

# Responses to Halesworth Neighbourhood Plan

## Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 22 June 2022 to 3 August 2022

Published August 2022



# Responses

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## What is the purpose of this document?

Halesworth Town Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 22<sup>nd</sup> June 2022 to 3<sup>rd</sup> August 2022.

# East Suffolk Council

This is a well written and well presented neighbourhood plan. It contains many thoughtful and carefully written policies and actions responding to a wide range of topics and issues of local importance. Local engagement and a good evidence base supports the neighbourhood plan. Please see detailed comments from East Suffolk Council below.

## List of Policies, p. 2

Page numbers against the list of policies and hyperlinks to the policy section of the document would be helpful.

### Para. 4.16

Final sentence: I believe this should read: "In this regard they are considered to meet the Green Infrastructure Strategy definition of 'passive amenity green spaces' and therefore are should be protected..."

### Policy HAL.ENV2: Protection of Open Spaces

First sentence: To make it clear that the plan is providing a new designation it is recommended that this says: "The green spaces at Princes Green, Aldergrove Close and Rectory Green, as shown in Figures 4.4-4.6 and on the Policies Map, are designated as open spaces."

### Policy HAL.ENV4: Verges

B.: 'Maximising' the provision of green verges is probably stronger language than is necessary to achieve the objective of providing green verges to roadways. Regard should also be had to making efficient use of space in achieving this objective, therefore main roadways which provide '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 addition of the wording 'as appropriate' would help the application of this policy. I.e. 'in particular these objectives include, as appropriate:...'
- C.: 'Conservation Area' should be capitalised.

### Policy HAL.ED1: Small-Scale Commercial Workspaces and Employment Areas

- Part A: use of 'flexible terms'. The terms of any letting agreement are very unlikely to be a material planning matter and therefore not applicable to determining a planning application. As such the reference to 'flexible terms' should be removed from the policy text. The objective seems to be to support working space which can be used flexibly, so alternative wording that could be used in its place would be: "...the provision of small-scale offices/workspaces, including those which would support flexible working, that would encourage..."
- Part B: The term "move-on' employment space' is not clear. It is not evident how this should be applied in land-use terms. Does it apply to particular use classes? Or

certain types of buildings? This should be made more precise so that it is clear to a decision-maker how this element of the policy should be applied. This part of the policy applies to existing employment sites where employment uses are already supported in principle, therefore clarity over what this specific objective should achieve should be added. It would also be helpful to be explicit in the policy that the existing employment sites are those allocated in the local plan and this neighbourhood plan.

### **Policy HAL.ED3: Major Development Opportunities**

- Part C: the support for mixed-use schemes in the policy is noted and supported, but in some cases a mixed-use scheme may not be feasible or appropriate. Perhaps, for example, due to a site's location or specific physical characteristics of a site. An added degree of flexibility would help to apply this policy in such a situation.
- It would be good to reference the importance of good design in bringing forward Major Development in Halesworth. Inclusion of reference to the design policy HAL.DH1 in the policy or supporting text would help in this regard.

### **Page 68**

- Use of examples from Halesworth would be preferable if possible.
- Qualification of the reference to the Suffolk Design Guide and inclusion of reference to a new design guide are welcomed.

### **Page 69**

Reference to the Historic Environment Supplementary Planning Document is welcomed. The adoption date (June 2021) could be included in the document.

### **Page 72**

Clarity in what the pictures are showing (eg. good examples, or bad examples) would be helpful.

### **Policy HAL.DH1: Design**

- The content of the policy is supported. It is considered to be very well worded, balanced, and considered. It can be applied to a variety of development types, not just residential. Important also to have cross-referred to the Halesworth Design Guide
- Part B: These principles seem to mainly to apply to large scale or major development. If they are to be applied to all types of development the following wording could be added to allow for a proportionate application of the principles: "The following principles should be considered as part of design proposals as appropriate to their scale, nature and location:..."

### **Page 74**

The aerial photograph really needs an entire page to itself to be able to do justice to a view of the entire town and to be able to show how the town nestles around the church tower. The church tower is too small to see anything useful, even when enlarged. Also, what does the red line represent? Either it should be annotated or deleted from the map. The photos

of the church tower are very helpful, but but would benefit from being cross-referenced to the map at Figure 8.1, as these are the specific protected views.

#### **Policy HAL.DH2: Views and Gateways**

The revised wording is now concise and strongly supportable. It is appropriate and welcome that the Plan identifies the central importance of the church tower through protection of key views to it. Figure 8.1 does show that this centrality is legitimate since views of the tower can be gained from most compass points – that is, there is not just one key view, only. The Gateway policy is an interesting one and is a good aspiration to set out for these key areas of the town's edges.

#### **Policy HAL.DH3 Non-Designated Heritage Assets**

The policy is supported. The additional non-designated heritage assets are welcomed.

#### **Policy HAL.TM1: Key Movement Routes**

Part D, final sentence: clarity on whether this part applies to just the key movement routes or other pedestrian and cycle accesses would be helpful.

#### *Detailed comments from Design and Conservation Team*

- Paragraph 8.3, p66 – I strongly welcome the inclusion of a key over-arching objective of the Plan to secure the character and heritage of Halesworth whilst supporting sympathetic contemporary design. I consider this to be a well worded objective that embraces the possibility for good quality new design to add to the character of the town and become part of its heritage over time. Few Plans that I have seen have been as open-minded with respect to contemporary design as here.
- All of the headings and contents of the Design section are very well considered, comprehensive, accurate and definitely receive my strong support.
- Paragraph 8.16, Materials, p72 – this is a well written and illustrated section and so important to include. They help make explicit what is particular to Halesworth's materiality that sets it apart from, say, towns further south in the District or those further north, next to Norfolk. I like also that there is some scope for contemporary materials to be used. This allows for the fact that 21<sup>st</sup> century buildings may require 21<sup>st</sup> building techniques and materials to address new and sustainable forms of construction, and which could be different from more traditional ones.
- there is a new Halesworth Conservation Area appraisal under draft that will be completed later this year, alongside a boundary review. I wonder if this information should be included to make clear that the existing appraisal cited as a footnote will be superseded in due course.
- P104, Halesworth Town Centre – it is highly commendable to see these proactive strategies and proposals set out here and based on sound evidence garnered from extant and extensive investigation. I would hope that these can, in part, be implemented through future planning decisions, where feasible
- Paragraph 10.34, Design in the Town Centre, p120 – I support the inclusion of this section and its contents. It appropriately highlights the central importance of the historic core of Halesworth to its locally distinctive character, and is welcome for it.

## Historic England

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

# Natural England

Thank you for your consultation on the above dated 22 June 2022

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this Regulation 16 neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

**Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities**

## Natural environment information sources

The [Magic](#) website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#).

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#). Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas (NCAs)** divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#).

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the



area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic5](#) website and also from the [LandIS website](#)<sup>6</sup>, which contains more information about obtaining soil data.

### **Natural environment issues to consider**

The [National Planning Policy Framework](#) sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> sets out supporting guidance.

**Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.**

#### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

#### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

#### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)) or protected species. To help you do this, Natural England has produced advice [here](#) to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#).

### **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

## Elizabeth Adnett

Halesworth neighbourhood plan

A narrow gauge railway linking Halesworth to Blythburgh with the scenic journey along the Blyth valley would be a welcome asset to the area. Please give it some consideration as this would be of great benefit to Halesworth.

# Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Halesworth Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in italics and deleted text will be in strikethrough.

## Archaeology

For the Heritage section and paragraph 8.24 onwards, it would be good if this section on heritage could say something about archaeology, although we appreciate that the plan does not allocate sites.

The following wording is suggested:

*“Suffolk County Council manages the Historic Environment Record for the county, and there are archaeological remains from multiple periods recorded in the plan area (<https://heritage.suffolk.gov.uk/>). Non-designated archaeological heritage assets would be managed through the National Planning Policy Framework and Local Plan policies. Suffolk County Council Archaeological Service (SCCAS) should be consulted for advice as early as possible in the planning application process”*

The Consultation Statement response indicated that “It is not clear how this information assists the plan and policy matters relating to heritage.”

