

Responses to Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 1 September 2021 to 13 October 2021

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Responses

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What is the purpose of this document?

Lound with Ashby, Herringfleet and Somerleyton Parish Councils submitted their Neighbourhood Plan to East Suffolk Council and the Broads Authority 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 1st September 2021 to 13th October 2021.

East Suffolk Council

A thoughtfully written document which strives to embody the community's views.

Paragraph numbers are missing in some places and some of the text is out of alignment.

Paragraph 5.3

This part of the last sentence does not seem to make sense: 'Residential moorings are allocated by and also need to meet(?) the requirements of the Broads Authority's Local Plan'

Policy LAHS1

Comments have previously been made at Regulation 14 that the policy as written will have little impact in the determination of planning application. It will carry full weight; it just won't do much to ensure that the size of dwellings and number of rooms are fixed in the determination of planning applications. This is due to a lack of evidence to support the need for smaller dwellings.

This policy is entitled 'Housing Mix' but it includes reference to 'scale' which is a design matter. The matter of scale would be better dealt with in the design policies. Including it here is confusing and muddles the policy, but a simple re-wording could resolve this.

Whilst the Neighbourhood Plan Group have explained their approach in the Regulation 14 Consultation Statement the points above remain relevant and are reiterated for completeness.

Paragraph 7.3.5

Following discussions with the Broads Authority prior to Regulation 16 it was agreed with Neighbourhood Plan Group that the Design Guide should be considered by all new development proposals within the East Suffolk area but exclude those within the Broads Authority area. The following change (in red) to the wording is recommended.

"Any further sites proposed in the future will be considered on their merits within the Neighbourhood Plan area, and with reference to the policies in the East Suffolk Council (Waveney) Local Plan, the Broads Authority Local Plan 2019 and the Lound and Somerleyton, Suffolk, Master-planning and Design Guidelines, AECOM, June 2019 (~~although the Design Guide relates to all new residential development in the Neighbourhood Plan area, excluding the Broads Authority Area, as stated in Policy LAHS 4 is related to allocated sites outside the Broads Authority area and s such this area has been excluded from the relevant policies LAHS4, LAHS5 and LAHS7).~~"

7.5 Design styles new residential development

The text loosely supports policies LAHS3 and LAHS4. It should made clear the details in section 7.5 are not policy requirements.

Policy LAHS 3 & LAHS 4

The supporting text should have paragraph numbers.

Paragraph 8.1.1

The text states “New developments will be expected to enhance biodiversity and mitigate against climate change”. More appropriate wording might be “mitigate the impact of climate change”

Policy LAHS 9 Support of Local Businesses

As worded the policy is not in conformity with the Waveney Local Plan policies WLP1.2 ‘Settlement Boundaries’, WLP8.13 ‘New Employment Development’, WLP8.15 ‘New Self Catering Tourist Accommodation’, WLP8.16 ‘New Hotels and Guest Houses’, and WLP8.18 ‘New Town Centre Use Development’.

Terms used in the final paragraph such as ‘rural tourism and other businesses that will benefit the local economy’, and ‘locations that are sustainable’ are vague and the plan does not offer clarity or guidance on how these should be applied. Our concern is that this could potentially allow development of many different types of business and tourism uses throughout the neighbourhood area in a manner which is contrary to local and national planning policy.

As examples, where town centre uses are involved, The NPPF takes a town centre first approach to town centre uses – this policy potentially waters that down substantially to a degree that undermines the thrust of the NPPF. The policy would appear to support hotels, for example, in countryside locations which is contrary to the NPPF and local plan policies WLP8.16 ‘New Hotels and Guest Houses’. Local plan policy WLP8.18 ‘New Town Centre Use Development’ sets out criteria for new town centre uses which LAHS9 does not take account of and would potentially support development in a manner which conflicts with WLP8.18. Where employment uses are concerned, local plan policy WLP8.13 ‘New Employment Development’ sets out how proposals should be treated according to their proposed location. Policy LAHS9 does not take account of this policy or this strategy. The loose direction of the policy resulting from the vague wording could result in business-related development taking place across the neighbourhood area in countryside locations, contrary to the aims and objectives of local plan policy WLP1.2.

