

Kessingland Neighbourhood Plan – Consultation Statement

1. In April 2012 a formal request was made to Kessingland Parish Council to adopt a proposal that Kessingland should prepare a Neighbourhood Plan. At the Parish Council Meeting held in May 2012 it was agreed that the Plan should go ahead and that the Neighbourhood Planning Team (NPT) should be community-led and be made up of a mix of members of the community and parish councillors.
2. A meeting about the Neighbourhood Plan was called for 3rd September 2012. This was advertised on noticeboards around the village and on the Parish Council website. The meeting was reasonably well attended, with a cross-section of members of the community and parish councillors, along with representatives from Waveney District Council, including the Principal Planner from the Planning Policy team. Volunteers put themselves forward and the NPT was formed.
3. Over the next 5 months a series of NPT meetings were held and the early evidence gathering was undertaken which enabled the Neighbourhood Plan to move forward.
4. In March 2013 information was circulated to the community through the Village Newsletter under 'My Ideal Village' – a name which was used from then on to identify the Neighbourhood Plan. The newsletter is delivered to every household in the parish.
5. The NPT had reached the point where it was necessary to seek the views of the community on certain key issues. It was agreed to conduct a sample survey of some of the village groups and organisations before involving all the community.
6. The NPT consulted groups that use St. Edmunds Church Centre, Kessingland Womens' Institute, the local Methodist Church, groups who use the Community Centre on a regular basis, the local GP Patients Participation Group, Kessingland Gardening Club and the residents over-60's club.
7. This consultation was completed by the beginning of May 2013.
8. On the 27th May 2013 at Kessingland's Village Fete, the NPT had a presence in order that it could communicate with the Community, and to get their opinion on the idea of a Neighbourhood Plan. There was also media coverage of this event and an article appeared in the local press. This was planned so that people who did not attend the village fete would still be informed and could make their comments known to the NPT.

9. This was followed on the 7th and 8th June 2013 by a Drop-In Consultation where residents could again attend and give their opinion on the Neighbourhood Plan for Kessingland. The topics covered included Housing, Leisure, Education, Retail Facilities, Transport, Amenities, Road Safety and the Environment. This was advertised through the local press, on the Parish Council website and on local noticeboards.
10. Over the two events 264 people gave their comments and feedback which were very constructive, as a result of which the NPT took this as a positive step to move forward with the community and progress with the Neighbourhood Plan.
11. In July 2013 the local village business community were consulted about whether a Neighbourhood Plan would be a good way forward for the development of Kessingland and again a positive result was obtained.
12. Having had a positive feedback in June and July 2013, Terms of Reference were drawn up for the NPT and a Project Plan set out and adopted. On the 19th July 2013 Neighbourhood Area Designation was requested from Waveney District Council.
13. In August 2013 the NPT sent out some trial questionnaires to a group of selected people in the community. This exercise was undertaken to ensure that future questionnaires would cover all the topics that the community wanted in the Neighbourhood Plan. It would also help with determining the format of how questions were phrased so that everybody would understand what was required.
14. In October 2013 the NPT took on board a consultant to advise and formulate planning policies in the Neighbourhood Plan.
15. In December 2013 Waveney District Council approved the Area Designation for Kessingland's Neighbourhood Plan, it would be contiguous with the Kessingland Parish boundary.
16. Over the next 3 months the NPT, working with their newly appointed consultant and computer software provided by Community Action Suffolk, put together a detailed questionnaire. There were four sections to the Questionnaire - Householder only – Individual – Business – Youth.
17. The first section was for the Head of the Household only.
18. The Individual section was for all members of the household, including the head of household, over the age of 18 years and there was provision for 6 people to answer.
19. The Business section was for any member of the household who ran a business in Kessingland.