However, SCC believes that this information would provide direction and guidance to developers, and as such should be included in the plan.

### Flooding

During the Pre-Submission consultation, SCC raised concerns over the lack of any mentions of surface water flooding, drainage, or SuDS in the plan.

We note the additional section of 3.3-3.5 of the Reg16 version of the plan regarding climate change, which explains some existing paragraphs of the Waveney Local Plan, in particular Policy WLP8.24.

However, SCC as the Lead Local Flood Authority, would recommend that the neighbourhood plan state that *all* developments should be including the provision of SuDS, and not just limiting itself to major developments only (which is defined as 10 or more dwellings for residential development).

A requirement for all development to incorporate multi-functional SuDS will cover Policy HAL.HSG2 Small Housing Sites, which states that small developments of 10 or under will be strongly supported. Without this proposed stipulation, a development of 10 or fewer housing has no specific requirement to incorporate SuDS into the design, and could have the potential to lead to surface water flooding elsewhere in the parish.

Paragraph 160 of the NPPF states that policies should “take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards” (underline added for emphasis).

SCC as the Lead Local Flood Authority, recommends the following wording to be added to Policy HAL.DH1 Design:

*“D. Development must not result in water run-off that would add to or create surface water flooding; and shall include the use of above ground open Sustainable Drainage Systems (SuDS) where possible, which could include wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/recreational areas and biodiversity benefits.”*

## Bernard Lark

Halesworth would benefit from the reinstatement of the narrow gauge railway, which would be a welcome boost to the towns economy as there is very little to see in a lovely town which has a lot of character and I feel that putting the heritage of the railway at the heart of the town would really put Halesworth on the map

## Chris Johnson

Reinstatement of the Southwold Railway should be identified as an important objective in the plan. It would introduce tourism into Halesworth, with obvious benefits for local traders, but would be unlikely to generate much road traffic into the town ..... so a benefit without a downside.

# East Suffolk Internal Drainage Board (Water Management Alliance)

The Board has been made aware of the above Neighbourhood Plan and wishes to make the following comments.

The Parish of Halesworth is partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. The area also falls within the Board's Watershed Catchment (meaning water from the site will eventually enter the IDD). A copy of the Board's Byelaws are on our website, [https://www.wlma.org.uk/uploads/ESIDB\\_Byelaws.pdf](https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf), along with maps of the Board's district, found at: <https://www.wlma.org.uk/east-suffolk-idb/boards-area/>.

The principal function of the IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy. We request that the Board is consulted for detailed comments as any planning application comes forward relating to any of the identified allocation sites.

Main Rivers within the IDD are regulated by the Environment Agency. Therefore, I recommend that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency.

In order to avoid conflict between the planning process and the Board's regulatory regimes and consenting process, please consider the recommendations provided below for sites located within and outside the Board's IDD, with specific reference to Sections 5 (Housing), 6 (Economic Development) and 6.1.6-6.1.9 (Major Development Opportunities), concerning the potential requirements for Land Drainage Consent from the Board.

A summary of the consents potentially required under the Land Drainage Act 1991 (including Byelaws) is shown in the table below, followed by a more detailed explanation:



Byelaw / Section of Act	Description	Requirement
Byelaw 3	Discharge of water to a watercourse (treated foul or surface water)	Consent may be required for a proposed discharge of water (treated foul or surface water) to a watercourse within the Board's IDD
Section 23, Land Drainage Act 1991	Alteration of a watercourse	Consent may be required for an alteration of a watercourse within the Board's IDD
Byelaw 10	Works within 9 metres of a Board maintained watercourse	Not applicable (no Board maintained watercourses within the parish boundary)

#### Byelaw 3 (Surface Water)

For developments allocated within or partially within the IDD of the Board:

- If a development includes the disposal of surface water via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency. If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge is proposed to a watercourse, the proposed development will require consent in line with the Board's byelaws (specifically Byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (available at [https://www.wlma.org.uk/uploads/WMA Table of Charges and Fees.pdf](https://www.wlma.org.uk/uploads/WMA%20Table%20of%20Charges%20and%20Fees.pdf)).
- If a development includes a proposed discharge of surface water to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically Byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (available at [https://www.wlma.org.uk/uploads/WMA Table of Charges and Fees.pdf](https://www.wlma.org.uk/uploads/WMA%20Table%20of%20Charges%20and%20Fees.pdf)). Please note that we recommend that any discharge is in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), therefore the Board is unlikely to grant consent for discharges in excess of greenfield rate.

- If a development includes a proposed discharge of surface water to a sewer, which is the least sustainable method of surface water disposal within the drainage hierarchy, we recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in the proposed location. For developments allocated outside of the Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice:

- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.

- If a development includes a proposed discharge of surface water to a watercourse within the watershed catchment of the Board's IDD (including if, following testing as suggested above, a strategy reliant on infiltration is deemed not viable and therefore a discharge to a watercourse is proposed), we would request that the discharge is facilitated in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly, we would recommend that the discharge from the site is attenuation to the Greenfield Runoff Rates wherever possible.

### **Byelaw 3 (Treated Foul Water)**

If an applicant has indicated that they wish to discharge treated foul water to a watercourse within the Board's IDD following their preferred treatment method, the proposal will require consent under Byelaw 3.

### **Section 23, Land Drainage Act 1991**

Should any development include works to alter a watercourse within the Board's IDD, consent will be required under the Land Drainage Act 1991 (and Byelaw 4).

The Board recommends that adequate space (3-5 metres) is left flat and free from obstruction to any adjacent riparian watercourses in order to enable maintenance by future riparian owners or a designated maintenance company/contractor.

### **Byelaw 10**

There are no Board maintained watercourses within the Halesworth parish boundary, therefore Byelaw 10 does not apply.

**Please see the supplementary information overleaf for further detail on the Board's policy and consenting process.**

If, following review of our comments and supporting policy documents linked below, you wish to discuss any of the requirements I have raised, please contact the Board using the details at the head of this letter.

## Doreen Hale

Subject: Halesworth to Southwold Narrow Gauge Railway Society

As an enthusiastic member of the HSNGRS – I wish to show my support by the following comments.

How fortunate to have had a historically unique railway running from Halesworth to Southwold during 1879 to 1929. From a Tourist point of view this can re-instated to the Town's advantage already mentioned as a Heritage Asset but no mention of the railway being re-instated. Imagine - Tourists coming to Halesworth Railway station transferring to a historical steam train, a leisurely ride through the Suffolk countryside having an enjoyable day in Southwold and the return journey back to Halesworth and picking up their train back to their holiday base. These types of old steam trains throughout the UK are very popular and we the means of getting it back on track. The perfect Halesworth attraction, restoration is very widely supported in town, and should be a stated intention within the Neighbourhood Plan – Parts of the plan which are relevant are HAL.ED2. HAL.DH3. Figure 9.5 and associated test, and Objectives 3 “Tourism”.

# Environment Agency

Thank you for your consultation dated 22 June 2022. We have reviewed the Regulation 16 submission of the Halesworth Neighbourhood Plan and have the following comments regarding Flood Risk.

## **Flood Risk**

We welcome the proposal to designate The Millennium Green as a Local Green Space, as it is 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) which requires development to be located in Flood Zone 1 wherever possible. We also support the proposal to create a Local Nature Reserve south of Kennedy Close for the same reasons, as well as the benefit to biodiversity.

We support Neighbourhood Plan Action: Rivers and Waterways 1, to ensure that the floodplains are managed to support increased biodiversity. We also welcome the increased drive for understanding of flood risk in Halesworth, as demonstrated by our engagement with the Halesworth Neighbourhood Plan Group in preparing the Flood Risk Factsheet in Autumn 2021.

It may be beneficial to also add 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”. This is because it is the riparian owner’s responsibility to maintain the river, and we just have permissive powers of maintenance in this regard.