It is recommended that this policy should be made more precise in terms of what type of development is supported and in what location, and in doing so reflect local and national

policy more strongly.

Please note that these comments are given at an Officer level without prejudice to any future decisions that the Council may make.

Broads Authority

Comment on Neighbourhood Plan

Issues relating to Basic Conditions

- LAHS9 seems to be contrary to policy WLP1.2 of the Waveney Local Plan as it refers to employment land outside of settlement boundaries and WLP1.2 says that Neighbourhood Plans can allocate sites, but LAHS9 does not allocate and is general policy wording. East Suffolk Council may have thoughts on this. There is potential to affect the setting of the Broads, if there is development beyond the settlement boundaries that is not controlled or guided by specific policy and criteria. This seems to be related to Basic Condition E as it does not seem to adequately reflect the Waveney Local Plan.

Issues relating to delivery of policies/how they can be used in decision making

- Policy LAHS1 – by saying ‘preference will be given’ there is no real instruction or requirement there. If there is evidence and local desire for homes to be 1, 2, 3 bed then the policy needs to be worded stronger. As written, it is not clear what the policy will achieve. What does ‘preference’ really mean? As a developer do I need to just say ‘I can make more money on one 5 bed house’ and that will be accepted as ok? Do you want a more formal sequential approach? Do you want a more robust approach? We mentioned this at the Regulation 14 consultation.
- 7.4.6 – it is not clear what this paragraph seems to be saying has the same status as the design guide. And which policy sets out that these other documents need to be considered? 7.5.7 seems to continue to imply that the supporting evidence document has weight in decision making. It is not in the Plan however and as stated previously, there is no policy wording to say this is the case.
- Policy LAHS4, last paragraph – not all applications need a design and access statement. Or is this policy requiring them all to complete one?
- Para 9.2.4 – where is the site identified? In this Plan? In the Waveney Local Plan? In a planning application? LAHS7 does not allocate land for this use. The wording in 9.3.1 talks of a location, but that is not in a policy or on a map.

Factual changes:

The following comments are **factual** changes that are required to be made to the Neighbourhood Plan.

- Throughout – where is the OS licence for the maps used?
- Para 7.2.3 and 7.2.4 are the same. Seems to be repeated.
- 7.3.1 – following 7.2.2 and 7.3.4, this para should state that the design guide does not apply to the Broads (and this stance is supported as the Guide does not adequately assess the Broads and relevant documentation which could have resulted in different outcomes and the Neighbourhood Plan group are unable to change the document as AECOM produced it; it should be noted that if the guide applied to the Broads, we would have had to object in relation to Basic Condition E).
- The map on page 10 has a Neighbourhood Plan allocation shown. What is this? There does not seem to be an allocation in this Neighbourhood Plan. The map will need updating.
- Para 7.3.5 says: (although the Design Guide is related to allocated sites outside the Broads Authority area and as such this area **the Broads** has been excluded from the relevant policies LAHS4, LAHS5 and LAHS7). Recommend the changes in yellow are made to make this part clearer.
- LAHS3 says ‘Local Plan polices WLP8.23 (Protection of Open Space) of the East Suffolk (Waveney) Local Plan and DM7 (Open space on land, play space, sports fields and allotments) of the Broad Authority Local plan’. But this is a fragment of a sentence. Perhaps it needs to end with ‘are of relevance’?
- Para 8.1 - and the lakeside areas at Lound Waterworks along with the Broads Authority executive area.

Wording that is not in policy, but seems to be setting policy

It is not clear how a Development Management Officer can use these statements as they are not in a policy:

- Section 7.5 – these seem requirements for designing development, but they are not in a policy so it is not clear what weight they have. Is there a need for a design policy that refers to these criteria? Indeed 7.4.6 seems to be an instruction, to include the community when designing schemes, and would form part of a design policy.
- Section 8.1 – this has some criteria but they are not in a policy so it is not clear how the information in this section is intended to be used.
- Section 8.5 – this seems to be policy wording. But it is not in a policy so it is not clear what a DM Officer would do with it. Also, the Waveney and Broads Local Plans have policies on SuDS. How does this go further or say anything different to those policies?