20. The Youth section was for family members between the ages of 11 to 18 years to ensure that the views of younger people were obtained.
21. The questionnaires were circulated to every household in Kessingland between the 26th March 2014 and the 4th April 2014, with collection being made in the week commencing the 22nd April 2014.
22. 2,000 questionnaires were delivered and a total of 800 questionnaires were returned, representing a figure of 40% of the households of Kessingland.
23. The breakdown of results from the 4 component parts of the questionnaire was:
 - a. Householder – 726 homes, return of 36.59% (2011 Census stated there were 1,984 occupied homes in Kessingland)
 - b. Individual – 1,318 individuals, return of 30.45% (2011 Census stated there 4,327 individuals in Kessingland)
 - c. Youth – 75 individuals for the age group 11 to 18 - return of 20.66% (2011 Census stated there were 363 individuals in this age group)
 - d. Business – 29 residents completed the Business Questionnaire.
24. There was then a period of six months analysing all the data recovered from the questionnaires and the information gained prior to March 2014.
25. In September 2014 the first skeleton draft of the Neighbourhood Plan was produced by the consultant advising the NPT. This was closely followed with contact being made with two local landowners with possible sites for development located at the edge of the village. A wider call for sites was not undertaken because the two landowners in question accounted for most of the land around the north and west edges of the built-up area. The land to the south was discounted because of the significant detrimental impact that any development would have on the Area of Outstanding Natural Beauty further to the south.
26. From the meeting with these two landowners, three sites were put forward as options and included in Draft 2 of the Neighbourhood Plan dated November 2014.
27. It was considered important to put the three sites to the community along with the other emerging policies and supporting evidence. As a result, a two-day Community Consultation event was set for the 5th and 6th December 2014.
28. Invitations to the event were sent to every household about the event. However, attendance wasn't that good, with only 49 people attending. It was decided therefore to extend the consultation period until the end of January 2015. The exhibition boards remained up in the main community hall and people could come and look at these at any time.

29. In this extended period of consultation, a group of Kessingland residents took it upon themselves to get residents involved by circulating a document encouraging residents to have their say. As a result, 113 residents responded and their comments were added to the original 49 respondees.
30. The main interest surrounded the three sites now highlighted by the NPT as possible sites for future development. Although the number of responses analysed was small, it did give the NPT an indicator for the future development of Kessingland.
31. Before the public consultation the NPT were approached by East Coast Health Care with a proposal to provide a Children's Centre that would provide pre-school care for families in the community, aftercare from the local school for working parents and create new jobs which will be accessible to the local community. This proposal was well received during the consultation process and has been included in the Neighbourhood Plan.
32. In late-December 2014, a formal request was made to Waveney District Council to screen the need for a Strategic Environmental Assessment (SEA). Following consultation with Natural England, Historic England and the Environment Agency, it was confirmed that an SEA was required. The Screening Opinion and responses from the statutory bodies are included as part of the evidence base documents.
33. A Sustainability Assessment Scoping Report, incorporating SEA, was produced in March 2015, together with Draft 3 of the Neighbourhood Plan. This was consulted on with the statutory bodies and, following comments, amendments were made. These documents are included as part of the evidence base.
34. One of the issues consistently raised by the community was concern over the ever increasing problem of dementia and care of the elderly. In April 2015, the NPT and the Parish Council were contacted by the owner of a local care home who wanted to expand the care facility in Kessingland to address this issue.
35. In August 2015 the owner of the local care home gave a presentation to the NPT for a development which was for a 60-bed care home, with all the relevant support facilities. An allocation to reflect these proposals was included in the draft Neighbourhood Plan.
36. Affordable housing had been a significant issue raised by the community consistent throughout the engagement events. As a result the WDC Housing Team was consulted in April 2015 to explore mechanisms for ensuring that some or all of the affordable housing units that would be delivered on site allocations were held in perpetuity for people with a local connection to Kessingland. The WDC Housing

Scheme stated that such a mechanism was only permitted on rural exception sites. The NPT therefore decided to undertake a full Housing Needs Survey.

