Hearing Statement by Waveney District Council

Matter 7 – Strategies for Beccles and Worlingham, Halesworth and Holton, Bungay and Southwold and Reydon

Waveney Local Plan Examination
Contents

Question 7.1 Are the following allocations for new development and policy areas defined on the policies map soundly-based; are the criteria set out in the relevant policies justified and effective; and is there evidence that the development of the allocations is viable and deliverable in the timescales indicated in Appendix 3 of the plan?

Policy WLP3.1 – Beccles and Worlingham Garden Neighbourhood.............................................................. 1
Policy WLP3.2 – Land West of London Road, Beccles ................................................................................. 2
Policy WLP3.3 – Land South of Benacre Road at Ellough Airfield, Ellough ............................................. 4
Policy WLP4.1 – Halesworth/Holton Healthy Neighbourhood ................................................................. 5
Policy WLP4.2 – Land Adjacent to Chediston Street, Halesworth ................................................................ 7
Policy WLP4.3 – Land North of Old Station Road, Halesworth .................................................................. 9
Policy WLP4.4 – Land West of Lodge Lane, Holton .................................................................................. 10
Policy WLP4.5 – Land at Dairy Farm, Saxons Way, Halesworth ............................................................... 11
Policy WLP4.6 – Broadway Farm, West of Norwich Road, Halesworth ....................................................... 13
Policy WLP5.1 – Land East of St Johns Road, Bungay ............................................................................... 14
Policy WLP5.2 – Land West of St Johns Road, Bungay ............................................................................. 15
Policy WLP6.1 – Land West of Copperwheat Avenue, Reydon .................................................................. 17
Policy WLP6.2 – Southwold Harbour ........................................................................................................ 20

Appendix 1 – Response to the main issues raised by representations.......................................................... 22
Appendix 2 – Planning Committee Report for Land south of Chediston Street, Halesworth .................. 66
Appendix 3 – Halesworth Town Council Community Centre Proposal ..................................................... 97
Appendix 4 – Halesworth and Holton Healthy Neighbourhood and Land North And East Of Hill Farm Road ......................................................................................................................... 104

Suggested Main and Additional Modifications ......................................................................................... 105
**Question 7.1**

Are the following allocations for new development and policy areas defined on the policies map soundly-based; are the criteria set out in the relevant policies justified and effective; and is there evidence that the development of the allocations is viable and deliverable in the timescales indicated in Appendix 3 of the plan?

**Policy WLP3.1 – Beccles and Worlingham Garden Neighbourhood**

1. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

2. The suitability, availability and achievability of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). In the assessment the site is made up of five sites: 8, 9, 81, 82 and 205. The assessment for Site 8 is found on pages 198 - 199. The assessment for Site 9 is found on pages 200 - 201. The assessment for site 81 is found on pages 234 – 235. The assessment for site 82 is found on pages 236 – 237. The assessment for site 205 is found on pages 260 – 261. The assessment concludes that the site has no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

3. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 477-480. Significant positive effects have been identified with respect to efficient movement and access to services and facilities objectives. Positive effects are identified for objectives for health, deprivation, housing, landscapes and townscapes, biodiversity, economic growth, and viability and vitality of town centres. A negative effect has been identified with respect to the natural resources objective.

4. A summary of the assessments of the site undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the sites inclusion in the First Draft Local Plan is found on pages 367 – 372, 409 – 414, 440 – 441, and 942 – 947 of the Consultation Statement (A4). Having considered the comments made on the First Draft Local Plan, the Council concluded that the site should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 942 - 947 of the Consultation Statement. The main change following the First Draft Local Plan consultation is a new outline masterplan (C12). This included an analysis of all of the responses received and also further stakeholder engagement. This outline masterplan has been included in the local plan and replaces the masterplan in the first draft plan.

5. The large open field making up the eastern part of the site has undergone significant changes over time and lacks any landscape features. The industrial buildings to the east and southeast
and the housing to the north break up long views of the site resulting in a low quality landscape. The neighbouring M&H Plastics industrial buildings detract from the quality of the landscape in this area. The construction of the Beccles Southern Relief Road will alter the character of the landscape, introducing a harder edge and enclosing the edge of the garden neighbourhood. The site presents an opportunity to develop a comprehensive mixed use development including housing, employment land and community facilities such as a primary school, shops, allotments and indoor/outdoor sports facilities. Comprehensive planning of the site will promote contact with nature, healthy lifestyles and wellbeing for all through the delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes. The provision of a country park will help mitigate recreational impact on nearby protected habitats. An outline masterplan has been developed to inform development, and a detailed masterplan will be required which will help ensure the delivery of a high quality development based on garden city principles.

6. The site is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 282-287 of the PDF. This shows that the site would be viable providing up to 30% affordable housing with a section 106 contribution of up to £8,000 per dwelling.

7. The majority of the site allocation is owned or optioned by three landowners or developers. Two landowners who own sites 8, 9 and 81 are working together and are represented by the same agent. Larkfleet Homes have an option on site 82. They have all supported the allocation (Rep IDs: 476 and 930). Larkfleet Homes have confirmed the site is readily deliverable on its own or as part of the wider allocation in their representation and are committed to delivering development on the site as soon as possible. The landowner of site 205 has confirmed the site is available immediately, viable and deliverable when submitting the site. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicate delivery will begin in 2022/2023 on the site which is considered fully realistic.

8. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.

**Policy WLP3.2 – Land West of London Road, Beccles**

9. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

10. The suitability, availability and achievability of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). In the assessment the site is made up of two sites; Site 43 and Site 156. The assessment for Site 43 is found on pages 211 - 212. The assessment for Site 156 is found on pages 250 - 251. The assessment
concludes that the site has no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

11. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 480-482. A significant negative effect is identified due to the loss of grade 2 agricultural land. A minor negative effect is identified with respect to the landscape objective. Against other objectives the effect is either neutral or minor positive.

12. A summary of the assessments of the site undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the sites inclusion in the First Draft Local Plan is found on pages 383 – 385, 429 – 431 and 948 – 949 of the Consultation Statement (A4). Having considered the comments made on the First Draft Local Plan, the Council concluded that the site should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 948 - 949 of the Consultation Statement. The main change between the First Draft Local Plan and the Final Draft Local Plan was to remove the requirement for a cemetery extension due to the lack of evidence of need over the plan period.

13. The site has good access to existing services, facilities, schools and employment opportunities in Beccles and the surrounding area via footpath, public transport, cycle and road links. The site offers moderate landscape value but is considered to be reasonably well contained in the landscape. Landscaping around the edges of the site would help to integrate development into its surroundings. Redevelopment of the petrol station site can offer enhancements to the street scene and the setting of the conservation area and development should aim to maximise these benefits.

14. The site is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 276-281 of the PDF. This shows that the site would be viable providing up to 30% affordable housing and with Community Infrastructure Levy rate of £80 per sqm.

15. The majority of the site is now in the control of a developer, Hopkins Homes, as confirmed in their representation on the site (Rep ID: 807). The developer in their representation confirms that they consider the site suitable, available, viable, and deliverable now. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicate delivery will begin in 2020/2021 on the site which is considered fully realistic.

16. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.
Policy WLP3.3 – Land South of Benacre Road at Ellough Airfield, Ellough

17. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

18. The suitability, availability and achievability of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). In the assessment the site is no. 240. The assessment for Site 240 is found on pages 264 - 265. The assessment concludes that the site has no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

19. The site was originally submitted as part of a larger parcel of land for a mixed use development (site 77). The consultation statement sets out how this proposal was assessed and considered on pages 405 – 407. The Sustainability Appraisal Report (A2) contains an assessment of this option on pages 831 – 833. The reason this option was not progressed can be found on pages 158 – 159.

20. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 482-484. Positive effects were identified for the deprivation and economic growth objectives. Negative effects were identified with respect to the natural resources and efficient movement objectives.

21. A summary of the assessments of the site undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the site’s inclusion in the First Draft Local Plan is found on pages 949 – 950 of the Consultation Statement (A4). Having considered the comments made on the First Draft Local Plan, the Council concluded that the site should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 949 - 950 of the Consultation Statement.

22. The site forms part of the Great Yarmouth and Lowestoft Enterprise Zone and was originally allocated in the Site Specific Allocations Development Plan Document (2011). The area is flat and has a very low landscape quality with few natural features and many landscape detractors in the vicinity. Further employment development on this site would relate well to the existing employment uses on the surrounding industrial estates. Development of the site will benefit from the Beccles Southern Relief Road which is currently under construction.

23. The Whole Plan Viability Assessment concludes that on paper industrial development is unviable at the present time (pages 72 – 74). However, there have been recent employment developments on sites similar to this undertaken. Therefore in the right circumstances, it is considered that employment development on this site will be viable during the life of the plan.
24. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.

Policy WLP4.1 – Halesworth/Holton Healthy Neighbourhood

25. The site allocation supports a mixed use development providing a range of benefits to the area which will be delivered by several stakeholders. Those involved include Richborough Estates, Halesworth Campus Ltd, Halesworth Community Sport and Leisure, Castlemeadow Care, and Suffolk County Council. Discussions around delivery of the project, including Waveney District Council, have been under way for some years and these will continue as the development progresses.

26. The site allocation and policy are considered soundly based, justified and effective, and viable and deliverable.

27. The suitability, availability and achievability of the housing element of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). There are three sites in the Assessment which make up the housing element of the site allocation: 151 (p. 320-321), 152 (p. 322-323), and 154 (p. 326-327). The assessment concludes that these sites have no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

28. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 484-486. Significant positive effects are identified with respect to the health and well being and access to key services and facilities objectives. Minor negative effects are identified with respect to the landscape and conservation of natural resources objectives. For other objectives the effect is either neutral or minor positive.

29. A summary of the assessments of sites covered by the allocation undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the site’s inclusion in the First Draft Local Plan is found on the following pages of the Consultation Statement (A4): site 151 - pages 513-515; site 152 - pages 516-518; site 153 – pages 519-521; site 154 – pages 522-524; site 155 – pages 525-527; and site 161 – pages 534-536. Having considered the comments made on the First Draft Local Plan, the Council concluded that the sites should be allocated in the Final Draft Local Plan. These sites are used to make up the WLP4.1 allocation. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 978 - 983 of the Consultation Statement. Only minor amendments were made to the policy between the First Draft Local Plan and the Final Draft Local Plan in order to secure a programme of archaeological evaluation and an ecological assessment with any planning application.
30. The development of this site will help deliver the vision of the Halesworth Campus and Halesworth Health (an organisation supporting health care provision in the town) to provide sporting and health facilities in the town. The plans of these organisations will help promote healthier lifestyles for new residents and existing residents alike. The development of the site will include new and improved sports fields, a 3G pitch, a sports hall, community and training facilities, health care facilities, a retirement community and 215 new homes. Health care facilities at the Patrick Stead Hospital in Halesworth have been significantly reduced and it is due to close in the near future. The new health facilities on the site allocation will help replace those lost. The housing provided on the site will have excellent access to these new facilities. The site also has good access to existing facilities in the town centre, Cutlers Hill Surgery, the railway station and employment premises. The Halesworth Community Sport and Leisure will also implement its own plans to improve the existing sports facilities at Dairy Hill, which will contribute towards the Halesworth Healthy Neighbourhood. The northwest portion of the site on part of the former middle school site will be developed to provide high quality care and accommodation for elderly residents as well as health facilities for the community.

31. Although the site sits within the gap between Halesworth and Holton and is within tributary valley farmland landscape character area, the fields comprising the eastern part of the site are well screened with mature vegetation which will limit the impact on the landscape and the potential for coalescence between Halesworth and Holton. Planning permission was granted earlier this year for a housing development of up to 160 dwellings with a new meadow, wide open space and landscaping to the south of the site allocation. The proposal will pass the meadowland and open space to public ownership and this will be protected in perpetuity. The site allocation complements the open space which is safeguarded by the planning permission and the two developments will create a large, continuous belt of publicly accessible open space between Halesworth and Holton. A plan is included in the appendix to this hearing statement which illustrates how the two will work together.

32. The housing element is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 276-281 of the PDF. This shows that the site would be viable providing up to 30% affordable housing and with Community Infrastructure Levy rate of £80 per sqm.

33. A collaborative approach is needed for a comprehensive development of the site. Relevant parties, including Sport England, have been working together to agree the mechanisms which support the comprehensive delivery of the site. This should support an exchange of land which will enable all components to be fully delivered.

34. Richborough Estates (Rep ID: 696) have confirmed they support the allocation and are committed to working with Halesworth Campus Development Board and Halesworth
Community Sport and Leisure (formerly Halesworth Playing Field Association). Halesworth Campus and Castlemeadow Care have been working together for several years on development of this site. Both organisations expressly supported the proposals in their comments on the first draft plan. See ‘Responses to the Waveney First Draft Local Plan’ (B11), comment ID: 1047 (pages 1109 – 1110) and comment ID: 1055 (page 1121). Suffolk County Council own part of the site and have expressed their support for the allocation (Rep ID: 451).

35. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicates delivery will begin in 2020/2021 on the site which is considered fully realistic.

36. Sport England have expressed support in principle for the development as it will deliver new/enhanced sports facilities (Rep ID:489). Halesworth Town Council also support the allocation (Rep ID: 957).

37. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.

Policy WLP4.2 – Land Adjacent to Chediston Street, Halesworth

38. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

39. The suitability, availability and achievability of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). There is one site making up the allocation: site 203 (pages 343 – 344). The assessment concludes that the site have no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

40. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 486 - 488. A Significant negative effect is identified with respect to the conservation of natural resources objective; a minor negative effect. A Minor negative effect was identified with respect to the landscape and conservation of natural resources objective. Unknown effects were identified for the biodiversity and geodiversity and historic environment objectives. For other objectives the effect is either neutral or minor positive. Potential mitigation was identified for the landscape objective.

41. A summary of the assessment of the site undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the site’s inclusion in the First Draft Local Plan is found on the following pages of the Consultation Statement (A4) (pages 545 – 546). Having considered the comments made on the First Draft Local Plan, the Council concluded that the
sites should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 984 - 986 of the Consultation Statement. Only minor amendments were made to the policy between the First Draft Local Plan and the Final Draft Local Plan including a bullet point in the policy to secure an ecological assessment with any planning application. Reference to the Minerals Consultation Area has been added to the supporting text.

42. The site is just 600 metres from the town centre and therefore has excellent access to services and facilities. The site will deliver housing with good access to employment premises in the town, the railway station and the primary school. Open space including a neighbourhood equipped area for play will be provided to serve the development and surrounding housing. With development to the south of the site and to the east, the site constitutes a logical extension to the town. Carefully designed buildings and landscaping will help to reduce the visual impact in the landscape.

43. The site is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 276-281 of the PDF. This shows that the site would be viable providing up to 30% affordable housing and with Community Infrastructure Levy rate of £80 per sqm.

44. A planning application has already been submitted to the local planning authority by a developer. This has not been determined and is still under consideration. The developer has also made a representation on the final draft local plan supporting the allocation (Rep ID: 616). This affirms that the site is still suitable, available, viable, and deliverable. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicates delivery will begin in 2020/2021 on the site which is considered fully achievable.

45. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.

46. Charlotte Slater (Rep ID:479) raises a number of issues with the assessment of Policy WLP4.2 in the Sustainability Appraisal (Pages 486-488 of the SA). With respect to objective 1, the site is in an accessible location, and Chediston Street provides a direct link to the town centre. There are also alternative off-road cycling links via Roman Way and Holmere Drive. The policy also requires the provision of open space which will encourage healthier lifestyles. With respect to objective 8 on water quality, there is no evidence to suggest that water quality will be affected by development on the site. No objections or concerns from the Environment Agency have been received. There are no historic landfill records for the site. Historic ordnance survey maps show evidence of a small (0.1 hectare) sand excavation on the northern boundary of the site. This will be investigated further at the planning application stage but is unlikely to result in any impact on water quality as development on this part of the site could be avoided. With regard to Objective 9, the appraisal already acknowledges a negative effect, however, this is mitigated to a degree by the requirement for a landscaping
scheme. With respect to Objective 10, the site is not within a flood zone. No concerns have been raised by Suffolk County Council as the Local Lead Flood Authority or the Environment Agency with respect to surface water. With respect to Objective 11, the SA concludes a significant negative effect due to the loss of grade 2 agricultural land. For objective 12, the SA concludes an uncertain effect. The representation from Charlotte Slater points to comments made by Suffolk Wildlife Trust on a planning application on this site ref: DC/17/3981/OUT. These comments were disputed by the applicant in a follow up response (G10). In their reply (G16), Suffolk Wildlife Trust acknowledge the comments from the applicant and recommend an ecological mitigation and enhancement plan is secured by planning conditions on any planning permission. Therefore, based on the best available information, an uncertain effect is still considered a robust conclusion. For Objective 13, an uncertain effect is considered robust given the extent of archaeology and the potential for harm will be unknown until a detailed investigation takes place. No objections have been made from the archaeological team at Suffolk County Council to the principle of development. With respect to Objective 17, the site is within walking and cycling distance of the town centre where a number of employment opportunities are available. The site is also within cycling distance of employment premises on Blyth Road. Therefore the conclusions are considered robust.

Policy WLP4.3 – Land North of Old Station Road, Halesworth

47. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

48. The suitability, availability and achievability of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). There is one site making up the allocation: site 140 (pages 313 - 314). The assessment concludes that the site have no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

49. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 488 - 490. A minor negative effect is identified with respect to the conservation of natural resources objective. For all other objectives the effect is either neutral or minor positive.

50. A summary of the assessment of the site undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the site’s inclusion in the First Draft Local Plan is found on the following pages of the Consultation Statement (A4) (pages 503 – 505). Having considered the comments made on the First Draft Local Plan, the Council concluded that the sites should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 987 - 988 of the Consultation.
Statement. Only minor amendments were made to the policy between the First Draft Local Plan and the Final Draft Local Plan in order to include an ecological assessment with any planning application.

51. The site is well contained within the landscape and development on the site would not intrude further into the countryside than development already permitted. The site is bordered by development to the south and east and to the west has planning permission for a self-build development. The site is within walking distance of nearby employment premises on Norwich Road. The site also has good access to the primary school and the proposed facilities within the Halesworth/Holton Healthy Neighbourhood as described in Policy WLP4.1. The site therefore presents a sustainable opportunity for a small scale development.

52. The site is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 246-251 of the PDF. The table on page 250 clearly shows that the site is viable with Community Infrastructure Levy at a rate of £80 per sqm. There is no requirement for Affordable Housing on the site which is a huge aid to viability.

53. The site has been submitted by an agent on behalf of the sole landowner and it has been confirmed that the site is immediately available, viable, and deliverable. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicates delivery will begin in 2020/2021 on the site which is considered fully achievable.

54. No main issues have been identified with respect to this site.

Policy WLP4.4 – Land West of Lodge Lane, Holton

55. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

56. The suitability, availability and achievability of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). There is one site making up the allocation: site 89 (pages 295 – 296). The assessment concludes that the site have no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

57. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 490 - 492. Minor positive effects were identified in respect of the objectives for health, access to services and facilities, housing, and efficient movement. A Minor negative effect was identified with respect to the conservation of natural resources objective.
58. A summary of the assessment of the site undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the site’s inclusion in the First Draft Local Plan is found on the following pages of the Consultation Statement (A4) (pages 481 – 483). Having considered the comments made on the First Draft Local Plan, the Council concluded that the site should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 988 - 989 of the Consultation Statement. Only minor amendments were made to the policy between the First Draft Local Plan and the Final Draft Local Plan in order to require an ecological assessment with any planning application.

59. The existing development to the south and west of the site and the mature screening surrounding the rest of the site means development will only have a limited effect on the landscape. The site has good access to services and facilities in the village of Holton, including the primary school. Lodge Road is currently part of the National Cycle Network Route 1.

60. The site is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 252-257 of the PDF. The table on page 256 shows that the site is viable with Community Infrastructure Levy at a rate of £80 per sqm and 30% Affordable Housing.

61. The site is being progressed by a developer who has confirmed that the site is available, viable and deliverable. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicates delivery will begin in 2020/2021 on the site which is considered fully achievable.

62. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.

**Policy WLP4.5 – Land at Dairy Farm, Saxons Way, Halesworth**

63. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

64. The suitability, availability and achievability of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). There is one site making up the allocation: site 256 (pages 347 – 348). The assessment concludes that the site has no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

65. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 492 - 493. Minor positive effects were identified with respect to the objectives for health, education, access to services and facilities, housing, town centres, and
efficient movements. Minor negative effects were identified with respect to biodiversity and the historic environment.

66. This site is an allocation in the adopted Waveney Site Specific Allocations development plan document (E3) (pages 83 – 85). This allocates it for 40 dwellings plus a community centre/customer access centre. Development has not taken place on the site therefore the allocation has been rolled forward into the local plan.

67. The site is of considerable importance because it is one of the last remaining development opportunities in close proximity to the town centre. Existing community buildings in the town such as the London Road office (which currently houses the Town Council) and the Rifle Hall struggle to deliver modern fit for purpose facilities to meet the needs of the existing community and the growing community of Halesworth and Holton. To accommodate the level of growth planned for Halesworth and Holton a new pre-school setting is required. This site, with its close proximity to the town centre makes it the most suitable site to provide these facilities. The proximity to the town centre means that there is potential for linked trips which will help enhance the vitality and viability of the town centre and reduce the need to travel.

68. The site is considered to be viable. The Whole Plan Viability Assessment (C36) assesses a comparable site (pages 260 - 263) of 30 units at 25 dwellings per hectare which is found to be viable with CIL at £80 per sqm and 30% Affordable Housing. The site allocation would be at a higher density of 40 dwellings per hectare – the table on page 263 shows that this higher density would significantly improve viability. The CIL due to be paid on the housing on the site could be paid for with a transfer of land from the developer, as allowed under part 73 of the CIL Regulations 2010. This would provide the necessary land for the pre-school and the community centre. Funding will also be provided through CIL for the community centre and pre-school setting, as identified in the Infrastructure Study (C11) (pages 50 and 56). Table A3.3 of Appendix 3 of the Local Plan (page 321) indicates delivery will begin in 2020/2021 on the site which is considered fully achievable.