Issues relating to formatting which need to be addressed

- Page 16, wording under title LAHS3 does not have a para number. Suggest that is added. We mentioned this at the Regulation 14 consultation.

Other comments

- Para 7.2.2 seems to imply that schemes of under 10 dwellings is favoured, yet acknowledges that the affordable housing policies will not be triggered. It is clear in the objectives of the Neighbourhood Plan that it is important to meet the needs of the whole community and attract younger people and enable the population to be more balanced. Is the text in the policy, apparently supported by the Design Guide, contradictory to the stated objectives of the Plan?
- Para 8.3.4 – is there a school travel plan? Could that perhaps be an action or project for the group? We mentioned this at the Regulation 14 consultation.
- Section 9.1 and 9.2 and 9.3.2 to 9.3.8 and 9.4 and section 11 seem to be background information with no related policy. It is not clear what the intentions are for the information in these sections.

Basic Conditions Statement

- As set out at the start of this representation, one part of the document does not seem to meet some Basic Conditions, for the reason set out in this representation.
- The NPPF 2021 has been released recently. Not sure how the Examiner would want to address how the NPPF is assessed in the Basic Conditions statement.

Character statement for Somerleyton Village

- ‘Listed Landscape’ do they mean Registered Parks and Gardens or Protected Landscapes? If the latter, they could mention that the western end of the Conservation Area (CA) is within the Broads Authority Executive Area.
- 5.4 / 5.5 could some description of the marina and boatyard area, part of which is in the CA be provided in the ‘walk-through’ description of the CA? It certainly has a distinct character that contributes to this part of the CA and its wider setting.
- They make various references to views across the Waveney Valley – should these be more descriptive and could the document make clear that these contribute positively to the conservation area?

Historic England

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

We do not consider it necessary for Historic England to provide further detailed comments at this time. We would refer you 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 your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the planning authority. 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 NP, where we consider these would have an adverse effect on the historic environment.

Natural England

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 neighbourhood plan.

Norfolk County Council

Thank you for consulting Norfolk County Council on the Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan. The County Council has no comments to make.

Somerleyton Estate (Evolution Town Planning Ltd)

Introduction

- 1.1 These representations have been prepared on behalf the Somerleyton Estate. The Estate is a significant employer and landowner in the villages of Somerleyton, and Lound that are within the Neighbourhood Plan area, and also around Fritton. The Estate has a close and long-term interest in the success and vitality of the local area.
- 1.2 The Estate owns and runs the Grade II* Somerleyton Hall and Gardens which are open to the public. The Hall is an important local tourist attraction and employs around 15 people as well as numerous local trades involved in the maintenance and upkeep. The various activities on the wider Estate are carried out with the aim of maintaining and improving the Hall, for example, funding the restoration of the 17th Century gardens. The current owner strongly believes that the local area needs sustainable development in order to thrive.
- 1.3 The Estate aims to develop housing that is attractive, environmentally exemplary and which meets local needs in a way that will be appreciated by current and future residents. A number of housing developments have been built on estate land from Victorian estate worker housing to the Morton Peto Close in the 1980's. The Estate has 2 housing allocations in the Waveney Local Plan which it is in the process of developing. In addition, the Estate is involved in many local businesses including The Kings Head pub and the marina in Somerleyton. In Fritton, the Estate has the Fritton Arms and Fritton Lake holiday resort which provides holiday accommodation and leisure activities. These businesses have been purchased, or created by, the Estate. They have received investment from the Estate with the aim of supporting local infrastructure and jobs and generating an income to support the upkeep of Somerleyton Hall. The Estate has a large farming operation based in Somerleyton village. Hugh Somerleyton is a founding trustee of Wild East which seeks to rewild 250,000 acres of East Anglia. The Estate is leading the way with an extensive rewilding project on 1,000 acres of its own land.
- 1.4 The Estate supports the preparation of the Neighbourhood Plan and has worked with the Neighbourhood Plan group for several years. The Estate is grateful to the volunteers who have prepared the Neighbourhood Plan and supports many parts of the Neighbourhood Plan.

- 1.5 We have a few comments on the Policies in the Plan to ensure that they are effective and meet the basic conditions for Neighbourhood Plans.