37. In order for this work to be undertaken the NPT contacted Community Action Suffolk for them to carry out the necessary survey.
38. In June 2015 the Housing Needs Survey was circulated to every household in Kessingland – the consultation period being the 15th June to the 8th July. The replies to this survey were returned directly to Community Action Suffolk and they undertook the necessary analysis.
39. At the end of July 2015 the results from the Housing Needs Survey were received by the NPT. In total 378 households responded, amounting to 750 individuals. This represents 19% of households and 17% of individuals.
40. The report summarised that 42 households responded stated that they have a current housing need, amounting to 70 people. A further 16 households responded identifying 30 people who wanted to return to live in the parish.
41. This meant that in total 58 households containing 100 people were in identified need of affordable housing. In addition the report highlighted the fact that on the Gateway to Home Choice Register (the local housing register) there were 63 households claiming a local connection to Kessingland. Some of these may have been included in the Housing Needs Survey figures but it demonstrated that the need was likely to be higher than reported.
42. This report has established a significant need for affordable housing for those with a local connection to Kessingland.
43. Draft 4 of the Neighbourhood Plan was produced by the consultant in May 2015 and reviewed by the NPT. Following their feedback, Draft 5 was produced in September 2015.
44. In September 2015 Waveney District Council started its consultation with regards to its Local Plan Review and members of the NPT met up with officers from WDC Planning Policy to discuss how the Neighbourhood Plan would fit in with future WDC plans. The meeting was constructive and information gained was fed back to the NPT Consultant which was reflected in Draft 6 of the Neighbourhood Plan.
45. Over this period of drafting, the policies were being tested through the development of the Sustainability Appraisal (incorporating SEA). The final SA document was completed in December 2015. This is included as part of the evidence base documents.

46. At this stage in late-2015, Draft 6 of the Neighbourhood Plan was agreed by the NPT and informal comments were sought from Waveney District Council planning officers. Following receipt of these and amendments duly being made, the decision was taken in November 2015 to commence the formal Pre-Submission (Regulation 14) Consultation.
47. A Pre-Submission Consultation version of the Plan was added to the Parish Council website.
48. Letters were then sent to all statutory consultees (see appendix A), local groups and organisations together with local land owners informing them that the consultation period was to run from the 4th November 2015 to the 15th December 2015 and where to view the Plan. A full list of consultees formally written to is included in Appendix B.
49. On the 13th and 14th November 2015 a two-day community Drop-in Session was organised so that residents could give their views on the draft plan. This was advertised in the same way as other public engagement events.
50. The results of this consultation were that over 80% of those attending were supportive of the Neighbourhood Plan. There were some minor concerns about infrastructure and these were addressed in the Submission Stage (Regulation 16) Version of the Neighbourhood Plan.
51. The responses received back from the Statutory Consultees were again very encouraging and comments were also reflected in the Submission Stage Version. A commentary on the representations received is included in Appendix C.
52. Previously a request to screen for the need for a Habitats Regulations Assessment (HRA) had been submitted to Waveney District Council. However, no response had been received so this was followed up with WDC planning officers and the response was duly received in February 2016 confirming that an HRA was not required. The Screening Opinion is included as part of the evidence base documents.
53. Overall the Neighbourhood Plan has been well received in the village despite the fact that not everybody participated in the consultation process. However, it was considered that no specific group had been significant under-represented. Specific targeting of young people through a bespoke survey and actions such as lengthening public engagement events to give more time for people to attend were observed as having addressed any potential issues that had arisen.
54. For those that did engage at Pre-Submission Stage, there was a small minority who were against the Neighbourhood Plan, mainly on the issue of more housing. Some thought that there was already enough development in the village, and that no more housing should be built.

55. Those in favour of the Neighbourhood Plan agreed that for the future development of Kessingland, and in order to provide for future generations who want to live in Kessingland, further development was needed, with the caveat that the village infrastructure is improved at the same time.
56. The one gap that has not been filled throughout the whole process has been the response from the local GP practice. From the very start it has been difficult to engage with them and get their opinion on the Neighbourhood Plan. Initial attempts to engage were not responded to and a follow-up letter from the Neighbourhood Plan Consultant also did not elicit a response. From all research and consultation with the community (including successful engagement with the GP Patient Participation Group, a mix of patients and medical staff), GP capacity was one of the biggest areas of concern.
57. Since this process started in 2012, the NPT has worked hard at engaging with the Community over the future needs of Kessingland and it feels confident that the Neighbourhood Plan fully reflects the views of the whole community and will be a valuable part of the future development of Kessingland parish.

APPENDIX A: LETTER TO STATUTORY CONSULTEES ADVERTISING PRE-SUBMISSION CONSULTATION



Kessingland Parish Council
Marram Green
Hall Road
Kessingland
NR33 7PP.
4th November 2015

Dear

**KESSINGLAND NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION
(REGULATION 14)**

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, Kessingland Parish Council is undertaking Pre-Submission Consultation on the Kessingland Draft Neighbourhood Development Plan (NDP). As a body that we are required to consult, we are hereby seeking your views on the Draft NDP.

