

Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan

Regulation 14 Consultation Feedback Responses and Action Plan

The following is a compilation of all the feedback received from the community and stakeholders from the Regulation 14 consultation process. Feedback was received a number of ways (online, open meetings, letters etc) and is collated here. The feedback was discussed by the Neighbourhood Plan committee and its response and/or action agreed to each point is recorded here.

Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan

Regulation 14 Consultation Feedback - Responses and Action Plan

Comment responses – Red

Comment responses resulting in an action – Green

Numbers in parenthesis denote date that NP Committee discussed comment.

Comment	Originator Medium	Action/Comment
<p>Thank you so much for all your hard and diligent work in producing our Neighbourhood Plan.</p> <p>It reads well, reflects nicely the results of the 2017 questionnaires and conforms well with Waveney's Local Plan.</p> <p>Looking forward to the next and final stages</p>	<p>Gerda Gibbs Webpage</p>	<p>No action (09/03)</p>
<p>If any social housing built could be bungalows it would be amazing as I live in the village but due to declining health I need a bungalow 2 bedrooms as my grandson lives with us and I really don't want leave the village</p>	<p>Theresa Rudrum Webpage</p>	<p>Policy LAHS1 supports smaller homes</p> <p>The need for single storey dwellings should be drawn out at the Planning Application stage for a specific design proposal. Public consultation on the proposal will enable a need for bungalows to be included to be considered by the Planning Committee, if none are included in the design. (09/03)</p>

<p>I read the neighbourhood plan with interest as I live opposite the proposed plot for the new properties in Lound. I was pleased and relieved to see how much thought has gone into this, especially with regard to the planting of shrubs and trees, and the requirement that new properties maintain the feel of the village. This will enhance the area beautifully. I know how much time and work went into this neighbourhood plan, and this shows in the finished product. I look forward to watching it all develop over the course of time.</p>	<p>Jill Brown Webpage</p>	<p>No action (09/03)</p>
<p>Can we be given assurance that the property Jernigan will be left with a garden area to the rear of the property? At the moment the plans show the land is to be used up to the border of the outbuildings. It is would be unfair that it would be the only property in the village to not have a rear garden.</p>	<p>Jean Lindsay Webpage</p>	<p>Not applicable to NP</p> <p>This issue is one that can be raised at the Planning Application stage.</p> <p>A lack of garden space that results from the proposal can then be raised and discussed by the District Council Planning Committee. They can require an amended design to retain garden space if the proposal reduces it unnecessarily. (09/03)</p>
<p>Natural England does not have any specific comments on this draft neighbourhood plan.</p>	<p>Natural England Email</p>	<p>No Action (09/03)</p>
<p>1) There is no discussion regarding the provision of school places for the larger number of children who will be living in the neighbourhood.</p>	<p>Sue Cox Email</p>	<p>(1) SCC have, based on current forecasting, confirmed that</p>

<p>2) With additional inhabitants, the village could benefit from, and support, a convenience store/post office. I'm surprised to see that no mention is made of this.</p>		<p>Somerleyton School has sufficient capacity (09/03)</p> <p>(2) LAHS 9 supports local businesses, and a proposal for a shop and/or Post Office would therefore gain Planning support and, recent village initiatives have commenced with a view to providing a community village shop. (09/03)</p>
<p>Many thanks for the recent update on the Neighbourhood Plan for Lound with Ashby, Herringfleet and Somerleyton. It is extremely detailed and thorough. I am pleased with the attention to our natural environment, the historical importance of the area and the desire that the new properties will reflect those already built and should 'fit in', providing as well the types of dwellings that people need, not just desire. The pedestrian and cycle route suggested through the Mill Farm Field in Somerleyton is a great suggestion for so many reasons.</p> <p>I look forward to seeing more detailed building plans but feel it is very important that we ensure the Design Guidelines for each site are adhered to, as they seem very much to reflect what people need and deserve.</p>	<p>Julie Reynolds Email</p>	<p>No Action (09/03)</p> <p>The Design Guidelines forms part of the NP once it is adopted. The NP then becomes part of the Local Plan and its requirements must be followed by any planning proposal. (09/03)</p>
<p>Policy LAHS 2 Development of Allocated Sites</p>	<p>Essex and Suffolk Water</p>	<p>No Action (09/03)</p>

