

## Kessingland Neighbourhood Plan

# Comments Form

Kessingland Parish Council, in accordance with the Neighbourhood Planning (General) Regulations 2012 have submitted their neighbourhood plan to Waveney District Council ahead of it being submitted for independent examination. At this point in the proceedings Waveney District Council is required to publicise the neighbourhood plan and to invite comments.

### How to respond to this consultation:

Consultation is open for six weeks from **16th May to 27th June 2016**. Please respond by using one of the following methods:

- Online: [www.waveney.gov.uk/neighbourhoodplanning](http://www.waveney.gov.uk/neighbourhoodplanning)
- Email: [waveneylocalplan@eastsoffolk.gov.uk](mailto:waveneylocalplan@eastsoffolk.gov.uk)
- Post: Waveney District Council, Planning Policy and Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ

Section / paragraph	Your comment
	Comments and further statement attached.

Section / paragraph    Your comment

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Do you wish to be notified of Waveney District Council's decision whether to accept the Examiners' recommendation and future progress with the plan?

☐

Yes

☐

No

**Your details**

Title:

MR.

First Name:

M.

Surname:

DIXON

Organisation:

MDPC LTD

Address:

WOLFELEY MOVE

1 QUAY VIEW BUSINESS PARK.

BARNARDS WAY.

LOWESTOFT.

Postcode:

NP32 2HD

Email:

## Consultation Response to KNP Policy Submission (Reg16)

Para/Policy	Comment
<b>1.0</b>	<b>Introduction</b>
1.9	Please see <b>attached statement and appendices</b> regarding the fact that not all adjoining land owners were actively engaged in the process.
<b>2.0</b>	<b>Local Context</b>
2.1	Largest village in Waveney
2.30/2.31	(WDC) CS Policy CS01 Spatial Strategy <ul style="list-style-type: none"> <li>• Larger villages will accommodate a small amount of new housing inc. Affordable housing where there is a demonstratable need (<b>see attached statement and appendices</b>)</li> <li>• Presently 5% of housing growth expected in larger villages. Given the WDC a call for sites "Help Plan Our Future" Consultation document and the need for between 7700 – 9500 houses by 2036 then it follows that larger villages such as Kessingland could accommodate additional housing.</li> <li>• <b>See attached statement and appendices.</b> This site (identified as <b>Site 85</b> in the WDC Call for Sites exercise ) could assist in funding infrastructure through CIL payment to which Kessingland PC is entitled and possibly through WDC CIL funds.</li> </ul>
<b>3.0</b>	<b>Vision and Objectives</b>
3.2	<ul style="list-style-type: none"> <li>• <b>See attached statement and appendices.</b> New housing would further address affordable (and starter homes) housing needs.</li> <li>• Sport facilities could benefit via CIL, channelled through KNP.</li> </ul>
3.3	<ul style="list-style-type: none"> <li>• Housing need – <b>see attached statement and appendices.</b></li> </ul>
<b>4.0</b>	<b>Physical Limits Boundary</b>
4.1	<ul style="list-style-type: none"> <li>• Physical Limits – The proposed sites SA1, SA2 and SA3 extend beyond the physical limits and SA1 &amp; SA2 are Greenfield sites within the defined Strategic Gap – <b>see attached statement &amp; appendices.</b></li> </ul>
4.3/4.6/4.7	<ul style="list-style-type: none"> <li>• Greenfield development – <b>see attached statement and appendices.</b></li> </ul>
4.8	<ul style="list-style-type: none"> <li>• Through a flexible approach <b>Site 85</b> would significantly help to address housing need in Kessingland – <b>see attached Statement and appendices.</b></li> </ul>
<b>Policy PL1</b>	<ul style="list-style-type: none"> <li>• Review of the WDC Core Strategy is being undertaken and therefore there is scope to explore additional housing sites such as <b>Site 85.</b></li> </ul>

## **5.0 Housing**

5.4/5.8/5.10

- See **attached statement and appendices**.
- promotion of starter home provision could also assist local residents.

5.13

- **See attached statement and appendices** as indicated lower density ..... is possible – A scheme involving a breakdown of 30% AFF Housing (AH), 20% starter houses (SH), and 50% General market (GM) homes (subsidising the cost of the AH & SH) that a scheme involving low density 48 dwellings would produce:
  - 14 A.H
  - 10 S.H
  - 24 GM

This would address the estimated housing need and allow some starter Home provision for those wishing to acquire a starter home in the parish.

5.16

It is also reasonable to assume that infill & backland development is unlikely to generate sufficient numbers to create AH & SH (taking into account the threshold of no fewer than 10 dwellings where AH can be included).

