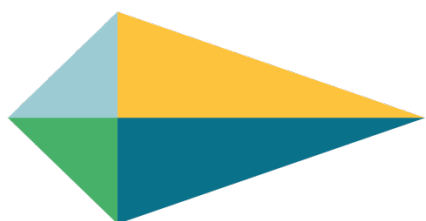


# Responses to Worlingham Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 10 January to 21 February 2022

Published April 2022



**EASTSUFFOLK**  
C O U N C I L

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# What is the purpose of this document?

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

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

This document contains all representations received during the publicity period of 10<sup>th</sup> January to 21<sup>st</sup> February 2022.

# East Suffolk Council

Part of Neighbourhood Plan	Comments
General comments	<p>Weblinks in all footers should show the full text of the webpage so that they can still be followed by readers who are not using a digital version of the plan with active weblinks.</p> <p>It is good that the plan states that any new community facilities that are developed complement and don't compete with the Community Centre. It is also important that the plan stresses the importance of community engagement underpinning this – i.e. there needs to be a clear evidence base that new facilities are needed and add something different that meets need. It is positive to see a point highlighted about unmet demands for young people.</p>
Para 4.9	<p>Agree that this could work, but I'm not sure that this is possible around the central southern area of the masterplan where the boundary crosses a potential primary transport route.</p>
Policy WORL1: Village Identity	<p>Part A seems to be written to contain a list of bullet points, but in fact contains only one bullet point. Part A would read better if it was restructured in to one or two paragraphs without bullet points.</p> <p>With respect to community facility proposals, part A refers to the community's needs and aspirations in the neighbourhood plan objectives. The plan's only relevant objective in para. 3.3 seems to be 'F'. This provides little direction on what should be delivered, except for referring to the Parish Plan from 2009. This is quite an old document now and the community's needs and aspirations could have moved on since 2009. Therefore, part A of the policy should allow sufficient flexibility for the community's <i>current</i> needs and aspirations to shape community centre proposals. It is recommended that a slight weakening of the wording linking to the neighbourhood plan objectives is made. For example: <i>'Demonstrate that new community facility proposals have been informed by engagement with the community and positively respond to the community's needs and aspirations, including reference to the Neighbourhood Plan Objectives as appropriate.'</i></p> <p>As written, parts A and B of this policy apply to applications for development of all sizes - this is considered to be onerous where applications for small scale developments such as householder development is concerned. It is recommended that the policy is amended to exclude small scale development. At the start of part A, adding the following text (or similar) would be a pragmatic way to address this: <i>'As appropriate to their nature and size, development proposals...'</i></p> <p>Part B seems to be written for large scale development and would be</p>

Part of Neighbourhood Plan	Comments
	best applied to major development (as defined in the NPPF) only. Item B, sixth bullet point – I agree that trees forming the core of landscaping is linked to village identity, but I would add that the examples are large significant trees, and in some cases tree lined streets, so this could be reworded to incorporate/clarify that element. In landscape character terms a single significant tree provides a very different character from an area of young woodland, or small amenity trees, large significant trees need sufficient space to grow and have become focal points within the village, so if this is to be used as a design cue then it needs to be properly planned into to developments with sufficient space and an appropriate layout to enable the tree to be ‘privileged’ and appreciated as a feature, viewed from a distance etc.
Para 5.18	I am struggling to see identify with the definition of the 8 separate zones relating to character. Whilst the character assessment and figure 21 identify 8 differing housing character areas, which are largely based around the age of development. Para 5.19 then groups the overarching features of these all together, identifying 5 overarching features of all housing areas.
Para 5.21	I agree with the intention here but I’m not sure that the character assessment strongly supports or evidences this at present.
Para 5.25	I completely agree with the importance of this (for all developments) but I’m not sure it has been clearly evidenced.
WORL4: Housing Design and Character	Item b – would be more effective by saying: ‘Minimise the impact of development on higher ground <u>through careful siting and a comprehensive landscape strategy</u> ’. Item L - regarding boundary treatments, I support encouraging boundary treatments in line with historic and rural character but consider it over prescriptive to suggest that ‘Serpentine’ walls should be encouraged. I agree with a statement made elsewhere in the documents that the overuse of this design tool would weaken it as a design feature within the village.
WORL6: Housing Design – Security	The wording of the policy could be improved. Suggested re-wording: ‘Any detailed planning application or application for householder development must be accompanied by a security statement. This statement must demonstrate how the design and layout facilitates the natural surveillance of areas including parking areas, outbuildings, public spaces and pedestrian routes. In locations within or with potential to impact on the dark skies in the Broads Authority Area, external lighting should demonstrate how it meets the requirements of Policy WORL4(m).’
Policy WORL8: Parking Standards	Third paragraph – delete ‘young’ from ‘young working couples’. This wording is not necessary or relevant.
Policy WORL10: The Design of Parking Courts	The policy seems to say that parking courts require particular justification, but the plan does not say what justification is needed or why it is needed. The policy wording should be amended to be more