69. A developer has recently acquired the site and supports the allocation of the site whilst querying the viability and deliverability of providing a community centre and pre-school setting (Rep ID: 229). Given the existing allocation of the site for 40 dwellings plus a community centre in the adopted Site Specific Allocations document is similar to the allocation WLP4.5, the requirements of the policy should have been reflected in the price of the land when purchased and should not be a detriment to development viability. The Whole Plan Viability Assessment, as referenced above, identifies that the housing element is highly viable and as such is capable of providing subsidy towards the community centre and pre-school setting. This site is one of few available for development which can provide a location for a community facility that is so well related to the town centre. Therefore the developer’s
assertions that there are alternative sites which can be considered for a community facility are not supported and it remains the Council’s view that this facility should be delivered on this site. Further, Halesworth Town Council (Rep ID: 963) highlight the need and pledges their support for the community facilities on the site. The Town Council have also produced a ‘Community Centre Proposal’ document which is attached as an appendix to this hearing statement. This highlights the need for a community centre in Halesworth and the importance of this site, rebutting the arguments put forward by the developer. Taking the above in to account, the site is considered to be suitable, available, viable and deliverable.

70. Historic England commented that consideration should be given to the setting of other listed buildings near the site and the impact of development within the conservation area. They found that the policy is unsound on heritage grounds (Rep ID: 849). Modifications to the policy and supporting text have since been agreed with Historic England via a statement of common ground to address these concerns (see section on policy WLP4.5).

71. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.

**Policy WLP4.6 – Broadway Farm, West of Norwich Road, Halesworth**

72. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

73. The suitability, availability and achievability of the site has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3). There is one site making up the allocation: site 242 (pages 345 – 346). The assessment concludes that the site has no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

74. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is found on pages 494 - 496. Positive effects are identified for the health, access to services and facilities, deprivation, economic growth, and efficient movement objectives. Negative effects are identified with respect to landscape, natural resources, and biodiversity objectives.

75. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 990 - 991 of the Consultation Statement.

76. This site makes up part of the current HAL2 allocation in the adopted Waveney Site Specific Allocations development plan document (E3) (pages 77 – 79). This allocates a larger area for employment use. Development has not taken place on the site therefore the allocation has
been rolled forward into the local plan. The size of the allocation has been reduced to reflect
the distribution of employment land across the district in policy WLP1.1 ‘Scale and Location of
Growth’.

77. The site provides a logical extension to the existing industrial areas to the north of
Halesworth. The site is relatively well contained within the landscape which is of reduced
quality in this location due to the pylons which run to the west of the site. Development on
the site would provide valuable extra jobs to support the local economy and the growing
population of Halesworth and Holton.

78. The Whole Plan Viability Assessment concludes that on paper industrial development is unviable
at the present time (pages 72 – 74). However, there have been recent employment developments
on sites similar to this undertaken. Therefore in the right circumstances, it is considered that
employment development on this site will be viable during the life of the plan. The access to the
site is identified in the Infrastructure Plan (C11, p. 46) and its delivery can be supported through
CIL funding.

79. The appendix to this Hearing Statement includes a response to the main issues raised by
representations in respect of this site allocation and policy.

**Policy WLP5.1 – Land East of St Johns Road, Bungay**

80. The site allocation and policy are considered soundly based, justified and effective and viable
and deliverable.

81. The suitability, availability and achievability of the site has been assessed through the
Strategic Housing and Employment Land Availability Assessment (C3). There is one site
making up the allocation: site 45 (pages 271 – 272). The assessment concludes that the site
has no unresolvable constraints which would question its suitability, is available for
development now, and is deliverable within the plan period.

82. The site and policy have also been subject to sustainability appraisal (A2). The appraisal is
found on pages 496 - 498. Positive effects have been identified with respect to the objectives
for health, access to services and facilities, housing, biodiversity, and efficient movements. A
negative effect is identified for the natural resources objective.

83. A summary of the assessment of the site undertaken during the preparation of the First Draft
Local Plan (B4a) together with justification for the site’s inclusion in the First Draft Local Plan
is found on the following pages of the Consultation Statement (A4) (pages 450 – 452). Having
considered the comments made on the First Draft Local Plan, the Council concluded that the
site should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 1013 - 1016 of the Consultation Statement. Some amendments were made to the policy between the First Draft Local Plan and the Final Draft Local Plan. An indicative master plan of the site was created to provide clarity around the policy requirements. Reference to biodiversity improvements; protection for hedgerows; and completion of an ecological assessment have also been included.

84. The site represents a natural extension to the south of the town with good access to the road network and public transport. The high school is within walking distance and a primary school is within 1 km. Local services and facilities are within walking distance. The site would provide housing and an important local pedestrian and cycle connection.

85. The site is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 264-269 of the PDF. This shows that the site would be viable providing up to 30% affordable housing and with Community Infrastructure Levy rate of £80 per sqm.

86. The land owner has made a representation on the final draft local plan supporting the allocation (Rep ID: 587). This affirms that the site is site suitable, available, viable, and deliverable.

87. Through the Statement of Common Ground with Suffolk County Council: Matters Relating to Schools, it has been agreed to add an additional bullet point to the ‘Infrastructure’ section referring to potential relocation of the primary school. See Statement of Common Ground with Suffolk County Council, section relating to ‘Strategy for Bungay – Infrastructure’.

88. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.

Policy WLP5.2 – Land West of St Johns Road, Bungay

89. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

90. The site allocation is made up of one new site (site 206) and an allocation in the Site Specific Allocations document – BUN1 (D3) (pages 58 – 60) which has been granted planning permission for 150 dwellings, open space and 3 ha of employment land. The main purpose of the BUN1 allocation is to deliver employment land in Bungay, subsidised by the housing element. Delivery of the employment land remains an important role of this allocation and the policy is written to secure this. The consented site has been included as part of this allocation to ensure the whole allocation is delivered in a comprehensive manner.
91. The suitability, availability and achievability of site 206 has been assessed through the Strategic Housing and Employment Land Availability Assessment (C3) (pages 275 – 276). The assessment concludes that site 206 has no unresolvable constraints which would question its suitability, is available for development now, and is deliverable within the plan period.

92. The site and policy has also been subject to sustainability appraisal (A2). The appraisal is found on pages 498 - 500. Positive effects are identified with respect to health, education, access to services and facilities, housing, economic growth, and efficient movement objectives. A negative effect is identified with respect to objectives for natural resources and an uncertain negative effect with respect to the landscape objective.

93. A summary of the assessment of site 206 undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the site’s inclusion in the First Draft Local Plan is found in the Consultation Statement (A4) (pages 456 – 457). Having considered the comments made on the First Draft Local Plan, the Council concluded that the site should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 1016 - 1018 of the Consultation Statement. Amendments were made to the policy between the First Draft Local Plan and the Final Draft Local Plan to include the existing adopted BUN1 allocation (described above) for housing and employment land in addition to site 206. Also, additional bullet points to the policy were added in relation to provision of employment land; location of vehicular access; an increased area for the school playing field extension and open space; the requirement for a landscape strategy; additional pedestrian and cycle route connection points; the requirement for an archaeological evaluation; and the requirement for a drainage strategy.

94. The site forms an extension to the built up area of Bungay. The site lacks distinctive landscape features and its landscape sensitivity and value is not high. There is good access to local services, facilities and employment land. The allocation includes a parking and turning area for school buses which will alleviate school traffic in the roads to the north of the high school. As the development of the site will effectively ‘land-lock’ the Bungay High School, an extension to the school playing field is necessary to future-proof the growth of the school. The site provides an opportunity to provide a more suitable access for school buses to the high school. Employment land and a new pre-school setting will be provided, along with play space and allotments to meet need identified in the Green Infrastructure Strategy (C14, pages 52, 57 and 59).

95. The site is considered viable. The Whole Plan Viability Assessment (C36) assesses residential development of a comparable type of site on pages 276-281 of the PDF. This shows that the site would be viable providing up to 30% affordable housing and with Community Infrastructure Levy rate of £80 per sqm.
96. The site is considered to be suitable, available, viable and deliverable. The two landowners have both supported the site allocation in their representations (Rep IDs: 601 and 687). Part of the site already has outline planning permission and a reserved matters application is expected in the near future. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicates delivery will begin in 2019/2020 on the site which is considered fully achievable.

97. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.

**Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon**

and in particular:

*Does the allocation give great weight to the conservation of the landscape and scenic beauty of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty?*

*Would the allocation be for ‘major development’ and if so is it likely that the exceptional circumstances would exist which are necessary to permit such development (NPPF para 116)?*

98. The site allocation and policy are considered soundly based, justified and effective and viable and deliverable.

99. The suitability, availability and achievability of the site has been assessed through in the Strategic Housing and Employment Land Availability Assessment (C3). In the assessment the site is made up of two sites; Site 189 and Site 202. The assessment for Site 189 is found on pages 371 and 372. The assessment for Site 202 is found on pages 373 and 374. The assessment concludes that the sites have no unresolved constraints which would question its suitability, is available for development now, and is deliverable within the plan period. The sites combined cover a slightly larger area than allocated by Policy WLP6.1. The size of the site was reduced to mitigate the impact on the landscape and minimise the risk of the local school becoming over-subscribed.

100. The site and policy have also been subject to sustainability appraisal. The appraisal is found on pages 500-503 of the Sustainability Appraisal Report (A2) with a summary on page 168. Minor negative effects are recorded in respect of the conservation of natural resources due to the loss of undeveloped land, which is common with many alternative sites and impact on landscape which again is common with many alternative sites. Indeed, most alternative sites considered in Southwold and Reydon were predicted to have a significant negative effect on landscape. Against other objectives the effect is either neutral or minor positive.

101. A summary of the assessments of the site undertaken during the preparation of the First Draft Local Plan (B4a) together with justification for the sites inclusion in the First Draft Local Plan is found on pages 572-575 of the Consultation Statement (A4). Having considered the
comments raised on the First Draft Local Plan, the Council concluded that the site should be allocated in the Final Draft Local Plan. The Council’s response to comments on the site at the First Draft Local Plan stage is found on pages 1025-1029 of the Consultation Statement. The main change between the First Draft Local Plan and the Final Draft Local Plan was to decrease the size of the allocation from 250 to 220 homes.

102. As indicated by the Sustainability Appraisal Report (A4) as discussed above, the site is likely to have the least impact on the landscape than other possible options in the Southwold and Reydon area it also has good access to existing services and facilities in Reydon and Southwold. Additionally the allocation of a large development in Reydon provides a unique opportunity to secure land for the relocation of properties at risk (or already lost) from coastal erosion to a sustainable location.

103. The site is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type site in the outer Lowestoft area on pages 330-335 of the PDF. This shows that a site such as this would be viable with 40% affordable housing with Community Infrastructure Levy rate of £160 per sqm with a significant surplus over threshold land values.

104. The landowners of the site, confirm in their representation on the site (Rep ID: 613) that the site is suitable and available for development. The developer also confirms that housing can be delivered on the site within the short term. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicates delivery will begin in 2020/2021 on the site which is considered entirely realistic.

105. The appendix to this Hearing Statement includes a response to the main issues raised by representation in respect of this site allocation and policy.

**Matters Concerning the Area of Outstanding Natural Beauty**

106. The entire settlements of Southwold and Reydon (including the built-up areas) fall within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. At the outset it should be noted that neither Natural England or the Suffolk County Council Area of Outstanding Natural Beauty Team have raised soundness objections regarding the principle of development on this site. However, they have requested some minor amendments (see Rep ID: 756). The Council, together with Natural England and the Suffolk County Council Area of Outstanding Natural Beauty Team have signed a Statement of Common Ground with respect to this site to provide the Inspector with an up to date position of the parties. The Statement of Common Ground confirms that with a small number of changes to the supporting text and the policy, the proposal is considered to be sound by the signatory parties.
107. The site allocation will result in major development in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). Paragraph 116 of the 2012 NPPF states that consideration of proposals within AONBs should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

108. Paragraph 172 of the 2018 NPPF includes the same criteria as above. The Council contends that the allocation, when considered in the context of the vision of the Local Plan and the spatial strategy in Policy WLP1.1 together with the evidence base in the Sustainability Appraisal Report (A2), Consultation Statement (A4), Strategic Housing and Employment Land Availability Assessment (C3), Landscape Character Assessment (C26) and Settlement Fringe Landscape Sensitivity Study (C28), meets the above tests. Each test is considered in detail below.

_The need for the development_

109. The Council’s Hearing Statement for Matter 3 covers in detail why the level of development proposed for Southwold and Reydon is considered the most appropriate option. The entire parishes of Southwold and Reydon are within the Area of Outstanding Natural Beauty including the built up areas so all development options to meet the overall strategy are within the Area of Outstanding Natural Beauty.

_The cost of, and scope for, developing elsewhere outside the designated area_

110. As stated above all options for development in Southwold and Reydon are within the Area of Outstanding Natural Beauty. Therefore, to deliver the Vision of the Local Plan and the strategy set out in Policy WLP1.1, there are no alternatives to developing within the Area of Outstanding Natural Beauty.

_Detrimental effects on the environment, the landscape and recreational opportunities_

111. As stated above, compared to other options considered the impact of this site on the landscape is limited. The harm to the landscape rests primarily with the conversion of farmland to housing. However, the site is largely bordered on three sides by existing development and would not extend the built-up area further than the existing extent of development to the north and south of the site. Furthermore, the open landscape to the
west has already been urbanised by a solar farm, Adnams Distribution Centre and former quarry works.

112. The site falls within the Blyth and Wang Tributary Valley Farmland landscape character area as identified in the Landscape Character Assessment (C26 – pages 165-170). Page 169 of the assessment identifies the positive landscape features of the character area and sensitivities. It is considered that the development of this site would not impact upon any of these characteristics.

113. The site falls within landscape setting area 1 for Southwold and Reydon in the Settlement Fringe Landscape Sensitivity Study (C28 – 127-131). The assessment identifies that the sensitivity of this landscape area is low. The main positive feature of the landscape area identified in the study is the historic continuity due to the pre-enclosure field patterns of the wider landscape area (particularly to the west of the landscape area). The site in question does not have these qualities as historic field boundaries have been removed over the last 100 years. The field is now a modern, large agricultural field surrounded by development. Consistent with national planning policy the Settlement Fringe Landscape Sensitivity Study does identify the landscape area as having a very high value by virtue of its national designation as an Area of Outstanding Natural Beauty. This results in an overall low capacity for development for the landscape area as a whole. It should be noted that this is for the area as a whole and not specific to the certain sites within the area. Landscape Area 1 is quite a large landscape setting area that includes this site, so whilst the conclusion may be valid for the whole area, this specific allocation site shows fewer of the AONB special qualities than the wider area.

114. The existing development on the edge of Reydon to the north, east and south of the site, is exposed and poorly integrated with the landscape and provides a hard edge to the settlement to the detriment of the landscape. Paragraph H7.17 on page 170 of the Landscape Character Assessment (C26) recommends exploring opportunities to enhance the relatively long edges of Reydon. The development of the site therefore creates an opportunity to enhance the landscape by creating a more attractive edge to Reydon. Additionally the development of the site provides opportunities to enhance recreational opportunities through improvements to the landscape along the public right of way which runs to the west of the site. The modifications proposed in the Statement of Common Ground referred to above will further ensure the impact on the landscape is minimised and that the integrity of the wider AONB is not compromised.
Policy WLP6.2 – Southwold Harbour

115. Policy WLP6.2 is part of the Local Plan’s positive strategy for the protection and enhancement of the historic environment as required by paragraph 126 of the 2012 NPPF and paragraph 185 of the 2018 NPPF.

116. When considered against the alternative of not having a policy on Southwold Harbour, the Sustainability Appraisal Report (A2) identifies that the preferred approach would result in more positive social, economic and environmental benefits. (see pages 117, pages 374-376 and pages 576-577).

117. The appendix to this Hearing Statement includes a response to the main issues raised by representations in respect of this site allocation and policy.
Appendix 1 – Response to the main issues raised by representations