### **Policy H1**

- Acceptable approach

## **6.0 Housing Allocations**

6.4

- By promoting **Site 85 (see attached statement and appendices)** then this would preclude the reliance on possible windfall development whilst also addressing the AH shortfall and offering additional SH accommodation as well.

6.9

- SA3 in particular will impinge on the strategic gap as will **Site 85** but if the former is acceptable then the latter should also be so, whilst the latter can also offer ecological benefits (see **attached statement and appendices**).

### **Housing Policy SA1,SA2 & SA3**

- No objections to any or all of these proposals

## **9.0 Community Infrastructure**

9.12

A low density scheme at **Site 85** (48 dwellings equates to approximately 18 per hectare on a site of 2.65 hectares) will enable potential provision of additional play space facilities to supplement Site SA2 at Laurel Farm.

## **10.0 Environment and Green Spaces**

10.1

By clever design and layout **Site 85** could offer a generous area in a park type setting enhanced by a backdrop of woodland on the northern and eastern boundaries

## Statement & Appendices

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## 1.0 Background

The **KNP Consultation Statement** (updated) does not appear to have indicated that all land owners on the edge of the village had been approached with regards to promoting sites within the KNP.

At **Para 25** it is stated that

*"The first skeleton draft of the KNP was produced (Sept 2014) . This was closely followed with contact being made with 2 local landowners with possible sites for development located at the edge of the village. **A wider call for sites was not undertaken because the 2 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 discarded because of (potential) impact on the AONB to the South.*

*"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 gave the NPT an indication for the future development of Kessingland.*

It goes on to state at :

- *"Para 30 At the end of July 2015, the results of the housing need survey were received by the NPT. In total 370 households responded .....*
- *"Para 41 "58 households (containing 100 people) were identified as being in need of affordable housing, in addition the report highlighted that on the Gateway to Home Choice Regulator (the local housing register) there were 63 households claiming a local connection to Kessingland (which) demonstrated that the need was likely to be higher than reported .*
- *"Para 42 This report has established that there is a significant need for those with a connection to Kessingland.*
- *Para 55 "Those in favour of the KNP agreed that further development was needed, with the proviso that the village infrastructure is improved at the same time".*

## 2.0 Comments

Wellington are representing the owner of the land indicated on the attached Plan (attached at **App 1**), which is also the subject of a land bid (**Site 85**) being considered as part of the WDC *"(Call for sites) Help Plan our Future"* Consultation document. A copy of the Statement submitted in support of the site is attached at **App 2**. It is understood that the KNP should be in conformity with the Adopted Core Strategy and as this is being updated, then there is a degree of uncertainty but the LPA advises that the Revised Core Strategy will pay heed to the KNP once adopted. However the KNP Reg 16 Submission also recognises that at Policy PL1 that where the Core strategy is being reviewed then this could result in additional housing being required.

With regard to the site itself, it appears that it was not considered as part of the KNP process and the landowner was not approached during the previous KNP consultation rounds. Turning to Section 5 of the KNP document, the owner does not object to the alternative sites being promoted but would request that his site also be considered.

Furthermore with regard to **Affordable Housing** there is scope to consider this site in order to bolster the level of housing expected to come forward through the promoted sites SA1 Ashley Nurseries, SA2 Laurel Farm (west & South) and SA3 Laurel Farm (East) i.e 44 in total from these 3 sites. This issue is more important than ever, given the Government's promotion of starter homes (20 % on sites of 10 dwellings or more) ahead of affordable homes and the lack of potential affordable housing development on schemes of less than 10 which will be likely to account for most proposed housing falling into sites covered by **Policy H2** (covering potential infill and backland development)

Although located within the (northern) Strategic Gap between Kessingland and Lowestoft, this site is relatively unobtrusive, some distance away from exposed views along the main through route; and with the benefit of a backdrop of established woodland to the north and east. Furthermore, the KNP acknowledges that development opportunities are more restricted on the south side of the village, given the AONB status of land in the vicinity.

Taking a loose interpretation of the WDC SPD re Provision of Affordable Housing in the Kessingland area, then this site could help to facilitate affordable housing to reflect housing need in the area as a "quasi exception site" involving a potential mix of tenure involving 50% Affordable Housing (AH), including 20% Starter Homes (SH) and the residual 50% general market housing to effectively subsidise the AH in terms of viability. A scheme of 48 dwellings would generate 14 AH and 12 SH.