We 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, as detailed in the comments below.

Parts of Halesworth lie within fluvial Flood Zone 3a defined by the ‘Planning Practice Guidance: Flood Risk and Coastal Change’ as having a high probability of flooding and fluvial Flood Zone 2 defined by the ‘Planning Practice Guidance: Flood Risk and Coastal Change’ as having a medium probability of flooding.

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.

## **Planning Practice Guidance (PPG)**

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). The PPG advises how planning can take account of the risks associated with flooding and coastal change in plan-making and the planning application process. The following advice could be

considered when compiling the Neighbourhood Plan to ensure potential development is sequentially sited or if at flood risk it is designed to be safe and sustainable into the future.

### **Sequential Approach**

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it isn't possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Zone 3), an FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

### **Finished Floor Levels**

We strongly advise that Proposals for 'more vulnerable' development should include floor levels set no lower than 300 mm above the level of any flooding that would occur if defences were overtopped in a 1% / 0.5% flood event (including allowances for climate change). Safe refuge should also be provided above the 0.1% undefended/breach flood level (including allowances for climate change). We are likely to raise an objection where these requirements are not achieved.

We recommend 'less vulnerable' development also meets this requirement to minimize disruption and costs in a flood event. If this is not achievable then it is recommended that a place of refuge is provided above the 0.1% flood level (including allowances for climate change). Where safety is reliant on refuge it is important that the building is structurally resilient to withstand the pressures and forces (hydrostatic & hydrodynamic) associated with flood water. The LPA may need to receive supporting information and calculations to provide certainty that the buildings will be constructed to withstand these water pressures.

### **Safe Access**

During a flood, the journey to safe, dry areas completely outside the 1% (1 in 100) / 0.5% (1 in 200) AEP flood event, including allowances for climate change, should not involve crossing areas of potentially fast flowing water. Those venturing out on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including, for example; unmarked drops, or access chambers where the cover has been swept away. Safe access and egress routes should be assessed in accordance with the guidance document 'FD2320 (Flood Risk Assessment Guidance for New Developments)'. We would recommend that you refer your SFRA which has produced hazard maps following a breach/overtopping of the defences.

### **Emergency Flood Plan**

Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. As stated above refuge should ideally be located 300mm above the 0.1% AEP flood level including

allowances for climate change. An emergency flood plan should be submitted as part of a FRA for any new development and it will be important to ensure emergency planning considerations and requirements are used to inform it.

### **Flood Resilience / Resistance Measures**

To minimise the disruption and cost implications of a flood event we encourage development to incorporate flood resilience/resistance measures up to the extreme 0.1% AEP climate change flood level. Information on preparing property for flooding can be found in the documents 'Improving the Flood performance of new buildings' and 'Prepare your property for flooding'.

### **Increases in Built Footprint (excluding open coast situations)**

When developing in areas at risk of flooding consideration should be given to preventing the loss of floodplain storage. Any increase in built footprint within the 1% AEP, including allowances for climate change, flood extent will need to be directly compensated for to prevent a loss of floodplain storage. If there are no available areas for compensation above the design flood level and compensation will not be possible then a calculation of the offsite flood risk impacts will need to be undertaken. If this shows significant offsite impacts then no increases in built footprint will be allowed. Further guidance on the provision of compensatory flood storage is provided in section A3.3.10 of the CIRIA document C624.

### **Climate Change**

The Environment Agency guidance 'Flood risk assessments: climate change allowances' should be used to inform the spatial distribution of growth and the requirements of Flood Risk Assessments (FRA) for individual applications.

The National Planning Practice Guidance provides advice on what is considered to be the lifetime of the development in the context of flood risk and coastal change. The 'Flood risk assessments: climate change allowances' guidance provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. For some development types and locations, it is important to assess a range of risk using more than one allowance. Please refer to this guidance. <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. This advice updates previous climate change allowances to support NPPF and may result in flood extents being greater than they have been in the past. This does not mean out flood map for planning has changed, as these maps do not consider climate change, but fluvial flood maps that may have been produced as part of SFRA's and other flood risk studies may be out of date. FRAs submitted in support of new development will need to consider the latest climate change allowances.

### **Environmental Permit for Flood Risk Activities**

An environmental permit 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.

Application forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

The Neighbourhood Plan should consider this when allocating development sites adjacent to a 'main river'. A permit may be required and restrictions imposed upon the work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk.

## Gerald Burns

I do not accept that Halesworth needs more space for wildlife given that it already has 50 acres of wildlife provision on the Millennium Green. I believe that the needs of people should take priority in this market town and that 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, that historically has made Halesworth a good place to live and work.



## Graham Kerridge

### HALESWORTH TO SOUTHWOLD NARROW GAUGE RAILWAY

I firmly believe that Halesworth is in a unique position in having the potential in benefitting from the reinstatement of this historic railway as a family friendly, all weather, all year, heritage tourist attraction. An example of how this can work successfully can be seen at the Mid Suffolk Light Railway Museum at Stowmarket. Halesworth does need an attraction and there could be a no better fitting one than this. Restoration is widely supported in the town.

I firmly believe that the restoration of this railway should be a stated intention within this Neighbourhood Plan.

# Halesworth Business Group

## Policy HAL.TC1: Enhancing Halesworth Town Centre

Proposals which enhance the quality and accessibility (specifically for pedestrians and disabled users) of the public realm in Halesworth Town Centre will be supported. In particular, any proposals are encouraged to reflect the principles that informed the public realm and movement solutions and projects identified in Section 10 of this Neighbourhood Plan.

As this is a very generic statement, we would ask that the “principles that should be reflected by any proposals” are clearly identified in the report and sufficient consultation with key stakeholders i.e. residents and businesses in the town centre, has been undertaken, with their comments duly reflected.

10.3 Given the economic importance of the town centre, Halesworth Town Council commissioned architects, We Made That, to undertake a study focusing on improving connectivity within the town centre and enhancing its different features. The full report can be accessed here: <https://halesworthtowncouncil.org.uk/town-centreconnectivity-report/>.

10.4 Following the appraisal process and consultations with the public and a range of other stakeholders, both statutory and business, the study made proposals focused on four geographic parts of the town. These are detailed and costed in the full report and summarised below. It is important to recognise that these are potential indicative solutions to address the issues raised by the community and addressed through the technical assessment. They do not represent fixed solutions and Policy HAL.TC1 seeks to provide flexibility so that the solutions brought forward through planning applications are the most appropriate.

It is understood that the proposals made in the We Made That report are only indicative. However, parts of the report form significant content for this chapter.

We are concerned that where several possible options have been given in the We Made That report, only one has been shown in the Regulation 16 Plan report eg clause 10.10 and figure 10.3, leading to a potential bias by the authors of the report which has not received full support from local stakeholders.

The business group 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 proposals remain unchanged.

For information, the following pages document the feedback given to the process:

- PAGE 3: General comments from businesses on the DRAFT Neighbourhood Plan issued in November 2021 (full feedback not included with this submission to ESC)
- PAGE 4: Comments submitted on the final “We Made That” Connectivity Report which was issued earlier in November (before the DRAFT NP). Comments were received by business on this and submitted.
- PAGE 7: Feedback submitted by HBG on the draft We Made That “Connectivity Report” presented in the summer 2021. Many of the comments remain valid.

### **COMMENTS ON HALESWORTH NEIGHBOURHOOD PLAN (DRAFT) NOVEMBER 2021**

GENERAL - It talked to the need for Employment 3.1, Page 22 Provision of High Quality business spaces. Then we have Infrastructure Page 21 even stating that currently ‘poorly maintained outdoor play facilities & open spaces’ which lends to my main concern as to the ongoing management of all these ‘Dwell areas’ , ‘Spaces’ etc

Within the Neighbourhood Plan I was particularly interested in understanding further;

1.9 Retail Development

3.1 Employment – start ups/micro businesses/provision of high quality business spaces

Page 38 Businesses – recyclable/reusable products

Page 51 Economic growth plan supporting entrepreneurs, encouraging growth of existing businesses

Page 98 Leaflets- 2 walks

GENERAL - I am perplexed about the proposed changes. Personally I like the town the way it is, and have lost count of the number of customers to my shop from outside Halesworth who tell me how much they enjoy visiting, and how lovely it is, and what a well-kept secret.