Policy WLP3.1 – Beccles and Worlingham Garden Neighbourhood

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council's Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1: Concerns were raised about the increased volume of traffic on the roads and impact on town centre parking.</td>
<td>Mr and Mrs Spence (Rep ID: 163); Beccles Society (Paul Fletcher) (Rep ID: 234); Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Susan Doherty (Rep ID: 650);</td>
<td>Transport modelling undertaken has identified the impacts of development at the allocated sites and the mitigation works required. The Transport modelling, reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018)(C19, page 36), shows there will be no capacity problems in the town of Beccles (p. 36). Two junctions on the A146 are shown to be close to capacity but the report concludes that there are no sites where traffic impacts could not be mitigated (p. 6). A Transport Assessment and Travel Plan should be submitted with any planning application. These will assess the impact of the proposal and identify any mitigation required as well as promoting sustainable modes of transport which will mitigate vehicular traffic generation. In response to a traffic assessment produced by Worlingham Parish Council, a specific technical note for Beccles and Worlingham has been produced by WSP (C20). This concludes that the findings of the Suffolk County Transport Model are sound. It is considered that there is sufficient car parking available in central Beccles to accommodate the proposed growth. The Council has three public car parks in Beccles with capacity for up to 260 cars. There are also car parks near the quay with</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------</td>
<td>-------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Main Issue 1: Strategies for Beccles and Worlingham, Halesworth and Holton, Bungay and Southwold and Reydon</td>
<td>capacity for 120 – 130 vehicles – these are not operated by the Council. Additionally there is parking available at Tesco which serves the town centre. Data on the use of the Council’s three public car parks show that tickets are issued to cover less than 40% of the capacity. Further, policy WLP8.21 ‘Sustainable Transport’ promotes sustainable modes of traffic which will support sustainable modes of transport and help reduce the need for car parking.</td>
<td></td>
</tr>
<tr>
<td>Main Issue 2: Concerns were raised in relation to the capacity of Medical Centres and GP surgeries and it was argued that a medical centre should be included in the allocation. It was requested to add a bullet point to the policy to include land for a medical centre.</td>
<td>Mr and Mrs Spence (Rep ID: 163); D Kirby (Rep ID: 622); Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Susan Doherty (Rep ID: 650); Beccles Town Council (C Boyne) (Rep ID: 676)</td>
<td>The Local Plan is supported by an Infrastructure Study (C11) and includes an Infrastructure and Delivery Framework in Appendix 1 of the plan. These detail the infrastructure needs arising from development and how these will be met. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan. This includes 247 sqm (or equivalent) of clinical floorspace in Beccles. NHS England and the Great Yarmouth and Waveney Clinical Commissioning Group comments on the First Draft Local Plan (Consultation Statement (A4), pages 841 – 842) said that there would be increased capacity in primary care facilities in Beccles by means of reconfiguration, extension or possible relocation of existing health facilities. They added that the exact nature and scale will be calculated at the appropriate time. Discussions with the Clinical Commissioning Group will continue and the Council will seek to support delivery of improvements as they progress.</td>
</tr>
<tr>
<td>Main Issue 3: Concerns were raised over the ability of allocated sites to</td>
<td>Beccles Society (Paul Fletcher) (Rep ID: 234)</td>
<td>The allocated sites have been tested to ensure that infrastructure, affordable housing, and CIL contributions as specified in the local plan can all be viably</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>fund infrastructure via CIL and/or Section 106 agreements.</td>
<td>Beccles Society (Paul Fletcher) (Rep ID: 235)</td>
<td>delivered. This is demonstrated in the Whole Plan Viability Assessment (C36).</td>
</tr>
<tr>
<td><strong>Main issue 4:</strong> It was stated that the site should have an ecological appraisal prior to allocation</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 275)</td>
<td>The majority of the site is large, open, farmed fields with hedgerows removed and therefore provides little ecological value. Site 205 has been subject to a wildlife audit (C29, pages 32 – 35). This concludes that the site has medium biodiversity value and further surveys will be required before development takes place. As such it is considered that the ecological requirements contained in the policy are sufficient to mitigate any ecological impacts.</td>
</tr>
<tr>
<td><strong>Main issue 5:</strong> It was argued that the large allocation is not effective and creates significant risk and delay for housing delivery. It was suggested that smaller sites should be added to the supply in Beccles to improve the supply of housing including land at Sandpit Lane, Worlingham.</td>
<td>Badger Building (E.Anglia)Ltd (Edward Gilder) (Rep ID: 388)</td>
<td>The site allocation is considered to be achievable and deliverable. Part of the site is optioned by a developer who has confirmed their site is readily deliverable on its own or as part of the wider allocation (Rep ID: 930). The landowners for the majority of the rest of the site are working together to progress the allocation. The policy has been written to secure delivery of the masterplan and development which would undermine comprehensive development will not be permitted. The strategy for Beccles includes the WLP3.1 allocation which is deliverable early in the plan period, as confirmed by the developer (Rep ID: 807). This provides a strong supply of housing land in Beccles as illustrated in the Housing Trajectory table A3.2 in Appendix 3 of the local plan.</td>
</tr>
<tr>
<td><strong>Main issue 6:</strong> It was opined that there has been no meaningful public engagement. It was requested to add a reference to community</td>
<td>Worlingham Neighbourhood Planning Team (Wendy Summerfield) (Rep ID:</td>
<td>See the Council’s hearing statement response to Matter 1, questions 1.2 and 1.3. The outline masterplan has been prepared including an analysis of all comments on the Garden Neighbourhood policy and masterplan in the first draft plan, plus</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>engagement as opposed to community consultation in the supporting text.</td>
<td>248); Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Susan Doherty (Rep ID: 650)</td>
<td>additional dedicated stakeholder engagement sessions (C12, p. 14). The policy requires a detailed masterplan to be prepared in consultation with the community to be submitted with a planning application. This provides the opportunity for the community to take part in the design process. Further, neighbourhood plans can play a role in shaping detailed matters of the design which can be progressed with full engagement with the community.</td>
</tr>
<tr>
<td><strong>Main issue 7</strong>: It was stated that the amount of housing in the Parish of Worlingham is too great and not justified.</td>
<td>Worlingham Neighbourhood Planning Team (Wendy Summerfield) (Rep ID: 248); Susan Doherty (Rep ID: 650)</td>
<td>See the Council’s hearing statement response to matters 2 and 3.</td>
</tr>
<tr>
<td><strong>Main issue 8</strong>: It was argued that the Beccles and Worlingham Garden Neighbourhood layout should be altered with respect to the size of the country park and the position of the Beccles/Worlingham parish boundary. An amendment to the policy was requested to reflect this.</td>
<td>Worlingham Neighbourhood Planning Team (Wendy Summerfield) (Rep ID: 248); Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
<td>The outline masterplan includes a linear park along the majority of the Parish boundary between Beccles and Worlingham to provide meaningful recognition of the border. The country park provides a distinctive place and space to contribute to the character of the development, whilst also mitigating the impact on the grade II listed Worlingham Manor to the east. A park of this scale is considered to be most appropriately located on the fringes of the site so that homes and facilities can be more closely situated.</td>
</tr>
<tr>
<td><strong>Main issue 9</strong>: It was contended that Worlingham Parish</td>
<td>There are currently no significant air quality issues in Beccles and Worlingham. The</td>
<td></td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>the policy should recognise potential effects on air pollution from increased traffic. An additional bullet point to the policy requiring air pollution monitoring and appropriate mitigation was requested.</td>
<td>Council (Lesley Beevor) (Rep ID: 640); Susan Doherty (Rep ID: 650); D Kirby (Rep ID: 622);</td>
<td>Council’s Air Quality Status Annual Report (G6) monitors air quality at two locations at Ingate, Beccles and finds that there is no exceedance of air quality objectives. Transport modelling to accompany planning applications for the allocated sites will assess the impacts of development on air quality and identify any mitigation required.</td>
</tr>
<tr>
<td><strong>Main issue 10:</strong> It was argued that the policy should provide greater clarity including trigger points for the provision of infrastructure, access and facilities in order to be considered effective.</td>
<td>Cheneys’ Land Partnership (Wheatman Planning Ltd.) (Rep ID: 476); Beccles Town Council (C Boyne) (Rep ID: 676)</td>
<td>The infrastructure needs are identified in the policy. The precise timing for infrastructure and facilities is a detailed matter which will need to be determined through a detailed planning application.</td>
</tr>
<tr>
<td><strong>Main issue 11:</strong> It was argued that the policy should specify a school size of 2.2 rather than 2 hectares.</td>
<td>Education and Skills Funding Agency (Douglas McNab) (Rep ID: 633); Suffolk County Council (Robert Feakes) (Rep ID: 539)</td>
<td>Agreed. See amended text in Statement of Common Ground with Suffolk County Council: Matters Relating to Schools, Policy WLP3.1</td>
</tr>
<tr>
<td><strong>Main issue 12:</strong> It was argued that there was no sustainable strategy informing location of growth in Beccles and Worlingham.</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
<td>The Sustainability Appraisal Report (A2) considered various site options for growth in Beccles and Worlingham. Having considered these options as detailed in the report, the allocated sites were considered preferable. Infrastructure to support the growth is identified in para. 3.7 of the local plan.</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>-------------------</td>
</tr>
<tr>
<td><strong>Main issue 13:</strong> It was argued that the plan has not been positively prepared due to the risks to a comprehensive development arising from multiple land owners. An additional sentence specifying that piecemeal applications on small parcels of land will not be permitted was requested.</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Worlingham Neighbourhood Planning Team (Wendy Summerfield) (Rep ID: 248)</td>
<td>The wording of the policy is considered to be appropriate to deliver a comprehensive development and avoid pitfalls of piecemeal development. Policy WLP3.1 has been written to secure a comprehensive development of the whole site and is specific that development must support the delivery of key facilities, access and utilities across the entire site. It is also specified that development which would undermine comprehensive development of the site will not be permitted. The masterplan, which has been included in the local plan, articulates the policy and sets out a deliverable and comprehensive development.</td>
</tr>
<tr>
<td><strong>Main issue 14:</strong> It was argued that site management of the finished development should be reflected in the policy. It was requested to add a bullet point relating to a management plan.</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
<td>This is a detailed matter which can be addressed through a detailed planning application.</td>
</tr>
<tr>
<td><strong>Main issue 15:</strong> It was argued that the policy lacks clarity on how neighbourhood plans can influence provision of infrastructure and design of development. An amendment was requested to add reference to Neighbourhood Plans influencing infrastructure items to address the needs of the community.</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
<td>This is a strategic site allocation and neighbourhood plans are required to be in general conformity with the policy, as set out in the basic conditions for neighbourhood plans. Key requirements for strategic infrastructure to deliver the garden neighbourhood are included in the policy. Neighbourhood plans can influence the detail of infrastructure provided that they conform with the strategic objectives. As this principle is already dealt with by neighbourhood planning regulations it is not considered necessary to specify this in the policy. There are a number of policies in the local plan which allow Neighbourhood Plans to</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Main issue 16:</strong> It was contended that the policy should take account of the community centre being developed in Worlingham.</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
<td>There is little in terms of existing community facilities in the area to the south of Beccles and west of Worlingham. The proposed community centre included in policy WLP3.1 would be in a highly complementary and compatible position with respect to the proposed primary school, pre-school, sports provision, shops and retirement community. It would be located to serve the new community of the garden neighbourhood as well as the existing community in areas close to the site. As such it is considered that it will play an important role for new and existing communities with a separate function to the new community centre under development in Worlingham. Therefore it is not necessary to take account of the new community centre under development in Worlingham.</td>
</tr>
<tr>
<td><strong>Main issue 17:</strong> It was argued that the policy is too precise in relation to pedestrian and cycle links and an amendment was requested to make the policy broader less precise in this respect and to demonstrate a clear network of cycling and pedestrian links as part of a transport assessment or travel plan with a planning application.</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
<td>The policy is not considered to be too precise in this regard. The access points listed in the policy are spread across the site and are key locations for the existing community to gain access to the garden neighbourhood and the services and facilities it will provide. An element of prescription is considered to be important here so that important links do not get missed out.</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Main issue 18:</strong> It was argued that design codes should be used to provide a consistent approach to design across the development and an additional bullet point in the policy to this effect was requested.</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
<td>It is not considered necessary to address the matter of design codes on the whole development. This is a matter of detail which can be addressed through detailed planning applications, with regard to neighbourhood plans where these are in place.</td>
</tr>
<tr>
<td><strong>Main issue 19:</strong> It was argued that there is insufficient capacity in the sewerage system to cope with the proposed growth.</td>
<td>Susan Doherty (Rep ID: 650)</td>
<td>The Water Cycle Study (C27) identifies that upgrades at the Beccles Marsh Lane Water Recycling Centre (WRC) would be required to accommodate the proposed growth for Beccles and Worlingham. The study states that the WRC would be capable of being upgraded to meet the necessary requirements. As such, phased development in Beccles and Worlingham is recommended in the study (page 33). The upgrade is identified as required infrastructure to support growth in Beccles and Worlingham at para. 3.7 in the local plan. Policy WLP1.4 ‘Infrastructure’ requires development to take place only when there is capacity at the WRC.</td>
</tr>
<tr>
<td><strong>Main issue 20:</strong> Concerns were raised over surface water flooding on the site.</td>
<td>Susan Doherty (Rep ID: 650)</td>
<td>The Strategic Flood Risk Assessment identifies that the whole site is in flood risk zone 1 (low risk); the majority of the site is at low risk of surface water flooding; and the site is likely to be suitable for infiltration sustainable drainage systems. Therefore surface water can be effectively managed on the site and a planning application will have to demonstrate how this will take place in line with policy WLP8.24 ‘Flood Risk’ and the NPPF.</td>
</tr>
<tr>
<td><strong>Main issue 21:</strong> Concerns were raised over an increase in crime arising from new development.</td>
<td>Susan Doherty (Rep ID: 650)</td>
<td>There is no evidence to suggest that crime rates would rise in connection with the development.</td>
</tr>
<tr>
<td><strong>Main Issue</strong></td>
<td><strong>Representations</strong></td>
<td><strong>Council’s Response</strong></td>
</tr>
<tr>
<td>---------------</td>
<td>--------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td><strong>Main issue 22:</strong> It was stated that reference to Sustainable drainage systems should be included.</td>
<td>Environment Agency (Rep ID: 719)</td>
<td>Policy WLP8.24 ‘Flood Risk’ will apply to any new development and this requires developments to make use of sustainable drainage systems. Therefore specific reference in this policy is not necessary.</td>
</tr>
<tr>
<td><strong>Main issue 23:</strong> It was contended that design and landscaping should take account of the proximity to the Broads National Park and Suffolk Coast and Heaths AONB.</td>
<td>Natural England (Rep ID: 751)</td>
<td>Policy WLP8.35 ‘Landscape Character’ states that developments should be informed by, and be sympathetic to, the Waveney District Landscape Character Assessment (2008), the Settlement Fringe Landscape Sensitivity Study (2016), the Broads Landscape Character Assessment (2016) and the Broads Landscape Sensitivity Study for Renewables and Infrastructure (2012). Policy WLP8.24 ‘Design’ requires development to demonstrate understanding of the character of the built and natural environment to complement local character. Therefore it is not considered necessary to include reference to this in the policy.</td>
</tr>
<tr>
<td><strong>Main Issue 24:</strong> It was stated that the site was not well suited to retirement housing and that a preferred site would be Site 14 – Saxons Way, Halesworth.</td>
<td>McCarthy and Stone Retirement Lifestyles Ltd (The Planning Bureau Ltd)(Rep ID:802)</td>
<td>The site will provide new services and facilities and is in close proximity to existing services and facilities. It has a suitable topography having only a very gentle gradient on the site. The provision of housing for older people on this site will help create mixed communities in line with paragraph 50 and 69 of the 2012 NPPF and paragraphs 61, 62 and 91 of the 2018 NPPF. Suffolk County Council support the policy’s provision for housing for older people (Rep ID: 500).</td>
</tr>
<tr>
<td><strong>Main issue 25:</strong> It was argued that employment land is not justified and should be reduced.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930)</td>
<td>Policy WLP1.1 identifies a need for 43 hectares of employment land over the plan period across the district. This is based on the findings of the Employment Land Needs Assessment (C5). Approximately 25% of this development is apportioned to the area of Beccles. The employment allocation on the site allocation will help to meet this need in line with the spatial strategy set out in policy WLP1.1.</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>--------------------</td>
</tr>
</tbody>
</table>
|            |                | The Larkfleet Homes representation includes a report on Employment Land which argues that the Local Plan provides excessive amounts of Employment Land which means the amount of employment land on Policy WLP3.1 could be reduced. The reports conclusions on supply are not recognised by the Council. Appendix 3 on page 323 of the Local Plan identifies a total supply 53.6 hectares over the plan period when taking into account existing commitments and land allocated in the plan. The plan assumes that given the scale of sites WLP2.17 and WLP3.2 not all of the sites will come forward within the plan period. The 53.6 hectares represents an over allocation of 25% which is higher than the over allocation for housing. However, there is greater uncertainty with employment land and therefore in order to ensure a positive approach to economic growth as required by the NPPF this is considered reasonable. Even if it could be considered that the Local Plan provides too much employment land, land in this allocation would not necessarily be the most appropriate option to reduce. The land in this location provides a suitable use of land which would not be suitable for many other uses given the amenity issues caused by adjacent industrial uses. Furthermore, the aspiration for a garden neighbourhood and a sustainable extension to Beccles, supports the provision of employment in an accessible location to new residential developments. |}

**Main issue 26:** Concerns were raised regarding the weight given to the masterplan and accompanying report.

Larkfleet Homes (Strategic Planning Research Unit - DLP)

The outline masterplan embodies the requirements and objectives of policy WLP3.1. It incorporates national policy in the 2012 NPPF (para.s 35, 56 and 69) as well as the principles of ‘Active Design’ produced by Sport England. Para. 52 of the 2012 NPPF
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amendments and/or deletions of parts of the policy and supporting text were requested to reflect this.</td>
<td>(Planning) Limited (Rep ID: 930) Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
<td>supports the use of Garden City principles in planning for larger scale development and the masterplan applies these principles of Garden City development. In accordance with para. 35 of the 2012 NPPF, the masterplan gives priority to pedestrian and cycle movements with a high quality and comprehensive network of walking and cycle routes. Para. 38 of the 2012 NPPF seeks key facilities such as schools and shops to be located within walking distance of most properties on large scale developments. This is captured in the policy and the outline masterplan articulates this requirement and demonstrates how these uses can be effectively located alongside other community uses on the site. Para. 56, 126 of the 2012 NPPF gives great weight to achieving good design, distinctiveness and place making. The masterplan sets out a place-making approach by creating a central community hub through co-locating many of the services and facilities also incorporating distinctive features such as a country park and a network of green spaces. Para. 69 of the 2012 promotes social interaction and healthy, inclusive communities. The masterplan supports this approach by setting out a community hub, active streets including a walking and cycling network, a complementary mix of uses and high quality public spaces.</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>These elements are continued in the 2018 NPPF including para.s 72, 91, 102 and 104.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The masterplan has been prepared following analysis of all responses to the policy and masterplan in the first draft local plan. It has been also been informed following stakeholder engagement sessions. An assessment of the site and its constraints has also shaped the masterplan.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The outline masterplan is therefore rooted in core principles contained in national policy as well as being derived from comments on the first draft local plan and engagement with stakeholders. It represents good design and good planning which is reinforced by planning policy. It has also been developed by consultants who are renowned experts in master planning and who have a strong commitment to Garden City principles. With these elements behind it, it is considered to be wholly justifiable to include the outline masterplan in the local plan and to give it weight in addressing applications for development on the site.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>It is an outline masterplan and articulates principles of good design. It is not prescriptive and there is sufficient flexibility to allow for local constraints to be accommodated without sacrificing principles of good design.</td>
</tr>
<tr>
<td><strong>Main issue 27:</strong> It was argued that the quantum of housing on the Garden</td>
<td>Larkfleet Homes (Strategic Planning)</td>
<td>The Council’s Hearing Statement for Matter 4, Question 4.3, confirms that the Council is supportive of an amendment to be made to all site allocation policies to</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>Neighbourhood, particularly on Larkfleet’s site, is too low.</td>
<td>Research Unit - DLP (Planning) Limited (Rep ID: 930)</td>
<td>insert the word ‘approximately’ before each reference to dwelling numbers. Even so, the number of homes on the site allocation and the infrastructure incorporated is considered to result in a well designed and balanced development which builds on the Garden City principles. The number of homes on the allocation is in accordance with the strategy for Beccles and the spatial strategy for the district. It should be noted that the gross to net ratio of developable land on this site is approximately 53%, which is considered reasonable for a strategic scale development site and is consistent with the gross to net ratio for the Woods Meadows strategic site which is currently under construction in Oulton. There are also key constraints on the site which will have a bearing on how many homes can be accommodated on Larkfleet’s part of the site (east of Oak Lane). There are noise generating industrial uses neighbouring the site to the southeast which makes nearby parts of the site unsuitable for residential use. This potentially diminishes the number of dwellings that can be accommodated. The precise numbers of homes on each part of the site will be determined via a planning application.</td>
</tr>
<tr>
<td><strong>Main issue 28:</strong> It was argued that vehicular access points should not be restricted to the Southern Relief Road.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930)</td>
<td>It is considered that the Southern Relief Road is the most suitable access point for vehicles. This gives vehicles good access to the strategic highway network. It will encourage cars not to use roads such as Ingate for access to Beccles town centre where there is the potential for air quality issues. The residential roads immediately to the north of the site are not suitable to accommodate the numbers of cars a</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>development of this scale could generate. A number of pedestrian and cycle links are identified across the allocation site which will provide strong permeability in to and out of the residential areas to the north which will be highly important in encouraging sustainable modes of transport. This is in accordance with paras. 35, 37 and 38 of the 2012 NPPF, and paras. 91, 102 and 104 of the 2018 NPPF.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930))</td>
<td>Para. 38 of the 2012 NPPF seeks key facilities such as schools and shops to be located within walking distance of most properties on large scale developments. This is captured in the policy and the outline masterplan articulates this requirement and demonstrates how these uses can be effectively located alongside other community uses on the site. Para. 69 aims to deliver mixed use developments, strong neighbourhood centres and active streets to promote healthy communities. Para. 70 seeks plans for shared space, community facilities, services, recreation, shops and more to enhance sustainable communities and residential environments. Paras 102 and 104 of the 2018 NPPF seek mixed uses in walkable and cycle-able environments to promote sustainable transport. Para. 91 aims for strong neighbourhood centres, mixed use development, easy pedestrian and cycle connections to promote healthy communities. As such the policy is therefore considered to demonstrate good design by incorporating a central hub in the development where important uses can be co-located for the benefit of access to all and promoting health and inclusive communities. This is a vital aspect of creating communities and too much flexibility</td>
<td></td>
</tr>
</tbody>
</table>
Main Issue | Representations | Council’s Response
--- | --- | ---
could undermine these principles and therefore should be resisted.

**Policy WLP3.2 – Land West of London Road, Beccles**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Highway safety concerns were raised about the position of the vehicular access on to London Road. Concerns were raised over the capacity of highway network to accommodate the increase in traffic.</td>
<td>Mr Milton (Rep ID: 20); Mr Crane (Rep ID: 250); Beccles Society (Paul Fletcher) (Rep ID: 236); Michelle Golding (Rep ID: 651)</td>
<td>The location and design of vehicular access to the site including safety aspects will be considered in detail through the planning application process. Transport modelling undertaken has identified the impacts of development at the allocated sites and the mitigation works required. The Transport modelling, reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018)(C19, page 36), shows there will be no capacity problems in the town of Beccles itself (p. 36). Two junctions on the A146 are shown to be close to capacity but the report concludes that there are no sites where traffic impacts could not be mitigated (p. 6). A Transport Assessment and Travel Plan should be submitted with any planning application which will assess the impact of the proposal and identify any mitigation required.</td>
</tr>
</tbody>
</table>

| Main issue 2: Concerns were raised over the ability of allocated sites to fund infrastructure via CIL and/or Section 106 agreements. | Beccles Society (Paul Fletcher) (Rep ID: 236) | The site allocation is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 276-281 of the PDF. This shows that the site would be viable providing up to 30% affordable housing and with Community Infrastructure Levy rate of £80 per sqm. |

<p>| Main issue 3: It was argued that the | Mr Montagu (Rep ID: | Sufficient sites have been allocated to meet the objectively assessed need for |</p>
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>allocation should be extended to include land to the west.</td>
<td>362); Mrs Montagu (Rep ID: 446)</td>
<td>housing. The site allocations in Beccles provide sufficient land to meet the need for 16% of housing and 25% of employment land in the district as set out in policy WLP1.1. Therefore extending the site further into countryside to the west would not be justified.</td>
</tr>
<tr>
<td><strong>Main issue 4:</strong> It was opined that the allocation should include a small convenience store.</td>
<td>Rosemary Simpson (Rep ID: 657)</td>
<td>A small convenience store which does not undermine the town centre could be considered via a planning application.</td>
</tr>
<tr>
<td><strong>Main issue 5:</strong> It was suggested that open space should include an outdoor gym and wildlife corridors.</td>
<td>Rosemary Simpson (Rep ID: 657)</td>
<td>The design of the open space is a matter of detail which will be considered via the planning application process in accordance with policies WLP8.30 ‘Design of Open Spaces’ and WLP8.34 ‘Biodiversity and Geodiversity’.</td>
</tr>
<tr>
<td><strong>Main issue 6:</strong> It was contended that the policy should take into account the setting of protected landscapes and the vicinity of designated sites.</td>
<td>Natural England (Rep ID: 752)</td>
<td>Policy WLP8.35 ‘Landscape Character’ deals with the matter of landscape character and WLP8.34 deals with biodiversity, therefore it does not need to be repeated in this policy.</td>
</tr>
<tr>
<td><strong>Main issue 7:</strong> It was argued that the policy is not sufficiently flexible in terms of dwelling numbers and it should be amended to read “approximately 280 dwellings.”</td>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)</td>
<td>The Council’s Hearing Statement for Matter 4, Question 4.3, confirms that the Council is supportive of an amendment to be made to all site allocation policies to insert the word ‘approximately’ before each reference to dwelling numbers. The term ‘minimum’ is not supported because this could result in numbers of dwellings being delivered well in excess of what studies at the plan making stage have envisaged and therefore would be difficult to properly assess through the sustainability appraisal process.</td>
</tr>
<tr>
<td><strong>Main issue 8:</strong> It was argued that the policy should allow for the possibility</td>
<td>Hopkins Homes (Armstrong Rigg</td>
<td>The policy does not specify the number of vehicular access points, only the location (off London Road). Therefore two accesses are not precluded by the policy and no</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>of two vehicular accesses into the allocation site and the policy wording should be altered to reflect this.</td>
<td>Planning (Rep ID: 807)</td>
<td>amendments are needed in this respect. The design of vehicular access is a matter of detail which will be addressed via a planning application.</td>
</tr>
<tr>
<td><strong>Main issue 9</strong>: It was argued that the requirement for a landscape buffer of 10 metres width should be amended to state that the design should instead be informed by a landscape assessment of the site.</td>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)</td>
<td>The landscape has moderate value and the visual impact of the development needs to be mitigated. At 280 dwellings, the development is of a reasonable scale and landscaping will require space for trees to grow and establish themselves. A landscaped buffer at 10 metres width will allow trees to flourish which will safeguard the character of the landscape.</td>
</tr>
<tr>
<td><strong>Main issue 10</strong>: It was argued that the policy should include flexibility so that a contamination study does not need to cover the entire site.</td>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)</td>
<td>It is agreed that the contamination assessment does not have to cover the entire site if the site does not come forward in one development. It is proposed to delete the word “full” from this bullet point in the policy and from the second sentence in para. 3.28. See MM7.1 and MM7.2 of the Suggested Main and Additional Modifications at the end of this document.</td>
</tr>
<tr>
<td><strong>Main issue 11</strong>: It was requested that a paragraph is added to the supporting text to support delivery in two phases.</td>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)</td>
<td>It is considered that the supporting text and the policy allow for development to take place in two phases and specific reference to this is not necessary. The change proposed in main issue 10 will support a two phase delivery.</td>
</tr>
<tr>
<td><strong>Main issue 12</strong>: It was stated that the site should make provision for a new early years education setting.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 533)</td>
<td>Agreed. See amended text in Statement of Common Ground with Suffolk County Council: Matters Relating to Early Years, Policy WLP3.2.</td>
</tr>
<tr>
<td><strong>Main issue 13</strong>: It was suggested that the site would deliver only 25 units in</td>
<td>Larkfleet Homes (Strategic Planning)</td>
<td>Delivery of the numbers of units on the site as set out in table A3.3 of the local plan is considered to be entirely reasonable. The developer Hopkins Homes have a</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>the five year period rather than 75.</td>
<td>Research Unit – DLP (Planning) Ltd.) (Rep ID:939)</td>
<td>controlling interest in the site and they have confirmed that the site is available and deliverable for development now (rep ID: 807). Further, they have also confirmed in their representation that a planning application is being prepared. There is no reason why a full planning application could not be determined by early 2019 and new homes delivered in 2020/2021 allowing 125 units to be compete on the site within the five year period as shown in Table 4 of the Statement of a 5-year supply of housing land (as at March 2018)(D3). Local experience as discussed in the Council’s Hearing Statement for Matter 4 indicates that on average it takes less than a year for first completions to be realised on a site following grant of planning permission.</td>
</tr>
</tbody>
</table>