2.0 Policy LAHS 1 Housing Mix

- 2.1 The Estate supports the aim of this Policy to encourage smaller homes, however, to maintain a balanced mix of homes some larger homes are needed. The Waveney Local Plan has a Policy reference WLP.8.1 – Housing Mix that requires that 35% of new dwellings on residential developments are 1 or 2 bed properties. The Neighbourhood Plan Policy LAHS 1 states a preference for 1, 2 and 3 bed properties.
- 2.2 We question whether stating a ‘preference’ in a Policy means that it is a Policy or an objective?
- 2.3 It is important that the mix of homes that is provided includes some 4 bed homes and that the Policy does not prevent development of these types of homes. In recent discussions, the village school in Somerleyton and businesses, have voiced support for some 4 bed homes to be developed to ensure that the village has sufficient families to support the school and local businesses such as the pub. Appendix 1 of this report contains correspondence from the Headteacher of the Village School on the need for some larger homes. This was previously circulated to the Neighbourhood Plan group at the start of 2020. The correspondence refers to other possible projects that were being discussed at the time and which can be disregarded for this consultation. This shows the benefits that a mix of housing would bring to local businesses and the school which is particularly important as the country recovers from the pandemic.
- 2.4 We suggest that the Policy could be amended to say that ‘*more weight*’ will be given to the provision of smaller homes rather than a preference. This would show that positive support will be given to planning applications that help to achieve the aim to deliver smaller homes without preventing the delivery of some larger homes. This change would ensure that the Neighbourhood Plan meets the basic condition of achieving sustainable development, which is recognised in the Local Plan Policy on housing mix.

3.0 Policy LAHS 2 Development of Allocated Sites

- 3.1 Policy 2 identifies the 3 allocated sites in Somerleyton and Lound. It refers to the AECOM Design Guidelines that are contained in the Lound and Somerleyton, Suffolk Masterplanning and Design Guidelines June 2019. The Policy states that the

development of each site should be in conformity with the Concept Masterplan and the Design Features section of the Guide for each site.

- 3.2 The AECOM work was carried out before any detailed site investigations were undertaken or before any detailed work on ecology, drainage or landscape design. The Concept Masterplans were prepared before any detailed architectural work was carried out which requires an in depth understanding and assessment of the sites. The proposals in the Design Guide may be appropriate, however, they have not been carried out with the rigour or range of professional input that would be required for a planning application. There should be flexibility in the Policy so that appropriate alternative designs can be considered. It is accepted that, even with flexibility, in the policy that any proposals will have to meet the strict requirements of the Waveney Local Plan Policies for the development of the sites and the aspirations of the Design Guide.
- 3.3 To meet the basic conditions, Neighbourhood Plans must have regard to the desirability of preserving any listed building or its setting; preserving or enhancing the character and appearance of any Conservation Area; and must contribute to achieving sustainable development.
- 3.4 To achieve these aims there should be flexibility so that any development makes reference to the Concept Masterplans and Design Guide and, if necessary, is allowed to explain and justify why it may be appropriate to propose an alternative layout or design of development and for a reasonable alternative to be approved. The Estate has submitted a planning application on the allocation WLP7.5 which is shortly to be approved. At the time of writing, the Estate is about to submit a planning application on WLP7.6 Mill Farm Field. The application has been prepared by a very experienced team including the architects Project Orange, Area landscape architects, and engineers Richard Jackson. The proposals are landscape led schemes that follow a detailed analysis of the sites. The Site Layout and Design and Access statement for Mill Farm Field are included in Appendix 2. In Appendix 3 is a pre-application advice letter and the Site Layout submitted with the pre-application advice. This demonstrates Council support for a layout that improves on the suggestions in the Neighbourhood Plan Design Guidelines, and which better delivers sustainable development and a development which better reflects the character of the Conservation Area.
- 3.5 An example of the flexibility supported by the pre-application discussions is the benefits of integrating the open space within the development. The northern open space as shown on the Design Guide Concept Masterplan would be behind a hedge if, as required by the Design Guide, the boundary hedges are retained. This approach

hides the open space which would be inconsistent with open nature of other public spaces in the village and in the Conservation Area. An alternative approach of a more central open space could also be acceptable and, in our view, would be an improvement.

