

**From:** Sarah Nunn  
**Sent:** 14 June 2022 10:56  
**To:** Ruth Bishop  
**Subject:** (SF124) RE: Worlingham Neighbourhood Plan examination

Hi Ruth,

Thank you for the opportunity to provide comments on this.

As set out in our Regulation 16 comments (as attached) we provided comments on WORL14 (paras 3.47 and 3.48) and noted that *'Larkfleet support the use of appropriate native species and it is intended that the wildlife corridors will contribute to the achievement of a 10% net gain in biodiversity.'*

If it is the intention of the Neighbourhood Plan to include the requirement of 10% BNG in the policy, Larkfleet would be supportive of this.

Would you be able to confirm that this is the intention of the criterion to be added to the policy?

Kind regards,

**Sarah Nunn BA(Hons) MA MRTPI**  
Planner

**DLP Planning Limited**



For and on behalf of  
**Larkfleet Group**

**Worlingham Neighbourhood Plan  
Submission Regulation 16 Consultation**

**Land between Oak Lane and Ellough Road, Beccles, Suffolk**

**Prepared by  
DLP Planning Ltd  
Bedford**

February 2022



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<b>CONTENTS</b>	<b>PAGE</b>
<b>1.0 Introduction .....</b>	<b>4</b>
<b>2.0 Planning Policy and Legislation .....</b>	<b>5</b>
National Policy and Legislation .....	5
<b>3.0 KEY ISSUES WITH THE WORLINGHAM NEIGHBOURHOOD PLAN AND GENERAL CONFORMITY WITH STRATEGIC POLICIES .....</b>	<b>8</b>
Paragraph 4.9.....	8
Paragraph 4.10.....	9
Paragraph 11.....	10
Policy WOL1: Village Identity .....	10
Policy WORL2: Housing Mix .....	12
Policy WORL3: Lifetime Design .....	13
Policy WORL4: Housing Design and Character .....	14
Policy WORL5: Heights of Dwellings .....	15
Policy WORL6: Housing Design – Security .....	16
Infrastructure.....	16
Policy WORL7: Sports Facilities.....	16
Policy WORL8: Parking Standards .....	17
Policy WORL9: Design of On-Street Parking Provision.....	17
Policy WORL10: The Design of Estate Road and Parking Courts.....	17
Policy WORL12: Landscaping .....	18
Paragraph 8.8 and Policy WORL13: Country Park Landscaping and Management .....	18
Policy WORL14: Wildlife Corridors.....	19
Policy WORL16: Drainage .....	19
<b>4.0 Conclusions .....</b>	<b>21</b>

## 1.0 INTRODUCTION

- 1.1 These representations to the Submission (Regulation 16) version of the Worlingham Neighbourhood Plan (WNP) have been prepared by DLP Planning Ltd (DLP) acting on behalf of Larkfleet Group who have an option on a substantial part of land comprising the Beccles and Worlingham Garden Neighbourhood including parts falling within the designated Neighbourhood Plan area.
- 1.2 Previously, representations were submitted by DLP on behalf of Larkfleet Homes to the Pre-Submission (Regulation 14) consultation in June 2021. It is recognised that there are a number of the policies which have been amended to take account of representations from a number of representors from the Regulation 14 consultation.
- 1.3 A Neighbourhood Plan must however demonstrate, *inter alia*, that it will support the achievement of sustainable development and is prepared in general conformity with the strategic policies of the development plan for the area. These elements form the *basic conditions* that a plan must meet. Section 2 of these representations sets out the relationship with national policy and guidance.
- 1.4 The submission version of the Worlingham Neighbourhood Plan is to be assessed for its general conformity with the strategic policies of the development plan. At the time of writing, the adopted development plan includes the Waveney Local Plan (2019) and the Policies Map (2019).

## 2.0 PLANNING POLICY AND LEGISLATION

### National Policy and Legislation

2.1 A Neighbourhood Plan must meet prescribed basic conditions if it is to proceed to a referendum. These are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004:

*a. have regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).*

*d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.*

*e. the making of the order (or 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).*

*f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*

*g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*

2.2 In seeking to ensure the achievement of sustainable development, paragraph 11 of the Framework specifies that plans and decisions should apply a presumption in favour of sustainable development. Paragraph 13 states that the implications of the presumption apply to those engaged in the preparation of neighbourhood plans.

2.3 In relation to basic condition (e) it is important that Neighbourhood Plans should support the delivery of strategic policies contained in the Local Plan. Neighbourhood Plans should not undermine those strategic policies. They should also plan positively to support, shape and direct development outside of these (ID: 41-070-20190509).