<p>We note that it is proposed to allocate sites for residential development including a site which currently appear in the Local Plan. Anglian Water has no objection to the principle of residential development on the sites identified in the Neighbourhood Plan.</p> <p>The adopted Waveney Local Plan includes district wide policy relating to sewerage, sewage treatment and the use of Sustainable Drainage Systems to manage surface water (Policy WLP1.3 - Infrastructure and Policy 8.24 - Flood Risk)</p> <p>As the Development Plan is intended to be read as a whole it is not considered necessary to include similar requirement in Policy LAHS2 the Neighbourhood Plan.</p>		
<p>Neighbourhood Plan</p> <ul style="list-style-type: none"> · Objectives – should landscape and the Broads be mentioned in the objectives? They are mentioned in the vision. · LAHS1 only includes numbers of bedrooms, but 7.1.7 implies that it endorses design elements – but the policy does not say that. You may wish to clarify 7.1.7 and LAHS1. · 7.2.2 – what about the fact that with less than 10 dwellings there is likely to be no affordable housing. Does that contradict the objectives and vision? Especially the social objectives. 	<p>Broads Authority</p> <p>Email</p>	<p>Objectives – We have reviewed the Objectives and, are satisfied that the BA mention in 5.3 is sufficient (09/03)</p> <p>The emphasis on the design principles would be better placed preceding LAHS4 and the NP will be revised accordingly. (09/03) Action taken 7.1.7 deleted, LAHS 4 already has preceding ref to Design Guide.</p> <p>7.2.2 No, it is accepted that affordable housing will be incorporated in line with Waveney Local Plan policies, however LAHS1 supports smaller dwellings. (09/03)</p>

<ul style="list-style-type: none"> · 8.1 para 2- what about mitigating climate change – reducing emissions in the first place? This section talks of adapting to a changing climate and not reducing emissions. · 8.1 we suggest this change ‘New developments will be expected to take into account the impacts on enhance biodiversity and climate change’ needs to be updated to keep step with new biodiversity gain requirements. · Map on page 11 shows a Neighbourhood Plan allocation. I think it is called LAHS4, but it is not clear on the map. LAHS4 however is a design policy. Is the Neighbourhood Plan allocating the land shown as blue on the map on page 11, and if so, where is the policy? 		<p>8.1 This point is agreed and the text is changed to “New developments will be expected to enhance biodiversity and climate change” (09/03)</p> <p>Correct observation. The reference LAHS4 will be revised to LAHS7 (09/03)</p>
<p>The Design Guide</p> <ul style="list-style-type: none"> · The design guide does not adequately reflect the Broads. There are many comments made on the design guide below. The issue is that what is in the design guide is effectively made policy by policies in the Neighbourhood Plan. The design guide needs to be amended to reflect the Broads and related documents and our comments. 	<p>Broads Authority</p> <p>Email</p>	<p>Note that Masterplanning and Design Guidelines has been produced by a third party consultant and cannot be revised. Any comments that require inclusion will be incorporated into the NP text.</p> <p>The Masterplanning and Design Guidelines is specifically written for the three allocated sites, as identified. The NP requires any further developments to adopt the requirements of the Masterplanning and Design Guidelines.</p>