- 3.6 The Councils pre-application letter makes the following comments about the central open space: *'Inclusion of two large areas of open space successfully break up the layout of the site, allowing for a loose and informal layout, which is attractive in form. This is strengthened by the front elevations along the northern aspect, which integrates well within the street scene and wider character of the village.'* This supports the proposal for housing on the northern part of the site and the open space being central to the site. The Neighbourhood Plan should have the flexibility to deliver this layout.
- 3.7 In response to these representations in the Regulation 14 consultation, the comment was made by the Neighbourhood Plan group that: *'The Masterplanning and Design Guidelines provide a concept that meets and satisfies the requirements laid down by the NP. It shall be adopted by default but alternatives that equal or surpass this arrangement may be proffered by developers.'* If this is the case, we suggest that the flexibility should be reflected in amendments to the policy as we have set out below to the position is clear.
- 3.8 The Neighbourhood Plan should contain sufficient flexibility to allow architects and landscape architects, who have considered the site in more detail than has been possible in the Design Guide, to deliver a high-quality scheme. This will ensure that the finished developments best deliver the quality that is required by Local and Neighbourhood Plan Policies.
- 3.9 To meet the basic conditions, the Policy should be amended to state in each of the 3 bullet points (new words underlined and existing words crossed out): ...*'should have regard to ~~be in in conformity with~~ the concept masterplan.....*
- 3.10 At the end of the Policy a new sentence should state: *'Departures from the Concept Masterplan and Design Guidelines that equal or surpass the proposals in the Guide should be explained and agreed with the Local Planning Authority'*

4.0 Policy LAHS 4 Design of New Residential Developments

- 4.1 We make similar comments on this Policy to LAHS 2. The Policy states that: *'All new development will be expected to comply with the requirements of the Masterplanning and Design Guides.'* There should be flexibility so that any

development makes reference to the Concept Masterplans and Design Guide and, if necessary, is allowed to explain and justify why it may be appropriate to propose an alternative layout or design of development and for a reasonable alternative to be approved. At the end of the Policy a new sentence should state: 'If the design of the allocated sites changes from the Concept Masterplans and Design Guidelines this should be explained in any planning application and agreed with the Local Planning Authority'.

5.0 Lound and Somerleyton, Suffolk Masterplanning and Design Guidelines

- 5.1 As set out in our representations on the Neighbourhood Plan Policy LAHS 2, the AECOM work on the Masterplanning and Design Guides was carried out before any detailed site investigations or any detailed work on ecology, drainage or landscape design. The Concept Masterplans were prepared before any detailed architectural or landscape work was carried out.
- 5.2 To meet the basic conditions, Neighbourhood Plans must have regard to the desirability of preserving any listed building or its setting; preserving or enhancing the character and appearance of any Conservation Area; and must contribute to achieving sustainable development.
- 5.3 The Design Guide should recognise that there should be sufficient flexibility to allow architects to design a high quality scheme and to be allowed to justify and improve on the Concept Masterplans if this gains the support of the Local Planning Authority. This is important in order to deliver high quality design that best responds to historic character and delivers sustainable development.
- 5.4 Examples of where flexibility would be helpful is in respect of site WLP 7.6 known as Mill Farm Field off The Street and Station Road in Somerleyton. The retention of the boundary hedges, the location of open space, the transition to neighbouring woodland and the location of access points are important considerations in the design process. The retention of the boundary hedgerows is important and a sensible aim. Part 6.5 of the Design Guide describes it as *'crucial'* and recognises the ecological benefits of retention.
- 5.5 However, this aim makes the creation of open space to the north of the site difficult because the boundary hedge would cut off the open space from The Street in a manner that will be out of character with the village, where open spaces are not enclosed. As shown in Appendix 2 open space may be better located within the site surrounded by attractive built frontages. A positive frontage to the north of the site

could be created with attractive homes that would meet the aim of the Design Guide which is to sensitively deal with this important area.