However, there is one aspect of the town that really does need work, in my view, and that is the Town River. When I came to Halesworth 18 years ago the river flowed freely and both it and the Thoroughfare were home to many ducks. They were a common and delightful sight. Alas, the ducks have long gone - whilst we still have menacing signs about rats, which are now completely superfluous.

The river has been neglected (on purpose) for some years, is nigh-on silted-up in parts and desperately overgrown in others, and looks a mess, apart from being a flood risk. I understand that people want to protect wildlife, as I do, but there is a limit. And it could be such an asset to the town! Picnics in the park, a punt on the river, a walk up to the Folly and, who knows maybe at last a restored heritage steam railway.

Now that would bring visitors into Halesworth — forget a massive supermarket.

GENERAL - I have read the document (Town Centre Response) and am largely in agreement with it. Obviously my prime interest is the Market Place. The plans put forward to divide the Market Place to make seating for an non existent 'cafe culture' were totally ridiculous. What is needed is improved paving and for it to be all around the Market Place rather than on just two sides, thus providing safer pedestrian access, protection for historic buildings and generally a far more attractive look. Resurfacing of the Market Place should also be another priority. With this done and some attractive planting it would, for not a great cost, become an attractive asset to the town. Essential parking places would be retained whilst still leaving an attractive area that could easily be closed for Town events. The disabled parking places do need to be moved to a more suitable space , i.e. closer to Boots and the rest of the retail outlets which is what most people that use them come for.

GENERAL - I am concerned about losing 10 car parking spaces in the Market Place as parking is already an issue. I think we can achieve what is purposed without losing parking. Especially with new signage and population increase those spaces will be even more precious to the Market Place. Also now the county car parks are only offering free car parking once a day per vehicle throughout Suffolk.

I don't understand why decreasing parking is an idea at all. Policy or not. It is worrying that ideas that will be detrimental to the town if implemented are still part of the plan ideas. We need a balanced view between business and residents and people who use the towns businesses.

The following is a summary of some of the key comments made during the WMT consultation. Please also refer to the formal written response submitted, repeated later in this document.

As this summary was representative of the inputs of many businesses, a response on the comments is requested.

## **COMMENTS ON CONNECTIVITY OF HALESWORTH TOWN CENTRE REPORT NOVEMBER 2021**

### **Page 12 -**

#### 2.0 Market Place

- held back by layout & design?
- space performing poorly?
- people to dwell (why do we want people to dwell...what feeds this?)

Where is the support to develop business in this area going to come from?

There are no retail outlets available on the Market Place?

Where is the 'Café culture etc' going to be?

"Retail frontages are very inaccessible and concealed" Generic statement and only applicable to a few - Fit2Vape, Sign of the Fish, KebabShop

Building design is not aligned with building usage as retail / hospitality

**Page 14 -**

Key theme raised make the whole Market Place pedestrianised' this is a concern and will impact businesses around the area. People use the parking as a quick pop in and out.

**Page 15 -**

'Improve pedestrian space at Market Place' to 'encourage Dwell' To do what? Surely this can be done within a smaller area of the Market Place in front of the Boarding House coming out from the Church a corner with benches and greenery if required.

Access for Deliveries is a real concern. Small businesses do not have a choice on the type of vehicle that their goods are delivered on neither do they have a choice on when their deliveries are made. I currently have to ask Drivers to not go down Chediston street and to park away from the congested area. If space and access is further reduced then this will lead to further congestion and issues. What are the plans to support this?

**Page 18 -**

Design Principles

Where is the commentary on the actual town centre businesses?

Complement/Support/Sustain the 100+ businesses that make the Town Centre a go to.

Cycling

What are the provisions for the increase in Cyclists?

- Page 31 Train Station bike parking/possibly hire
- Page 32 Parking – but where is it to be located as it will need multiple points?

Walking

- Routes to be maintained and provisioned by who??

**Page 26 -**

Wayfinding

Signage strategy should include

- Town Centre
- Parking
- Themes of businesses

**Page 29 -**

'Under Celebrated'

The Town Centre is also!!

**Page 37 -**

Saxons Way Crossing

- Surely this will have a major impact on the flow of traffic and cause issues backing up traffic especially at peak times?

- States 'not clear access' via the under pass ...So make it clear and use the existing walkway which is functional and safer (saving 404k!!!)

- Use it as a Street Art area .....Banksy!!

The potential residential development restricts both general business and delivery access Safety implications of pedestrian, cyclist, vehicle and delivery access in a restricted area.

Flow of traffic with a pedestrian crossing at entrance

**Page 38 -**

'Potential Community Uses'

What are these uses??

**Page 39 -**

Small scale retail - is the instead of a singular supermarket development  
Can the plan indicate pedestrian routes across private land - riverside path and south to Angel Link car park

**Page 42 -**

Key to this is a need for 'Management' or it will all fall over. What are the Plans for a Town Manager or similar?  
Need to add here it is not just 'servicing vehicles but Jo Public too.

**Page 43 -**

A. Car park route - does not take account of large trucks for deliveries using this space. The long term car parks are now located elsewhere  
B . Saxons way Crossing - challenges should include safety  
D. Thoroughfare pedestrianisation - this should be a higher impact - 5 versus 3  
E. River connection - lower impact - 3 versus 5

**Page 44 -**

Agree with Paragraphs 1 & 2  
However, Para 3.  
- Retail frontages almost inaccessible?  
- These conditions have limited the types of successful businesses found on the Market Place  
"Inaccessibility has limited the types of businesses found here"  
It should also mention the design of these heritage buildings are not ideal for the requirements of modern government standards for the operation of retail and hospitality businesses

**Page 45 -**

Currently dominated by Parking'  
Yes, without this parking businesses would struggle it actually drives footfall into our businesses as customers can just pop in and out. One narrow access point to the Market Place would hinder retail or hospitality businesses in this area owing to delivery accessibility  
There have been no attempts made to widen footpaths on the stretch Fit 2 Vape / Kebab shop where there is currently no pavement. The widening has taken place where there is already a wide pavement area.

**Page 46 -**

A1 – I love the idea but the reality is not possible and to retain vehicular access, point narrowing/one way traffic would all cause congestion.  
- This would impact the parking outside my business which I moved this year location to gain. Customers want to drive in and out.  
- Has it been considered that the day-to-day shoppers would be driven elsewhere where they can pop in and out? It is similar to the boom in out-of-town shopping let's not make it more time

consuming or they won't shop here.

**Page 49 -**

The Weekly Market is very poor and no energy is put into this by the Town Council. Markets are a huge pull for incoming visitors so a lot of work needs to be done to pull this up to a reasonable standard.

'Café Seating' is cited as an activity but where are the cafes/fooderies to support this? It's a great idea in principle but I would like to understand the plan to develop this further or it will be a Plaza with nothing to do and nothing to eat or drink!!! There have been no attempts made to widen footpaths on the stretch Fit 2 Vape / Kebab shop where there is currently no pavement. The widening has taken place where there is already a wide pavement area.

**Page 51 -**

B2 - Trialling is ESSENTIAL

A – needs a proper plan to size drawn up to determine viability – currently a nice picture on paper but not reality For whom is the seating intended? The takeaways?

**Page 54 -**

Has an income / consumer spend / expenditure analysis been done to ascertain whether there is enough economic benefit for many businesses to warrant the investment? Market Place is currently used one morning / week for a market - what other proposals have been put forward for usage?

**Page 56 -**

A1 – Is this possible to develop and retain dual traffic flow?  
MANAGEMENT – what are the plans to manage all this development?  
- Greenery?  
- Cleanliness?  
- Bins/Waste?  
- People?  
- Dogs?