It should also be noted that relatively recently both mixed tenure housing (comprising 20 general market and 10 affordable dwellings) and 100% rented accommodation (23 dwellings) have been allowed on appeal at Heritage Green (Appeal Reference APP/T3535/A/14/2218439) beyond the present

defined Physical Limits for Kessingland and The Nordalls (Appeal reference APP/T3535/A/14/2217031) respectively. It therefore follows that mixed tenure has been accepted beyond , whilst larger scale affordable housing has been accepted within, the village. Both developments are underway, and the latter is being built by Wellington on behalf of Orbit Housing Association (Wellington, incidentally, would be involved in **Site 85** being promoted here.)

The inclusion of this site would generate additional funding through CIL which could be channelled towards providing additional infrastructure, such as assisting the apparently stretched GP Surgery as referred to at Para 2.2.7 in the KNP Consultation document and Early Years Centre as referred to at Para 9.17-9.13 (Policy C13) in the Reg 16 submission document.

### **3.0 Summary**

Notwithstanding the KNP position as stated above the site will be promoted through the strategic call for sites under consultation at present, but in the meantime if KPC was agreeable to consider this site then the owner and Wellington would be prepared to engage with the members to deliver a scheme which could also benefit the social objectives of the PC through its KNP, particularly with regard to significantly reducing Housing Need, a process which is underway through the Heritage Green Scheme and even more so through the scheme at The Nordalls.

It could also help address the shortfall in parkland provision as referred to in the Reg 16 document at Section 10.

Promotion of this site takes into account the precedent being set by both Sites SA2 and SA3 in terms of development in the Strategic Gap (**Adopted Development Management Policy 28 Strategic Gaps and Open Breaks**) including larger scale Affordable Housing (Site SA3).

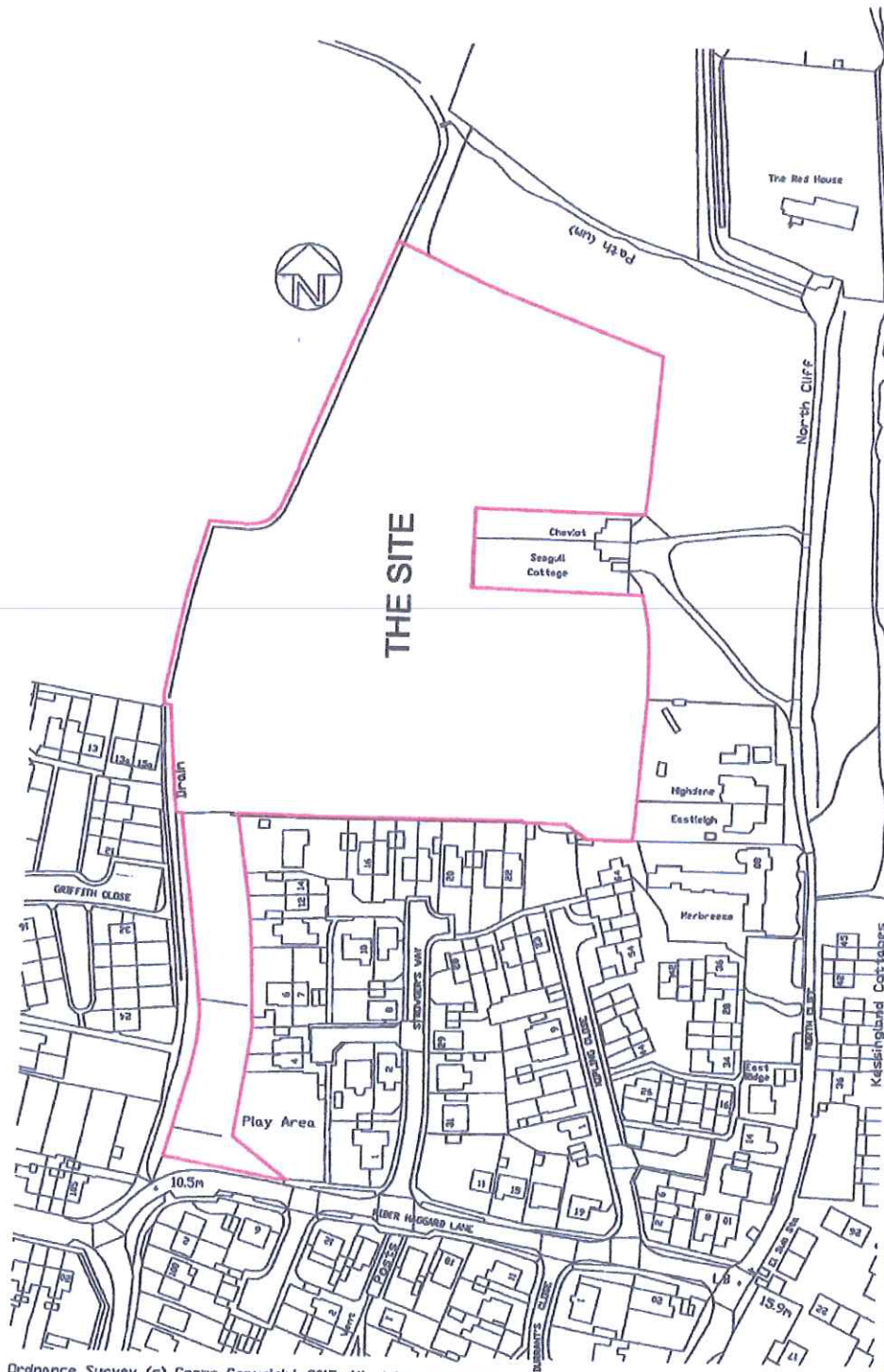
These comments should read in conjunction with both the comments above and those attached at **App 2**.