2.4 Planning practice guidance confirms that Neighbourhood Plans should demonstrate how they may contribute towards environmental, social, and economic conditions while ensuring adverse impacts are avoided (ID: 41-072-20190509). This is consistent with the objectives for a plan-led system. Sufficient and proportionate evidence is required to demonstrate this and may best be illustrated through preparation of a Sustainability Appraisal. A Sustainability Appraisal allows the context, objectives, and approach to the assessment to be outlined;

relevant environmental issues and objectives to be identified; and alternatives to the preferred strategy considered. This may draw on the evidence base for the Local Plan, if available and up-to-date.

2.5 The Framework emphasises that strategic policies should be clearly distinguished from non-strategic policies. Planning Practice Guidance specifically addresses the approach to understanding the implications of identifying strategic policies relevant to basic condition (e) and ensuring general conformity. Strategic policies can occur anywhere in the development. They will not solely relate to housing matters and can be required to address the range of priorities identified in paragraph 20 of the NPPF, including infrastructure and community facilities.

2.6 Groups preparing Neighbourhood Plans should apply a number of considerations when identifying and determining the role of strategic policies, including *inter alia*:

- ***“whether the policy sets out an overarching direction or objective***
- ***whether the policy sets a framework for decisions on how competing priorities should be balanced***
- ***whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the local plan or spatial development strategy***
- ***in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the local plan or spatial development strategy***
- ***whether the local plan or spatial development strategy identifies the policy as being strategic” (ID: 41-076-20190509) (DLP emphasis)***

2.7 Infrastructure needs to be provided in the Neighbourhood Plan area should be considered at the earliest stage in plan-making. This should ensure that the planning system supports growth in a sustainable way. These considerations include:

- ***“what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way;***
- ***how any additional infrastructure requirements might be delivered;***
- ***what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery; and***

- *what are the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which could help shape decisions on the best site choices” (ID? 41-045-20190509)*

2.8 The requirements for prioritised infrastructure to support development in the plan should be set out and explained within the Plan.



### **3.0 KEY ISSUES WITH THE WORLINGHAM NEIGHBOURHOOD PLAN AND GENERAL CONFORMITY WITH STRATEGIC POLICIES**

3.1 It is important to note that the requirement for general conformity means that policies in the Neighbourhood Plan are in accordance with the adopted development plan.

3.2 Policy WLP3.1 of the Local Plan allocates the Beccles and Worlingham Garden Neighbourhood for a comprehensive mixed-use development including:

- Approximately 1,250 dwellings;
- Retirement community comprising a care home/nursing home and extra care and/or sheltered dwellings;
- 2 form entry primary school and a pre-school setting (2.2 hectares);
- Country Park, indoor/outdoor sports facilities, allotments, play areas and public open space (at least 25 hectares);
- Community Hub comprises a convenience store, local shops, community centre and pre-school setting; and
- Employment development (falling under classes B1, B2 and B8) (5 hectares).

3.3 The proposed allocated site falls across three parishes: Beccles, Worlingham and Weston, respectively, however, the adopted policy does not specify the amount of built form to be brought forward in each respective parish area. The majority of Larkfleet's land falls within the parish of Worlingham with a small portion in neighbouring Beccles. The following section provides Larkfleet's response to the policies set out in the Submission (Regulation 16) Worlingham Neighbourhood Plan (WNP) and the strategy and policy approach towards the development of the Beccles and Worlingham Garden Neighbourhood.

3.4 The pre-submission version of the WNP was previously assessed for its general conformity with the strategic policies of the adopted development plan (Waveney Local Plan 2019 (adopted March 2019)). This representation considers the amendments made to policies and where is considered that further amendments would aid the successful delivery of the Beccles and Worlingham Garden Neighbourhood.

#### **Paragraph 4.9**

3.5 The text as set out in Paragraph 4.9 requires that in respect of the Beccles and Worlingham Garden Neighbourhood, all opportunities to achieve separation of housing along the entirety of the western parish boundary should be explored and ideally this would involve a full-length green corridor or a break of some form in the development's layout and perhaps this might partially be contributed towards through the layout of the amenities, the landscaping and the

signage that are to be provided within the required “hub zone” for example.