**Policy WLP3.3 Land South of Benacre Road at Ellough Airfield, Ellough**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was requested to include reference to remedying potential contamination from the former airfield in the policy.</td>
<td>Environment Agency (Rep ID: 721)</td>
<td>Agreed. A bullet point shall be added to the policy requiring a contamination assessment to consider potential contamination on the site. A paragraph in the supporting text referencing the risk from contamination shall be included also. See MM7.3 and MM7.4 of the Suggested Main and Additional Modifications at the end of this document.</td>
</tr>
<tr>
<td><strong>Main issue 2:</strong> It was contended that the design and landscaping should take account of the setting of protected landscapes and nearby</td>
<td>Natural England (Rep ID: 753)</td>
<td>Policy WLP8.35 ‘Landscape Character’ states that developments should be informed by, and be sympathetic to, the Waveney District Landscape Character Assessment (2008), the Settlement Fringe Landscape Sensitivity Study (2016), the Broads Landscape Character Assessment (2016) and the Broads Landscape Sensitivity Study</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council's Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>designated sites.</td>
<td></td>
<td>for Renewables and Infrastructure (2012). Policy WLP8.24 ‘Design’ requires development to demonstrate understanding of the character of the built and natural environment to complement local character. Therefore it is not considered necessary to include reference to this in the policy.</td>
</tr>
</tbody>
</table>

**Policy WLP4.1 – Halesworth Healthy Neighbourhood**

<table>
<thead>
<tr>
<th>Main Issue 1: It was requested that Town Farm house was removed from the boundary of the allocation.</th>
<th>Representations</th>
<th>Council's Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Mr E Milburn (Rep ID:386)</td>
<td>This property is covered by the site allocation polygon, but the policy allocates no use or development for this property. The property would be adjoined by open space and sports fields resulting in minimal impact on the property and its setting. This is illustrated by the indicative masterplan on page 108 of the local plan.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Main Issue 2: It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.</th>
<th>Representations</th>
<th>Council's Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 276)</td>
<td>The site is currently a former middle school site, a skills centre incorporating a building and hardstanding, sports fields, and agricultural land. The ecological value of these uses is low and therefore it is not considered necessary to carry out a wildlife audit prior to allocating the site. The policy requires an ecological assessment with any planning application which is considered sufficient and proportionate.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Main Issue 3: It was argued that the site was not sustainably located to meet the needs for elderly residents. Two sites at Saxons Way were</th>
<th>Representations</th>
<th>Council's Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>McCarthy and Stone Retirement Lifestyles Ltd (The Planning Bureau Ltd)(Rep ID:803)</td>
<td>There is support from the interested developer in delivering the retirement community. The site is well located for many services and facilities and will be further complemented by the health facilities and open space brought forward as part of the allocation. It has a suitable topography being mostly flat. The provision</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>--------------------</td>
</tr>
</tbody>
</table>
| suggested in addition.  
  - Site 14 – Saxons Way, Halesworth.  
  - Site 86 – Saxons Way, Halesworth | Badger Building (E.Anglia)Ltd (Edward Gilder)(Rep ID: 402) | of housing for older people on this site will help create mixed communities in line with paragraph 50 and 69 of the 2012 NPPF and paragraphs 61, 62 and 91 of the 2018 NPPF. It is therefore considered to be a highly suitable site for a retirement community. |
| **Main Issue 4:** It was suggested that the density of and number of homes on the site to the east of the former middle school was too high. | Mr E Milburn (Rep ID:407) | The policy specifies an approximate density for dwellings, but the precise layout will be determined through a detailed planning application. There is considered to be sufficient space allocated to accommodate the proposed number of dwellings and the site is considered to be in a sustainable location which is well served by services and facilities. |
| **Main Issue 5:** It was requested that the allocation was specific with regards to type of homes. | Mr E Milburn (Rep ID:407) | Policy WLP8.1 ‘Housing Mix’ will determine the type of homes to be provided. The Halesworth Neighbourhood Plan which is under development could set a housing mix policy of its own to address local housing needs. |
| **Main Issue 6:** It was stated that the trigger point of 100 dwellings was unjustified and could create a ransom situation. | Richborough Estates Ltd (Brown & Co) (Rep ID:696) | The Council emphasizes the importance of connecting the delivery of the housing with the sports facilities, but recognizes that this trigger is not necessarily the best way of carrying this out. Discussions around delivery of the site will continue with all delivery partners, and it is the Council’s view that these should continue with all partners and including Sport England to agree the specific mechanism and wording. As such a modification to the policy is proposed. See MM7.5 of the Suggested Main and Additional Modifications at the end of this document. |
| **Main Issue 7:** It was suggested that the requirements for an ecological assessment, transport assessment | Richborough Estates Ltd (Brown & Co) (Rep ID:696) | It is considered that these requirements are useful signposts providing precision and clarity as to what is required with a planning application given the particular issues identified at the plan making stage. |
and archaeological investigation were not necessary as they could be secured by local validation requirements.

Main Issue 8: It was stated that the location of the sports facilities and associated infrastructure could impact on the setting of Town Farm and the policy does not specify what would be most appropriate closest to Town Farm.

Historic England (Rep ID: 845)

The detailed layout of the sports facilities and associated infrastructure will be addressed via a detailed planning application. This will need to take account of the listed building and its setting. The listed building and the need for sympathetic development is referenced in the supporting text at para. 4.12.

Main Issue 9: It was suggested that the site would only deliver 40 units rather than 80 within the five year period as there is no planning application currently submitted.

Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID: 940)

Delivery of the numbers of units on the site as set out in table A3.3 of the local plan is considered to be entirely reasonable. The interested developer, Richborough Estates, has stated that they are committed to working with Halesworth Campus Development Board and Halesworth Community Sport and Leisure to deliver the site allocation (Rep ID: 696).

Policy WLP4.2 - Land adjacent to Chediston Street.

Main Issue 1: Concerns were raised over drainage and the impact on flooding.

Mrs Boyd (Rep: 23)
Mr Derham (Rep: 101)
Mr Osborne (Rep: 118)

The Strategic Flood Risk Assessment (C21a) does not identify a risk from flooding on the site (fig. 12, part 1). Fig. 11.4 identifies that the site is compatible with infiltration sustainable drainage systems (SuDS),
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Ms Silver (Rep ID: 258) Mrs J Saunders (Rep ID:415) Mrs C Slater (Rep ID: 479) Mr M Fagg (Rep ID:774) Mr J Young (Rep ID:805) Halesworth Town Council (N Rees)(Rep ID:952)</td>
<td>therefore surface water could be managed on the site with a drainage strategy based on SuDS, as required by policy WLP8.24 ‘flooding risk’. Both the 2012 and 2018 versions of the NPPF specify that development should not increase the risk of flooding elsewhere. This would therefore apply to any planning applications on this site. The developer has prepared a flood risk assessment for the site (G7) and submitted it as part of a planning application. This finds that there is a low flood risk on the site and surface water can be successfully managed using SuDS (rep ID: 616). The committee report for the application is included in the appendix to this hearing statement. This shows that the flooding aspects of the development were assessed and accepted by Suffolk County Council as the Lead Local Flood Authority (p. 39). The planning officer’s assessment of flood risk in the committee report (pages 48 – 49) concludes that the site can be satisfactorily drained.</td>
</tr>
<tr>
<td>Main Issue 2: Concern was raised about the impact of development on wildlife.</td>
<td>Mrs Boyd (Rep ID:23) Mr Osborne (Rep ID: 118) Mrs C Slater (Rep ID: 479) Mr M Fagg (Rep ID:774) Halesworth Town Council (N Rees)(Rep ID:952)</td>
<td>The site is farmed arable land and the ecological value is therefore low. The developer has carried out ecological assessments and supporting documents (G8, G9, G10). These have concluded that the site has limited value as wildlife habitat (Rep ID: 616). The policy requires a completed ecological assessment by a suitably qualified person to accompany any planning application.</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> Concerns were raised over impact on residential amenity.</td>
<td>Mrs Boyd (Rep ID:23) Halesworth Town Council (N Rees)(Rep ID:952)</td>
<td>Residential amenity is a detailed matter which will be considered via a detailed planning application.</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was suggested that the development would remove a landing point for the emergency ambulance helicopter service.</td>
<td>Mrs Boyd (Rep ID:23)</td>
<td>There are other agricultural fields in the vicinity which would provide a similar landing area for a helicopter in an emergency.</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concerns were raised over the impact on infrastructure and the impact on traffic in the town.</td>
<td>Mrs Boyd (Rep ID:23) Mr Derham (Rep ID: 100) Mr Osborne (Rep ID: 118) Ms Silver (Rep ID: 258) Mrs J Saunders (Rep ID:415) Mr M Fagg (Rep ID:774) Halesworth Town Council (N Rees)(Rep ID:952)</td>
<td>The local plan is supported by the Infrastructure Study (C11) which identifies the infrastructure required to support the growth in the local plan. Where possible it identifies the cost and sources for funding and delivery. Developers will help fund infrastructure in line with policy WLP1.4. The development will provide infrastructure in the form of open space. Transport modelling undertaken has identified the impacts of development at the allocated sites. The Transport modelling, reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018)(C19, pages 32 and 43), finds that there will be no capacity or congestion issues in Halesworth. Additionally, a transport assessment and travel plan will be required with any planning application to help mitigate any traffic impacts and promote sustainable transport. The developer has commissioned a transport assessment (G11). This</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council's Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>-------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>concludes that the existing highway network can accommodate the increase in traffic, the site is well connected to local facilities, and the proposed development will have no material impact on the local highway network. The Committee report in the appendix to this hearing statement states that the highway authority have no objection, subject to conditions. The planning officer’s assessment of the transport issues (pages 47 – 48) concludes that the proposal deals satisfactorily with the highway and pedestrian safety issues.</td>
</tr>
</tbody>
</table>

**Main Issue 6:** It was noted that Roman archaeological artefacts had been found on the site and development could have a detrimental impact on archaeology.

Mrs J Saunders (Rep ID:415)
Mrs C Slater (Rep ID: 479)

Suffolk County Council Archaeological Service have been consulted on the local plan and have identified the sites which require archaeological investigation prior to investigation. This site has not been identified as such a site.

The developer has carried out a desk top archaeological assessment (G13) and has agreed with Suffolk County Council that any further investigations can be secured through planning conditions (Rep ID: 616). The Committee report makes reference to Suffolk County Council’s Archaeologist and notes that there are no objections on archaeological grounds.

**Main Issue 7:** It was suggested that the site was not in a sustainable location as access to services and facilities and employment is undermined by the nature of Chediston Street. It was suggested that the site was poorly located to employment.

Mrs C Slater (Rep ID: 479)
Mr M Fagg (Rep ID:774)
Mr J Young (Rep ID:805)

The site is considered to be in a sustainable location with very good access to services and facilities. Chediston Street is a quiet road and it is suitable for walking and cycling. Further, the Waveney Cycle Strategy (C13) identifies additional suitable cycle routes to the town centre (pages 55 - 56). These could also be used by pedestrians. There are
### Main Issue
and education and other facilities to the north of the town.

<table>
<thead>
<tr>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>employment sites to the south of the town at Blyth Road Industrial Estate which are easily accessible by foot and cycle. Schools, employment sites, services and facilities are all readily accessible by foot or cycle. This is assessed through the sustainability appraisal (A2) (pages 486 – 488), along with alternative site options in Halesworth (pages 878 – 931).</td>
</tr>
</tbody>
</table>

### Main Issue 8: It was suggested that the site was located over a historical landfill.

<table>
<thead>
<tr>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
</table>
| Mrs C Slater (Rep ID: 479)  
Mr M Fagg (Rep ID: 774) | The developer has submitted a preliminary assessment (G14) with the planning application which has found the potential for made ground on part of the site. The Council’s Environmental Health team recommended planning conditions to secure further investigation, as noted on page 50 of the Committee report. Any future planning application on the site would be accompanied by a contaminated land assessment to evaluate and mitigate this matter. |

### Main Issue 9: Concern was raised over the impact on the landscape.

<table>
<thead>
<tr>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
</table>
| Mrs C Slater (Rep ID: 479)  
Halesworth Town Council (N Rees)(Rep ID: 952)  
Mr M Fagg (Rep ID: 774) | The site is on Blyth tributary valley farmland (C26) (pages 165 – 170). The Settlement Fringe Landscape Sensitivity Study (C28) (pages 121 – 126) identifies this area as having a moderate capacity for development because of its high landscape sensitivity and moderate value. The policy requires a landscaping scheme to integrate development into the landscape in order to help mitigate the visual impact.  
The developer has submitted a ‘Landscape and Visual Impact Assessment’ (G15) with their planning application which is referenced in their representation (Rep ID: 616). The planning officer’s evaluation |
of the assessment in the Committee report concludes that development would associate with the urban edge of Halesworth when viewed from the countryside and tree planting on the western edge and within the site will aid the integration into the landscape (once established). The change of land use has an effect on the landscape character, but this can be mitigated. The impact beyond the site boundaries is limited by landform and existing vegetation. Effects on the wider landscape character are considered to be minor at worst.

It is acknowledged that the landscape around Halesworth has sensitivities to development and all sites on the edge of Halesworth will have a degree of impact in the landscape. This must be weighed against the other attributes of the site and it is considered that the benefits of this site outweigh any landscape impact. This has been tested through the Sustainability Appraisal process, along with alternative sites in Halesworth.

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 10:</strong> The loss of grade 2 agricultural land was objected to.</td>
<td>Mrs C Slater (Rep ID: 479) Mr M Fagg (Rep ID:774) Mr J Young (Rep ID:805)</td>
<td>The site is on mainly grade 2 agricultural land but it is considered that the benefits of allocating this site for development would outweigh the negatives of losing grade 2 agricultural land.</td>
</tr>
<tr>
<td><strong>Main Issue 11:</strong> It was suggested that site 122 land west of Norwich Road would be preferable to this site.</td>
<td>Mrs C Slater (Rep ID: 479) Mr M Fagg (Rep ID:774)</td>
<td>See response to Question 7.1, site WLP4.2 in the Council’s hearing statement for matter 7.</td>
</tr>
<tr>
<td><strong>Main Issue 12:</strong> It was stated that the policy was</td>
<td>Suffolk County Council</td>
<td>Agreed. See amended text in Statement of Common Ground with</td>
</tr>
</tbody>
</table>
### Main Issue 7 – Strategies for Beccles and Worlingham, Halesworth and Holton, Bungay and Southwold and Reydon

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>ineffective as it should include a requirement to test the quality of the potential mineral resource and consider use of the resource during construction.</td>
<td>(Robert Feakes)(Rep ID:579); Suffolk County Council (Robert Feakes)(Rep ID:582)</td>
<td>Suffolk County Council: Matters Relating to Minerals Safeguarding, Policy WLP4.2.</td>
</tr>
</tbody>
</table>

**Main Issue 13:** The viability and deliverability of the site was questioned given the various constraints on the site.

<table>
<thead>
<tr>
<th>Main Issue 13</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Mr M Fagg (Rep ID:774)</td>
<td>The site is considered viable. The Whole Plan Viability Assessment (C36) assesses a similar type of site on pages 276-281 of the PDF. This shows that the site would be viable providing up to 30% affordable housing and with Community Infrastructure Levy rate of £80 per sqm. The developer has also made a representation on the final draft local plan supporting the allocation (Rep ID: 616). This affirms that the site is suitable, available, viable, and deliverable. Table A3.3 of Appendix 3 of the Local Plan (page 321) indicate delivery will begin in 2020/2021 on the site which is considered fully achievable.</td>
</tr>
</tbody>
</table>

### Policy WLP4.3 – Land North of Old Station Road

No main issues.

### Policy WLP4.4 – Land west of Lodge Road, Holton

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1: Concern was raised over the impact on infrastructure, including</td>
<td>Mr Henderson (Rep ID: 260)</td>
<td>The Infrastructure Study (C11) identifies that new primary school places will be required in Halesworth and Holton and these will be split between improvements at</td>
</tr>
</tbody>
</table>
the primary school in Holton.  

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the site should not be required to provide a pre-school or community facility as there were alternative options for accommodating this need.</td>
<td>Badger Building (E.Anglia)Ltd (Edward Gilder)(Rep ID:229)</td>
<td>This site is very well located for the town centre making it the most suitable and available site for a community facility. Therefore the developer’s assertions that there are alternative sites which can be considered for a community facility are not supported and it remains the Council’s view that this facility should be delivered on this site. Further, Halesworth Town Council (Rep ID: 963) highlight the need and pledges their support for the community facilities on the site.</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was questioned whether the site would be viable to provide a pre-school and community facility.</td>
<td>Badger Building (E.Anglia)Ltd (Edward Giller) (Rep ID:229)</td>
<td>The site is considered to be viable. The Whole Plan Viability Assessment (C36) assesses a comparable site (pages 260 - 263) of 30 units at 25 dwellings per hectare which is found to be viable with CIL at £80 per sqm and 30% Affordable Housing. The site allocation would be at a higher density of 40 dwellings per hectare – the table on page 263 shows that this higher density would significantly improve viability. The CIL due to be paid on the housing on the site could be paid for with a transfer of land from the developer, as allowed under part 73 of the CIL Regulations 2010. This would provide the necessary land for the pre-school and the community centre. Funding will be provided through CIL, as identified in the Infrastructure Study (C11) (pages 50 and 56). Further, a developer has recently acquired the site. Given the existing allocation of</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>------------------------------------------</td>
<td>-----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Main Issue 3: Concern was expressed over the impact on infrastructure, particularly healthcare.</strong></td>
<td>Mr D Storey (Rep ID:628)</td>
<td>The Infrastructure Study (C11) identifies all improvements to infrastructure required to support development. It has been developed in consultation with infrastructure providers. This includes 94 sq. m of clinical floorspace in Halesworth (page 54). Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.</td>
</tr>
<tr>
<td><strong>Main Issue 4: It was stated that an ecological assessment should be undertaken on the site prior to clearance of scrub and construction.</strong></td>
<td>Mr D Storey (Rep ID:628)</td>
<td>The policy includes a requirement for an ecological assessment by a suitably qualified person as part of any planning application. Further, the policy specifies that no clearance of the site should take place until the results of the assessment are completed.</td>
</tr>
<tr>
<td><strong>Main Issue 5: It was stated that there was insufficient information in the policy and supporting text with regard to impact on the setting of nearby heritage assets.</strong></td>
<td>Historic England (Rep ID:849)</td>
<td>Changes to the policy and supporting text have been agreed through the statement of common ground with Historic England. See amended text in Statement of Common Ground, Policy WLP4.5.</td>
</tr>
<tr>
<td><strong>Main Issue 6: It was suggested that the site would only deliver 20 units rather than 40 within the five year period as there is no planning application currently submitted.</strong></td>
<td>Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID:940)</td>
<td>Delivery of the numbers of units on the site as set out in table A3.3 of the local plan is considered to be completely reasonable. A developer has an interest in the site who will deliver the residential units on the site. There is no reason why a full planning application could not be determined by early 2019 and new homes delivered in 2019/2020 allowing 40 units to be compete on the site within the five years.</td>
</tr>
</tbody>
</table>
### Main Issue 7: The importance of the provision of the community centre was noted. It was requested that additional clarity on the nature of community centre was added to the text.