Part of Neighbourhood Plan	Comments
Para 8.1	<p>precise or this reference to needing particular justification removed.</p> <p>Encouraging developers to look at ‘published guidance’ on landscape design principles is tokenistic given how essential landscape character will be to the successful planning of the garden neighbourhood. I would suggest the WNP are in a position to encourage a truly landscape led approach and the early engagement of landscape consultants/landscape architects in the design process to ensure that an understanding of the existing landscape is fully integrated into any development. The reference to the published guidance is not a good reference point, it is from an American university. It is also not accessible without signing into an academia account.</p>
Para 8.4 & 8.5	<p>These paragraphs are too prescriptive. Yes native species and planting reflective of local and rural character should be encouraged, but native species might not be the best suited to line streets and this should be decided by qualified landscape and arboricultural specialists and not as part of a plan document. If a particular species is significant to Worlingham it would be acceptable to say this and ask for it to be included in designs.</p>
Para 8.12	<p>I would suggest this would be a consideration for all residents settled or new, and this reads as though particular residents are concerned about changes. If this is the basis for the comment then I’m not sure that a plan document is the place for it. Perhaps the paragraph would be better if the reference to settled residents was removed and it was more generic such as - In determining the facilities and layout of the country park, the proximity to existing and new dwellings should be considered.</p>
Policy WORL13: Country Park Landscaping and Management	<p>Part B) - the reasoning and justification for this part is not clear. What particular characteristics of a ‘landscaped open space’ are important and why? And why must they be located by the northern boundary? As written the policy is vague and it will be difficult for a decision-maker to know when it has been complied with. Further clarity and justification for this part of the policy is required, otherwise it should be removed. Should include an item relating to management/maintenance, to ensure good stewardship, reflecting the point in para 8.13.</p>
Para 8.19	<p>It may be the case that this is a good species for the purposes noted, but why rule out the use of hundreds of other plant species and be so prescriptive? It reads as though someone is particularly keen on this plant and so has asked for this to be included, it is overly prescriptive for a plan document and unless there is evidence of this being a plant already extensively used in Worlingham and therefore representing a particular character then the refence should be removed.</p>

These comments are provided at officer level and do not prejudice any future decisions the Council may take.

## Broads Authority

It is a good idea to put a date on the front page of the document – the next version, if adopted, would therefore say ‘adopted xxx 2022’.

Vision: A mix of housing needs has been met across the private and affordable housing sectors and much of the green spaces between Worlingham and Beccles has been retained. Should it say ‘have’?

Section 8, landscaping, refers to the landscape in the area, but does not mention the Broads, which has a status equivalent to a National Park. The Broads is mentioned in the policy, but a mention in the supporting text seems prudent.

Are the wildlife corridors identified in a map? That would help in delivering this policy.

# 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 detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

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



## Isaac Carter

With regards to Garden Neighbourhood, I worry that the traffic will excessively spur onto the Beccles Southern Relief Road, reducing its impact as a “relief” road, especially at peak times. To alleviate this, I suggest having one of the internal roads in the Garden Neighbourhood come out directly onto Ellough Road as I believe that vast swathes of motor traffic would only use the relief road to turn left then 1st roundabout exist to access Hillside Avenue and the town centre.