- 3.6 As was outlined in our Regulation 14 response, Parish boundaries do not (for the most part) follow any clearly defined boundaries on the land. It follows that local administrative boundaries should have no role in determining the proper master planning of the Garden Neighbourhood and should not be utilised to dissect a comprehensive development with the aim of creating separate and distinct communities within what should be a single neighbourhood. To do so would be wholly unreasonable where it may impact on the integral design of an area and creates division in the community, which is explicitly intended to be a cohesive new garden neighbourhood.
- 3.7 Supporting text in paragraph 3.18 of the Waveney Local Plan states that *“a comprehensive approach to development is essential to the success of this allocation”* adding at paragraph 3.22 that *“Neighbourhood Plans for Beccles, Worlingham and Weston can play a role in shaping the detailed design of development in this area, promoting local distinctiveness”*.
- 3.8 The response to previous representations on this matter argues that the vision of the Waveney Local Plan and Policy WLP3.1 require the preservation of the distinctiveness of existing settlements. However, it is clear that Beccles and Worlingham are intrinsically linked and is considered to have a connected population with employment and local infrastructure which serve the wider area of both parishes as outlined in paragraph 3.2 of the Waveney Local Plan. It is clear therefore that the new garden neighbourhood is intended to be an integrated new community rather than one split by parish boundaries.
- 3.9 The Local Plan explicitly identifies that a comprehensive approach to development is sought across the masterplan area. On this basis, paragraph 4.9 remains contrary to the intentions of the development plan and should be removed to ensure conformity with Policy WLP3.1 of the Local Plan and its supporting text.

#### **Paragraph 4.10**

- 3.10 Paragraph 4.10 has been revised to reflect the concern regarding potential competition between the community facility to be delivered in the “hub zone” of the site and the Worlingham Community Centre which is to be built. It is outlined that the garden neighbourhood facility should either not be placed fully within the neighbourhood plan area, which would also require the other “hub” use to be located elsewhere as well, or should complement rather than compete with the proposed Worlingham Community Centre.

- 3.11 As was previously outlined in the Regulation 14 representation, the proposed Community Hub as required by Policy WLP3.1 are for the purposes of meeting the needs of the new Garden Neighbourhood: it is not allocated for the purposes of meeting any existing shortfalls, although access to them may be facilitated by the existing community. On this basis, the proposed facilities, whether located fully within the Worlingham Parish or not, would not compete with the new Community Centre that is to be developed elsewhere within the Worlingham Parish and will work to complement new facilities and provide additional facilities to the southern parts of the Parish.
- 3.12 As the Community Hub required by the Local Plan, should be accessible to new and existing residents from both parishes and be delivered in a comprehensively planned approach within the development alongside the school and sport pitch provision, the proposed measure to limit the ability to identify the most appropriate location for these uses is contrary to the Local Plan and should be removed. If we proposed the Community Hub further west, then the other uses including the school and sports pitch provision will also need to be relocated as these are centred around the Community Hub provision.

### **Paragraph 11**

- 3.13 Paragraph 11 has not been amended from the previous consultation and still notes that differing character areas or design approaches either side of the Beccles/Worlingham parish boundary would assist in demarcating the location of the shared boundary.
- 3.14 However, as previously outlined, the Beccles and Worlingham Garden Neighbourhood is a comprehensive site which will require a consistent design approach and palette across the site to create a cohesive neighbourhood. It is acknowledged that areas of the site have the potential to comprise of different 'character areas' which could be reflective of the design features in Worlingham, however, the shared boundary within the site should not separate the design and development pattern, however the updated masterplan approach being pursued is being developed around the formation of a new linear park throughout the development highlighting the parish boundary and being mindful of the Neighbourhood Plan's aspirations.

### **Policy WOL1: Village Identity**

- 3.15 Policy WOL1 has been amended and added to and now states that:

*A. Development proposals in Worlingham must demonstrate how the identity of*

*Worlingham is to be respected, meeting as far as possible feedback as gathered through community engagement. Particular attention must be shown as to how the proposals:*

- *Demonstrate that new community facility proposals have been informed by engagement with the community and positively respond to the community's needs and aspirations as set out in the Neighbourhood Plan Objectives.*

*B. Development proposals for the Beccles and Worlingham Garden Neighbourhood within the Worlingham Neighbourhood Plan area must demonstrate how they will promote the local distinctiveness of Worlingham, in particular addressing the importance of:*

- *the parish boundary. Proposals for the new development must demonstrate a strategy to effectively delineate the parish boundary and support appropriately designed, locally distinctive development in the parish of Worlingham.*
- *meeting the design requirements of Policy WORL4;*
- *having a clear predominance of within-curtilage parking in a mix of residential parking solutions;*
- *a high proportion of homes having gardens of sufficient size, shape and access to sunlight for the provision of recreational benefits to the occupants;*
- *there being a clear demarcation between public and private land;*
- *trees forming the core of landscaping;*
- *achieving an overall density of dwellings commensurate with an outer-suburban area type of about 30 dwellings per hectare.*

3.16 Ongoing engagement with the community is required by policy WLP3.1, therefore it is considered that part a) does comply with the Local Plan.