The plan can be viewed on the following website –

<http://kessingland.onesuffolk.net/assets/Neighbourhood-Plan/Kessingland-NP-Pre-Submission-Regulation-14-Version.pdf>

The pre-submission consultation runs for a period of 6 weeks from the date of this letter, the closing date for representations is **5pm on Tuesday 15th December 2015** and can either be emailed to clerkkessingland@outlook.com or sent by post to The Parish Clerk at the above address.

Yours sincerely



Liam Martin
Chairman
Kessingland Parish Council

APPENDIX B: LIST OF STATUTORY AND OTHER CONSULTEES INFORMED OF PRE-SUBMISSION CONSULTATION

Statutory consultees

Suffolk County Council
Homes and Communities Agency
Natural England
Environment Agency
Historic England
Highways England
Marine Management Organisation
Anglian Water
Essex and Suffolk Water
British Gas
British Telecom
Gisleham Parish Council
Henstead with Hulver Street Parish Council
Wrentham Parish Council
Benacre Parish Meeting
Cllr Alan Green
Cllr Bruce Provan

Other key stakeholders

Sport England
Suffolk Preservation Society
Suffolk Wildlife Trust
Sustrans
Fields In Trust
Mono Consultants Limited
Suffolk Constabulary

Mobile Operators Association

Health East

Local Organisations

KSSC – Community Centre

Parochial Church Council via Rector

Methodist Church

Doctors Surgery

Citizens Advice Bureau

Kessingland Academy

Flagship Housing

Village Hangout (Youth)

Businesses

Africa Alive

Haydens (Chemist)

Cycle / Recycle

Costcutters

Co-op

Livingstones

Sailors Home

Waterfront

Church Motors

Kessingland Garage

Block Engineering

Heathlands

Kessingland Beach

The Hollies

Alandales

Kessingland Cottages

Seaview

White House Beach Caravan Site

The Old Rectory Guest House

The Knoll

Manor House Care Home

East Coast Community Healthcare

Landowners

Mardles Trust (Allotments, Whites Lane)

Coopers Lane Allotments

Benacre Estate

Manor Farm

Help in Need Trust

Grange Farm, Gisleham

Ventureforth (Ashleys Nursery)

Geoffrey Guymer

APPENDIX C: COMMENTARY ON REPRESENTATIONS RECEIVED AT PRE-SUBMISSION CONSULTATION (REGULATION 14) STAGE

The Neighbourhood Planning Team met on the 21st January 2016 to review the representations made during the 6-week Regulation 14 consultation.

A total of 63 organisations, groups and landowners were invited to comment on the Neighbourhood Plan. In total, 7 public bodies responded with the Community Open Days producing 101 responses from the public.

80% of the responses from the Community Open Days were in support of the Neighbourhood Plan.

Dealing with the public responses to the Plan, although there were very few objections, there were concerns and worries over future development in Kessingland with regards to the Infrastructure.

Housing

Suffolk County Council raised an issue regarding the consistency and achievability of the parking requirements of Policy H2 and those in Policy TM1. As a result, Policy H2 has been revised to clarify and provide a more realistic set of criteria that need to be addressed in respect of parking.

Transport and Movement

With regards to Policy TM1, Suffolk County Council identified that the policy is not explicit as to the intended treatment of visitor car parking of cycle parking. "They recommend inclusion of the following wording, *"0.25 unallocated visitor parking spaces be provided per dwelling and that visitor/unattended parking can, subject to appropriate design, be located on the street."*

Community Infrastructure

There are a number of minor issues raised that have required changes to the Neighbourhood Plan and are accepted:-

1. Policy C14: The promoter requested that the sentence at para. 9.23, line 3, be changed to *"the land adjacent to the existing Manor Farm Care Home building within the existing site provides an opportunity to extend provision in Kessingland."*

In addition on Page 51, the Proposals Map, the site indicated for the Care Home needed to be moved to the east to reflect the fact that it is on Manor Farm Care Home site, not Manor Farm.