**Page 63 -**

Costings do not take account of design, permissions eg Market Place / Thoroughfare junction so misleading

**Page 65 -**

Immediate Actions – to liaise with market traders?? & Businesses?? WHEN?  
- Parking capacity study – WHEN?

GENERAL - Market traders have short term leases for their space - how much of an influence will they have over the longer term business occupants?

Signage needs input from signage specialists with input from local people - are artists signage experts?

There is no doubt that Halesworth suffers from a lack of fluid connection. This plan in principle delivers these connections 'sticking assets together, improve cycling/walking, improve signage and set out spaces.

1. Pictures are great and they give a good feel but the scaled drawings need to be completed and when they are reality will drive a different plan – WILL THE TOWN BE CONSULTED FURTHER AT THIS POINT?
  2. 100+ Businesses form a hub of a town centre which relies on access for deliveries as well as customer need.  
REAL THOUGHT & CLEAR UNDERSTANDING OF THIS NEEDS TO BE GAINED.
  3. The term 'Dwell' is used throughout and it creates a question for me which is 'Dwell to do what'? Where are the services around these Dwell areas??
  4. Reduction of parking in the Market Place will impact businesses, a trial is essential.
  5. PLAZA – great idea but no clarification in this document on how and what support will be given to encourage businesses in to create the services required for a 'Plaza' (this is covered in the Neighbourhood plan 3.1)
  6. This is a focus on Connectivity but there needs to be a project running alongside. Retail business development to encourage new business and to support the setup of new business. Seating/Spaces, Dwell Areas, Plaza, Walkers, Dogs, Cyclists, Cycles = the need for Café/fooderies. Toilets, Bike Parking, Bins, Facilities, Pop up culture, Micro Market Stalls, Alternative retail outlets
  7. This is a 'grand plan' but it is hard to talk to the need for £4.017 million when the Town is in need of a lot of TLC. This is kept on top of very basically by Volunteer Groups currently so the Management of this PLAN is not discussed anywhere in this document.
    - Signage
    - Pavements – clean/weed/tidy
    - Info points
    - Maintenance of Plants/greenery in existing areas
    - WIFI connection
    - Dog Facilities
    - Toilets
    - Bins
    - Management and Cleanliness
1. REALITY - what does this look like?
  2. ACCESABILITY - How accessible can it be kept?
  3. MANAGEMENT – how is this going to be looked after/maintained?



GENERAL - Costings do not take account of design, permissions eg Market Place / Thoroughfare junction so misleading.

No account taken of input given by businesses at all consultation events and in writing about business accessibility in the Market Place and Thoroughfare - particularly deliveries

Proposals which enhance the quality and accessibility (specifically for pedestrians and disabled users) of the public realm in Halesworth Town Centre will be supported. In particular, any proposals are encouraged to reflect the principles that informed the public realm and movement solutions and projects identified in Section 10 of this Neighbourhood Plan.

As this is a very generic statement, we would ask that the “principles that should be reflected by any proposals” are clearly identified in the report and sufficient consultation with key stakeholders i.e. residents and businesses in the town centre, has been undertaken, with their comments duly reflected.

### **FEEDBACK ON NEIGHBOURHOOD PLAN CONNECTIVITY STUDY Halesworth Business Group (HBG) JUNE 2021**

The following feedback has been received from businesses located in the town centre of Halesworth (loosely defined by HBG as Bridge Street, the Thoroughfare and the Market Place). Businesses were encouraged to attend one of the zoom meetings and/or review the documents on Halesworth Town Council’s website. Feedback has been given confidentially.

A key message is that there is a great opportunity to improve connectivity between the main zones of the town centre, encouraging footfall to the ends of this ribbon shaped shopping and business area. Visual markers in the form of signage, street furniture and street landscaping would help facilitate this. This needs to be supported by other marketing channels.

As Halesworth’s layout is influenced by historical buildings in the economic centre, many of the businesses are reliant on existing access points to service their businesses for deliveries. Any proposed plans should retain commercial accessibility as well as ensuring pedestrian safety and residential access.

If you have any questions regarding the feedback, please let us know.

#### **THOROUGHFARE CAR PARK**

##### **GOOD IDEAS**

1. Appropriate landscaping at this key entrance point to the town centre would be a great improvement. This includes improved surfaces, pedestrian pathways, updated signage and a distinct visual identity building on the cultural heritage of the town.
2. Consider grant funding businesses to carry out works to upgrade the rear exteriors of properties around the car park perimeter to improve visual appearance
3. Review road signage strategy to the town centre (from as far away as the A12 as well as approaching the centre area) to provide a consistent and informative pathway for users ie

pedestrians, cyclists, cars and delivery / service vehicles

4. The Thoroughfare has restricted access for vehicles during core hours. This closure could be extended for improved pedestrian safety but also to allow an improved extended social space. Appropriate barrier / street furniture to restrict vehicles should be implemented. Business delivery access would need to be reviewed.

#### CONCERNS

1. Creating a more attractive link across to the town park is a great idea but needs to be reviewed from a safety perspective as the vehicle access ramp down to the parking area is not very wide for use by cars, delivery vehicles and pedestrians. A crossing at the key car park entrance to cross Saxons Way does not seem logical. Improvements to the underpass should be considered as a first priority.
2. The three entry points from the central town centre car parks to the Thoroughfare are used for business deliveries (some articulated vehicles). There needs to be sufficient space to allow this to continue otherwise it will impact on business operations / viability.
3. Any proposed changes need to balance business and residential deliveries, cars and pedestrian access, along with any pedestrian or cycle connectivity routes across this area. It is a compact space to have multiple usages and there needs to be a considered safety approach.
4. There are other parking facilities but signage and habit encourages density of users at this location. New signage and communication could support a change in pattern/habit. Current signage directs town visitors to the Town Centre (Thoroughfare) car park only indicating that this is the (main) entranceway to the shopping and business area.
5. Consideration also needs to be given to restricting bikes and scooters along the Thoroughfare for the safety of pedestrians.
6. There are business that require their customers to be able to park alongside their building in the old "long term" car park. Development of this space for other uses could force these businesses to close
7. The properties (Red Eye Dove to HG Services) have allocated free parking spaces to the rear as part of their title deeds. Has this been investigated?

#### MARKET PLACE

##### GOOD IDEAS

1. There is a great opportunity for creating a better visual link between the south end of the Thoroughfare, along towards the Church and then towards the Market Place, through landscaping, road layout and signage. This would improve footfall and circulation between all of the town centre zones. Signage should include physical signage as well as other information tools / marketing to improve knowledge of the town zones and assets.
2. Realigning the bell opening of the road outside the book shop with improved landscaping would create improved visual impact. Consideration however does need to be taken into account that narrowing of this area could impact accessibility to businesses for deliveries.
3. The general visual identity of the Market Place should be updated along with that of the Thoroughfare to provide a cohesive identity throughout all of the zones of the town centre. This could include repaving, landscaping, signage etc
4. Providing pedestrian routes / pavements around the Market Place would be an improvement allowing safe access for all whilst retaining essential car parking space

5. Allocation of blue badge parking should be reviewed across the Market Place to allow improved accessibility to all of the businesses

#### CONCERNS

1. A reduction of car parking spaces would be hugely detrimental to the businesses in this part of the town, restricting accessibility for deliveries and in particular for those less mobile for whom the distance to the other car parks is prohibitive. At peak times, there are insufficient spaces. Before any further action, a more detailed review of parking demand and vehicle access for the businesses and the church should be undertaken in collaboration with the Market Place businesses.
2. Parking surveys in the Market Place need to be undertaken outside the current pandemic restrictions and consider the peak operating times of the primary users ie the Church, restaurant, take away food businesses and funeral home, which might be different to those of the other businesses in this area.
3. Closing the area between the Crab & Oyster and the Wine Shop would divert all traffic via the MENCAP / Rosedale access point. The access here is narrow even though it's two way (in front of Miles Ward Court) and involves a sharp turn to access the Market Place. Pedestrian paths here are also restricted owing to space and traditional layout. This is not suitable for larger delivery vehicles and funeral vehicles. The Rosedale property has a family viewing room and is also the starting point for all funeral processions.
4. "Sit and dwell" space is important in the town centre. It can become a mini-destination, increasing footfall to parts of the town. It would provide economic benefit if combined with relevant retail / hospitality units. The Market Place currently has a mix of usage including service businesses, takeaways (evenings), a pharmacy. There is no daytime hospitality and the properties are currently not configured to this standard to encourage business diversity in the area. Consideration might need to be given to parallel economic funding to support any changes to the urban landscape.
5. Any proposed changes need to balance business usage, business and residential deliveries, cars and pedestrian access along with any pedestrian or cycle connectivity routes across this area. It is a compact space to have multiple usages and there needs to be a considered safety approach.
6. The narrowing of the junction of the Thoroughfare and Market Place outside of the bookshop needs to be designed to allow sufficient vehicle manoeuvrability for both domestic and commercial vehicles. This is also a difficult junction in terms of visibility on an almost 90 degree bend.