### **Appendices**

#### **App 1 Location Plan**

#### **App 2 Statement submitted with regard to WDC (Call for Sites) "*Help Plan our Future*" Consultation Document**





	<b>Project Title</b> Site Off Rider Haggard Lane Kessington	<b>Client</b> Rider Haggard Lane Kessington	<b>Drawing Reference</b> Location Plan	<b>Job Number</b> W-...	
				<b>Scale</b> 1:1250 @ A3	<b>Drawn by</b> PD
				<b>Date</b> Dec 2015	<b>Drawing No.</b> 1

App 1

## App 2

### Options for the New Waveney Land Plan (Consultation Exercise 22<sup>nd</sup> April-17<sup>th</sup> June 2016)

#### Site 85 Housing – Rider Haggard Lane Kessingland (Wellington)

- 1.0 The “*Initial Sustainability Appraisal of Emerging Options*” is encouraging in that the only negative points identified relate to:

- (a) “*Conserving and enhancing the quality and distinctiveness of landscapes and townscapes*”
- (b) *Conserving natural resources*
- (c) *To reduce contribution to climate change and mitigate effects*”

Furthermore the exercise has identified 3 plus points:

- Health and well-being
  - Improving access to key services & facilities
  - Meeting housing requirements of the whole community and
- 2.0 The site is identified by the LPA to have the potential for 60 dwellings. Development of this site is considered to be relatively close to a range of facilities.
- 3.0 With regard to (a) (b) & (c) above, It is inevitable that there will be negative issues around the rural location being a greenfield site but this situation applies to the vast majority of sites being promoted through this land bid exercise. Furthermore, there is sufficient room to include strategic planting to enhance the development and to mitigate the limited impact it may have on the rural hinterland which in any event would be reinforced by existing substantial tree planting along the northern and eastern boundaries, thus mitigating any impact on the Strategic Gap on the north side of Kessingland which in any event is being reduced through the promotion of a site in the Kessingland Neighbourhood Plan (KNP) to the south of Laurel Farm to the north west of Site 85 involving approximately 55 dwellings. The Laurel Farm site is more intrusive in terms of its location within the strategic gap and peculiarly does not appear to be being promoted strategically through this Call for Sites exercise. For your information a separate response will be submitted to the KNP (Reg 16) Submission Consultation Exercise presently underway.
- 4.0 The Sustainability Appraisal refers to the loss of protected woodland presumably in the corridor at the southern end of the site where access to Rider Haggard Lane would be provided, and is covered by a TPO. However this area does not appear to be identified in the KNP and should the land bid prove successful then replacement landscaping can be offered through the introduction of a landscaped area within the site comprising commensurate replacement tree planting and other plant species to compensate for the loss of the trees covered by the TPO. The TPO covers two groups comprising 46 Corsican Pine and 7 poplar trees in total, but at a glance do not provide particularly attractive specimens.
- 5.0 The LPA recognises that the site is in a sustainable location being relatively close to a range of facilities and could assist in providing both much needed affordable and starter homes. The site offer potentially around 60 dwellings (LPA estimate) ,but a lower density scheme could also be considered to facilitate a higher level of strategic planting ;and although a greenfield site, given the present search for sites, the LPA has recognised that greenfield development throughout the district is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area within Lowestoft.
- 6.0 The Council predicts that at least 7700 new homes will be needed up to 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land. The LPA has also indicated that 630 dwellings

have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036, whilst the highest figure represents the need for 380 per year.

- 7.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall ;and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF .
- 8.0 It is understood that there are no viability issues with this particular site and therefore development could be delivered relatively swiftly, and in so doing help to achieve both the Councils required 5YHLS and its Housing Strategy, if supported by the LPA.