2. The Community Centre requested that para. 6.20 state that it is the Parish Council who provide the facilities not the KSSC. They also sought clarification on the word 'pavilion' which has been made.
3. The Community Centre raised a query over the 4th bullet point in Policy SA2 requested that this be changed to, *"The provision of improvements to Kessingland Community Playing Field to support field and sports provisions"*

Suffolk County Council (SCC) addressed comments to Policy CI3 in respect of the proposed new children's centre off Francis Road. SCC acknowledged the fact that a local provider is interested in establishing a new pre-school at Kessingland, a planning policy framework which is positive towards its establishment is helpful. However, they conclude by saying that, *"this proposal is not for a Childrens Centre as outlined by the Childcare Act 2006. This Act defined Childrens Centres as a location for early childhood services which may include groups which parents attend with their children or parenting support. It may be more accurate to describe the new provision as 'early years provision'"*.

This was followed up with East Coast Community Healthcare, the proposed provider. It agreed that the use of the term 'children's centre' was misleading as the proposed centre would not provide the full range of services that a children's centre would be expected to, under the legal definition. It suggested that it was referred to as 'Early Years provision underpinned by ECCH's health and safeguarding services, plus additional wrap around care through holiday and after school clubs'. This was agreed.

Environment and Green Spaces

It was noted by several people that some of the photographs in Appendix 1 have errors to their captions. Photo 17 should be the photograph at 21; photo 19 should be the photograph at 17; photo 21 should be the photograph at 19.

At the Community Open Days, people were specifically asked for their views about the green spaces identified in Policy E1. Only 3 people out of the 101 that responded were against the policy.

Natural England is satisfied that the proposed site allocations are not within the East or the North of the settlement, so are not likely to significantly affect any of the nationally or European designated sites in the vicinity.

Natural England recommended that paragraphs 10.8 and 10.9 including wording to address the network of green spaces. They noted that, *"features to encourage wildlife should be included where possible, including native planting, scrub, trees,*

hedgerows and ponds. We agree that a park would be ideal but since there is a lack of space for the provision of a park, we consider that combining it with the proposed sports area and focusing on improving and connecting the small green spaces is a reasonable approach." This wording has been used to expand these paragraphs.

Flooding and Drainage

In respect of Policy FD1, Anglian Water suggested the policy wording at bullet point 2 be amended to, *"provide appropriate Sustainable Drainage Systems unless it can be shown to be impractical"*

Suffolk County Council identified the need to require sustainable drainage measures to ensure that surface water is managed in respect of the proposed site allocations. They have requested that the supporting text to paragraphs 12.2 and 12.5 be amended as follows:-

- *12.2 – "Development will therefore have to ensure that it minimises the potential for all types of flooding, including surface water. This can be through a range of flood mitigation measures, both for the scheme as a whole and for individual buildings."*
- *New Paragraph 12.5 – "New developments will be expected to incorporate sustainable drainage systems (SuDS) where feasible. Ideally SuDS should be at or near the surface, providing water quality, biodiversity and amenity benefits and reducing flood risk."*

SCC also asked for clarification of the last line of Policy FD1, stating, "It is assumed that the line is intended to relate to the process by which surface water drainage requirements receive permission. Perhaps the Parish Council could clarify that point". Following a review, it is not considered that the final sentence in the policy adds anything so it has been taken out.

Other issues

Suffolk County Council considered that the section on the History of Kessingland should include reference to the archaeological context. As a result, the following text has been added to Section 2, *"There are 131 entries on the County Historic Environment Record for Kessingland. There are significant Palaeolithic deposits under the cliffs, which are also the location of several sites of WW2 heritage. On the south facing slopes over the Kessingland Levels in particular, there are sites of all periods, including Bronze-Age ring ditches."*

Historic England and the Suffolk Preservation Society noted that there was no reference to built heritage in the Neighbourhood Plan. The reason is that this was not

an issue raised through the preparation of the plan and the Strategic Environmental Assessment shows that only one proposal could have a significant impact on the limited number of heritage assets in the parish. This is the proposed allocation of the Ashley Nurseries site which is adjacent to a Grade II listed farmhouse. This point was raised by the Suffolk Preservation Society and it is considered appropriate to add reference to this into Policy SA1. The Society also raised the issue of local listing of the Kings Head which is to be added to the WDC list.