<table>
<thead>
<tr>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>This is a matter of detail which can be addressed through the management of the facility. Alternatively, such a specific local issue could be addressed through Halesworth’s Neighbourhood Plan which is under development.</td>
</tr>
</tbody>
</table>

**Halesworth Town Council (N Rees)(Rep ID:963)**

**Halesworth Town Council (N Rees)(Rep ID:966)**

---

### Policy WLP4.6 – Broadway Farm, West of Norwich Road.

<table>
<thead>
<tr>
<th>Main Issue 1: It was stated that the policy was ineffective as it wasn’t clear whether an archaeological evaluation would be required or not.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suffolk County Council (Robert Feakes)(Rep ID:518)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Main Issue 2: It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 277)</td>
</tr>
<tr>
<td>The site is currently an open field in agricultural use which will provide low ecological value and would not prevent to principle of development. The impact on wildlife in the area and around the edges of the site can be assessed and suitable mitigation identified through a survey as part of a planning application.</td>
</tr>
</tbody>
</table>
Policy WLP5.1 - Land East of St Johns Road, Bungay

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main issue 1:</strong> Concerns were raised in relation to the visual impact of development on this site. It was argued that the landscaped buffer is not consistent with the buffer on site WLP5.2.</td>
<td>Peter Scott (Rep ID: 106, 110); Mr and Mrs J V Palin (Rep ID: 191); Diane Scott (Rep ID: 217); Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 395, 43, 449); Maureen Davison (Rep ID: 468)</td>
<td>The Settlement Fringe Landscape Sensitivity Study identifies that the site is in an area of high landscape sensitivity and moderate landscape value. The site itself is surrounded by development to the north and east. There is a main road and planning permission for development to the west, and a substantial swimming pool and gym building to the southwest. Farm buildings are also found to the south. Given these factors, the sensitivity of the site itself is not considered to be high and development would be strongly associated with the existing urban area of Bungay, rather than being exposed in the landscape. Furthermore the policy and the indicative masterplan and the policy require a landscaped strip sufficiently wide to accommodate tree and substantial shrub planting to both screen the development and deliver biodiversity improvements. Additionally, the masterplan identifies areas where housing should be no higher than 1.5 storeys in order to mitigate the visual impact in the landscape. In relation to the landscaping requirements for the WLP5.2 site, this is a smaller site and the 5 metre landscaped buffer is considered to be proportionate to the size of the site.</td>
</tr>
<tr>
<td><strong>Main issue 2:</strong> Concerns were raised about the impact on wildlife habitat. It was requested to amend the policy to</td>
<td>Peter Scott (Rep ID: 106, 110); Mr and Mrs J V Palin</td>
<td>The majority of the site is farmed agricultural land which will have low ecological value. The policy requires a landscaped strip on the southern boundary to support biodiversity connectivity; the retention of the hedgerow on the north eastern</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>include suitable buffers at the boundary and ecological enhancements.</td>
<td>(Rep ID: 191); Diane Scott (Rep ID: 217); Suffolk Wildlife Trust (James Meyer) (Rep ID: 278)</td>
<td>boundary; and an ecological survey with any planning application. A wildlife audit of the site has been carried out (C29) (page 54 – 57 of the pdf). This concludes the site is of low wildlife value, but a buffer should be maintained between any development and the hedgerow and ditch on the northeast boundary. Further surveys are also required. The policy requirements set out above are considered to address these matters and therefore changes are not considered to be necessary.</td>
</tr>
<tr>
<td><strong>Main issue 3</strong>: It was argued that the pedestrian and cycle path should be adjacent to boundary of the houses on Kerrison Road and Fairfield Road.</td>
<td>Peter Scott (Rep ID: 108, 111); Diane Scott (Rep ID: 218); Malcolm Tate (Rep ID: 261); Maureen Davison (Rep ID: 468)</td>
<td>The policy and indicative masterplan allow sufficient flexibility in this respect. This is a detailed matter which will be resolved through a detailed planning application. Therefore no changes are necessary.</td>
</tr>
<tr>
<td><strong>Main issue 4</strong>: It was contended that any new dwellings should be limited to single storey.</td>
<td>Peter Scott (Rep ID: 109, 111); Mr and Mrs J V Palin (Rep ID: 191); Diane Scott (Rep ID: 220); Malcolm Tate (Rep ID: 261)</td>
<td>The indicative masterplan sets out areas where dwellings should be no higher than 1.5 storeys in order to safeguard residential amenity and mitigate visual impact in the landscape. It is not considered reasonable or justifiable to apply such restrictions to the entire site as planning policy.</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council's Response</td>
</tr>
<tr>
<td>------------</td>
<td>------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concerns were raised relating to flooding on the site and the importance of this site acting as flood mitigation for site WLP5.2. It was requested that this site is used for flood mitigation and open space rather than built development.</td>
<td>Dominic Belisario (Rep ID: 447); Diane Scott (Rep ID: 217); Bungay Town Council (P Morrow) (Rep ID: 693); Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 410, 412, 448, 449, 492)</td>
<td>Part of the east of site WLP5.1 is in a flood risk zone, however this area has been set aside for public open space and drainage attenuation. This drainage attenuation will also help to deal with surface water from the WLP5.2 site. As part of a planning application, development on the WLP5.2 site will be required to take account of flooding from all sources and demonstrate that it does not increase flood risk elsewhere, as required by para. 103 of the 2012 NPPF and para. 163 of the 2018 NPPF. WLP8.24 ‘Flood Risk’ requires developments to make use of sustainable drainage systems (SuDS). The level 1 Strategic Flood Risk Assessment (C21a) identifies that the WLP5.2 site is likely to be suitable for infiltration SuDS (fig. 9). Given the scale of the site, it is considered that there is sufficient flexibility for the layout to incorporate effective SuDS schemes. Furthermore, there are no objections from the Environment Agency or the Lead Local Flood Authority with respect to flooding on the allocated sites in Bungay. As such there is no justification to increase drainage attenuation on site WLP5.1 above the requirements set out in the policy.</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> Concerns were raised over highway safety and it was</td>
<td>Diane Scott (Rep ID: 221);</td>
<td>Consultation with the highway authority via the local plan process has not revealed a requirement for a bypass or roundabout in this location. This is a matter of detail</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>requested to include traffic calming such as a bypass or roundabout in the local plan.</td>
<td>Peter Scott (Rep ID: 107); Dominic Belisario (Rep ID: 447); Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 411, 449); Maureen Davison (Rep ID: 461, 468)</td>
<td>which will be addressed via a planning application and the access requirements and highway safety measures will be looked at in the detail at that time.</td>
</tr>
<tr>
<td>Main issue 7: It was asserted that 30 dwellings per hectare should be the maximum density.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 449)</td>
<td>The policy sets an average density which is considered to be a good reflection of the surrounding development and provides the number of dwellings for the development. The actual density may vary across the site according to the detailed design. It is not considered necessary or justified to set a maximum density level.</td>
</tr>
<tr>
<td>Main issue 8: It was contended that the pedestrian and cycle way on the northwest edge of the site is little used.</td>
<td>Maureen Davison (Rep ID: 464)</td>
<td>An east-west link across the site is identified in the Waveney Cycle Strategy as an important link for Bungay. It is also supported by the Bungay Neighbourhood Plan Group (Rep ID: 414, 449). Therefore it is considered that this should be retained in the policy.</td>
</tr>
<tr>
<td>Main issue 9: It was argued that the 85 dwellings should be a minimum or</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Tim Basey-Fisher (John Long Planning) (Rep</td>
<td>The Council’s Hearing Statement for Matter 4, Question 4.3, confirms that the Council is supportive of an amendment to be made to all site allocation policies to</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>approximate number.</td>
<td>ID: 587)</td>
<td>insert the word ‘approximately’ before each reference to dwelling numbers. The term ‘minimum’ is not supported because this could result in numbers of dwellings being delivered well in excess of what studies at the plan making stage have envisaged and therefore would be difficult to properly assess through the sustainability appraisal process.</td>
</tr>
</tbody>
</table>

**Main issue 10:** It was argued that a further masterplan should determine the density; developable area; and landscaped buffer.

Tim Basey-Fisher (John Long Planning) (Rep ID: 587)  
It is not considered necessary to add an additional requirement to the policy for further masterplanning work. The masterplan in fig. 17, page 122 of the local plan is considered to be sufficient to guide development to meet the aims of the policy.

**Main issue 11:** It was argued that the Policy’s requirements for planning applications to be supported by ecology, archaeology, flood risk and transport assessments are not necessary as they are covered by other policies in the Local Plan.

Tim Basey-Fisher (John Long Planning) (Rep ID: 587)  
It is considered that these requirements are useful signposts providing precision and clarity as to what is required with a planning application given the particular issues identified at the plan making stage.

**Main issue 12:** it was requested that the policy should clarify that the pedestrian and cycle links are only required up to the edge of the site.

Tim Basey-Fisher (John Long Planning) (Rep ID: 587)  
Agreed. The development needs to allow for onward connections beyond the site, but the development only needs to construct the links as far as the site boundary. See MM7.6 of the Suggested Main and Additional Modifications at the end of this document.

*Policy WLP5.2 - Land West of St Johns Road, Bungay*

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Main issue 1: it was argued that ecological assessment is required prior to allocating the site. It was requested that the policy specifies that development avoids or mitigates ecological impacts and provides ecological enhancements.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 279)</td>
<td>The majority of the site is farmed agricultural land in two large open fields which will have low ecological value. The policy requires a 10 metre wide landscaped strip on the southern boundary; the retention of natural features on site such as hedgerows and trees; and an ecological assessment with any planning application.</td>
</tr>
<tr>
<td>Main issue 2: It was asserted that more employment land should be allocated on this site.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 453)</td>
<td>The Employment Land Needs Assessment (C4) identifies that Lowestoft has the largest market for new employment development, followed by Beccles. This is reflected in the strategy for new employment land distribution in policy WLP1.1. This allocates 85% of the 43 ha of employment land to Lowestoft and Beccles - the remaining 15% of employment land is distributed across the district. Additionally, there is extant planning permission for 3 ha of employment land on this site. As such there is not considered to be justification to increase the amount of employment land on the allocation. However, the Bungay neighbourhood plan, which is under development, can explore allocating additional employment land.</td>
</tr>
<tr>
<td>Main issue 3: It was contended that traffic calming should be included such as traffic lights or a roundabout.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 454)</td>
<td>Consultation with the highway authority via the local plan process has not revealed a requirement for traffic lights or a roundabout in this location. This is a matter of detail which will be addressed via a planning application and the access requirements and highway safety measures will be looked at in the detail at that time.</td>
</tr>
<tr>
<td>Main issue 4: It was argued that the area for allotments should be increased</td>
<td>Bungay Neighbourhood</td>
<td>The 0.25 Ha of allotment land is considered sufficient to meet the needs of the proposed development and is based on the standard for allotments in the Waveney</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>to 0.5 hectares.</td>
<td>Development Plan Steering Group (Ken Lodge) (Rep ID: 456)</td>
<td>Open Space Needs Assessment (C15, p. 265). The Bungay Neighbourhood Plan, which is under development, could allocate additional land for allotments to meet need.</td>
</tr>
<tr>
<td>Main issue 5: Concerns were raised relating to the management of surface water drainage and whether the flood mitigation on WLP5.1 will be sufficient.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 457)</td>
<td>As part of a planning application, development on the WLP5.2 site will be required to take account of flooding from all sources and demonstrate that it does not increase flood risk elsewhere, as required by para. 103 of the 2012 NPPF and para. 163 of the 2018 NPPF. WLP8.24 ‘Flood Risk’ requires developments to make use sustainable drainage systems (SuDS). The level 1 Strategic Flood Risk Assessment (C21a) identifies that the WLP5.2 site is likely to be suitable for infiltration SuDS (fig. 9). Given the scale of the site, it is considered that there is sufficient flexibility for the layout to incorporate effective SuDS schemes. Furthermore, there are no objections from the Environment Agency or the Lead Local Flood Authority with respect to flooding on the allocated sites in Bungay.</td>
</tr>
<tr>
<td>Main issue 6: It was contended that B8 uses will only be acceptable if all HGV traffic is diverted around the town centre.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 458)</td>
<td>This issue is acknowledged in the policy which states that B8 uses will only be acceptable where it is demonstrated there will be no adverse impact on the town centre. No changes necessary.</td>
</tr>
<tr>
<td>Main issue 7: It was asserted that housing density should be a maximum</td>
<td>Bungay Neighbourhood</td>
<td>Density may need to vary across the site and therefore it is not considered necessary or reasonable to set an upper limit on dwelling density.</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>of 30 dwellings per hectare and preferably less.</td>
<td>Development Plan Steering Group (Ken Lodge) (Rep ID: 458)</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 8:</strong> It was requested that the extension to the school playing field is increased to 2.75 hectares.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 540)</td>
<td>Agreed. See amended text in Statement of Common Ground with Suffolk County Council: Matters Relating to Schools, Policy WLP5.2.</td>
</tr>
<tr>
<td><strong>Main issue 9:</strong> It was requested that text is added to the policy stating that the development should be phased to consider the provision of sufficient school places.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 540)</td>
<td>See amended text in Statement of Common Ground with Suffolk County Council: Matters Relating to Schools, page 4</td>
</tr>
<tr>
<td><strong>Main issue 10:</strong> An additional criterion for the policy was requested to say that sand and gravel resources will be tested to judge if they should be used during development.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 584)</td>
<td>See amended text in Statement of Common Ground with Suffolk County Council: Matters Relating to Minerals Safeguarding, Policy WLP5.2.</td>
</tr>
<tr>
<td><strong>Main issue 11:</strong> It was stated that the policy is too restrictive in specifying the number of dwellings.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601); The Slater Family (Bidwells) (Rep ID: 687)</td>
<td>The Council’s Hearing Statement for Matter 4, Question 4.3, confirms that the Council is supportive of an amendment to be made to all site allocation policies to insert the word ‘approximately’ before each reference to dwelling numbers. The term ‘minimum’ is not supported because this could result in numbers of dwellings being delivered well in excess of what studies at the plan making stage have envisaged and therefore would be difficult to properly assess through the sustainability appraisal process.</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Main issue 12:</strong> It was argued that the policy is too restrictive with respect to housing density.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601); The Slater Family (Bidwells) (Rep ID: 687)</td>
<td>The policy sets out the objective for development to achieve an approximate density of 30 dwellings per hectare which is reflective of nearby residential development and in line with policy WLP8.32 ‘Housing Density and Design’. Given the more rural setting of the development to the south of the site, lower density is considered to be more in keeping for this location. Given the scale of the site and the more urban context of the northern parts of the site, there is considered to be flexibility to vary the density over the development and go higher in some parts, such as near the High School. As such no changes are considered to be necessary.</td>
</tr>
<tr>
<td><strong>Main issue 13:</strong> It was asserted that the policy should provide more clarity on the pre-school setting.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601)</td>
<td>Changes to the supporting text and policy have been agreed through the statement of common ground with Suffolk County Council: Early Years. See section on policy WLP5.2.</td>
</tr>
<tr>
<td><strong>Main issue 14:</strong> It was argued that the requirement for the employment land to be developed in advance or concurrently with the housing should be removed.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601); The Slater Family (Bidwells) (Rep ID: 687)</td>
<td>The residential development should support the delivery of the employment land and therefore it is important to have strong links in the timing of the two. The employment land does not have to be provided prior to the residential but the policy should not exclude this prospect, should it come forward. The plan is not specific about when the employment land must be developed – this should be determined at the planning application stage. Therefore there is flexibility which will assist with delivery of both the residential and employment elements. Therefore no changes are considered necessary. This is consistent with the existing outline planning permission on the BUN1 site.</td>
</tr>
<tr>
<td><strong>Main issue 15:</strong> It was requested that the policy should clarify that the pedestrian and cycle links are only</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601)</td>
<td>Agreed. The development needs to allow for onward connections beyond the site, but the development only needs to construct the links as far as the site boundary. See MM7.7 of the Suggested Main and Additional Modifications at the end of this</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------</td>
<td>------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>required up to the edge of the site</td>
<td>document.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 16</strong>: It was argued that the policy’s requirements for planning applications to be supported by ecology, archaeology, flood risk and transport assessments are not necessary as they are covered by other policies in the Local Plan.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601); The Slater Family (Bidwells) (Rep ID: 687)</td>
<td>It is considered that these requirements are useful signposts providing precision and clarity as to what is required with a planning application given the particular issues identified at the plan making stage.</td>
</tr>
<tr>
<td><strong>Main issue 17</strong>: It was asserted that the employment land should not be reduced and should be developed at the same time or in advance of residential development on the site.</td>
<td>Bungay Town Council (P Morrow) (Rep ID: 693)</td>
<td>The policy already supports this approach. It is clear on the amount of employment land required and when it should be developed.</td>
</tr>
<tr>
<td><strong>Main issue 18</strong>: It was argued that the policy is unsound on heritage grounds due to lack of evidence.</td>
<td>Historic England (Rep ID: 856)</td>
<td>Agreed. See amended text in Statement of Common Ground with Historic England, section on policy WLP5.2.</td>
</tr>
<tr>
<td><strong>Main issue 19</strong>: It was argued that the policy should allow more flexibility with respect to the type of employment uses that will be permitted.</td>
<td>The Slater Family (Bidwells) (Rep ID: 687)</td>
<td>The policy is considered to be sufficiently flexible in the range of employment uses which be permitted. B1, B2 and B8 (where appropriate) allow a range of employment uses to take place on the site which would support the local economy and are unlikely to compete with, and undermine, the town centre. There is a risk that allowing too much flexibility will allow development which will compete with the town centre and be harmful to the town centre’s vitality and viability.</td>
</tr>
<tr>
<td><strong>Main issue 20</strong>: It was contended that On-site open space is important to serve the needs of the development and help to</td>
<td>The Slater Family</td>
<td></td>
</tr>
</tbody>
</table>
### Waveney Local Plan Examination | Hearing Statement by Waveney District Council
Matter 7 – Strategies for Beccles and Worlingham, Halesworth and Holton, Bungay and Southwold and Reydon

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>the policy should be more flexible with respect to open space, landscaping and coach parking/turning on the site.</td>
<td>(Bidwells) (Rep ID: 687)</td>
<td>meet a shortfall in open space identified in the Green Infrastructure Strategy (C14). Landscaping is necessary to mitigate the impact of the development in the landscape and the setting of the grade II listed Manor Farm. Coach parking/turning on site 206 was proposed as part of the call for sites submission. This will provide important benefits locally by alleviating traffic congestion issues at school pick up/drop off times in the roads to the north of the site. Therefore it is considered that the policy requirements should not be altered in this respect.</td>
</tr>
</tbody>
</table>

| Main issue 21: It was suggested that the site would deliver only 60 units in the five year period rather than 110. | Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID:942) | Delivery of the numbers of units on the site as set out in table A3.3 of the local plan is considered to be completely reasonable. The two landowners are fully supportive of the allocation and confirm that the site is immediately available for development. (Rep IDs: 601, 687). In his representation, Tim Basey-Fisher has confirmed that a reserved matters planning application for part of the site is due by end of summer 2018. |

### Policy WLP6.1 – Land West of Copperwheat Avenue

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: Concern was raised over the impact of the development on infrastructure and the highway network.</td>
<td>Mr Tickner (Rep ID:44) Mr Reaney(Rep ID:67) G Duke (Rep ID:626)</td>
<td>The Local Plan is supported by an Infrastructure Study (C11) and includes an Infrastructure and Delivery Framework in Appendix 1 of the plan which details how infrastructure needs arising from development will be met. Transport modelling undertaken as detailed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) -</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>-------------------</td>
</tr>
</tbody>
</table>
| **Main Issue 2**: It was considered that the site would have an impact on the landscape and the Area of Outstanding Natural Beauty. It was stated that in order to be sound, a requirement for a Landscape and Visual Impact Assessment should be added to the policy. | Mr Reaney (Rep ID:63)  
Mr North (Artisan PPS Ltd) (Rep ID: 445)  
G Duke (Rep ID:626)  
Reydon Action Group for the Environment  
(Stephen Chessher) (Rep ID:733) | Preferred Option Traffic Forecasting Report (2018) (C19) indicates the development will not result in significant impacts on the network.  
The policy and supporting text recognise the need for improvements to the Crescents and a new pedestrian crossing over Wangford Road.  
See Statement of Common Ground with Natural England and the Suffolk County Council Area of Outstanding Natural Beauty Team and consideration of landscape impacts in the main body of this Hearing Statement. |
| **Main Issue 3**: It was suggested the reservation of 7 plots for the relocation of properties at risk to erosion did not justify the allocation of the remaining 213. | Mr Reaney (Rep ID:64) | The reservation of 7 plots for the relocation of properties at risk to erosion is a positive part of the policy but it is not the only reason for allocating the site for development as explained in the main body of this Hearing Statement. |
| **Main Issue 4**: The site was considered too large for the neighbourhood and impact on the enjoyment of the public right of way on the western boundary. It was suggested the site should be reduced to no more than 50 homes. | Mr Reaney (Rep ID:65)  
Mr Reaney (Rep ID:66) | As stated in the main body of this Hearing Statement, the site presents an opportunity to improve the landscape around the public right of way. The site boundary already allows for a buffer between the public right of way and the site. There is no justification for a reduction to 50 homes. |
<p>| <strong>Main Issue 5</strong>: Concern was raised about the | Mr Reaney (Rep ID:68) | The setting of Gorse Lodge relates more strongly to land to the south |</p>
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>impact of development on the setting of the grade II listed Gorse Lodge.</td>
<td>Mr North (Artisan PPS Ltd) (Rep ID: 445)</td>
<td>and west of the asset. The policy requires development to limit the impact on the setting and any impact on the setting can be mitigated through design and landscaping. No objections have been raised by Historic England.</td>
</tr>
<tr>
<td>Main Issue 6: It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 281)</td>
<td>There are no natural features on the site which would question the overall suitability of the site for development. The policy requires an ecological assessment to be undertaken prior to planning permission being granted.</td>
</tr>
<tr>
<td>Main Issue 7: It was suggested the size of the site should be reduced by 50% and the residual housing allocated to land off Green Lane (Site 5/38) or alternatively allocate land off Green Lane in addition to site.</td>
<td>Mr North (Artisan PPS Ltd) (Rep ID: 445)</td>
<td>It is considered the justification for a reduction of 50% is not robust given the allocation respects the existing extents of development to the north and the south of the site.</td>
</tr>
<tr>
<td>Main Issue 8: It was stated that the policy should be amended to require the testing of the quality of the mineral resource within the site prior to development taking place.</td>
<td>Suffolk County Council (Robert Feakes)(Rep ID:585)</td>
<td>See Statement of Common Ground with Suffolk County Council on Matters Regarding Minerals Safeguarding.</td>
</tr>
<tr>
<td>Main Issue 9: It was suggested that the site would only deliver 50 units rather than 100 within the five year period as there is no planning application currently submitted.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd) (Rep ID:936)</td>
<td>The landowners of the site, confirm in their representation on the site (Rep ID: 613) that the site is suitable and available for development. The developer also confirms that housing can be delivered on the site within the short term. The market is very strong in Southwold and Reydon and it is considered homes could be delivered very quickly following grant of planning permission. There is no reason why a full</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
<td>Council’s Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>planning application could not be determined by early 2019 and new homes delivered in 2020/2021 allowing 150 units to be completed on the site within the five year period as shown in Table 4 of the Statement of a 5-year supply of housing land (as at March 2018)(D3). Local experience, as discussed in the Council’s Hearing Statement for Matter 4, indicates that on average it takes less than a year for first completions to be realised on a site following grant of planning permission.</td>
</tr>
</tbody>
</table>

**Policy WLP6.2 – Southwold Harbour**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
<th>Council’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that paragraph 6.19 of the supporting next needed to be updated to reflect the flood risk permitting regime.</td>
<td>Environment Agency (Rep ID:725)</td>
<td>Agree, this would be a useful factual update. See MM7.8 of the Suggested Main and Additional Modifications at the end of this document.</td>
</tr>
</tbody>
</table>
Appendix 2 – Planning Committee Report for Land south of Chediston Street, Halesworth
1 SUMMARY

1.1 This application seeks outline planning permission for up to 200 dwellings including car parking, open space with associated infrastructure and access on land south of Chediston Street, Halesworth.
The site is allocated for housing in the Final Draft Local Plan which was published on 29\textsuperscript{th} March 2018 although only limited weight can be given to this in the determination of this application.

The National Planning Policy Framework (NPPF) promotes a presumption in favour of sustainable development. At the present time the Council is unable to demonstrate a 5 year supply of housing land. Under these circumstances the NPPF indicates that planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably out weigh the benefits.

The site lies outside the defined physical limits for Halesworth and is therefore contrary to the Development Plan. However the site is adjacent to the defined physical limits with residential development to the east and south. The site is also in close proximity to the town centre and proposed highway and footway improvements will make it easily accessible for pedestrians and cyclists.

The proposed development will also include measures to mitigate the impact of development on designated sites.

The proposal is considered to constitute sustainable development in conformity with the NPPF.

The application is recommended for approval. The application is referred to the Planning Committee as it is a major application.

\section*{SITE DESCRIPTION}

The application site is located on the western edge of Halesworth and covers an area of approximately 9.04ha of agricultural land to the south of the B1123 Chediston Street. Chediston Street forms the northern boundary of the site.

The site comprises part of a larger arable agricultural field which extends beyond the western boundary of the site. A slope which falls from 27m AOD at the southern boundary down to 12m AOD at Chediston Street forms a key characteristic of the site.

The eastern boundary of the site follows Roman Way and includes a bank which reduces intervisibility between this road and the site itself. A private access track is located along this boundary which arcs up into the site before following the southern boundary, past a row of mature deciduous trees before joining the residential development at Barley Meadow.