- 5.6 The suggestion in 6.5 of the Design Guide that the primary access route should be from the north is difficult to achieve, as shown on the Concept Masterplan which does not show such an access. Instead, the Concept Masterplan shows the pedestrian and cycle link to The Street, not the primary access route. It would be sensible if this bullet point indicated that there should be pedestrian and cycle access from The Street.
- 5.7 These examples show how an alternative and high-quality development could be created that respects the historic character of the area and delivers sustainable development.
- 5.8 To allow architects and designers to have the opportunity to create high quality developments, the introductions to the Lound and Somerleyton sections in paragraphs 5.1 and 6.1 should be amended as follows (new wording is underlined and deleted wording is crossed out):
- ...distinctive features which ~~need to be reflected in~~ future development should have regard to.....*
- 5.9 A new sentence should be added to the end of paragraphs 5.1 and 6.1 to state: *'If needed departures from the Concept Masterplan and Design Guidelines can be permitted and should be justified and agreed with the Local Planning Authority.'*
- 5.10 In order to provide design flexibility bullet points 2, 6, 7 and 8 in paragraph 6.5 should be amended as follows.
- *Creation of a green corridor along the southern boundary through the use of open space or suitable boundary treatments.*
 - *Natural surveillance of ~~the public open space in the southern part of the site~~ will be created by properties facing onto the space and creating active frontages.*
 - *If open space is located to the front of the development is it should be set back from The Street to create a positively green frontage to the development. This allows the built form to positively relate to the existing houses along Morten Peto Close.*
 - *This site is adjacent to a mature woodland group beyond the eastern boundary along The Street and beyond the southern boundary. Development opposite the woodland to the south needs to have a positive relationship with the woodland*

and the design should incorporates open space or other landscape treatments to reflect this sensitive approach to the design.

These changes will ensure that the Design Guide can be flexibly applied and deliver sustainable development that reflects the historic character of the area. In respect of Mill Farm Field these changes will allow flexibility so that the design can respect local character.

Appendices

[Appendix 1](#)

[Appendix 2](#)

[Appendix 3](#)

Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of this 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~~.

Policy LAHS 6

During the Reg14 consultation, SCC recommended that there is provision for a proportion of on-street parking for new developments. SCC acknowledges that due to the rural nature of the villages and limited public transport there is a high level of car usage, and instances of inconsiderate on-street parking restricting access.

Some level of on-street parking will always be inevitable from visitors for residential dwellings, deliveries, and services. Having well-designed and integrated on-street parking within new developments can help to reduce inconsiderate parking on unsuitable roads that are too narrow, which can restrict access for emergency services and refuse collections, as well as farm machinery as stated in paragraph 8.3.3 on the plan, and parking on pavements that hinder pedestrian access and safety. We are not suggesting the plan encourage on-street parking on existing narrow carriageways, but should be designed into new development sites.

SCC also suggested that the parish could include support for community facilities and housing developments to include features that encourage sustainable transport for short trips to local destinations, such as safe and secure cycle parking spaces.

Therefore, the following additions are recommended to Policy LAHS 6 Parking Provision for new Residential Developments:

“A proportion of visitor parking should be provided on-street within any new developments, but is well-designed, located and integrated into the scheme to avoid obstruction to all highway users or impede visibility.”

Proposals should include provisions for safe and secure cycle storage, in accordance with adopted cycle parking standards.”

It was also suggested that “configured location” was removed from Policy LAHS6, as this was ambiguous. This phrasing could be clarified in the supporting text of LAHS6.

Policy LAHS 8

Section 11 Promotion of Healthy Activity indicates that residents appreciate the opportunities for healthy outdoor activities, including walking and cycling. SCC believes that the plan could further encourage active and sustainable travel, with the inclusions of requirements for safe access routes, and secure cycle storage and parking within the villages. The suggested additions to policy wording would also help to meet Objective Env1.

In the consultation statements, the parish council stated in response to the suggested wording: ‘The policy is expressly pertaining to rural community facilities and is not appropriate for sustainable transport statements. The focus on footpaths reflects feedback from our community questionnaire’

With the recently opened bicycle hire shop in Somerleyton, it would be logical to encourage sustainable transport and have secure cycle parking available in community locations. This could help to enhance community facilities as set out in Policy LAHS8, and make more appealing sites for small business owners as set out in Objective Econ4.