3.17 As has been set out within this representation and the previous Regulation 14 representation, Parish boundaries do not (for the most part) follow any clearly defined boundaries on the land. It follows that local administrative boundaries should have no role in determining the proper master planning of the Garden Neighbourhood and to do so would be wholly unreasonable where it may impact on the integral design of an area and creates division in the community, which is explicitly intended to be a single, new garden neighbourhood. This is supported by the Inspector's Report on the examination of the Waveney Local Plan, specifically paragraph 89, which states:

*“The Council commissioned a Masterplan Report, prepared in consultation with the local community, to guide the development of the neighbourhood, within which is an outline masterplan diagram showing the broad distribution of uses across the site. The outline masterplan diagram is included as part of the plan itself and policy WLP3.1 requires that a detailed masterplan, based on the outline masterplan, is submitted as part of any planning application. Notwithstanding that it forms part of the local plan, the outline masterplan is, appropriately, indicative and I am satisfied that the local community’s detailed concerns about it, and the proposed development more generally, (maintaining the distinction between Beccles and Worlingham and the trigger points for the provision of infrastructure for example) can be satisfactorily addressed in the preparation of the detailed masterplan and/or through the planning application process; the same applies to the cited practical implementation difficulties of development if it were to be carried out precisely as shown on the outline masterplan.”*

- 3.18 The indicative masterplan shown within the Local Plan identified a green buffer along only part of the parish boundary. As outlined in the previous representation, it is not considered appropriate to delineate the parish boundary along the entirety of the western edge site boundary as it crosses into land which already has planning permission for 7 dwellings (the ‘triangle land’) and would impact on a cohesive and continual frontage south of the proposed spine road. On this basis, the first bullet point of part b) of Policy WOL1 should be deleted as it is in direct conflict with Policy WLP3.1 and it is considered that this would undermine the delivery of a comprehensive development. However, it should be noted that the masterplan approach which is being pursued will reflect the other aspirations as set out in the neighbourhood plan and will as far as possible respect the different design features of the parishes.
- 3.19 In regard to reflecting local distinctiveness, the Worlingham Character Assessment (January 2020), as shown in Figure 21 of the Neighbourhood Plan, identifies eight different character areas in the existing village and the proposed design of the units on the Beccles and Worlingham Garden Neighbourhood will seek to take influence from local design cues as appropriate.

**Policy WORL2: Housing Mix**

- 3.20 Policy WORL2: states:

*“The mix and type of new housing units proposed for the Worlingham Neighbourhood Plan area, including on the part of the Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1 of the East Suffolk (Waveney) Local Plan) within the Neighbourhood Plan area, must be based on evidence contained within both the Worlingham Housing Needs Assessment (2017 or successor document) and the District level Strategic Housing Market Assessment (or successor document). In particular, schemes should*

*demonstrate how they have considered and addressed the need for provision of:*

- a. One and two bedroom dwellings suitable for older people;*
- b. Bungalows;*
- c. Semi-detached and terraced properties suitable for young people; and*
- d. Three-bedroom, family-sized housing”.*

3.21 As previously noted, Larkfleet Group support the provision of one, two and three bed properties as well as specialist accommodation for the elderly. The final housing mix will be subject to development viability, as well as market demand and Larkfleet Group welcome the addition of wording in the document to highlight that up-to-date information will be used to consider the identified need to be in line with the provisions of strategic policy WLP3.1.

3.22 However, we would object to this policy on the basis that the previously recommended text has not been added to the policy. As such the follow text needs to be added to this policy: *‘such a mix will be dependent on local market circumstances, the viability of the development and any additional localised housing need information at the time of determination.’* The addition of this text will acknowledge that the viability of development will factor into the determination of any future application.

### **Policy WORL3: Lifetime Design**

3.23 Policy WORL3 states:

*Within the part of the Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1 of the Waveney Local Plan) that falls within the Worlingham Neighbourhood Plan area, at least 40% of dwellings built within the neighbourhood area should meet requirement M4(2) of Part M of the Building Regulations for accessible and adaptable dwellings.*

3.24 It was previously noted that this is in accordance with Policy WLP8.31 of the Waveney Local Plan and it was therefore questioned whether this policy needs to be included within the Neighbourhood Plan. The consultation statement notes that Policy WLP8.31 applies to the development considered as a whole and that Policy WORL3 applies only to the part of the development lying in Worlingham.