#### SWAN LANE

##### GOOD IDEAS

1. There are two opportunities here to improve connectivity with the town. The suggested London road linkage is one however to provide a circular link, an access point via the Angel Link / EACH shop is of equal consideration. There are two underutilised parking areas here and connectivity from here would encourage greater usage.

#### STATION LINK

##### GOOD IDEAS

1. STATION: It would be good to invest in signage and place marking at this entry point to

the town directed at “first time” visitors.

2. THE CUT: Improved connectivity with the opposite car park to improve pedestrian safety is important.

#### CONCERNS

1. STATION: Do we know the volume of visitor versus local traffic to know what information is needed?

2. THE CUT: The trustees of The Cut feel that the 3 car parking spaces along the building are essential they do not have any customer parking. They are “limited time” parking spaces which makes them ideal for visitors to the building. The provision of additional pavement by The Cut of limited value to the organisation.

#### OBJECTIVES

#### GOOD IDEAS

1. The objectives are great and provide a positive framework.

#### CONCERNS

1. Perhaps consider the order of the objectives and amending the wording:

1. DEVELOP AND IMPLEMENT INFRASTRUCTURE SOLUTIONS TO Help ensure the ECONOMIC AND SOCIAL sustainability of the Town Centre and tourism in Halesworth.

2. Ensure Halesworth's many (BUILT, GREEN, ECONOMIC, CULTURAL??) assets stitch together as a cohesive whole.

3. Set out a network or routes and spaces that ensures existing assets and future developments complement each other.

4. Improve visual connections between assets for visitors.

5. Improve WALKING AND cycling connections to create an attractive alternative to car travel.

6. Create recreational routes for everyone.

# Halesworth to Southwold Narrow Gauge Railway Society

The Neighbourhood Plan states that the encouragement of tourism to the town is one of the main objectives. Halesworth does not have a tourist attraction. Halesworth is ideally - in fact uniquely - situated with regard to tourism potential in that it contains substantial heritage and historic artefacts of the 18th century Blyth Navigation and also of the 19th century Southwold Railway. Even one of these potential assets would be something other market towns would give their eye-teeth to have: having both is an embarrassment of riches.

Local tourism and planning policy states that the establishment of new tourist attractions should only take place west of the A12: thus the development of a tourist railway in Halesworth (rather than, for example, in Southwold) would comply with this policy, and act to draw tourists away from the over-heated coastal tourist economy into the under-promoted inland towns.

With specific regard to the Southwold Railway, this unique Victorian branch line was - and could again be - a major asset to the town, in that a restoration would attract the ideal demographic of tourists - families with young children, and the retired. A heritage railway (like the other 152 in the UK) provides all-year, all-weather family-friendly entertainment: an example of a local heritage railway is the Mid-Suffolk Light Railway Museum in Wetheringsett, while a larger example is the Talylyn Railway in Mid-Wales. UK heritage railways turn over several millions each year, and it is proven that between five times and seven times additional value is provided to the community in shops, catering, and accommodation, providing for both tourists and the railway's own staff.

Far from damaging wildlife, each heritage railway provides a wildlife corridor because access to the trackside is rigidly controlled by law: local birds, animals and vegetation cannot thus be disturbed. The ospreys which thrive close to the Welsh Highland Railway in Gwynedd are an example of this: passing trains do not disturb them. The majority of the time, a heritage railway is just a wildlife haven, as train movements are restricted to certain days and certain times by demand. Approximately 80% of each working day is train-free, and trains are likely to run anyway on only 150 days at most. Many heritage railways provide transport as well as tourism, and a park-and-ride service like the one at Swanage could, for example, be run given demand. Although the public will wish for steam to be provided - and that can definitely be done in an environmentally-friendly manner - the Halesworth to Southwold Narrow Gauge Railway have invested in a historic battery-electric locomotive which is silent, emission-free, and can be charged from solar. This can be used on day-to-day services.

Although the original station is gone, it could be replicated on another site. This has been done by several heritage railways.

There is already a thriving Society, able and willing to restore this historic railway at no cost to the community - and similarly to run it at no cost using volunteers. Some employment would, however, be provided (in addition to the above-mentioned add-on advantages) as the project grows to maturity.

There is very strong support within Halesworth for the restoration of this railway.

Therefore, we submit that **the restoration of the historic Southwold Railway in Halesworth as a heritage tourist attraction should be enshrined within the Aims of the Halesworth Neighbourhood Plan document as a recommended development within the Plan.**

Halesworth lacks any really interesting and engaging tourist attractions. It is very fortunate in that in Halesworth and its environs and in fact all the way to Southwold the historic trackbed of the Narrow Gauge railway to Southwold survives, virtually intact, nearly 100 years after closure of the railway on 11 April 1929. The only small section that has been lost is the site of Halesworth Narrow Gauge Station and a small section of rail which took the railway over Holton Road into Bird's Folly on a bridge which was removed in 1962. But from Bird's Folly onwards it survives and it is a jewel in Halesworth's crown and must be preserved and restored as a railway for future generations to enjoy.

An ideal tourist attraction would be Halesworth's equivalent of Southwold's Steamworks with the former Narrow Gauge Station re-created with a Museum, Cafe etc but with a difference to Steamworks in that the new station could link with the actual trackbed and restored line. This attraction would be an all weather family friendly tourist venue. The Mid Suffolk Light Railway's Station with Museum and cafe etc at Wetheringsett shows exactly what could be achieved, Such attractions are very popular in the UK and bring great economic and other benefits to the towns where they are sited.

The restoration of the narrow gauge railway in Halesworth should be very much part of the Halesworth Neighbourhood plan as from our Society's experience in the Town and its environs, restoration of the railway is very popular and much supported there

## Hopkins Homes

Hopkins Homes note the content of the Submission version of the Neighbourhood Plan and acknowledge the considerable level of work and research which has formed the basis for the proposed Policies contained within it.

Hopkins Homes are pleased to note the desire for increased levels of new, larger family housing detailed within the content of Paragraph 5.13 and the wording of proposed Policy HAL.HSG1. As the preceding paragraphs indicate, whilst Policy WLP8.1 of the Adopted Waveney Local Plan focusses upon a District-wide desire for smaller houses, by definition, this effectively discourages the development of larger family houses. It is therefore pleasing to note that this Policy seeks to actively rectify this.

Whilst Hopkins Homes notes and generally supports the ethos of Policy HAL.DH1 in respect of 'Design', it is important the stated 'principles' are applied flexibly and not sought to limit the use of alternative or innovative design approaches. As inferred, the key will be to ensure that all proposals exhibit a high standard of design quality.

As the prospective developers of Waveney Local Plan Site WLP4.2 – Land South of Chediston Street, Hopkins Homes are seeking to create a high-quality, landscape-led residential development, with significant open space and tree planting to the west, along with a Neighbourhood Equipped Area for Play. Hopkins Homes therefore support the ethos of Policy HAL.DH2, with the requirement for development proposals of Site WLP4.2 to provide for a gradual transition from the rural countryside to the west, through to the more urban settlement form to the east, with suitable boundary planting and soft landscaping utilised to achieve this requirement.