To avoid the alienation of the Garden Neighbourhood from the rest of Worlingham (like Queen’s Hill neighbourhood and Costessey), I suggest an increased provision of pavements is required. Both sides of Ellough Road should be paved until the toucan crossing (zebra, toucan, pelican) should be incorporated into Ellough Road closer to College Lane. A pavement should be subsequently built along College Lane. These two measures allow safer pedestrian access to the economic hub of Worlingham (Hillside Avenue) and the historical and social hubs (All Saints Church, Serpentine Wall, Worlingham Hall).

I also fear a lack of public transport to the Garden Neighbourhood. A Garden Neighbourhood should not be cut off from its village and town centre but I fear this may happen, albeit I recognise that bus stops may be out of Parish Council’s limited reach.

To prevent the noise pollution from lorries that are recommended to pass by the ‘Garden Neighbourhood’ a green wall of forestation must be constructed and double glazing needs to be a minimum on homes closest to the road. Elsewhere, I welcome the introduction of greater forestation onto All Saints’ Green and hope it can make small wooded area, perhaps between the gym equipment and All Saints’ Green (the road). This will most closely replicate the much-lauded environmental area on the old Worlingham Primary school site.

I welcome the connection of the path between Orchard Rise and All Saints’ Green with that of Coplestone Close. I am also keen to know what would happen to the rocky cut-through between All Saints’ Green and Rectory Lane.

Finally, I strongly recommend the introduction of double yellow lines or a bus stop marking on Garden Lane opposite Orchard Rise. People park opposite the junction, making it dangerous to cross the road for numerous children attending the school, for cars passing through the trench of road that is left and for people leaving Orchard Rise. It is a miracle no one has been hit and preventative action should be taken. What’s more, these increasingly large vehicles block the Serpentine Wall, a strong mark of Worlingham’s history.

# Larkfleet Homes (DLP Planning Limited)

## 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 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 WORL1: Village Identity**

3.15 Policy WORL1 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.

### **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.

### **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.

## **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.

## Mr & Mrs Spence

Please see below our points of concern relating to the planned development in Worlingham.

Paragraph 2.44 shows via the chart that, a substantial %age of occupiers in Worlingham have more bedrooms than is needed.

It is very likely that some residents have need for the extra space to accommodate, for example, live in carers or the need for separate bedrooms for health &/or wellbeing reasons. Other residents may need to utilise that space to work from home as a result of the current pandemic. This also seems to be becoming more acceptable by employers on a more permanent footing in the future.

Paragraph: 2.45. It is highlighted that there is a higher %age of owned properties in Worlingham compared to the national level. Why? Surely the option of owning your home is a person(s) choice. It sounds like a criticism.

1250+ homes in Worlingham? Will locals have the opportunity to live there or will “migration” (as quoted by the then WDC officials) take priority? Where are the potential occupants migrating from? I recall quite a few years ago, a similar arrangement was agreed, by Waveney Council, when the development near the Warren school on Beccles Road in Oulton Broad was completed. Most of the properties were occupied by people who were “migrated” from the Merseyside and Blackpool areas. Will there be similar “migrations” from different parts of the UK for these new proposed developments? If so, why, when there are local people in need of homes.

Local people need to be the priority, which will help to keep our locals, local. It will also keep our community, local culture and local dialect healthy and solid. Of any development that is built, will there be affordable homes specifically for LOCAL PEOPLE?

It would seem that people outside the area would be given preference to locals.

There is also a mention of a percentage of homes to be allocated for “sheltered and extra care”. Does this include homes specifically for residents (of all ages) with special needs?

We know that new homes are needed, but this is far too many for the infrastructures of Worlingham and Beccles to cope with. We understand that recent surveys carried out a few years ago suggested that around 300 new homes would be sufficient to accommodate this parishes needs. This is a "Local neighbourhood plan" therefore should be for local people only. Not for the politicians to achieve another target.

Appendix 1. Shows the breakdown of all new dwellings for the Waveney area, with an increase of some 1575 properties, of which 257 will be added to the 1250 for Worlingham.