3.25 As such we object to this policy as the site is a comprehensive development and the location of housing to meet the requirements of M4(2) of Part M of the Building Regulations on site will need to be considered as part of the detailed masterplan and this will determine where the most appropriate location for these homes would be.

## **Policy WORL4: Housing Design and Character**

3.26 Policy WORL4 has been amended and now states that:

*“As appropriate to their scale, nature and location, residential development proposals must demonstrate, where relevant, how they have taken regard of the following positive aspects representing the character of Worlingham through high quality design and layout. They will be supported subject to meeting the following criteria:*

- a. *Use of the topography of the site to maintain the visibility of distant notable features and maximise the effect of landscaping treatments, e.g. by developing some views within which separate areas of landscaping appear to visually merge or flow into one another and/or with the distant surrounding treed landscape;*
- b. *Minimise the impact of development on higher ground by careful siting and by comprehensive landscaping.*
- c. *Maintain sight lines at street corners, avoiding abrupt or blind turnings unless it has been demonstrated that this is not possible;*
- d. *Gardens having sufficient size, shape and access to sunlight for the provision of recreational benefits to the occupants;*
- e. *Clear demarcation of private and public land, ideally through the use of high quality landscaping;*
- f. *Mix of housing types and sizes along a single street frontage in order to avoid a regimented appearance;*
- g. *Homes providing good natural surveillance of the streetscape, walkway and cycleway links to neighbouring developments, and any nearby facilities;*
- h. *Siting and design of any associated new facilities and/or employment development such that these do not lead to significant causes of nuisance to residential areas;*
- i. *Highly permeable residential layout for cyclists and pedestrians moving within and through the development, and permeable within the development for car users too;*
- j. *Landscaping that provides a sense of separation and privacy between neighbouring developments;*
- k. *Unobtrusive design of dedicated storage for bins;*
- l. *Boundary treatments should be in keeping with the historic, rural character of Worlingham. Where a hard boundary is deemed appropriate (for example, for clear reasons of security or privacy), the use of “Serpentine” walls in order to provide a link to historical Worlingham is encouraged;*
- m. *Respectful of the tranquil setting of the Broads and protecting of its dark skies, e.g. lighting needs to be fully justified and well-designed to shine only where it is needed.*

- 3.27 As was previously noted this policy appears to be a blanket approach to all new development proposals and not just those within Garden Neighbourhood. As previously stated, the Beccles and Worlingham Garden Neighbourhood is a comprehensive site which will require a consistent design approach and palette across the site. As the NP has previously recognised, parts of the site also fall within Beccles and Weston and such policies cannot apply to development within those Parishes which would in turn render this policy in conflict with the provisions of the role of a Neighbourhood Plan. Design cues will be considered as part of the house type development for the site and will work to consider the character of development in Worlingham, however, this is a comprehensive site and there are instances where dwellings may cross the parish boundaries and, in those instances, design cannot dissect the development pattern of the site. If it was the purpose of the Local Plan policy to maintain separation of Beccles and Worlingham in this location it is considered that a comprehensive site would not have been considered suitable for allocation.
- 3.28 On this basis, the position here is reiterated that this policy must be amended to explicitly exclude the Beccles and Worlingham Garden Neighbourhood for which Local Plan Policies WLP3.1 makes provision for master planning and WLP8.29, design.

#### **Policy WORL5: Heights of Dwellings**

- 3.29 Policy WORL5 in relation to heights of dwellings sets out that:
- A. In order to reflect the character of Worlingham, residential development is expected to reflect the prevailing context height of the surrounding area. In general, this is generally never more than three storeys.*
  - B. Heights of residences with more than three storeys will only be permitted where:*
    - i. this does not cause a detrimental visual impact when viewed in the wider landscape context;*
    - ii. it can be demonstrated how they have been designed to respond to their context and any visual sensitivities which make up their setting.*
- 3.30 Whilst Larkfleet Group do not have any objections in principle to this policy, higher scale development, including the development of the community hub and retail within the site close to areas of employment, may be more appropriate in certain areas of the site in urban design terms, and this could also provide for a varied housing mix e.g. the provision of apartments. This policy should therefore not seek to restrict development of higher buildings where they would be appropriate in design terms.