The following statement is suggested to be added to Policy LAHS 8 Support of Local Community Facilities:

“Support will be given where facilities include provisions that encourage travel by active and sustainable modes of transport, such as safe access for walking and cycling, and secure cycle storage facilities.”

National Planning Policy Framework 2021

The proposed wording above has been suggested in order to help the plan meet part a) of the Basic Conditions and be in conformity with the following paragraphs of the 2021 version of the NPPF:

Paragraph 85 states that planning policies should take ‘any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).’

Paragraph 92 states that planning policies should aim to achieve healthy, inclusive and safe places for all, and in particularly part b) that places ‘are safe and accessible’, part c) to ‘enable and support healthy lifestyles... and layouts that encourage walking and cycling’

Paragraph 106 part d) states that planning policies should ‘provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking’

Paragraph 104 part c) states that ‘opportunities to promote walking, cycling and public transport use are identified and pursued;’

Paragraph 112 part a) states that developments should ‘give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;’

General

The following comments are not issues concerning the Basic Conditions, however are made to suggest improvements for clarity, context, or ease of reading of the plan.

Paragraph 9.3.9 has a repetition of the phrase “children’s play area in Lound”.

During the Reg14 consultation, SCC strongly recommended the creation of a Policies Map, to visibly show all of the important policies of the plan, in one clear consolidated image. This would create visual context to the policies and provide clarity to the reader.

Susan Meeken

- The Neighbourhood Plan is commendable and I agree with its contents and policies LAHS 1-9.
- I also note that 30% affordable housing must be included at this site. Please ensure these are built at this site and not 'offset' elsewhere in the East Suffolk Local Plan.

My main objection is beyond the remit of this Plan as I do not agree with the allocation number requested for the Mill Farm Field site and concur with several comments in the published consultation made by residents earlier this year around housing density at this place.

In particular;

- There is no similar development with anything like this density in the village. The newer developments at Morton Peto Close and Marsh Lane have around 10-11 houses. The only concentration of dwellings are the 22 Brickfields' worker cottages that were built in 1840's - 70's and these remain out of sight from the main road with a private access within a conservation area.
- The allocation seems to be based central government demands using out of date population growth statistics. Birth rates are now declining with employment opportunities in Lowestoft, the nearest town, declining too (down 7.6% between 2015-18)¹
- I also understand that the village is considered 'large' because it has a station and school. It only has these for historical reasons; the station was added by the entrepreneur who built the railway line in the nineteenth century along with his own house, Somerleyton Hall, a short carriage ride away and the school is part of his mock Tudor Model Village – an idea on the lines of Robert Owen in New Lanark and Cadbury in Bourneville. These two assets of historical note do not make this village 'large' with an associated housing allocation but more unusual or peculiar.

The allocation of an additional 45 houses in total in this village therefore is out of proportion to its current actual size and is overwhelming. The development at Mill Farm Field is in danger of destroying the essential, unique character of Somerleyton that the Neighbourhood Plan sets out so clearly to protect.

¹ Business Register and Employment Survey 2018

Waveney, Lower Yare and Lothingland Internal Drainage Board (Water Management Alliance)

The Parish of Ashby, Herringfleet and Somerleyton, as part of the Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan, is partially within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. For further information on the Board's area, the designation of watercourses as riparian or Board-Adopted, and the Board's Byelaws please contact this office. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB. If you would like to see mapping of the district, please contact this office.

I note that sites have been allocated for development in Section 7.3 of the Neighbourhood Plan, and while we have no specific comments for development in these locations, please be aware of the advice provided below. 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](#).

In order to avoid conflict between the planning process and the Board's regulatory regime and consenting process within the Board's IDD, please be aware of the following:

- If a development proposes to dispose 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 proposes to discharge 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).
- If a development proposes to discharge surface water to a sewer, I recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in this location.
- If a development proposes to discharge treated foul water to a watercourse, this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3).
- Should any works be proposed to alter a riparian watercourse, consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such, I strongly recommend that the required consent is sought prior to determination of the planning application.

For developments 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 it is proposed to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the [Non-Statutory technical standards for sustainable drainage systems \(SuDS\)](#), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

- The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.