		<p>Any development that is within or abuts the BA area will be subject to the BA planning requirements, however all other developments are not compelled to do so.</p> <p>In recognition of the above the following is added as 7.5.9 to LAHS4 preamble – “The allocated sites do not impact the Broads Authority, but any future development that does should take the Broads Authority requirements into account” (09/03)</p>
<p>Design Guide</p> <ul style="list-style-type: none"> · In terms of the special qualities of the Somerleyton village itself, you would say that one of the most distinctive things about it is the cottages presumably built by the estate and giving it almost the appearance of an ‘Estate village’. I can understand why they have therefore focussed on that in terms of their policies / design guide for the main village itself. However, the village is on the edge of the Broads and the western edge is within the BA area so this does need to be considered. · Page 7 talks of three allocations. See comment previously about the NP map showing one allocation with no policy. Can this situation be clarified please? · Page 7 – last set of bullet points. Why have no Broads Authority documents been considered/assessed/mentioned? 	<p>Broads Authority</p> <p>EEmail</p>	<p>See above</p> <p>A map of Somerleyton which has two site allocations, and the third allocation is shown on the Lound map both of which can be found in the NP (09/03)</p> <p>Reference to BA planning requirements has been included into the LAHS4 preamble (09/03)</p>

· Page 7 – reference is made to Homes England’s Urban Design Compendium (2013). Better reference might now be made to the National Design Guide, October 2019.

· Page 7 – should the 4 sites include the one at Herringfleet Marina – albeit a slightly different form of development.

· Page 7 – and BA Local Plan 2019 and Design Guides

· Page 8 – within Waveney DC (now East Suffolk) and BA

· Page 9 – I’m not sure why para 196 of the NPPF re: the designation of CAs is included?

The Design Guide was current at the time of writing. (09/03)

Agree – reference added in NP as 7.3.6 “The Broads Authority has allocated 10 marine residential moorings at Somerleyton marina, that are subject to the Broads Authority requirements, see “Local Plan for the Broads” (09/03)

See reference to LAHS4 preamble (09/03)

The statement identifies the administrative district of the plan area, not all agencies that may have some jurisdiction within the area, of which BA is only one. (09/03)

This reference has been included by the author to contextualise Conservation Areas designation, which Somerleyton enjoys. (09/03)

<ul style="list-style-type: none"> · 3.2.2 – Parts of Somerleyton fall within the BA Executive Area and we therefore perform the role of LPA in this area. Need to include relevant policies from the BA Local Plan and other relevant docs re moorings / waterside buildings and ‘Keeping the Broads Special’ etc. This does not mention the adopted Local Plan for the Broads and it needs to. · Figure 5, page 10-11 – don’t forget that there is an allocation for residential moorings at Somerleyton Marina – see Local Plan for the Broads. · Pages 13 can the Marina allocation be shown on the Somerleyton Plan? · Page 14 – make reference to the ‘wooded ridge’ which runs along the eastern edge of the Herringfleet Marshes and forms quite a local landscape feature? The differentiation in height is clear from the plan. · Page 14 – for planning purposes, the Broads is not a National Park. The Broads has a status equivalent to a National Park. · 3.2.5 says: ‘The large grade II* listed was originally Tudor-Jacobean but what you see today is largely Victorian’. Seems that there is a word like ‘building’ missing. 		<p>The NP references the Local Plan for the Broads and is referenced in Objectives 5.3, affording it significant prominence (09/03)</p> <p>See above, referenced in 7.3.6 (09/03)</p> <p>We have no facility to revise this plan, but as reference to the Local Plan for the Broads is made, details are signposted (09/03)</p> <p>As stated, we have no facility to revise this document (09/03)</p> <p>Apologies on behalf of the author, but the error is not material, given the equivalence. (09/03)</p> <p>Agree an error, but does not detract (09/03)</p>
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· 3.2.5 – this needs vast improvement. Somerleyton is partly within the Broads. As this section is about culture, there is much to say about the culture of the Broads. The paragraph might be ok, but the reference to the Broads Plan should be removed. Perhaps replace with ‘Broads’ and go on to say the cultural aspects of the Broads.

· Page 15 last para – the Conservation Area is part in the Broads and part in ESC areas. The Broads itself is a landscape designation and this section needs to say that. The Broads is not split – it covers Norfolk and Suffolk, but it is the Broads. Somerleyton falls within the Broads, not Broads Plan. As such, the settlement has strong cultural traditions linked to the wider Broads area.

· Page 15 – grade II* listed Smock Mill at Somerleyton (Herringfleet mill) as well. I’m not sure that I would agree with the statement that the CA designation gives protection to all of the buildings and would suggest this is removed. They could say that ‘buildings within the CA have some different permitted development rights and development is expected to enhance the conservation area’.