### **Policy WORL6: Housing Design – Security**

3.31 Policy WORL6 has been amended and now states that:

*“Any detailed planning application or reserved matters application pertaining to new residential development or to residential property alterations not covered by permitted development rules must be accompanied by a security statement. This statement must demonstrate detailing: how the design and layout facilitates the natural surveillance of parking areas, outbuildings, public spaces and pedestrian routes, and in locations within or with potential to impact on the dark skies in the Broads Authority Area, how any external lighting provided for security reasons reflects the requirements of Policy WORL4(m).”*

3.32 It is noted that Larkfleet Group previously proposed amendments to this policy and are pleased to note these have been used in the revised policy wording. It is acknowledged that part of the amended text proposed was outside of the remit of the neighbourhood plan as advised in the consultation statement. Larkfleet support the revised policy wording in this regard.

### **Infrastructure**

#### **Policy WORL7: Sports Facilities**

3.33 The text relating to the provision of Sports facilities on the Garden Neighbourhood which falls within the Worlingham Neighbourhood Plan area outlines that:

*“Proposals for sports and recreation facilities on the part of the Beccles and Worlingham Garden Neighbourhood that falls within the Worlingham Neighbourhood Plan Area must demonstrate that they have been informed by meaningful and effective community engagement and have been designed to respond to the community’s needs and aspirations.”*

3.34 Whilst the text has been amended the purpose of this policy remains the same as was outlined in the Regulation 14 document. The Masterplan indicates that the sports facilities will be located within the Parish of Worlingham, we would reiterate that the facilities provided are there to meet the needs arising from the proposed development as a whole (including the part of the development that falls within Beccles), and would primarily be designed to meet the needs of the inhabitants of the development rather than existing needs from surrounding communities. The on-site provisions will be in line with the Waveney Local Plan Policy WLP3.1 and the requirements as set out in the Fields in Trust guidance/advice from the Council’s relevant statutory consultee/shortfalls in current provision. It should also be noted that Larkfleet Group have undertaken discussions with various sports organisations, as well as the Council’s own managers/providers to help inform the type of facilities that will

be required across the allocation and their specific parcel. It should also be noted that Larkfleet intend to carry out further consultation ahead of the submission of a planning application which will consider sports facility provision on the site.

- 3.35 As written, this policy is still considered to be in direct conflict with the strategic policies of the Local Plan and should be removed accordingly as to not prejudice the development.

#### **Policy WORL8: Parking Standards**

- 3.36 Policy WORL8 has not been amended since the Regulation 14 document.
- 3.37 The supporting text for this policy presents an explanation as to why Policy WORL8 seeks to increase the standards for 1-bed houses/flats and 5-bed houses and flats, relating to residents' views on parking, the increased insurance cost of on-street parking and the prominent feature within Worlingham of off-street parking.
- 3.38 Policy WLP8.21 of the Waveney Local Plan sets out that parking should be provided in line with the provided set out in the Suffolk Guidance for Parking which would ensure that a consistent approach is taken across the allocation rather than applying different standards within the parish areas. On this basis, Larkfleet's objection remains to this policy as drafted as it is in direct conflict with strategic policies and guidance and should therefore be removed from the Neighbourhood Plan.

#### **Policy WORL9: Design of On-Street Parking Provision**

- 3.39 Policy WORL9 relates to the design of on-street parking provision and has not been altered since the Regulation 14 document. Therefore, Larkfleet still have no objections to this policy in principle, however, it should be noted that any final design will be subject to agreement with the Highways Authority. It is noted that this is agreed in the consultation statement.

#### **Policy WORL10: The Design of Estate Road and Parking Courts**

- 3.40 Policy WORL10 has been amended and now only relates to the design of Parking Courts and no longer mentions Estate Roads.
- 3.41 Larkfleet still do not have any objections in principle to this policy but reiterate that the safety aspect will be vetted by the Highway Authority in the normal way, therefore the policy is not strictly required.

### **Policy WORL12: Landscaping**

- 3.42 Previously Larkfleet objected to the inclusion of Part A of Policy WORL12 (now incorporated into Part B i) which have been expanded and now states:

*B. Development proposals for the Beccles and Worlingham Garden Neighbourhood within the neighbourhood plan area must:*

*i) Incorporate a comprehensive soft landscaping scheme at the edge of the Beccles and Worlingham Garden Neighbourhood site (described by Local Plan Policy WLP3.1) to achieve a verdant setting for the existing dwellings in the neighbourhood area and which supports routes for movement as indicated on the Beccles and Worlingham Garden neighbourhood outline masterplan. The landscaping scheme must take into account the topography of the area.*

