has formed the basis for the proposed policies contained within the Neighbourhood Plan.</p> <p>Hopkins Homes stated that they are pleased to note the desire for increased levels of new, larger family housing detailed within the content of the Neighbourhood Plan however, no direct pedestrian routes through to either Barley Meadow or Allington Road are achievable without the utilisation of third-party garden land, hence these comments should be removed from the Plan.</p> <p>Furthermore, there is support for the plan in general and more specifically policy HAL.DH2, which contains significant amounts of open space, tree planting and play space which provides a gradual transition from rural countryside to urban settlements and works in conjunction with the development proposals in policy WLP4.2 of the Local Plan.</p>
Ian Fyfe	<p>Mr Fyfe contended that a thorough review of car parking is needed and should cover issues such as the level of usage across the different car parks, the needs for disabled spaces and loading bays, and the practicality of the proposal made in the Neighbourhood Plan to reduce car parking spaces in Market Square from 30 to 20</p>
J Janes	<p>Commented that the plan does not give sufficient weight to heritage and the development of a major attraction to the town and does not make enough of the heritage it has.</p> <p>Tourism is not given enough emphasis and the narrow-gauge railway from Halesworth to Southwold has the potential to create a tourist attraction.</p> <p>The Neighbourhood Plan should include a survey of all trees in Halesworth inviting the public to identify trees missing from this review and it should state that all trees noted in this review and those subsequently identified should be the subject of tree preservation orders.</p>

<p>Jeff Moors & Julia Bradbury</p>	<p>Mr Moors and Ms Bradbury suggested that the re-instatement of the Southwold Railway, a heritage tourist attraction, would bring a great benefit to the town and should be included in the Halesworth Neighbourhood Plan.</p>
<p>Joanna Barfield</p>	<p>Ms Barfield commented that a second supermarket has been a very contentious issue in the town, but she considered the draft did not reflect this with the current wording. Ms Barfield considered that in fact, it does the opposite by giving the impression that there is more support for it than not.</p> <p>There is no need for a specific reference to a supermarket with regards to the long-term car park site and it sets a precedence. References to the long-term car park site should only mention “retail” space rather than promoting one type i.e., a supermarket.</p> <p>Ms Barfield also commented that research has identified a need for 126m square of convenience retail floor space in Halesworth, but this will be dwarfed by a supermarket and will therefore go against the Retail Needs Assessment.</p> <p>Finally, Ms Barfield suggested that no retailers/developers have come forwards since 2020 and that all references to the long-term car park site should only mention “retail” space rather than promoting one type i.e. a supermarket.</p>
<p>Paul Taylor</p>	<p>Mrs Taylor stated that Halesworth is missing out on a tourist attraction that will bring many visitors to the town. The Narrow-Gauge Railway attracts a lot of interest from near and far and East Suffolk County Council need to encourage the growth of this.</p>
<p>SFC Developments Ltd</p>	<p>SFC Developments referred to development land at Pound Close along with associated works including: a skate park which is included as part of the overall masterplan, links to the existing play area, new footpath links which link the development with the existing settlement through to Lester’s Piece and newly created biodiversity land.</p> <p>They went on to state that the site is considered to be suitable in principle for development and would represent sustainable development and, it is requested that the site is considered for allocation for inclusion for a mixed-use site within the Neighbourhood Plan.</p>
<p>Sport England</p>	<p>Sport England gave general guidance as follows:</p>

	<p>It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99.</p> <p>It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>Any new housing developments will create the need for sports provision and planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Furthermore, they stated that consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities</p>
Stephen Bazire	<p>Mr Bazire supported the reinstatement of the old Southwold Railway. He contended that an ecologically sound rebuilding of the railway would put Halesworth on the map.</p>
Steve Daine	<p>Mr Daine commented that while the Neighbourhood Plan does refer to a plan to designate those parts of the railway which are within the town as a Heritage Asset it makes no mention of railway re-instatement.</p> <p>Mr Daine considered that the full restoration of the railway should be a stated intention within the Neighbourhood Plan.</p>
Tim Deacon	<p>Mr Deacon stated that the Reinstatement of a narrow-gauge railway will attract railway / transport enthusiasts that might not otherwise visit the area. Furthermore, it could employ local people helping to support the local economy.</p>
Veronica Downing	<p>Ms Downing stated that there is no mention of upgrading and increasing the infrastructure or services such as water supply and sewerage management as part of the planning of an expanding population and housing stock.</p> <p>Ms Downing commented that she considers Neighbourhood Planning to not be a holistic approach to planning and development, and that it is a process which aims to tick legislative boxes and meet current passions and trends without understanding the consequences of the major impact of an</p>

	<p>increasing population and the demands that this makes on the whole of the town and surrounding villages.</p> <p>Ms Downing also raises a number of issues relating to the B1123 and in particular increasing use by Heavy Goods Vehicles using the road as a short cut, and the number of road closures due to burst watermains, the amount of fast food and drinks litter on the verges, regular flooding in the winter months due to poorly managed culverts and drainage ditches on the road edge, the lack of a speed limit through Chediston on the B1123, which will have to be imposed with increased housing, traffic and people using the B1123 as an outcome of implementing the Halesworth Neighbourhood Plan. It is appreciated however that a certain amount of this traffic is agricultural – feed lorries and livestock transporters etc.</p> <p>Finally, Ms Downing states that she is not against new and more housing to meet the needs of our local growing population and want to see Halesworth thrive as a town and community for young families and older people.</p>
William Dunce	Mr Dunce stated that Halesworth would benefit from the restoration of a railway as a family friendly heritage tourist attraction.