· Section 3.2.7 needs to mention and assess our Landscape Character Assessment.

3.2.5 This provides a high level overview and is not intended to provide great detail of any specific element that makes up the area. Arguably, Somerleyton Hall dominates the public image of the area, but it only commands one paragraph, barely larger than the Broads.(09/03)

Apologies on behalf of the author, but the error is not considered material. (09/03)

The point is not material to the NP as developments within Conservation Areas will, by default, have to comply with those requirements that protect them. (09/03)

This is a Broads Authority requirement that is not mentioned in the NP, because like all other Planning requirements, the NP does not seek to repeat them. (09/03)

<ul style="list-style-type: none"> · Page 18 – mention of Somerleyton (do they mean Herringfleet?) Mill and engine house at the east of the area – do they mean west? · Page 23 says ‘In Lound the public footpath leads east from Blacksmith’s Loke where it splits and heads east to Hopton-on – Sea or south towards Church of St John the Baptist on Church Lane should be retained and enhanced in future development’; I don’t think this makes sense. It needs a read and re-wording. · Page 23. What is ‘River Waveney Special Area’? Could they just say should link to public footpaths along the river, if that is what they mean? · Page 23 ends with an ‘and’. · 4.1.5 bullet 2 – Broads Plan or Local Plan for the Broads? Probably the latter. · Page 27 – The Broads Local Plan, not Broads Plan. Proposals within the BA Exec area need to comply with all of the Local Plan policies, in particular those on character and landscape sensitivity are of relevance to the Design Guide. · Page 31 – bullet point 3 – ‘The existing character must be appreciated.’ – would it be better to remove this sentence which does not really mean anything – (how would a developer show they appreciate the existing character?) and just say ‘Architectural 		<p>Apologies on behalf of the author, but the error is not material. (09/03)</p> <p>Apologies on behalf of the author for syntax, but the statement is essentially correct. (09/03)</p> <p>Apologies on behalf of the author, but the error is not material.(09/03)</p> <p>Apologies on behalf of the author, but the error is not material.(09/03)</p> <p>Apologies on behalf of the author, but the error is not material.(09/03)</p> <p>This is a Broads Authority requirement that is not mentioned in the NP, because like all other Planning requirements, the NP does not seek to repeat them.(09/03)</p> <p>The selection of the word “appreciated” is deliberate, and is considered</p>
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<p>design should reflect the local character and the rural setting but should not stifle innovation’?</p> <ul style="list-style-type: none"> · Page 31 bullet 5 ‘Buildings should be spaced to allow glimpsed views of the surrounding countryside’? · Page 31 bullet point 6 – do they really mean 2.5 storeys? They have stated on the two previous pages that maximum heights are two storeys and a lot of the buildings in the villages appear to be 1.5 storeys (eg all three buildings shown in the photo on this page). I would think a maximum height of 2 storeys would be a more appropriate scale for new development. · Page 31, 7th and 10th bullet - complement rather than compliment? · Page 31, bullet point 8 – support, but you may want to mention the dark skies in the Broads and the work we did and our policy. · Page 31, penultimate bullet – locating cycle parking in discrete locations implies there will be a lack of natural surveillance or they could be located with the bins, which often happens. Please re think what you have written. · Page 33 4.1.9 Design checklist – I wonder if some of this needs to be checked as some of the Design Elements and Descriptions don’t quite seem to go together or reflect what has 		<p>appropriate in this context. The following sentence explains this point with precision. (09/03)</p> <p>Not an unreasonable statement, to provide rural aspects within a development (09/03)</p> <p>Somerleyton and Lound both have a few examples of two and a half storeys and thus future developments may consider them appropriate, depending on situation. (09/03)</p> <p>Apologies on behalf of the author, but the error is not material. (09/03)</p> <p>Unable to revise the document and not sufficiently material to insert mention in NP. (09/03)</p> <p>Disagree the implication and furthermore community, parish council and district planners will review proposals for these (and other details) upon submission of development proposals (09/03)</p>
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been discussed in the Design Guide eg Buildings Heights and Rooflines' description is about historic materials and architectural detailing – should it not be about height, roof form and chimneys? Connectivity talks about the linear pattern of development but should it not be about footpaths and access?