*ii) Demonstrate how the comprehensive landscape scheme for the part of the Beccles and Worlingham Garden Neighbourhood that lies in Worlingham has been shaped by the views of the community as captured in this neighbourhood plan and as further gathered from the community during the masterplan-development process. Evidence of views being sought from the occupants of all adjoining homes must be provided. iii) Demonstrate that the comprehensive landscape scheme for the part of the Beccles and Worlingham Garden Neighbourhood that lies in Worlingham includes a diverse range of shrub/tree species in order to maximise resilience to the risks of disease, pests and climate change, and to benefit native pollinator species.*

- 3.43 As previously noted, at outline planning stage, only high-level landscape parameters will be submitted alongside the masterplan and it will not be until reserved matters stage that detailed landscape plans will be provided. However, it is proposed that the linear country park provision around the periphery of the site will help to provide a green buffer between the development and existing properties. It will also provide opportunities to provide attractive walking routes. These areas will also include SuDS features and will be supplemented by other areas of formal and informal natural green space. Part B i) of this policy seeks to fix certain areas of the proposed masterplan which undermines the comprehensive master planning process. This is in direct conflict with the strategic policies and should therefore be removed.

### **Paragraph 8.8 and Policy WORL13: Country Park Landscaping and Management**

- 3.44 Paragraph 8.8 states that a Country Park will be incorporated within the Beccles and Worlingham Garden Neighbourhood, however at the time of writing the layout and positioning of this remains to be settled as noted in paragraph 8.9. This is noted, however, in addition, the location of larger areas of open space, including a Country Park may benefit from being linear throughout the development rather than in a single location allowing for a greener

neighbourhood and the ability to link the various areas of open space. This would be particularly beneficial in terms of natural green space and pertinently, to the usability of the country park provision.

- 3.45 Policy WORL13: Country Park Landscaping and Management outlines the approach which should be taken for the reflection of community engagement in the countryside park.
- 3.46 As previously noted, the proposed location of the country park is yet to be finalised and whilst the Neighbourhood Plan recognises this, Policy WORL13 still seeks to influence the design of the planting proposals using native species of trees found in Worlingham and associated with Worlingham Hall. Larkfleet support the use of native species however the types of trees to be provided within the Country Park will need to be subject to discussions and agreements with the LPA.

#### **Policy WORL14: Wildlife Corridors**

- 3.47 In respect of wildlife corridors, the NP advises that an east-west wildlife corridors, perhaps immediately south of the Bluebell Way estate could provide a connection both to the farmland south of the Cedar Drive estate and to the wooded area to the east of the latter housing estate.
- 3.48 As outlined in the Regulation 14 representation Larkfleet support the use of appropriate native species and it is intended that the wildlife corridors will contribute to the achievement of a 10% net gain in biodiversity. The master plan will demonstrate how the proposals seek to incorporate wildlife corridors within and on the boundaries of the site in line with Policy WORL14.

#### **Policy WORL16: Drainage**

- 3.49 In respect of drainage, the policy text has been slightly amended and a and b have been reversed. The policy requires that:

*A. Sustainable Drainage Systems (SuDS) within Worlingham must be designed to enhance wildlife and biodiversity and must use a wide range of creative solutions appropriate to the site, such as providing SuDS as part of green spaces, green roofs, permeable surfaces and rain gardens.*

*B. Development proposals for the Beccles and Worlingham Garden Neighbourhood (described under Local Plan Policy WLP3.1) within Worlingham parish must make it clear how the issue of water runoff towards the northern boundary of the Beccles and Worlingham Garden Neighbourhood in Worlingham will not be exacerbated.*