The detailed proposals for site WLP4.2 ensure that direct pedestrian linkages through the site from Roman Way to the Neighbourhood Equipped Area for Play will be provided, as part of wider pedestrian routes to be created around the periphery of the site, thus addressing the issues highlighted within Paragraph 7.6 of the Plan, whilst the previous Outline Planning Permission granted for the development of the site requires improved pedestrian crossing facilities within Roman Way to improve the accessibility between the town and the site, in accordance with the final bullet point of Paragraph 7.6. It is important to note, however, that contrary to the comments made within the penultimate bullet point, 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.

## Ian Fyfe

A thorough review of car park usage in Halesworth is necessary before many of the proposals in the plan can be implemented. Paragraph 9.13 states that such a review “will be conducted once it is considered movement of people is back to pre-pandemic levels”. Mention of Covid in this context is now virtually redundant; the parking survey should be carried out on the basis of current volumes, and as soon as possible.

When I raised this issue in comments on the previous version of the Neighbourhood Plan, the answer given in the Consultation Statement was that the parking survey would be carried out in 2022 by the ESC economic development team. I assume this is the review into parking across East Suffolk announced by ESC on 7th July ([see https://www.eastsuffolk.gov.uk/news/east-suffolk-council-parking-regulations-review-launched/](https://www.eastsuffolk.gov.uk/news/east-suffolk-council-parking-regulations-review-launched/)). The announcement gives no indication as to when the review will be carried out or completed. If this is the only parking review to be undertaken, then it needs to be clear that the issues particular to Halesworth will be covered – including 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.



## J Janes

The plan does not give sufficient weight to heritage and the development of a major attraction to the town. Unlike other towns, Halesworth does not have a castle, navigable river or other large attraction for visitors, tourists and residents alike. The town itself does not make enough of the heritage it has, and shamefully neglects its ancient and old buildings allowing them to deteriorate to the point of collapse, or be sold off, whilst pushing for new and bland CIL building. Tourism itself is not given sufficient emphasis. The Halesworth to Southwold Narrow Gauge Railway has the potential to bring real benefit to the town as a major attraction, all-weather and family-friendly, and should be supported and promoted. The restoration of the Halesworth to Southwold railway, the retention of other heritage buildings (The Rifle Hall, Old Court Rooms and Patrick Stead Hospital building), should be stated aims in the Neighbourhood Plan.

This register, whilst a good start, is very incomplete. There are many other trees which have not been included. The Neighbourhood Plan should include a survey of all trees in Halesworth inviting the public to identify trees missing from this review. The Neighbourhood Plan should state that all trees noted in this review and those subsequently identified should be the subject of tree preservation orders.

## Jeff Moors & Julia Bradbury

Hi, 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.

## Joanna Barfield

The wording in these paragraphs is inaccurate and, as resident 82 in Appendix S, I have already raised these objections in detail. The paragraphs as they currently stand in the draft NP have not been amended sufficiently to reflect this.

A second supermarket has been a very contentious issue in the town but the draft does not reflect this with the current wording: in fact, it does the opposite by giving the impression that there is more support for it than not.

Para 2.15 claims support for it but this is based on 114 comments on an initial survey which did not specifically ask about support for a second supermarket. It mentions “a previous application...(which) attracted a large number of supportive representations”. Which application was that? If it is the one from Tesco in 2007, it caused great division in the town with a huge number of objections and the formation of a protest group which, alongside Waveney DC, took the application to an inquiry where the application was rejected in 2010. So the wording in this paragraph is misleading.

Within the context of section 2, Halesworth Today, para 2.15 is totally unnecessary. In even mentioning a supermarket on the strength of 114 returns, it goes against point C in HAL.ED3 that “ no particular use dominates the scheme mix” which a supermarket will certainly do.

It also goes against 2.11 “The NPG has been very conscious of these dilemmas when trying to weigh up competing views of the present and the future” by lending undue weight to the views of 114 residents and without conducting specific research into this question. On the initial questionnaire, the number of returns on what people wanted to see in Halesworth outweighed the number wanting a second supermarket. It would have been useful to ask residents what they did not want.

Objection to the wording of paragraph 6.20 “ A significant proportion of the community has identified that a need for Halesworth is a new supermarket”. This is simply not true! No research has been done specifically on the question of a new supermarket. It is fair to say that some residents want one but others do not!

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.

This paragraph should be amended to simply the penultimate sentence beginning, “ The Retail and Leisure Needs Assessment identified the long term car park site as a significant opportunity to provide new retail...”

While there may have been interest from a supermarket during the period of creating the NP, the developer has not come forward since November 2020 so references to the developer/promoter are out of date.

Para. 6.21 Should be amended to the final sentence only, "It (the long term car park site) provides an opportunity..." This final sentence far better reflects the stated aims elsewhere in the NP that this site should be for mixed use, support residential , leisure and micro-business opportunities.

Para 6.22 comments on the "advanced nature of proposals". See comment above about developer not coming forward since November 2020. This paragraph should be amended so as not to imply the inevitability of a supermarket.

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 if it is in writing in the NP. It is based on little data in terms of community engagement and the researched need for only 126m square of convenience retail. See further references to the Waveney Plan in my comments as resident 82.

All references to the long term car park site should only mention " retail " space rather than promoting one type i.e. a supermarket.

## Paul Taylor

We have been reviewing the Halesworth Neighbourhood Plan and would like to make the following comment regarding HAL ED2, HAL DH3 and fig 9.5 Tourism.

Halesworth is missing out on a number 1 tourist attraction that will bring many visitors to the town and surrounding area throughout the year.

The Narrow Gauge Railway attracts a lot of interest from near and far and the East Suffolk County Council need to encourage the growth of this.

A strong body of volunteers have created the start of a restoration project , fully supported by the landowner. This needs to be recognised and acknowledged by the Council.

# SFC Developments Ltd

## Introduction

1. Brown & Co act for SFC Developments Ltd, in connection with land east of Pound Close, Halesworth.
2. The following representations have been prepared in response to the Regulation 16 Consultation on the Halesworth Neighbourhood Plan. The purpose of the representations is to discuss the benefits of the site on land east of Pound Close, Halesworth, in relation to the emerging Neighbourhood Plan.
3. Discussions have been held with the Town Council and a pre application request is expected to be submitted to the district council shortly. A public consultation is also due to start shortly, via the Brown and Co consultation website.

## Site and Surroundings

4. The land is located on land east of Pound Close, Halesworth. The site measures approximately 2.58 hectares and is located to the north eastern edge of the town, approximately 0.2 miles from the town centre and would be accessed via an access off the A144. A field access currently exists in this location.
5. The land proposed for development comprises a disused field, to the north east of the town centre and adjacent to Millenium Green. Allotments lie to the north west of the site, with a play area to the south of this. Industrial units lie to the south of the site along Blyth Road.

## Proposals

6. The proposed scheme comprises a mix of residential, employment, commercial, a new skate park and extensive areas of biodiversity land. The masterplan illustrates residential development to the northern section of the site, with two start up small scale employment units lying further north of this to the site frontage.
7. The residential element comprises 10 units, the majority of which have gardens backing onto the allotments to the west and views across Millenium Green to the east.
8. A new skate park is included as part of the overall masterplan, which links to the existing play area. New footpath links are proposed which link the development with the existing settlement through to Lester's Piece and the newly created biodiversity land.
9. An extension to Castle Clothing to the south of the site is also included as part of the overall masterplan.