- Page 33 4.2 typo 'influence'
- 4.1.9 – is the checklist for the Local Planning Authority or the developer? If for the developer, did you want a yes or no answer, or did you want some explanation? If explanation, could the wording be 'how do you...?'
- How has the Conservation Area appraisal been used to inform this work?
- 4.3 – is this for the LPA or the applicant? Also, this seems generic rather than area-specific, which might be fine, but is there scope to reference local things, like the Broads?

The document has been accepted by the NP committee (and ESC has reviewed and commended it). Connectivity, in this context, is taken to be visual connectivity (09/03)

Apologies on behalf of the author, but the error is not material. (09/03)

This is a guiding checklist, for the design aspects to be considered and for those reviewing, determining that the elements have been considered. How well the checklist is delivered is not a binary outcome, but rather an objective view by those who review each development proposal. (09/03)

Page 51 Section 8 references Waveney District Council (March 2011). Somerleyton Conservation Area. Suffolk: Waveney District Council. Pages 1 – 48. (09/03)

The purpose is to assist and prompt the designer to consider the range of elements that will make up the development proposal. Special requirements of BA will reside in the BA Local Plan, which will be consulted

<ul style="list-style-type: none"> · Section 6 – do you have any thoughts about design associated with the residential moorings allocation? You may not, but that allocation is not mentioned in this document. · Building for a healthy life has been released. Should this be reflected in the Design Guide? · There seems to be no reference to local plan policies on design from the Local Plan for the Broads. · Page 49 Will there be a ‘Concept Masterplan’ for the Somerleyton Marina site allocation? · Page 51 References – I would suggest that the National Design Guide should be a reference, as should the Local Plan for the Broads, 2019. 		<p>in the event that the development proposal site is within or abuts BA jurisdiction.(09/03)</p> <p>See above, referenced in 7.3.6 (09/03)</p> <p>The document was released after publication, so it cannot be included at this stage. (09/03)</p> <p>This is a Broads Authority requirement that is not mentioned, because like all other Planning requirements, the NP does not seek to repeat them.(09/03)</p> <p>It is not a requirement to satisfy the NP, however other agencies, eg ESC, BA, Environment Agency, may have a requirement for the production of a Masterplan. (09/03)</p> <p>The Masterplanning and Design Guidelines was published ahead of these documents (09/03)</p>
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<p>Supporting Evidence</p> <ul style="list-style-type: none"> · Section 5 – Character of Existing Somerleyton Village · Page 13 plan – I was unsure whether the key is correct? The yellow is shown on the key as being ‘Registered landscaped within the Conservation Area’ by which I assume they mean parts of the Registered Park and Garden of Somerleyton Hall? But it appears to show quite a large number of houses in yellow which wouldn’t come under this designation. · Page 13e plan – should the BA Executive Area be shown on here too? 	<p>Broads Authority</p> <p>E Mail</p>	<p>The comment is not understood (09/03)</p> <p>Agreed that the map is somewhat ambiguous and that a simple explanation can be substituted to overcome any potential inaccuracy or confusion (13/04)</p> <p>The map is specifically provided to identify the Listed building and Conservation Areas, not BA or other designations (09/03)</p>
<p>Reinstate the Village Shops and Post Office</p> <p>Cycling in the village is difficult with on street parking making overtaking difficult</p>	<p>Mrs M Greer Walker</p> <p>Handwritten on paper</p>	<p>LAHS 9 supports local businesses, and a proposal for a shop and/or Post Office would therefore gain Planning support. At the time of writing referred to AHS Parish Council (23/3)</p> <p>On street parking is recognised as an existing problem. The NP cannot influence the current situation (an issue to be pursued by Parish Councils) but LAHS 6 aims to reduce</p>