The breakdown as follows using the %age allocated to Worlingham assuming the potential extra dwellings will be pro-rated the same:

		Allocation split		
		Waveney	Worlingham	
Current		7660	1250	16.32%
Incl. vacancy rate of 6.86%*		8223	1342	
Incl. Planning authority's added 12.3%		9235	1507	
<b>Total increase of dwellings</b>		<b><u>1575</u></b>	<b><u>257</u></b>	

\*What does the phrase “vacancy rate” mean and why will there be an increase of 6.86% when the current vacancy rate for Worlingham is only around 2.4%?

Why has the Planning authority added another 12.3% of dwellings?

With these additional numbers included, the introduction of over 1500 new dwellings will exacerbate the already overwhelmed infrastructure of Worlingham and Beccles. There is no mention at all of the number of occupants moving into these properties. With the last figure given of current residents of Worlingham (3,745 - 2011 census), the proposed increase of dwellings would indicate a doubling of this number. How can the infrastructure of Worlingham and Beccles be expected to cope with that increase?

The new southern bypass has been created to deal with current levels of traffic in the area, not the huge increase of vehicles that this proposed development would undoubtedly cause.

The fact that all petrol stations and large retail outlets are located the opposite side of Worlingham to this proposed development indicates that any traffic, wanting to use those facilities, will travel, via Ellough Road and Ingate and/or London Road, across Hungate and converge into the centre of Beccles.

Thus **increasing:**

- a: the congestion of vehicles in the centre of Beccles.
- b: the already unacceptably high levels of pollution in our area.

People will look for and find the shortest and easiest route to their destination, hence using Ellough Road etc.

We are extremely concerned and worried that the large number of properties proposed for Worlingham will have a huge detrimental impact on our village and that of Beccles.

Now, Larkfleet Homes want to leave their stamp on our village with approximately 950 mixed dwellings etc. We'll wait to see what the ***final figure*** will be?

The same problems and worries will still be prevalent.

# 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 Regulation 16. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

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

### **Natural environment information sources**

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

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here

<http://webarchive.nationalarchives.gov.uk/20140711133551/>

<https://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>. Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

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

<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>.

There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

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

General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic <http://magic.defra.gov.uk/> website and also from the LandIS website <http://www.landis.org.uk/index.cfm>, which contains more information about obtaining soil data.

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

The National Planning Policy Framework

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf) sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/> sets out supporting guidance.

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

### **Landscape**

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

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you

carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

### **Wildlife habitats**

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here <http://webarchive.nationalarchives.gov.uk/20140711133551/https://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>), such as Sites of Special Scientific Interest or Ancient woodland <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

### **Priority and protected species**

You'll also want to consider whether any proposals might affect priority species (listed here <http://webarchive.nationalarchives.gov.uk/20140711133551/https://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>) or protected species. To help you do this, Natural England has produced advice here <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals> to help understand the impact of particular developments on protected species.

### **Best and Most Versatile Agricultural Land**

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land <http://publications.naturalengland.org.uk/publication/35012>.

### **Improving your natural environment**

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

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.

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

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

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



# Norfolk County Council

Thank you for consulting Norfolk County Council on the Worlingham Neighbourhood Plan.  
The county council has no comments to make.

## Suffolk Wildlife Trust

We are pleased to see that the Worlingham Neighbourhood Plan recognises the importance of biodiversity and proposes measures to protect and enhance it within Policy WORL14: Wildlife Corridors. Worlingham parish is a stronghold for species such as hedgehogs, with a high number of records across the parish (Suffolk Biodiversity Information Service (SBIS)), as well as habitats of county level importance such as wet woodland and coastal floodplain grazing marsh. Therefore, protection for the important wildlife and habitats of Worlingham parish should be strengthened within the plan text and policies, which will in turn benefit the people of Worlingham parish.