## Site benefits/Compliance with Neighbourhood Plan

10. Halesworth Draft Neighbourhood Plan sets out the aims and objectives for development in Halesworth. In terms of housing, the plan recognises that there is a need for both smaller housing and larger family homes, in order to attract younger people into the town, that are currently under represented. Policy HALHSG1 states that 'In meeting the requirements of

Waveney Local Plan Policy WLP8.1 (housing mix), development must provide a mix of larger properties (3 bed or larger) and, in particular, must provide at least 15% as 4 bed properties.' The site is able to accommodate this by providing a mix of larger and smaller properties.

**11.** The Draft Plan goes on to discuss the benefits of smaller windfall sites that can enable the other objectives of the plan to be delivered. For example, where development enhances a conservation area; where a development retains or provides employment opportunities or the provision of biodiversity rich space and green space. Policy HAL.HSG2 details this. As such, whilst the Site is not allocated, it can deliver a mixed use scheme that can bring forward many benefits, as discussed below.

**12.** The site lies adjacent to existing residential and commercial development and forms a natural extension to this part of the town, as well as a link to the adjacent green space. The entire site is contained within the realms of the established pattern of development in this part of the town.

**13.** An access road runs from the site entrance through the employment to the front of the site and through to the residential area. To the south, improvements to the existing park, as well as a new skate park are proposed within the overall masterplan, providing safe play space for both the new development, as well as a new facility for existing nearby residents. A significant new biodiversity area, including footpath links to the new area and Millennium Green beyond, is also proposed, providing new biodiversity rich space that will benefit the town, residents and wildlife.

**14.** New footpaths linking the existing part of the town through to the development scheme and Millennium Green beyond, as well as a new skate park, would bring about real benefits to the town.

**15.** Discussions have been held with Castle Clothing, situated to the south eastern end of the site. The company are limited in terms of space and would like to expand the business. There are no other reasonable options in Halesworth and building from scratch would be too expensive. The owner has sought alternative options further afield, but they are not considered workable from a cost and staffing perspective as it would mean moving families away from local schools etc.

**16.** Expansion of the site would bring forward a number of benefits for the company and, consequently the town, including a significant reduction in lorry and van movements between the unit and the other unit within the town.

**17.** The delivery of the masterplan would enable the release of the land to the company in order to allow them to expand into the southern section of the site. Two start up employment units are also proposed to the entrance to the site. The potential therefore, for employment on the site is significant. As such, the masterplan could deliver a scheme that is fully supported by Policy HAL.HSG2 of the emerging Neighbourhood Plan.

## Conclusions

18. The development of the scheme would offer opportunities for increased biodiversity, as well as the potential to create a natural habitat, with public access to landscaped walks and community facilities, as shown on the attached plan.
19. The site proposed for development is well-related physically to the town, with existing housing immediately to the west, as well as on the opposite side of the road. Facilities and other housing would be within easy reach of the site. The allocation of the site would not result in an isolated development therefore.
20. Development of the site would allow the local employment site Castle Clothing to expand their existing business, thereby retaining and enhancing employment use within the town
21. In terms of delivery, the site is available for development now and the scheme could be constructed in the short-term subject to planning permission being granted. The site is in a single ownership and no further land needs to be acquired in order to facilitate the development.
22. For the reasons set out above, the site is considered to be suitable in principle for development and would represent sustainable development that fully accords with the policies contained in the Draft Neighbourhood Plan. Accordingly, it is requested that the site is considered for allocation for inclusion for a mixed use site within the Neighbourhood Plan.



## Sport England

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore 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. 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.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and

deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, 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. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

## Stephen Bazire

I'd just like to support the reinstatement of the old Southwold Railway. Halesworth doesn't really have many/any "attractions" and an ecologically sound rebuilding of the railway would put Halesworth on the map to many railway enthusiasts and their significant others (yes, railway enthusiasts can have relationships as well as normal people!). These tend to be a bit older or younger with families, causing little trouble, and adding to the livelihood of area visited. If this part gets rebuilt to Blythburgh and the other half gets rebuilt the other side, there could be a joining up and then there's a transport link. And, when cars and petrol are scarce, this could be a far-sighted view.

## Steve Daine

I wish to give representation to the above plan regarding tourism, of which there is very little mention of.

The Plan does refer to a plan to designate those parts of our railway which are within the town as a Heritage Asset, but makes no mention of railway re-instatement. With over 200 (mainly local) people members of the Halesworth to Southwold Narrow Gauge Railway Society project it is by no means a small-scale operation.

I would suggest Halesworth is unique in having the potential of benefiting from the re-instatement of the historic railway as a family-friendly, all year, all-weather heritage tourist attraction. The Mid-Suffolk Light Railway Museum is a prime example of railway re-instatement attracting tourism.

Halesworth needs an attraction, and you could have no better-fitting one than this. As previously stated, the restoration is very widely supported in the town. The restoration of the railway should be a stated intention within the Neighbourhood Plan. Parts of the Plan which are relevant are HAL.ED2, HAL.DH3, Figure 9.5 and associated text, and Objectives 3 "Tourism".

## Tim Deacon

I have been a member of this railway society, and the Southwold Railway Trust, for several years, as a Life member of both societies. Living in Swanage Dorset I occasionally visit Halesworth and Southwold, and can see similarities with Swanage. I have been a working member on the Swanage Railway for over 40 years. The positive impact on Swanage of having a preserved railway has been significant, with Town Council stating how it attracts visitors to the town, and the financial support it brings to many businesses and accommodation locally. I appreciate that this railway is a short narrow gauge line, not eight miles of ex-BR branch line, but it will attract railway / transport enthusiasts that might not otherwise visit the area. In due course it could even employ local people, again helping to support the local economy.

## Veronica Downing

Thank you for your email regarding the above and the opportunity to respond. I have skim read the Halesworth neighbourhood Plan document sent with your email today. I have particular concern that there is no mention of upgrading and increasing the infrastructure of services such as water supply and sewerage management as a necessary part of the planning and design of an expanding population and housing stock.

For example, it is proposed for 200 new dwellings to be built to the west of Roman Way and Chediston Street / B1123.

Many words are written in the Plan for greenspaces, improving the environment, conservation, countering climate change – but no mention of the real impact of the increasing number of PEOPLE and plans to improve the water supply (mains) and sewerage systems. Very recently Waveney District has acknowledged pollution incidents with releasing raw sewage into our fresh watercourses. This is presumably because there is not the capacity to properly process sewage. More people means more poo and wee, and waste products which are inappropriately disposed of down the drains. Also, more bath and shower water with additives, more laundry water, more antibiotics and hormones, more cars being washed .... It isn't just livestock that create extra emissions and waste but PEOPLE. But the Neighbourhood Plan does not comment on this let alone offer management solutions as an integral part of the Plan.

We live on the B1123 which has been subject to numerous road closures this year with burst water mains – one of which was outside Bridge Farm. The infrastructure is ancient and needs replacing rather than constant patching.

The amount of heavy goods traffic on the B1123 probably contributes to the rupturing of the water mains, and certainly damages the road edges and churns up the verges.

From what I can see, the neighbourhood Plan is not an holistic approach to planning and development, but a process which aims to tick legislative boxes and meet current passions and trends – i.e. having green spaces and nature reserves, without understanding the consequences of the major impact of an increasing population and the demands that this makes on the whole of our town and surrounding villages.

Please can those involved in planning understand the that impact of more housing and development also drives the need to upgrade and increase the need for infrastructure to manage the waste that humans create with our 21st century lifestyles and expectations. Other issues on the Halesworth / Chediston stretch of the B1123 are:

- 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
- the number of heavy goods vehicles - 40 tonnes / 6 axle lorries using it as a short cut between the A12 and A143. It is appreciated that a certain amount of this traffic is agricultural – feed lorries and livestock transporters

I look forward to hearing the outcome of this latest consultation stage. I am 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. But please take a wider perspective than current issues on the populist agenda.

## William Dunce

Halesworth is unique in having the potential of benefiting from the re-instatement of the historic railway as a family friendly all year, all weather heritage tourist attraction. The Mid Suffolk Light Railway Museum is a fine example of this type of attraction. Halesworth would benefit from the restoration of this bygone railway that was in operation from its conception in 1879.