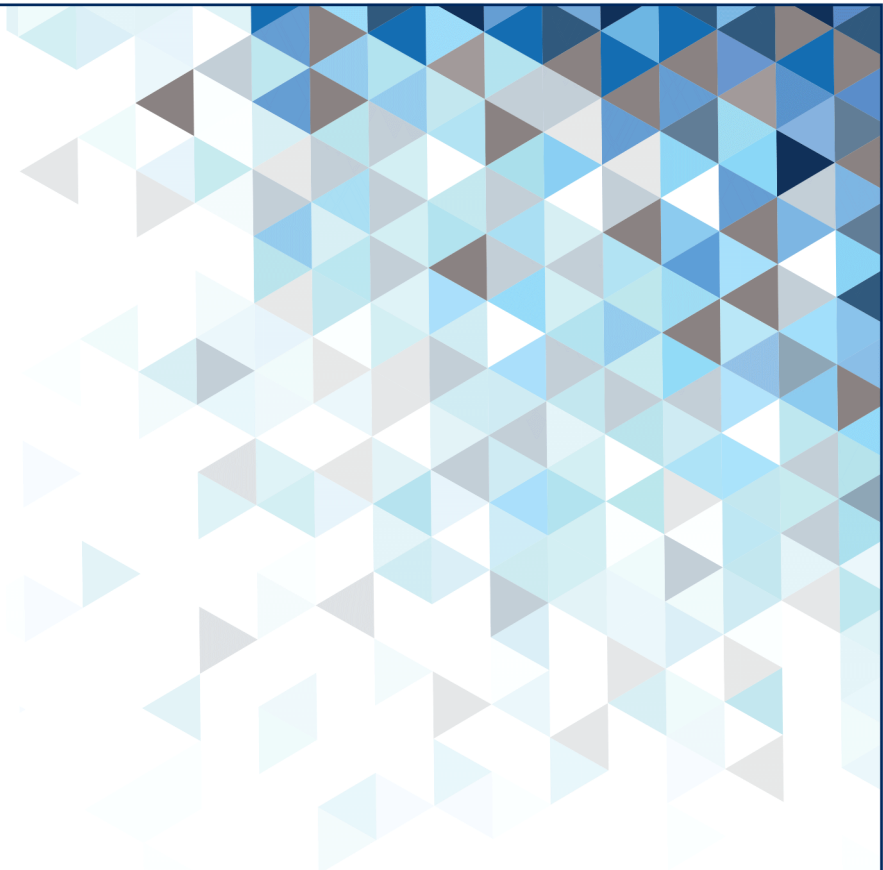
3.50 Larkfleet previously noted that any future application will be supported by a Flood Risk Assessment and outline drainage strategy which will demonstrate how the site will be drained and not increase flood risk elsewhere as required by national guidance.

## 4.0 CONCLUSIONS

- 4.1 The Beccles and Worlingham Garden Neighbourhood has been allocated in Policy WLP3.1 of the Local Plan for a comprehensive mixed-use development, this policy outlines the overarching considerations which need to be taken into account through the development of this site to ensure that the development can deliver to required social infrastructure including the school, community hub, sports pitches and care home alongside much needed housing.
- 4.2 The aspirations of the Worlingham Neighbourhood Plan will be taken into account as the masterplan is developed and will factor into the future application for the development, however, the current policies proposed as part of the neighbourhood plan which place specific requirements on only the parcel of the site which is located within the Worlingham Parish do not align with the comprehensive approach to development which needs to be considered for this development and would hinder the ability of the site to come forward successfully.
- 4.3 Larkfleet, alongside Chenery's Farm Partnerships and the Beccles Townlands Trust as invested parties in the wider Beccles and Worlingham Garden Neighbourhood allocation, recently made a joint representation to the Draft East Suffolk CIL Charging Schedule Consultation (December 2021) consultation.
- 4.4 In the response concerns were raised around the overall viability of development given the cost assumptions made by East Suffolk District Council particularly on Larkfleet's land which contains all the significant infrastructure delivery requirements including the primary school sports pitches, community hub and employment land. The cost assumptions suggested by the Council were not reflective of actual build and development costs.
- 4.5 Should East Suffolk District Council implement CIL at a rate of £40 per square metre for the Garden Neighbourhood, it will be likely that the developers will be required to seek a reduction in planning obligations to facilitate delivery especially considering the quantum of land that will need to be provided for open space (including Semi-Natural Accessible Green Space (SANG)), attenuation, landscaping etc.
- 4.6 This will see monies paid out to cover District-wide spending rather than localised contributions and will undermine the monies that will be afforded towards local improvements/services identified within the Local Plan, this Neighbourhood Plan and the

Beccles Neighbourhood Plan and would therefore be of disbenefit to the local community.

- 4.7 There is also a disparity between Larkfleet's land parcel and that which is located within Beccles Parish which is relatively light on the quantum of infrastructure provision that they need to provide.
- 4.8 This means that the imposition of CIL on the development will be particularly harmful to Worlingham Parish as the viability case that will be required in support of the application will be at the cost of development specific obligation requirements on the Worlingham side since, if imposed, the CIL requirement will be non-negotiable.
- 4.9 In some instances, and as we have outlined/objected to within this submission, some policies contained within this Neighbourhood Plan hinder the development proposal by placing further policy constraints (which are not in conformity with the Development Plan) and would have further impact on the viability if introduced.
- 4.10 We would respectfully ask that our submissions are taken into consideration as the Neighbourhood Plan develops to ensure that the Garden Neighbourhood can be successfully delivered.



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