<p>A green space between Waveney Cottage and any development is necessary</p> <p>Density of housing is unacceptable on the Mill Field. Traffic on Station Road causes problems already because of access to the farms and the British Rail Depot at the bottom of Station Road.</p> <p>Why so many exits onto Station Road?</p> <p>There should be a mixture of housing including some that is affordable for local people.</p>		<p>the problem being exacerbated by new developments. (23/3)</p> <p>Development proposals shall include open spaces in line with East Suffolk Local Plan Policies and LAHS 3 seeks to ensure that where provided they shall be appropriately landscaped. (23/3)</p> <p>This site is included in the NP and addressed in Masterplanning and Design Guidelines. Traffic impacts are addressed by SCC Highways (23/3)</p> <p>See above (23/3)</p> <p>LAHS 1 supports 1,2 and 3 bedroomed houses and the overarching East Suffolk (Waveney) Local Plan Policy WLP8.1 – Housing Mix requires 35% of housing in developments of 10 or more to be affordable. (23/3)</p>
<p>Having read through the policies we essentially support the proposals made. We would like to see the return of a shop in the village that would sell local produce and perhaps local crafts. We</p>	<p>Christine and Steve Tull</p>	<p>LAHS 9 supports local businesses, and a proposal for a shop and/or Post Office would therefore gain Planning</p>

<p>also feel the village would be able to support a tea room/café that would be used by locals and holidaymakers.</p> <p>We agree that to maintain a community in the area we need to attract young people.</p>	<p>Handwritten</p>	<p>support. At the time of writing referred to AHS Parish Council (23/3)</p> <p>Noted (23/3)</p>
<p>27 Jan 2021 15 Attendees Miles Thomas, Paul Strowlger, Jenni Livingstone, Ben Goodwin, Chris Morris, David Cook, E Goodwin, Jason Wharton, Jean Lindsay , Jenny Ozinel, Julia Griffith, Julie Reynolds , Sophie Lozach, Julia Reynolds</p>	<p>Zoom Consultation</p> <p>27 Jan 2021 19.00</p>	
<p>19.17 LAHS 1 Housing Mix - Have you assessed demand for 1 bedroom?</p>	<p>19.19 Julia Griffith</p>	<p>This is a preference rather than a requirement, as determined from the Community questionnaire (23/3)</p>
<p>19.25 LAHS 2</p> <p>Explanation of Allocation</p> <p>When did the allocation request go out?</p> <p>How many houses on sites? Design Guides?</p>	<p>19.26 David Cook</p> <p>19.27 Jean</p> <p>19.29 Chris Lozach</p>	<p>Stakeholders appeal for site (23/3)</p> <p>2015/6 (23/3)</p> <p>Clusters of 10 houses not large estate. From questionnaire (23/3)</p>

<p>19.34 LAHS3 Open Space</p> <p>Is there a guideline on open space as a percentage? Jenni Developer discuss with PC. checking trees as some are protected in the area.</p> <p>Trees at the end of Mill Lane are in a conservation area. Chris Firmin suggested that replacement should be with equivalent plants.</p>	<p>19.35 Julie Reynolds</p> <p>19.35 Jean Lindsay</p> <p>19.36 Julie</p>	<p>Mike said we fit in with local plan development (23/3)</p> <p>Noted (23/3)</p>
<p>19.39 LAHS 4</p> <p>No questions</p>		
<p>19.41 LAHS 5</p> <p>Mike explained footpaths will be maintained</p> <p>Like to see more of footpaths joined up to avoid roads</p>	<p>19.43 Jenny Ozinel</p>	<p>Not part of NP but footpaths reorganisation coming from central government. (23/3)</p> <p>Green and Environmental Groups in AHS and Lound PC currently reviewing footpaths to make recommendations to SCC rights of way (23/3)</p>
<p>19.46 LAHS 6 Parking</p>	<p>19.48 David Cook</p>	<p>Set by other guidelines - Suffolk County Council (23/3)</p>