The southern boundary is formed by the rear gardens of properties along Daking’s Drift and Allington Road. Also notable at the southern boundary are the two large residential properties known as Churchlands and Highgrove.

The northern boundary is defined by Chediston Street, a verge consisting of scrub vegetation, occasional deciduous trees and a short section of Beech hedgerow.
The western boundary is undefined due to a lack of any physical features. The boundary runs through the lower part of a localised undulation in the landform.

3 PROPOSAL

3.1 This application seeks outline consent for up to 200 dwellings including car parking, open space provision with associated infrastructure and access.

3.2 The scheme proposes the following:

- Up to 200 homes, of which 70 (35%) would be affordable
- A new roundabout at the junction of Chediston Street and Roman Way; and
- Open space including formal play space, wildlife corridors, informal footpaths, screen planting, sustainable drainage systems, biodiversity improvements and landscape buffers.

3.3 All matters are reserved with the exception of the access which has been shown on the illustrative masterplan that accompanies the application.

3.4 The illustrative masterplan proposes up to 200 dwellings, 5 of which would be self-build plots. Of the remaining 195 units, 127 (65%) would be open market and 68 (35%) would be affordable.

3.5 The main vehicular access is from Chediston Street. Additional access for pedestrians is proposed at the eastern boundary of the site.

3.6 The indicative masterplan shows a layout that continues the built frontage along Chediston Street forming a continued relationship from the existing housing to the east of Roman Way. A secondary vehicular access point will be included along Chediston Street. The proposed buildings will be two storeys across the majority of the site, with a few 2.5 storey feature buildings within the site and single storey dwellings at visually sensitive locations such as the south eastern corner of the site.

3.7 Open space containing footpaths create a loop around the development providing links to the existing residential areas to the east. The western area of open space would retain a rural meadow-like character bonded by woodland. The central and eastern areas of public open space will be overlooked by proposed houses and would contain a play area. A smaller strip of open space along the southern boundary allows for an offset from the existing rear gardens along Dakins Drift and retains to mature trees at this boundary.

3.8 Following comments made by the Highway Authority revised details have been submitted which confirm the proposal will include an extension of the existing 30mph speed limit on Chediston Street and improvements to the pedestrian route along Chediston Street.

3.9 The application is supported by a number of documents including:

- Planning Statement
- Design and Access Statement
- Illustrative Masterplan
- Movement and Access Plan
- Built Form, Scale and Massing Plan
4 CONSULTATIONS/COMMENTS

4.1 Neighbour consultation/representations 25 neighbouring properties were notified of the application. 32 objections have been received on the following grounds:

- Over development. 200 homes on this site is far too many and Halesworth’s infrastructure (schools, GP surgeries) are already heavily over burdened.
- The site in question is on high ground so intrusion/overlooking of existing properties would be damaging. A much reduced proposal with single storey dwellings confined to the Chediston end of the site would be more appropriate
- Flood risk and surface water run off.
- My side boundary will be overlooked and overshadowed resulting in a total loss of privacy/loss of view & outlook/reduction to the value of my property/loss of light.
- Light & noise pollution as it is currently a very quiet area.
- Difficulty in getting out of Dukes Drive/Roman Way into London Rd.
- The development will tower above existing housing.
- Increased traffic noise and pollution.
- The plan shows no provision whatsoever for cycling. Not only should they be accommodated onsite but also, a new, safe route into Halesworth, preferably along Chediston Street, should be created.
- This application is not included in the current development plan and is therefore, at best, premature. No application of this scope should be considered until the current plan has run its course and a new plan put in place – otherwise the planning process becomes a mockery.
- There are currently a number of sites, approved for development, and part of the current plan which have not yet been built. These sites must be progressed first before any new large scale projects are approved.
- Chediston Street will be significantly affected. It is a narrow street with on street parking and narrow pavements, and in parts no pavement. The increase in traffic will be dangerous for pedestrians.
- A playground will attract noise and anti social behaviour at all hours.
- Wildlife in the area will be seriously impacted, as traffic ignores their rights of way.
Planning permission should not be granted until there are better NHS dentists available, additional doctors and surgery space, a senior school has been built, additional nursery and junior places are needed, better transport links to Norwich, Bury St Edmonds and Liverpool Street, real employment possibilities, expansion of the existing supermarket or an additional supermarket and better leisure facilities.

Please give consideration to building bungalows not houses.

Chediston Street will become a rat run.

The scale of the proposed development in a potentially sensitive site is unacceptable.

There is no indication of how the local infrastructure will be enhanced or of new sustainable employment initiatives or improvements to public transport services.

Dust and debris disruption whilst building work is in progress.

Loss of quiet enjoyment of my property.

There are numerous former industrial sites onto which new housing schemes should be placed.

The site is farmland hay meadow and is rich in biodiversity and wildlife.

Impact on landscape and landscape views. The area offers varied and unspoilt views to the north and to the west far along the valley.

The proposal is incompatible with many established local and national policies.

The proposed building site has been a landfill site for rubbish over a long period.

Speeding traffic along Chediston street.

The site is outside the boundary of the town and would thus add to the sprawl of the town into green field borders.

The development would urbanise and spoil what is currently a rather beautiful river valley on the edge of the town and change the character of Halesworth with an inappropriate development on a difficult site.

The site has archaeological interest and as such needs appropriate archaeological survey and investigation.

Greenfield sites in market towns should be avoided for housing and where other “brownfield” sites are available. There are brownfield locations within the Halesworth town boundary that are more suitable for housing. These should be used first.

There seems to be no justification for this site to be an exception to normal policies. There has been no demonstration that housing is needed on this specific site or that there is a particular need that has to be addressed.

The development is not in the right location and is not at the right time; infrastructure to serve the development should either be in place or in place within an appropriate timescale.

The proposal is contrary to the NPPF principles of sustainable development.

4.2 One representation supporting the application has been received making the following points:

Additional housing is needed both nationally and locally. In Halesworth growth is needed to ensure its future as a viable market town. Our support, however, is subject to consideration of surface water, drainage and sewage, medical and school facilities and the nature of the houses; this development should contain a suitable mix of housing to reflect the existing demography of Halesworth and an emphasis on affordable housing for younger working people.
4.3 **Halesworth Town Council**: On Monday night at an Extraordinary meeting of the Town Council, the Council made the following decision.

DC/17/3981/OUT - Outline Application (Some Matters Reserved). It was RESOLVED that the Council recommended refusal for the following reasons (which are further detailed in the minutes), Traffic and Access problems, insufficient Surface Water containment and increased Flood risk problems, Sewage and Utilities issues which also impacts on the flood risk, Environment and Archaeology, the lack of comprehensive surveys to determine what the site will be built on top of, cumulative impact on the infrastructure, particularly health and education services which are already overloaded, density design and appearance, taking on board the comments regarding ‘outlook’ and suitability of the housing mix.

4.4 In addition,
With reference to WDC’s Planning Policy DM27, protection of landscape character, ‘Development proposals should demonstrate that their location, scale, design and materials will protect and where possible, enhance the special qualities and local distinctiveness of the area’. It was considered that this development did not comply with this policy.

4.5 With reference to WDC’s Planning Policy DM22 which restricts development in the countryside it would appear that this application would contravene that policy.

4.6 And that the development should be considered under WDC’s current Local Plan and not the new draft Local Plan. In which case this site had not been identified as a suitable location for 200 houses. It was noted that previously a small area of the site, known as site 163, was considered under Site Specific allocation for development of around 60 houses.

4.7 The draft minutes of the meeting are attached and incorporate the views of the Council and residents which supports the Council's decision to recommend refusal.

**Draft Minutes:**
The Council had noted there had been 19 neighbour responses against the development and that but that there had only been 5 Consultee responses; Highways, Fire and Rescue, Environmental Health, Crime and Archaeology. The application was then considered by categories in the following order:-

The Clerk recorded the names of residents that made comments but they are not named individually in the minutes. A short summary of residents and Cllr comments for each section are noted below.

1. Access, traffic & parking.

Serious concern was expressed that the Traffic Assessment supporting the Planning Application was based on erroneous assumptions. The Planning Statement has not taken into consideration that very few of the future residents will find employment in Halesworth and so at least 100 cars will be leaving the site during the morning peak exodus. The document states “Opportunities for non-car based travel to and from the site, by bus, train, bicycle and on foot have been considered. There are a number of services and facilities within 1 mile (1.6 km) of the site in Halesworth, including local shops, services primary and secondary schools, which are all within walking and cycling distance of the
site. Research undertaken by CHIT indicates that 80% of the journeys are shorter than 1 Mile are likely to be undertaken on foot meaning that the majority of trips to local facilities are likely to be on foot.” Contrary to this statement, no bus services serve Chediston Street, the train station is about one mile away and the nearest secondary school is about 8 miles away in Bungay. Halesworth is not “well served by public transport” as claimed in the Planning Statement and is in fact very poorly served. Instead of 80% of local journeys being by foot or bicycle, it is more likely that 80% will be by car. Additionally, most houses will require two cars, one for the wage earner and the other for shopping and taking the children to school, further increasing the pressure on the Roman Way – London Road junction.

An anticipated increase in traffic towards the site along Chediston Street caused considerable concern, The Council is already aware of speeding problems in Chediston Street at the present time. Chediston Street is a narrow medieval street with cars parked on one side and is deemed to be unsuitable for the main pedestrian route into town, particularly for children going to school.

Concerns were expressed that drivers will find alternatives routes via Dukes Drive to avoid the London Rd Junction creating further problems. All North bound traffic will have to use Saxon Way so any traffic incidents will cause serious delays as there is no other suitable alternative North bound route. There is no provision for cycle ways which is already a problem for cyclists travelling in Halesworth.

There are currently difficulties for pedestrians and mobility scooters crossing Roman Way and the increased traffic will only exacerbate the problem. Poor lines of sight, due to the slope of the hill, increases the danger for pedestrians and mobility scooters.

Concerns were also expressed over the lack of parking provision, both on site and for the increase in vehicles needing to park in the town. It was noted that the access road off the B1123 would only be for construction traffic and that would leave only one access to the site which was considered to be inadequate.

2. Housing mix (affordable, rented and mixed ownership), layout and density.

Residents and Cllrs expressed concerns that there was a disproportionate amount of 4 bed houses (25%) and this did not reflect the Town’s need for more affordable housing. In particular the Council considered that shared ownership houses were the only realistic method for local residents to get on the property ladder and acquire their first homes. Local applicants should be given priority of others so that families are not split up due to price of houses. Affordable houses are often outside the reach of many young Halesworth families due to the low-income levels in relationship to the house values in the areas.

The Chair also noted that, although the site was 9.1 hectares, the development space was only 5.1 hectares which related to a high housing density of 39 dwellings per hectare. It was considered that a lower housing density of 30 per hectare or less would enable a more attractive development to be built and avoid cars being parked on roadways spoiling the appearance of the development. Residents expressed fears that the 4 bed houses would become holiday homes as is happening in neighbouring parishes. A significant increase in the number of intermediate houses would better meet the needs of local residents trying to get on the housing ladder.
3. Surface water and flood risk.

Many residents present at the meeting relayed accounts of frequent surface run-off flooding problems particularly down Roman Way and in Chediston Street but also other areas such as Dukes Drive. The Council were concerned that the permeability tests were too few and not realistic and that the proposed provisions to use SuDS would not be adequate to prevent run-off flooding following heavy rainfall. This is a serious problem in this area and must not be underestimated.

4. Sewerage and utilities.

The Chair noted that Anglian Water had confirmed that the sewage system was not adequate and a new sewer pipe (600mm) would need to be laid alongside the existing sewer. Residents on Chediston Street were concerned that this could mean serious disruption for their own properties in order for the new sewer to be laid through and under their gardens.

5. Visual Impact:

The Council heard from several residents of neighbouring homes concerned that their views would, due to the steepness of the hill, be completely replaced by houses. Whilst the Council and the residents were informed and were aware that ‘Loss of View’ was not a non-material consideration, the overall effect of the new development would be considered as a loss of outlook for a large number of existing property owners. A resident noted and read extracts from WDC’s Planning Policy DM22 which restricts development in the countryside and it would appear that this application would contravene that policy. It was also noted by the Chair that the development should be considered under WDC’s current Local Plan and not the new draft Local Plan. In which case, this site had not been identified as suitable location for 200 houses. It was noted that previously a small area of the site, known as site 163, was considered under Site Specific allocation for development of around 60 houses.


It was noted that the site had previously been identified as a Red Archaeology site. It was also noted that parts of the hill had been built up with construction waste from the previous Hopkins Homes site and therefore the Council were sceptical that the archaeology survey had taken the excess soil into account when conducting their tests. Cllr Took raised the problem of the huge dump which had been used for many years, which overlapped the site. This dump had been used for burning foot and mouth carcasses and as a general landfill site. There is a serious risk that his part of the site might be contaminated and present an ecological risk. However, it was not clear that this had been taken into account by WDC Environmental Health and by the developers.

7. Cumulative impact.

The Council heard from two residents who articulately expressed the importance of the hill in terms of its natural beauty and prominence for the residents of Halesworth from various
viewpoints. One resident referred to WDC’s Planning Policy DM27, protection of landscape character, ‘Development proposals should demonstrate that their location, scale, design and materials will protect and where possible, enhance the special qualities and local distinctiveness of the area’. It was considered that this development did not comply with this policy. Another resident summarised his view that the development had very little benefit to the community and did not offer the right properties for the younger demographic but at the same time it had several disadvantages; harm to the countryside, more traffic, higher flood risk and urban sprawl. The Council had concerns over the existing infrastructure which has been noted and recorded on many occasions. The Council’s own comments to the agent, and copied to WDC, prior to the application had already noted many of the points raised in this meeting.

It was then RESOLVED that the Council recommended refusal for the following reasons (which are further detailed in the minutes), Traffic and Access problems, insufficient Surface Water containment and increased Flood risk problems, Sewage and Utilities issues which also impacts on the flood risk, Environment and Archaeology, the lack of comprehensive surveys to determine what the site will be built on top of, cumulative impact on the infrastructure, particularly health and education services which are already overloaded, housing density and taking into consideration comments regarding ‘outlook’ and suitability of the housing mix.

4.8 Suffolk County Council - Highways Department: Further to receiving Technical Note A13455-VAA (which satisfactorily responds to comments previously raised by the Highway Authority), the County Council as Highway Authority raises no objection subject to a number of conditions. The Highway Authority also request Section 106 contributions for an extension of the 30mph speed limit along Chediston Street and bus stop improvements on Dukes Drive.

4.9 Suffolk County Council Travel Plan Officer: No objection subject to Section 106 contributions for an interim travel plan, travel pack, full travel plan including monitoring and a condition requiring details of details of electric vehicle charging points.

4.10 Suffolk County Council Flood and Water Management: Recommend approval of this application subject to conditions:

4.11 Suffolk County Council Archaeology: In addition to geophysical survey which has already been undertaken at this site, a trial trenched evaluation is required to ground truth the survey results and provide information regarding the nature, extent and significance of any surviving archaeological remains in order to inform mitigation strategies. Whilst it is advisable that the trial trenched archaeological evaluation is undertaken prior to the determination of this application as there is a risk that significant finds will be identified which require preservation in situ, and thus require revisions to the layout of the site which would have both financial and time costs, if the developer is happy to recognise and accept this risk, we would not advise refusal of planning permission if further archaeological assessment is not undertaken prior to determination of this application.

4.12 Should the Local Planning Authority be minded to grant planning permission without a requirement for up front archaeological investigation, we would advise that in accordance with the National Planning Policy Framework (Paragraph 141), any permission granted should be the subject of planning conditions to record and advance understanding of the
significance of any heritage assets before they are damaged or destroyed. We would advise that in accordance with the National Planning Policy Framework (Paragraph 141), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage assets before they are damaged or destroyed.

**Suffolk County Council Strategic Development:** Suffolk County Council’s expected infrastructure requirements associated with this proposal are a new early years provision, primary school extension, libraries and waste contributions. Apart from contributions towards a new early years setting, the requirements being sought in this case by Suffolk County Council are to be requested through CIL.

4.13 **Suffolk Fire and Rescue Service:** Recommends the installation of fire hydrants.

4.14 **WDC Environmental Health Officer – Contaminated Land:** No objection subject to contaminated land conditions.

4.15 **WDC Environmental Health Officer – Noise and Air Quality:** The Environmental Protection Team have the no objections to the proposed development in respect of matters relating to the likely noise and air quality impacts.

4.16 In terms of noise impacts some mitigation measures may be required once the layout of the site is finalised and this will involve the properties placed in closest proximity to Chediston Street and Roman Way. Once the site design is finalised the developer should submit a noise mitigation scheme.

4.17 In terms of air quality, the impacts on local air quality are likely to be insignificant and there are no locations in close proximity where there is poor air quality.

4.18 In the short term both noise and air quality impacts during the construction phase have the potential to cause nuisance, so it is appropriate for the developer to submit an Construction Environmental Management Plan to ensure that suitable mitigation measures are in place.

4.19 **Natural England:** (Summarised): We have reviewed the Habitat Regulations Assessment for this application. Some of the conclusions of the report and the analysis of likely recreational activity are at odds with recent work carried out in Suffolk Coastal District, and also do not reflect our earlier advice on the Local Plan HRA.

4.20 However, the report still provides a commitment to provide green infrastructure and to make a proportionate contribution towards a Recreational Disturbance Avoidance and Mitigation (RAMS) Strategy in the District. With sufficient high quality green infrastructure in place, and proportionate contributions to a district wide RAMS, it would be possible to conclude no adverse effect on designated sites.

4.21 In this case, we would seek further detail around the design of green infrastructure to provide a variety of attractive routes of at least 2.6Km for dog walking, with connections to Rights of Way, and infrastructure such as interpretation, dog bins, and off lead areas. (For example see Jenkinson, S., 2013)
4.22 **Suffolk Wildlife Trust:** (Summarised): Suffolk Wildlife Trust are of the view that the site is of some value for a range of species including the UK Priority species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)) grey partridge, linnet and brown hare which were all recorded on site during the ecological survey. It is unlikely that mitigation measures included as part of any development would be suitable for retaining these species on site and therefore development in this location would result in a net loss of habitat suitable for these species in this area. It is also possible that it therefore appears possible that this species may be present on site at least transitorily during the year. We also query whether the scrub and tall ruderal area on the eastern side of the site may provide suitable habitat for other reptile species, such as common lizard and slow worm? We recommend that further consideration is given to the requirement for mitigation measures for these species should consent be granted.

4.23 The proposal should also be subject to a Habitats Regulations Assessment (HRA) by the local planning authority, as the competent authority, prior to the determination of this application. We recommend that Natural England are consulted for further advice on this matter.

4.24 Based on the information provided it appears that the proposed development would result in adverse impacts on a number of species, including several UK Priority species. The proposal must therefore be considered against the requirements of Waveney DC Local Plan policies CS16 and DM29. Consent should not be granted for development which is contrary to these policies.

4.25 Should it be determined that development at this site is acceptable it must be ensured that significant ecological enhancements are secured. As this is an Outline planning application we recommend that, should permission be granted, an Ecological Mitigation and Enhancement Plan is secured by planning condition. This should include the mitigation and enhancement measures set out in the Preliminary Ecological Appraisal (Cotswold Wildlife Surveys, May 2016), along with any other enhancement measures which are appropriate for the site (such as the inclusion of integrated swift boxes in new buildings).

4.26 **NHS England:** There is 1 GP practice within a 2km radius of the proposed development. The practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

4.27 This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity by way of refurbishment, reconfiguration, or extension at Cutlers Hill Surgery, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.

4.28 **Anglian Water:** Recommend conditions for a foul water strategy and a surface water management strategy.

4.29 **Suffolk Constabulary Designing Out Crime Officer:** I would ask that you make the document Designing Out Crime in Suffolk, Residential Development available to the
developer in order that they can consider these recommendations when work commences on the detailed design stage.

4.30 I also strongly recommend that an application for Secured by Design (SBD) approval is made for this development.

5 PUBLICITY

5.1 The application has been the subject of the following press advertisement:

<table>
<thead>
<tr>
<th>Category</th>
<th>Published</th>
<th>Expiry</th>
<th>Publication</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major Application, Departure from Local Plan</td>
<td>13.10.2017</td>
<td>02.11.2017</td>
<td>Beccles and Bungay Journal</td>
</tr>
<tr>
<td>Major Application, Departure from Local Plan</td>
<td>13.10.2017</td>
<td>02.11.2017</td>
<td>Lowestoft Journal</td>
</tr>
</tbody>
</table>

6 SITE NOTICES

6.1 The following site notices have been displayed:

General Site Notice Reason for site notice: Major Application, Departure from Local Plan posted 13.10.2017 Expiry date 02.11.2017

7 PLANNING POLICY

7.1 National Planning Policy Framework (March 2012)

7.2 The Waveney Core Strategy was adopted in January 2009 and the following policies are considered relevant:

- **CS01** Spatial Strategy
- **CS02** High Quality and Sustainable Design
- **CS04** Infrastructure
- **CS11** Housing
- **CS16** Natural Environment

7.3 The Waveney Development Management Policies were adopted in January 2011:

- **DM01** Physical Limits
- **DM02** Design Principles
- **DM18** Affordable Housing
- **DM22** Housing Development in the Countryside
- **DM27** Protection of Landscape Character
- **DM29** Protection of Biodiversity and Geodiversity

8 PLANNING CONSIDERATIONS

Development Plan Policies

8.1 The site is located outside of the physical limits of Halesworth which is identified as a Market Town in Policy CS01 of the Waveney Core Strategy. Policy CS01 states that 15-25%
of the District’s housing growth will be accommodated in the Market Towns with most of this accommodated on previously developed land within Beccles and Halesworth. As of April 2016, 29% of housing completions over the period 2001-2016 have been in the Market Towns (62% of these have been in either Beccles or Halesworth).

8.2 Looking forward, the latest Strategic Housing Land Availability Assessment predicts that based on current outstanding permissions, allocations and windfall, over the period 2001-2025 (the plan period), 24% of housing development would have occurred in the Market Towns (58% of which in either Beccles or Halesworth). The addition of an extra 200 homes in Halesworth may result in the range of percentages for the market towns being exceeded. It will further detract from the focus the Policy places on Lowestoft, which under current projections will not meet the 70-80% target.