Policy WORL14: Wildlife Corridors focuses on the creation of wildlife corridors in Worlingham, and we welcome the mention of creating dark corridors for wildlife across new development. The policy could be expanded to encompass landscape scale ecological networks, such as the River Waveney corridor and how this can be enhanced for people and biodiversity. In accordance with the NPPF (2021), ecological networks should be established to ensure that they are more resilient to current and future pressures. Therefore, protecting the river corridor against impacts from increased recreational disturbance could be included within this policy or a similar policy to ensure this ecological network is protected in perpetuity. There are several Priority Habitats in Worlingham Parish including coastal floodplain grazing marsh, ponds, wet woodland, mixed deciduous woodland and historic parkland surrounding Worlingham Hall, which should be highlighted in the plan text. Additionally, County Wildlife Sites (CWS) including the North Cove Alder Carrs CWS, and the River Waveney CWS should be recognized and protected within the neighbourhood plan. Wildlife corridor creation should focus on linking and buffering the existing ecological assets of the parish including Priority Habitats, CWSs and local green Spaces, which should be highlighted on Policy WORL14. For example, future development could link Priority Habitats and CWSs to the north of the Worlingham settlement boundary with existing local green spaces and future green space creation within the Beccles and Worlingham Garden Neighbourhood. This could be achieved with native planting and wildlife friendly verge management as well as the creation of nectar rich arable field margins and ponds. Additionally, species which depend on the protection, enhancement and creation of wildlife corridors such as hedgehogs, should be highlighted in this policy.

In order to strengthen protection for key habitats and species within the parish, an additional policy could be created with reference to biodiversity net gain, safeguarding protected species, as well as Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006 from future development. The new Environment Act 2021 requires development proposals to achieve a 10% net gain in biodiversity; whilst not yet required in law, this level is already being implemented as good

practice across the country. Therefore, we recommend that the Worlingham Neighbourhood Plan should require a minimum of 10% biodiversity net gain. The Wildlife Trusts are advocating for 20% biodiversity net gain where this is possible and pushing for more significant net gain is particularly important for parishes like Worlingham, which have large strategic allocations within the local plan, in order to ensure that wildlife and the rural character of the parish are conserved.

We also recommend including key Priority Habitats and Species for Worlingham Parish in a biodiversity focused policy to ensure strengthened protection. For example, swifts and hedgehogs are UK Priority Species and swifts are red listed in the Birds of Conservation Concern 51, and both have good populations in Beccles and Worlingham (SBIS). Other key species for the parish include house sparrow and great crested newt which should be included within the plan in order to provide better protection and require developers to provide targeted enhancements for key species within the parish.

## Water Management Alliance

The parish of Worlingham is partly within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) and therefore the Board's Byelaws apply to any new development. 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.

We are pleased to see that Policy 16 promotes the use of a range of SuDS within development which will mimic greenfield drainage and enhance wildlife and biodiversity. We also support part B which states that the Beccles and Worlingham Garden Neighbourhood must be clear on how the development will not negatively impact the parish in its disposal of surface water. The Board will seek to comment on any forthcoming planning applications relating to this proposal to give advice on maintaining sustainable drainage within the Board's watershed catchment.

I note that no sites are designated for development as part of this Neighbourhood Plan. For any forthcoming development in the parish, in order to avoid conflict between the planning process and the Board's regulatory regime and consenting process, I recommend that any proposed development in the parish is designed with an awareness of the following:

If a surface water discharge is proposed to a watercourse within the Board's IDD, the proposed development will require land drainage consent in line with the Board's byelaws (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_Table_of_Charges_and_Fees.pdf)). We request that any discharge is facilitated in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that surface water discharges are attenuated to the Greenfield Runoff Rates wherever possible.

If a development proposes to discharge foul water to a watercourse within the Board's IDD this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3).

I note the presence of a number of Board Adopted watercourses within the parish, specifically north of the railway line to the west and east of Marsh Lane. Should any development's layout include works within 7 metres of a Board Adopted watercourse,

consent would be required to relax Byelaw 10 (no obstructions within 7 metres of the edge of drainage or flood risk management infrastructure).

If any development proposals include works to alter an aforementioned Board Adopted watercourse, consent will be required under the Land Drainage Act 1991 (and byelaw 4).

If any development includes works to include works to install services within, make excavations within or alter the banks of an aforementioned Board Adopted Watercourse, consent will be required as per Byelaw 17 of the Board's Byelaws.

I note the presence of watercourses which have not been adopted by the Board (riparian watercourses) within the parish boundary. If any development's proposals include works to alter a riparian watercourse, consent will be required under the Land Drainage Act 1991 (and byelaw 4). The Board is the regulator of this activity within its district, however the Lead Local Flood Authority is the regulator for any alterations to a watercourse outside the Board's district.

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.