8.3 The site in question is also a greenfield site. Policy CS01 states that more than 50% of housing development is expected to be delivered on brownfield sites. Based on past completions and projected future completions it is expected that the Council will meet this target. The addition of an extra 200 homes on greenfield land will mean the Council will just miss this target with delivery at 42%. Considering the above, it is considered that the development of the site is in conflict with the overall Spatial Strategy.

8.4 Policy CS11 of the Waveney Core Strategy provides further detail for the housing strategy for the District and sets out a sequential approach to housing developments. The site is a greenfield site outside of the physical limits and therefore is the least sequentially preferable type of site. However, the Council’s latest Strategic Housing Land Availability Assessment Update 2017 indicates that there is insufficient land over the next 5 years to accommodate the need for housing. The proposal is therefore broadly in conformity with Policy CS11 of the Core Strategy.

8.5 Policies DM01 and DM022 support the housing strategy of the Core Strategy and provide extra detail on how to deal with planning applications for housing development.

8.6 Policy DM01 of the Waveney Development Management Policies state that development will be concentrated within physical limits and the supporting text to policy states that land outside of physical limits or allocated sites will be treated as being in the open countryside. The site clearly fits the description of open countryside. Policy DM22 of the Development Management Policies makes clear that housing development will not be permitted in the open countryside except in the following circumstances:

- Dwellings for agricultural or forestry workers where there is an essential need for the worker to live close to the workplace,
- Affordable housing on exception sites,
- Replacement dwellings for homes affected by coastal erosion
- Infill development, or
- Conversion of rural buildings

8.7 The proposed development fits with none of the above categories, therefore is contrary to Policy DM01 and DM22.

8.8 Overall it is considered that the proposal is in conflict with the existing Local Plan due to conflict with key policies CS01, DM01 and DM22.
8.9 The site is within tributary valley farmland landscape character area as defined by the Waveney Landscape Character Assessment. Policy DM27 states that development affecting tributary valley farmland landscape character areas will not be permitted unless it can be demonstrated there is an overriding national need for development and no alternative site can be found. It should be noted that this part of the policy was considered inconsistent with the NPPF through the appeal at Laurel Farm (APP/T3535/A/13/2199424 – DC/12/1332/FUL). The policy also sets out other tests with respect to impact on the landscape. Providing the proposals provide adequate landscape mitigation, the NPPF compliant parts of the policy should be met.

8.10 The application is accompanied by a Landscape and Visual Impact Assessment which has been considered by the Arboriculture and Landscape Manager. It is considered that in terms of landscape features, it is inevitable that a development proposal will result in change to the existing land use, in this case agricultural. That has to be a given, but in this instance the proposed development associates with the existing urban edge of Halesworth when viewed from the adjacent countryside. No significant changes to existing landforms are proposed and the indicated site layout shows retention of open space around the western margins of the site and within the site which allows opportunities for tree planting and wider landscape integration. The most notable effect is the predicted Major/Moderate effect on land use (and also landscape character). This acknowledges that there will a notable degree of change but not as significantly adverse as it could have been because of the opportunities for mitigation. Beyond the site boundaries the impacts on landscape character are relatively limited by landform and existing vegetation including woodland. These effects where they exist will moderate with time once mitigating planting establishes and becomes a presence in the landscape. These effects are no more notable than for any other similar development of this scale and their adverse nature needs to be balanced against the benefits that the scheme brings in wider planning terms. Effects on wider landscape character are considered to be no worse than Minor, although to secure this outcome it is considered necessary to secure a comprehensive planting scheme, appropriate to the prevailing landscape character and of a high specification for planting.

8.11 It is a somewhat similar picture in terms of visual effects in as much as the highest degree of effects is felt by receptors who are closest to the development site, including the closest existing residential properties, and for footpath users for up to 1km to the NW of the site. As described above, these effects will moderate over time as new planting establishes and grows on. In this respect the residents 19-27 Roman Way, 1-4 Newby Close and 67a Chediston Street are identified as receptors of greatest effects and these impacts will need to be specifically addressed in final detailed landscape design. This also applies to 16-22 Dakings Drift to a slightly lesser degree. Major effects will also be experienced for short distances for users of footpaths and cycle routes but again, mitigation planting will moderate effects over time.

8.12 In essence it is considered that this proposal does not present any significant effects other than what we would expect for a development of this type. Major adverse landscape and visual effects are localised and need to be offset against other planning related benefits in the overall balance. Where they do occur, a comprehensive planting proposal will moderate effects and contribute towards landscape integration with the surrounding
countryside. A comprehensive planting proposal could be secured by condition. As such it is considered that this proposal is not in conflict with Policy DM27.

Housing Land Supply

8.13 In the Planning Statement and the accompanying Five Year Land Supply Report, the applicant argues that the Council does not have a robust 5 year supply of housing. Paragraph 49 of the NPPF states that relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a 5 year supply of housing.

8.14 As stated above, the Council’s latest Strategic Housing Land Availability Assessment Update 2017 and Statement of 5 year supply of housing land March 2017 state there are insufficient deliverable sites to meet the five year supply of housing requirement. Currently the Council is 52 units short of a five year supply which equates to a 4.9 year supply. These figures are against the Core Strategy target of 290 homes per year based on the former Regional Spatial Strategy for the East of England and was adopted prior to the introduction of the National Planning Policy Framework. It is therefore not necessarily the full and objectively assessed housing need for the District as required by the National Planning Policy Framework. The Statement of 5 year supply of housing land March 2017 therefore assesses the supply against both the 2014 ONS Household Projections and the emerging objectively assessed need from the emerging New Local Plan. These indicate a five year supply of 4 years and 3.2 years respectively.

8.15 Paragraph 49 of the National Planning Policy Framework, specifies that relevant policies for the supply of housing should not be considered up to date if a five-year supply of deliverable housing sites cannot be demonstrated. The Supreme Court judgement of Suffolk Coastal District Council v Hopkins Homes and Richborough Estates v Cheshire East Borough Council 2017 makes clear that the primary purpose of paragraph 49 is to trigger the operation of a tilted balance in Paragraph 14 of the National Planning Policy Framework. Paragraph 14 states that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate that development should be restricted.

8.16 Given the above careful consideration needs to be made as to whether the proposal is in conformity with the National Planning Policy Framework and therefore, whether it constitutes sustainable development. If it is considered it does represent sustainable development, the tilted balance would indicate that the proposal should be permitted.

Emerging Local Plan

8.17 It should be noted that the site has been considered through the preparation of the Council’s Local Plan. The site was identified as a preferred site for development in the Council’s recent First Draft Local Plan consultation. The First Draft Local Plan was published under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, and therefore represents an early stage in the local plan making process which cannot be given weight in the determination of this application. In coming to the view of whether the site was a preferable site, the Council undertook a sustainability appraisal and a site assessment as part of the Strategic Housing and Economic Land Availability Assessment.
Whilst these assessments did not identify any significant issues with the sustainability of the site and indicated that the site was suitable for allocation in the Local Plan, they should not be relied upon in determining whether the proposal in question is sustainable development or not. This is because these assessments were undertaken on the basis of a generic scheme and on the best available evidence at the time. The scheme in question is more detailed, based on more substantial evidence and has been subject to more scrutiny from stakeholders. Therefore, the sustainability of the scheme must be assessed on the information provided with the application and the responses from stakeholders, rather than the assessment undertaken to inform the local plan.

8.18 A Final Draft of the Local Plan was published under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 on 29th March 2018. Paragraph 216 of the Framework states that from the day of publication decision makers may give weight to relevant policies in the emerging Local Plan. As the site has been allocated in the Final Draft Local Plan (for 200 dwellings), weight in favour of the site can be given. However the level of weight still needs to be rather limited, as there will be an opportunity for objections to be made to the plan.

Sustainable Development

8.19 The NPPF states that there are three dimensions to sustainable development: economic, social and environmental. These roles should not be undertaken in isolation, because they are mutually dependent.

8.20 Paragraph 19 of the National Planning Policy Framework states that the Government is committed to ensuring that the planning system does everything it can to support economic growth. The development of the site will bring economic development to Halesworth during the build period and will help to support/extend local services and businesses. It will deliver short/medium term employment in construction.

8.21 In terms of access the site is located approximately 600m from the town centre and therefore has excellent access to services and facilities. The site has good access to employment premises in the town, the railway station and the primary school. With development to the south of the site and to the east, the site is considered to constitute a logical extension of the town.

Habitats Regulations Assessment (HRA)

8.22 The application site lies approximately 8.0 km from the Minsmere to Walberswick Heaths & Marshes SAC and 13 km from the Benacre to Easton Bavents Lagoons SAC/SPA. At this distance, Natural England were of the view that the proposal could have potential significant effects on Minsmere- Walberswick SAC, SPA, and Benacre to Easton Bavents SAC, SPA. Natural England requested a Habitat Regulations Assessment which considers the potential for recreational disturbance impacts on these sites.

8.23 The Habitats Regulations require the impacts of development on European Sites to be assessed in combination with other plans and projects. The Final Draft Local Plan has been subject to a Habitats Regulations Assessment which recommends that Waveney joins the already established Suffolk HRA Recreational Disturbance Avoidance and Mitigation
(RAMS) Strategy. This mitigation strategy will include financial contributions from new dwellings towards the implementation of the recreational mitigation measures.

8.24 In commenting on the planning application Natural England are of the view that with sufficient high quality green infrastructure in place, and proportionate contributions to a district wide RAMS, it is possible to conclude there would be no adverse effect on designated sites.

8.25 The submitted Habitat Regulations Assessment concludes that in no circumstances will any of the impacts arising from the proposed development have a significant effect on the integrity of the SPA, SACs or associated SSSIs. The report provides a commitment to provide green infrastructure and to make a financial contribution towards developing a district wide recreational disturbance mitigation scheme (RAMS). The financial contribution could be secured in a Section 106 Agreement.

8.26 Natural England have requested further detail around the design of green infrastructure to provide a variety of attractive routes of at least 2.6km for dog walking, with connections to rights of way and infrastructure such as interpretation, dog bins and off lead areas. Such details could be secured by condition (See also paragraphs 8.43-4.6).

8.27 Subject to the provision of a financial contribution towards mitigating the impact of the proposal on designated sites and the provision of green infrastructure it is considered that the proposed development would not have an adverse effect on the Minsmere to Walberswick Heaths & Marshes SAC and Benacre to Easton Bavents Lagoons SAC/SPA.

Residential Amenity

8.28 As this is an outline application with all matters apart from access reserved for future consideration there are no details of the proposed houses although the illustrative masterplan shows where dwellings might be located.

8.29 The Design and Access Statement states that the majority of the 200 units will be two storey height with some 2.5 storey dwellings in the centre of the site. Single storey dwellings are indicated in the south eastern part of the site, closest to the existing bungalows along Dakings Drift. Single storey properties in this part of the site should ensure that the amenities of existing dwellings are not adversely affected by overlooking or loss of privacy.

8.30 The illustrative masterplan also shows a wide area of landscaped land along the eastern boundary due to the sloping nature of this part of the site. This undeveloped part of the site will ensure a wide separation between the proposed dwellings and existing properties along Roman Way. As such it is considered that the amenities of existing residential properties close to the site are unlikely to be adversely affected by the proposed development.

Highway Considerations and Parking Provision

8.31 The primary site access is proposed at the junction of Chediston Street and Roman Way and will take the form of a new roundabout located at the north eastern corner of the site.
An additional access point will be provided via Chediston Street, which will provide vehicular access to a small number of residential units.

8.32 A number of local residents have expressed concern that the traffic generated by the proposal will be detrimental to highway safety, particularly along Chediston Street. Following comments made by the Highway Authority revised details have been submitted which confirm that the proposal will include an extension of the existing 30mph speed limit on Chediston Street in a westerly direction to include the proposed secondary site access.

8.33 The revised details also propose to provide a continuous footway along the northern side of Chediston Street from the proposed site access roundabout to east of Beech Close, where it would connect with the existing footway to Halesworth Town Centre. This would provide an additional walking route into the town centre. The proposed footway would also extend along the northern edge of the site to connect with the secondary site access.

8.34 The proposed footway would also extend along the eastern boundary of the site to the south along Roman Way, where a 3m pedestrian / cycle link would also be provided. The pedestrian / cycle link, which is proposed at the southeastern corner of the site, would connect with the existing shared footway / cycle route on Roman Way.

8.35 The proposed pedestrian / cycle links and improvements to existing footways will improve the overall accessibility and sustainability of the site, while providing further alternatives to non-car based travel and connections to Halesworth Town Centre. The proposed footway on Chediston Street will also provide an alternative walking route to the centre of Halesworth to the existing route via Roman Way, Holmere Drive and Church Farm Lane.

8.36 Following the submission of these revised details the Highway Authority do not object to the proposal, subject to conditions. As such it is considered that the proposal deals satisfactorily with highway and pedestrian safety issues.

8.37 Car parking provision for the site will be in accordance with Suffolk County Council’s parking standards. The illustrative masterplan can incorporate the correct amenity space for each dwelling including garden size and car parking. Each dwelling will have at least one parking space, with some of the detached dwellings having a single or shared garage as well as integral garages.

Flood Risk

8.38 A Flood Risk Assessment (FRA) accompanies the application. The Environment Agency’s indicative floodplain map shows that the site does not lie within a designated fluvial flood plain, therefore the risk of flooding to the site from rivers is very unlikely. The risk of flooding from other sources, such as surface water and ground water is considered low.

8.39 The proposals will follow best practise regarding site drainage to ensure that any surface water runoff from the development is managed by attenuation and controlled discharge, to either the river via the surrounding surface water sewer network, or via infiltration directly into the ground, which will ensure flood risk is not increased elsewhere. A variety of Sustainable Drainage Systems will be utilised to control surface water flows from the
site. All surface water drainage systems will take account of local ground conditions and ground levels.

8.40 Suffolk County Council Flood and Water Management have reviewed the soakaway test report and FRA and recommend approval of the application subject to conditions including the submission of a surface water drainage scheme. As such it can be concluded that the site can be satisfactorily drained.

Heritage Considerations

8.41 At its nearest point the boundary of the Halesworth Conservation Area is approximately 150m to the east of the site along Chediston Street. There are a number of listed buildings further to the east along Chediston Street. There is a listed building approximately 1.1 km to the west of the site at Hill Farm House that is surrounded by tall garden boundary vegetation. The setting of this building is currently comprised of rural and agricultural character. It is considered that in view of the distance to this listed building and those along Chediston Street that there will be adverse impact on the setting or significance of designated heritage assets arising from the proposed development.

8.42 An archaeological desk-based assessment has been submitted and in order to provide further information regarding the presence or otherwise of archaeological remains on the site, a geophysical survey has been carried out, the results of which will be discussed with the relevant parties to ensure the proposed development has minimal effect on any on site archaeology. As will be noted above the Suffolk County Council Archaeologist raises no objection to the proposal subject to the imposition of conditions to record and advance understanding of the significance of any heritage assets before they are damaged or destroyed.

Biodiversity and Geodiversity

8.43 Natural England note that the Habitat Regulations Assessment provides a commitment to provide green infrastructure and to make a proportionate contribution towards a Recreational Disturbance Avoidance and Mitigation (RAMS) Strategy in the District and that with sufficient high quality green infrastructure in place, and proportionate contributions to a district wide RAMS, it would be possible to conclude no adverse effect on designated sites. Natural England have requested further detail around the design of green infrastructure.

8.44 In response to Natural England’s comments the applicant states that a network of at least 500m of new access routes will be created on the site which will connect to the wider footpath network which lies 160 m to the east of the site. Here there are Public Rights of Way which run north and then west or east. This footpath network offers a variety of local walks of various lengths, from 1.0 km to 10.0 km or more, so will more than cater for the minimum 2.6 km recommended by Natural England.

8.45 Further details of the design of green infrastructure could be secured by condition. A proportionate contribution to a district wide RAMS could be secured by Section 106 Agreement.
Suffolk Wildlife Trust’s comments are summarised in paragraphs 4.22-4.24 above. They are of the view that the proposal would result in a net loss of habitat suitable for a number of species including UK Priority species. In response the applicant has made the following comments:

“Although parts of the existing land provide potential nesting sites for Grey Partridge, these are extremely limited, and there is far more suitable, and extensive, habitat in the farmland to the west. Indeed, the fields here contain more wildflowers and thus more opportunities for foraging, whilst the hedgerows are less disturbed and safer for nesting. The proposed scheme will actually enhance the site for wildlife, as the western side will comprise a belt of tree and shrub planting with wildflower meadow creation. These features will be attractive to species such as Grey Partridge, as well as a wide variety of other birds and animals, including Linnet, reptiles and Brown Hare. The latter were found to be ranging widely around the area, so are not exclusive to the application site. And as with the partridge, the fields to the west contain a more diverse sward, and thus better foraging and breeding opportunities for Brown Hare”.

Land Contamination and Mitigation

The submitted Preliminary Risk Assessment has identified a filled sand pit within the confines of the site. The report did not include an intrusive assessment so the nature of the material used to fill the pit is unknown. This material could, depending upon its nature, act as a source of contamination and ground gas and will need to be investigated further. The intrusive investigation, together with any remediation and validation which may subsequently be required could be secured by condition.

Environmental Impact Assessment (EIA)

A screening opinion was requested on 16th November 2017 (Ref. DC/17/4964/EIA). It was concluded that the proposed development of this site is not EIA development.

Community Infrastructure Levy (CIL)

The proposed development will be liable for CIL. The 2018 Indexed CIL rate per square metre is £74.59. The affordable housing element would however be liable for CIL relief. The Town Council would receive a proportion of any CIL receipts that could be spent on anything that deals with the demands that development places on their area, such as open space, school places, cycle / pedestrian routes, strategic transport infrastructure and community facilities.

Benefits

A significant benefit of the proposal is the provision of 35% of the dwellings as affordable homes (compliant with Policy DM18).

The proposed development will also provide contributions towards a new pre-school facility, an extension of the 30mph speed limit on Chediston Street, bus stop improvements, a contribution towards habitat mitigation, on site open space and links to the wider footpath network.
In terms of access the site is located approximately 600m from Halesworth town centre which contains a range of shops, services and facilities. The site has good access to employment premises in the town, the railway station and the primary school. With development to the south of the site and to the east, the site is considered to be in a sustainable location.

The Planning Balance

To conclude on Development Plan issues, the proposed development is in conflict with Local Plan policies CS01, DM01 and DM22.

As noted above the Council’s latest Strategic Housing Land Availability Assessment Update 2017 and Statement of 5 year supply of housing land March 2017 state there are insufficient deliverable sites to meet the five year supply of housing requirement. Currently the Council is 52 units short of a five year supply which equates to a 4.9 year supply.

Paragraph 49 of the National Planning Policy Framework, specifies that relevant policies for the supply of housing should not be considered up to date if a five-year supply of deliverable housing sites cannot be demonstrated. In this instance and in accordance with the intention of paragraph 49 the ‘tilted balance’ under paragraph 14 of the NPPF is triggered. This states that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

A Final Draft of the Local Plan was published on 29th March 2018 which includes the allocation of the application site (Policy WLP4.2). Weight may be given to relevant policies in an emerging Local Plan although the level of weight needs to be rather limited, as there will be an opportunity for objections to be made to the plan.

Although the site is outside the physical limits as defined by Policy DM01, it is located adjacent to them and is conveniently located for access into the town centre by foot or cycle.

With regards to highway issues the Highway Authority raise no objection to the development subject to the inclusion of conditions and a Section 106 agreement to satisfactorily mitigate the impacts of the development. The proposed highway conditions consider provision of access roads, details of road construction, provision of parking facilities, footpath improvements along Chediston Road and link to Barley Meadow and extension of the 30mph speed limit along Chediston Street.

A further issue is the impact on designated sites. As will be noted above Natural England can conclude no adverse impact on designated sites subject to the applicant’s commitment to green infrastructure and a contribution towards a recreational avoidance mitigation strategy.

Suffolk County Council Archaeology point out the need for a trial trenched evaluation of the site. Whilst it is advisable that the trial trenching is undertaken prior to the determination of the application, these further investigations can be carried out as a
condition of planning permission, if granted, given this is an outline application. Suitably worded conditions will deliver appropriate mitigation on this matter.

8.61 Other matters, including surface water disposal and land contamination can be dealt with by conditions, should planning permission be granted.

8.62 The NPPF states that there are three dimensions to sustainable development: economic, social and environmental. These roles should not be undertaken in isolation, because they are mutually dependent. As noted above the site is close to the town centre and is considered to be sustainably located. There have been no objections from stakeholders subject to suitably worded conditions or a section 106 Agreement. It is therefore considered that the proposal constitutes sustainable development in conformity with the NPPF. Under these circumstances the ‘tilted balance’ indicates that planning permission should be granted.

9 CONCLUSION

9.1 This application is contrary to the development plan as the site lies outside the “physical limits” boundary for Halesworth. Notwithstanding this there are other material considerations to take into account in the determination of the application.

9.2 The site is allocated in the Final Draft Local Plan for 200 dwellings. At the present time the Council is not able to demonstrate a 5 year supply of housing land. In these circumstances the NPPF indicates that planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

9.3 The site is located close to Halesworth town centre and easily accessible by sustainable modes of transport. There have been no objections to the proposed development or impacts that cannot be satisfactorily mitigated by the imposition of conditions and requirements in a Section 106 Agreement.

9.4 Taking all the material planning considerations into account it is considered that the proposal, when assessed against the NPPF as a whole, represents sustainable development. The application is therefore recommended for approval subject to controlling conditions and a Section 106 Agreement.

10 RECOMMENDATION:

That the application be APPROVED subject to the completion of a section 106 agreement covering developer contributions, affordable housing and provision and future management of the open space and the following conditions:

1. a) Application for approval of any reserved matters must be made within three years of the date of this outline permission and then
   b) The development hereby permitted must be begun within either three years from the date of this outline permission or within two years from the final approval of the reserved matters, whichever is the later date.

   Reason: To comply with Section 92 of the Town and Country Planning Act 1990.
2. Details relating to the layout, scale, appearance and landscaping of the site (the “reserved matters”), and measures to minimise water and energy consumption and to provide for recycling waste shall be submitted to and approved by the Local Planning Authority before any development is commenced.

Reason: To comply with Sections 91 and 92 of the 1990 Act.

3. Details relating to the “reserved matters” pursuant to this planning permission shall not materially depart from the design principles and design proposals set down in the Design and Access Statement.

Reason: To secure a properly planned development.

4. No part of the development shall be commenced until details of the proposed access roundabout indicatively shown on Drawing No. A091299-1-105 have been submitted to and approved in writing by the Local Planning Authority. The approved access roundabout shall be laid out and constructed in its entirety prior to occupation. Thereafter the access roundabout shall be retained in its approved form.

Reason: To ensure that the access roundabout is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

5. No part of the development shall be commenced until details of the proposed access onto B1123 Chediston Street indicatively shown on Drawing No. YOR.2819_10C have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to occupation. Thereafter the access shall be retained in its approved form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

6. No part of the development shall be commenced until details of the proposed footway improvements indicatively shown on Drawing No. A13455-T-001 have been submitted to and approved in writing by the Local Planning Authority. The approved improvements shall be laid out and constructed in their entirety prior to occupation.

Reason: To ensure that the footway improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of sustainable travel and highway safety.

7. No part of the development shall be commenced until details of the proposed footpath/footway link to Barley Meadow has been submitted to and approved in writing by the Local Planning Authority. The approved link shall be laid out and constructed in its entirety prior to occupation.

Reason: To ensure that the link is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of sustainable travel.
8. Prior to commencement of the development, the applicant shall fund a Traffic Regulation Order to extend the existing 30 mph speed limit on the B1123 Chediston Street in a westerly direction to beyond the proposed new development access.

Reason: In the interests of highway safety.

9. Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

10. Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

11. No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

12. The new estate road junction(s) with Chediston Street (B1123) inclusive of cleared land within the sight splays to this junction must be formed prior to any other works commencing or delivery of any other materials.

Reason: To ensure a safe access to the site is provided before other works and to facilitate off street parking for site workers in the interests of highway safety.

13. All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.
14. Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING] manoeuvring and parking of vehicles including secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

15. Before the B1123 Chediston Street access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 215 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension).

Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

16. No development shall take place until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The statement shall provide details of:
   - proposed hours of work
   - proposed piling methods
   - the parking of vehicles of site operatives and visitors
   - loading and unloading of plant and materials
   - storage of plant and materials used in constructing the development
   - the erection and maintenance of security hoarding and acoustic screens
   - wheel washing facilities
   - measures to control the emission of dust and dirt during construction
   - a scheme for the recycling/disposing of waste resulting from construction works

The approved Statement shall be adhered to throughout the construction period.

Reason: In the interests of amenity and to ensure a safe development.

17. Site Investigation

No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until a site investigation consisting of the following components has been submitted to, and approved in writing by, the local planning authority:
1) A desk study and site reconnaissance, including:
* a detailed appraisal of the history of the site;
* an inspection and assessment of current site conditions;
* an assessment of the potential types, quantities and locations of hazardous materials and contaminants considered to potentially exist on site;
* a conceptual site model indicating sources, pathways and receptors; and
* a preliminary assessment of the risks posed from contamination at the site to relevant receptors, including: human health, ground waters, surface waters, ecological systems and property (both existing and proposed).

2) Where deemed necessary following the desk study and site reconnaissance an intrusive investigation(s), including:
* the locations and nature of sampling points (including logs with descriptions of the materials encountered) and justification for the sampling strategy;
* explanation and justification for the analytical strategy;
* a revised conceptual site model; and
* a revised assessment of the risks posed from contamination at the site to relevant receptors, including: human health, ground waters, surface waters, ecological systems and property (both existing and proposed).

All site investigations must be undertaken by a competent person and conform with current guidance and best practice, including BS10175:2011+A1:2013 and CLR11.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

18. Remediation
No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until a detailed remediation method statement (RMS) has been submitted to, and approved in writing by, the LPA. The RMS must include, but is not limited to:
* details of all works to be undertaken including proposed methodologies, drawings and plans, materials, specifications and site management procedures;
* an explanation, including justification, for the selection of the proposed remediation methodology(ies);
* proposed remediation objectives and remediation criteria; and
* proposals for validating the remediation and, where appropriate, for future maintenance and monitoring.

The RMS must be prepared by a competent person and conform to current guidance and best practice, including CLR11.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.
19. Implementation of remediation
Prior to any occupation or use of the approved development the RMS approved under condition 2 must be completed in its entirety. The LPA must be given two weeks written notification prior to the commencement of the remedial works.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

20. Validation
A validation report must be submitted to and approved in writing by the LPA prior to any occupation or use of the approved development. The validation report must include, but is not limited to:
* results of sampling and monitoring carried out to demonstrate that the site remediation criteria have been met;
* evidence that the RMS approved under condition 18 has been carried out competently, effectively and in its entirety; and
* evidence that remediation has been effective and that, as a minimum, the site will not qualify as contaminated land as defined by Part 2A of the Environmental Protection Act 1990.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

21. Unexpected contamination
In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority. Unless agreed in writing by the LPA no further development (including any construction, demolition, site clearance, removal of underground tanks and relic structures) shall take place until this condition has been complied with in its entirety.

An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and conform with prevailing guidance (including BS 10175:2011+A1:2013 and CLR11) and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority.

Where remediation is necessary a detailed remediation method statement (RMS) must be prepared, and is subject to the approval in writing of the Local Planning Authority. The RMS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The approved RMS must be carried out in its entirety and the Local Planning Authority
must be given two weeks written notification prior to the commencement of the remedial works. Following completion of the approved remediation scheme a validation report that demonstrates the effectiveness of the remediation must be submitted to and approved in writing by the LPA.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

22. No development shall take place until a Construction Environmental Management Plan to mitigate both noise and air quality impacts during the construction phase has been submitted to, and approved in writing by, the local planning authority. The construction shall be carried out in accordance with the approved Plan.

Reason: In the interests of amenity.

23. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

a. The programme and methodology of site investigation and recording
b. The programme for post investigation assessment
c. Provision to be made for analysis of the site investigation and recording
d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
e. Provision to be made for archive deposition of the analysis and records of the site investigation
f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy CS 17 of Waveney District Council Core Strategy Development Plan Document (2009) and the National Planning Policy Framework (2012).

24. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.
Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy CS 17 of Waveney District Council Core Strategy Development Plan Document (2009) and the National Planning Policy Framework (2012).

25. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:

1. Dimensioned plans and drawings of the surface water drainage scheme;
2. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
3. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Qbar or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
4. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
5. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
6. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
7. Details of who will maintain each element of the surface water system for the life.

The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

26. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

27. No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until
the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.

Reason: To prevent environmental and amenity problems arising from flooding.

28. Before the development hereby permitted is occupied full details of electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2.

29. Prior to the commencement of development full details of the design of green infrastructure to provide a variety of routes of at least 2.6Km for dog walking, with connections to Rights of Way, and infrastructure such as interpretation, dog bins, and off lead areas, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: In order to mitigate the impact of the development on designated sites.

30. The recommendations of the Preliminary Ecological Appraisal (Cotswold Wildlife Surveys, May 2017) and the great crested newt survey report (Cotswold Wildlife Surveys, May 2017) shall be implemented in full.

Reason: In the interests of the protection of wildlife and protected species.

31. Prior to the commencement of development an Ecological Mitigation and Enhancement Plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved Plan.

Reason: In the interests of the protection of wildlife and protected species.

32. Prior to the commencement of development full details of fire hydrant provision within the site shall be submitted to and approved by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: To ensure the adequate provision of water for fire fighting.

BACKGROUND INFORMATION: See application ref: DC/17/3981/OUT at www.eastsuffolk.gov.uk/public-access

CONTACT Phil Perkin, North Area Team Leader, (01502) 523073, Philip.perkin@eastsuffolk.gov.uk
Appendix 3 – Halesworth Town Council Community Centre Proposal
Halesworth
Town Council
Community Centre
Proposal

Keith Forster
3rd September 2018
Contents
1. Background 3
2. Proposals 3
3. Concerns 4
4. Alternative Options 4
5. Park & Toilets 5
6. Financial Considerations 5
7. Preferred Option 6
8. Conclusion 6
Community Centre for Halesworth

1. Background

1.1. Halesworth is one of the very few market towns which does not have a community centre to help create a cohesive structure within the community. Halesworth does not have a central hub - a focus for both regular and occasional community activities to occur. There are a number of venues used by clubs and organisations such as Chinny’s, a sports bar with function rooms; the United Reform and Methodist Churches, the Rifle Hall, and the library. Each venue in Halesworth has its own merits, but none of these venues can provide the facilities for all types of community social and recreational activities, nor can they support the current users of the London Road Building. These existing venues are generally unsuitable for some groups and consequently, these organisations often use alternative venues more suited to their needs, for example village halls in neighbouring parishes.

1.2. Waveney District Council’s (WDC) Local Plan identifies a growth of 762 dwellings in Halesworth between 2014 and 2036. This increase requires an improved infrastructure to support this growth. East Suffolk Business Plan’s vision, which has been adopted by WDC, is to ‘Maintain and sustainably improve the quality of life for everyone growing up in, living in, working in and visiting East Suffolk’. Provision of a Community Centre and additional Pre-Schooling facilities are two elements which demonstrate the implementation of this ‘vision’ towards the local community.

1.3. Halesworth Town Council (HTC), along with three voluntary organisations, currently has its office in the London Road building. WDC is divesting itself of all properties surplus to its requirements and as part of this project it wishes to dispose of the London Road building. HTC investigated the feasibility of purchasing the property, but have insufficient funds to further this option. Even if it were purchased, it is an old Victorian building in disrepair. It comprises small interconnected rooms and is far from being a suitable venue for HTC or the other organisations currently using it. There is very limited opportunity to utilise the currently unoccupied space, within the building, to generate any potential income streams. It does not make economic sense to undertake the cost of refurbishment for such limited gains.

1.4. In WDC’s latest draft plan, dated March 2018, it has been recognised that there is a need for a Community Centre and additional pre-school facilities located on the Dairy Farm Site, Policy WLP 4.5.

2. Proposals

2.1. At a meeting held on 13th June 2018 between WDC’s Planning Policy and Delivery Team and representatives from HTC at which the possibility for a new purpose built Community Centre for Halesworth was explored further. HTC’s conclusion from this meeting was that WDC fully supported the Local Plan’s identification of the need for a Community Centre and Pre-School facilities and were prepared to work to achieve it. The Dairy Farm site would have both a pre-school and a Community Centre with the necessary access and parking. The Community Centre would provide accommodation for the Town Council; the organisations currently based in the London Road building, the Day Centre, the Volunteer Centre and the Citizens Advise Bureau; a Council Chamber, meeting rooms and the necessary service facilities. Consideration must also be given to the needs of all the local clubs and organisations that meet in Halesworth and the surrounding area so as to incorporate these requirements within the final Community Centre design, as far as is practically possible.
2.2. In addition to the needs of the current London Road users, a new purpose built Community Centre could also offer facilities to the other organisations and societies in Halesworth who struggle to find meeting places. For example, the Halesworth Twinning Society entertains overseas visiting partners from Germany and France, in 'The Hub' at Heveningham because Halesworth does not have any suitable meeting venues. This is an embarrassing situation for not only the Twinning Society members but also reflects badly on Halesworth as a whole. Another example is Halesworth U3A which has a large membership and over 30 interest groups, many of which have to hold meetings in Holton Village Hall. In addition, current users of the Methodist Church have been informed that the building is to be sold, and consequently, they will need to find alternative meeting venues. Finally, the Rifle Hall (as noted below) is in very poor condition, and there is a need for the type of events and activities it stages to be provided in suitable accommodation.

3. Concerns

3.1. There are areas for concern, as it is reported that the site owner, Badger Building, are trying to obtain the complete site for housing, ignoring the need for a community centre. Badger Building suggests that Halesworth already has the London Road Building and the Rifle Hall and as a consequence has no need for a purpose built Community Centre. However, they ignore the identified need for an additional pre-school. Badger’s suggestion that the land should be used totally for dwellings is probably driven by the increased revenue for the additional dwellings. This does not negate the identified need for both a fit for purpose new Community Centre and a new pre-school, both new facilities which will greatly benefit the town.

3.2. To counteract that argument:

3.3.1 London Road Building

The London Road building comprises of small interconnecting rooms and is in disrepair. To make it functional, it would need to be completely restructured internally and its electrical, water and heating systems replaced to be compliant to current building regulations and standards. The Town Council and the volunteer organisations currently use only part of the building. There is no disabled access to the Town Council Offices, and no fire escape from the first floor. If HTC were to take over the entire site, it would need to be able to convert the currently unused old WDC offices in such a way that they would make the building self-financing. This conversion would require a considerable sum of money which HTC does not have. There is virtually no parking availability on site and no available on-road parking which requires any visitors to park in the ‘Co-op’ car park. HTC are unable to finance the building, and as noted above, any refurbishment / conversion cannot provide what is required or be economical.

3.3.2 The Rifle Hall

The Rifle Hall has major structural problems - the external flank walls are bowing out. At a meeting in April 2016, Dr Weeks, a Rifle Hall trustee, explained that ‘The survey had reported that the angle of the walls were leaning out to such a degree that if it wasn’t fixed shortly it would go past the stage where it was economically viable to repair’. The toilets are in a very poor condition. The building would require a completely new restructuring of the internal space and a modernisation of all the services. Even if the building was repaired, it would not provide the space required to house the existing users of the London Road building and offer no possibility of further renting facilities as a revenue stream. Similar to the London Road building, there is no parking available.

1. Alternative Options
1.1. Investigations have already been completed to identify alternative venues. However, none of the potentially alternative venues could support HTC, the Day Centre, the Voluntary Centre or the Citizens Advise Bureau, all of which are currently located in the London Road building. If the Day Centre loses the facilities available to them from LRB, there is a high probability that it will cease to function in its current format. Alternative Venues Report 28th July 2016, compiled by HTC and Hannah Reid of Community Action Suffolk, is summarised as follows: -

1.1.1. Library – No usable office space or suitable public meeting room available. No space for the volunteer organisations.

1.1.2. Chinnys Sports Bar – This is a commercial venue and does not comply with the Local Government Act 1972 regarding the supply of alcohol relating to Council meetings. There is no office space available for the Town Council nor for other users of LRB.

1.1.3. The Cut - The venue does not comply with the Local Government Act 1972 regarding the supply of alcohol. Although there are a number of meeting rooms available, there is no office space available for Council Offices or facilities for other LRB users.

1.2. None of the above can offer the Day Centre anything like the facilities they currently have to provide mid-day meals, three times a week, for elderly residents.

4. Park & Toilets

4.1. WDC has proposed that the park & toilets are transferred to and managed by HTC. Waveney Norse currently manage these facilities via a contract agreement with WDC. HTC will be required to work with Waveney Norse in preparing a new contract and agree a pricing structure for the park & toilets only. All other maintenance / ground keeping tasks would remain the responsibility of WDC.

4.2. Realistically, the transfer of the park and toilets to HTC is only viable if it is tied to an agreement where the funding of the Community Centre has been fully identified, the expenditure required for it approved at WDC cabinet level, a clear and reasonable time frame for its development has been set out, and HTC is the beneficiary of the revenue stream generated from the users of the building.

4.3. The play equipment, including the skateboard facilities, in the park and the toilets must be subject to an independent survey and, where necessary, refurbished and handed over in good condition before HTC takes responsibility.

5. Financial Considerations

5.1. The cost of providing a Community Centre and pre-school has been estimated to be £700k and £500k respectively, totals £1.2m, (WDC Planning Department figures). HTC assume the costing of £500k for pre-school is a Suffolk Country Council estimate and the full cost will be funded accordingly.

Therefore considering costs for the Community Centre only: -
Assume average WDC CIL money per dwelling will be: -
\[ \text{£6340} = \{\text{£74.59 per m}^3\} \times 85m^3 \]  

(Waveney Community Infrastructure Levy rates 2018)

If the expenditure is to be funded solely from the CIL monies generated in Halesworth, 110 new dwellings will cover the expenditure, \((110 \text{ dwellings} \times \text{£6340} = \text{£700,000})\). This represents less than 15% of the proposed developments.

5.2. Regarding the park & toilets, HTC recognises that the costs for their management and maintenance are paid for through a WDC budget and forms part of the Community Charge paid by the residents of Halesworth. HTC appreciates the financial constraints being placed on District Councils, but at this time, as HTC has no other source of funding apart from its precept, taking responsibility for the park and toilets is not feasible without financial assistance from WDC. In the longer term, the provision of a new Community Centre will result in HTC having a revenue stream that should not only be able to support the centre itself, but also assist in the funding of the park & toilets. Without the Community Centre facilities for generating income, HTC will not be able to fund the management of the park & toilets without significant long term financial support from WDC.

6. Preferred Option

6.1. The preferred option is a purpose-built Community Centre which would meet the needs of HTC and the volunteer organisations currently located at the London Road building, and provide a Community Centre for Halesworth residents.

6.2. The Dairy Farm site is on the edge of the town centre, close to the shopping centre with adequate parking close by. It would provide an ideal position for a Community Centre and a pre-school serving the residents of Halesworth.

6.3. It is assumed that the pre-school facilities will be dedicated towards that function, and whether it is incorporated within the Community Centre, or a separate annex, at this stage is irrelevant.

6.4. The Community Centre will be required to provide the following as a minimum;
   
   • Town Council offices and archive space.
   • Smaller meeting rooms for Council use and for hire to outside organisations.
   • A large meeting hall which can be used for Council Meetings, the Day Centre, social functions, club meetings, talks, mother and toddler groups, yoga, Pilates, and other wellbeing activities, etc.
   • A kitchen with cooking facilities for the Day Centre which provides lunches for elderly and socially isolated residents of Halesworth and the surrounding villages
   • A base for other voluntary organisations such as CAB, U3A, Twinning Society and those clubs and groups which will be made ‘homeless’ when the Methodist Chapel closes.

7. Conclusion

7.1. It is proposed that a new purpose built Community Centre will become a focal point for the residents of Halesworth and act as a catalyst for existing and new clubs, social activities and meeting groups. It will reflect the needs for all age groups of the community and be flexibly designed to suit the requirements of as many potential users and forms of activity as possible. It will provide facilities for members of our society who enjoy meeting and making new friends associated with different and diverse activities.
Appendix 4 – Halesworth and Holton Healthy Neighbourhood and Land North And East Of Hill Farm Road

[Map of Halesworth and Holton Healthy Neighbourhood and Land North And East Of Hill Farm Road]
## Suggested Main and Additional Modifications

<table>
<thead>
<tr>
<th>Modification No.</th>
<th>Paragraph / Policy</th>
<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Modifications</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MM7.1</td>
<td>Paragraph 3.28 Land West of London Road, Beccles</td>
<td>Delete the word “full” from second sentence.</td>
<td>To remove the guidance that any contamination report must cover the entire site.</td>
<td>Rep ID: 807 Hopkins Homes</td>
</tr>
<tr>
<td>MM7.2</td>
<td>Policy WLP3.2 Land West of London Road, Beccles</td>
<td>Delete the word “full” from the ninth bullet point.</td>
<td>To remove the requirement for any contamination assessment to cover the entire site.</td>
<td>Rep ID: 807 Hopkins Homes</td>
</tr>
<tr>
<td>MM7.3</td>
<td>Paragraph 3.35 Land south of Benacre Road at Ellough Airfield, Ellough</td>
<td>New paragraph after para 3.35: “As a former air field there is potential for contamination. Planning applications should be accompanied by a contamination assessment to address this risk.”</td>
<td>To address potential contamination on the site.</td>
<td>Rep ID: 721 Environment Agency</td>
</tr>
<tr>
<td>MM7.4</td>
<td>Policy WLP3.3 Land south of Benacre Road at Ellough Airfield, Ellough</td>
<td>New bullet point to the policy: “Any planning application on the site should be accompanied by a contamination assessment.”</td>
<td>To address potential contamination on the site.</td>
<td>Rep ID: 721 Environment Agency</td>
</tr>
<tr>
<td>MM7.5</td>
<td>Policy WLP4.1 Halesworth/Holton Healthy Neighbourhood</td>
<td>Bullet point 7 - Delete second sentence and replace with: “This should be enabled by residential development on the</td>
<td>To remove the trigger point at completion of 100 homes but still secure comprehensive</td>
<td>Rep ID: 696 Richborough Estates Ltd (Brown &amp; Co)</td>
</tr>
<tr>
<td>Modification No.</td>
<td>Paragraph / Policy</td>
<td>Change</td>
<td>Reason</td>
<td>Related Representation</td>
</tr>
<tr>
<td>-----------------</td>
<td>--------------------</td>
<td>--------</td>
<td>--------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>MM7.6</td>
<td>Policy WLP5.1 Land East of St Johns Road, Bungay</td>
<td>Amend bullet point 7 to read: A pedestrian and cycle route linking St Johns Rd to Kerrison Road and Meadow Road. The links should be constructed up to the edge of the site and support onward connections.</td>
<td>To clarify the policy requirements.</td>
<td>Rep ID: 587 Tim Basey-Fisher</td>
</tr>
<tr>
<td>MM7.7</td>
<td>Policy WLP5.2 Land West of St Johns Road, Bungay</td>
<td>Amend bullet point 13 to read: “Pedestrian and cycle routes should be provided up to the edge of the site which connect to the swimming pool; the employment land; existing residential development to the north; public rights of way immediately to the south and west of the site; and allow for onward connections to the west of the site.”</td>
<td>To clarify the policy requirements.</td>
<td>Rep IDs: 601 Tim Basey-Fisher</td>
</tr>
<tr>
<td>MM7.8</td>
<td>Paragraph 6.19 Southwold Harbour</td>
<td>Replace last sentence with: “Work in, under, over or within 8 metres</td>
<td>To ensure text is factually correct with respect to</td>
<td>Rep ID: 725 Environment Agency</td>
</tr>
<tr>
<td>Modification No.</td>
<td>Paragraph / Policy</td>
<td>Change</td>
<td>Reason</td>
<td>Related Representation</td>
</tr>
<tr>
<td>-----------------</td>
<td>-------------------</td>
<td>--------</td>
<td>--------</td>
<td>------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>of any fluvial main river, flood defence structure or culvert and within 16m of any tidal main river, flood defence structure or culvert may require an environmental permit for flood risk activities under the Environmental Permitting Regulations (England and Wales) 2016. A permit for works on the floodplain beyond these distances may also be needed if the work is likely to divert or obstruct floodwaters, damage any river control works or affect drainage.</td>
<td>permitting regimes.</td>
<td></td>
</tr>
<tr>
<td>MM7.9</td>
<td>Paragraph 3.22 Beccles and Worlingham Garden Neighbourhood</td>
<td>Delete “Ellough” and replace with “Weston”.</td>
<td>Allocation WLP3.1 lies partly in the parish of Weston and not Ellough.</td>
<td>Officer change</td>
</tr>
</tbody>
</table>

*Please note this list does not include modifications contained in Statements of Common Ground.*