<p>Issue in Somerleyton. Paul concurred from Lound</p>		
<p>19.50 LAHS 7 New village hall Somerleyton</p> <p>No questions</p>		
<p>19.51 LAHS 8 Community Facilities Village Shop</p> <p>45 new families community shop. Start planning for this now. Site available Old Petrol Station. Discussed by PC visited Thurlton. Pass this onto the PC and talk to the Estate. Jean from Cycling Shop Survey 6 folks have asked for milk in 4 years possibly unsustainable. Drifted into Somerleyton ways and means.</p>	<p>19.52 Julia Griffiths</p>	<p>Issues for AHS PC (currently addressing) (23/3)</p>
<p>20.02 LAHS 9</p> <p>Jean needs to clear up when the development happens related to her cycle business. This is for the developer possibly not the neighbourhood plan. Long discussion on plans for Somerleyton</p>	<p>20.03 Jean Lindsay</p>	<p>Planning Permission discussion between leasee and landlord (23/3)</p>
<p>20.11 Any questions.</p>		

<p>Julia compliments the process. Areas that can be pushed through PC .</p> <p>20.14</p> <p>David Cook raised the issue of access to the 3 sites by vehicles.</p>	<p>20.12 Julia</p>	<p>PC receives all formal planning applications and then can consider with reference to the NP. (23/3)</p> <p>Parking and access issues will be addressed in planning application (23/3)</p>
<p>20.19 Summary</p>		<p>No action (23/3)</p>
<p>Dear Miles</p> <p>Thank you for consulting Norfolk County Council (NCC) on your Neighbourhood Plan. I can confirm that NCC has no comments to make.</p> <p>Best wishes,</p> <p>Naomi</p>	<p>Norfolk County Council</p> <p>Email</p>	<p>No action (23/3)</p>

<p>17 Feb 2021 13 Attendees Miles Thomas, Paul Strowlger, Jenni Livingstone, Mike Brackenbury, Christine Saddington, David Barker, Judith Hobbs, Carolyn Greer Walker, Michael Wright, David Cook, Jennifer Ozinel, Chris Reynolds, Jason Wharton</p>	<p>Zoom Meeting 19.00 onwards</p>	
<p>19.15 LAHS 1 Housing Mix</p> <p>No questions</p>		<p>No action (23/3)</p>
<p>19.17 LAHS 2 Development of Sites</p> <p>No questions</p>		<p>No action (23/3)</p>
<p>19.18 LAHS 3 Public Open Spaces</p> <p>Who looks after open spaces Morton Peto as example. No one responsible</p>	<p>Carolyn Greer Walker</p>	<p>Open space maintenance addressed in LAHS 4 (23/3)</p>
<p>19.21 LAHS4 Design of new residential developments</p> <p>Mike explains how this will be used.</p> <p>No questions</p>		<p>No actions (23/3)</p>

<p>19.23 LAHS 5 Provision of Footpaths</p> <p>Where would they plan the cycle paths?</p>	<p>Carolyn Greer Walker</p>	<p>Suffolk Highways (23/3)</p>
<p>19.25 LAHS 6 Parking Provisions</p> <p>How do you enforce parking plan.?</p> <p>Bus routes. must be appealing. This impacts on car usage</p>	<p>Michael Wright</p> <p>Jennifer Ozinel</p>	<p>Planning tries to promote certain behaviours but cannot guarantee it. (23/3)</p> <p>Suffolk Highways dept. must be consulted (23/3)</p> <p>Noted and an ambition to resolve but not within the remit of NP (23/3)</p>
<p>19.39 LAHS 7 New village hall Somerleyton</p> <p>No questions</p>		<p>No action (23/3)</p>
<p>19.40 LAHS 8 Community Facilities Village Shop</p> <p>Return to Bus routes. Lack of cooperation of Somerleyton Estate</p>	<p>Michael Wright</p>	<p>As above the Neighbourhood plan can support but not operate this. AHS PC noted (23/3)</p>

<p>19.46 LAHS 9 Support of Local Businesses</p> <p>No questions</p>		<p>No action (23/3)</p>
<p>19.47 Any questions.</p> <p>19.55 Michael Wright Conflict How to ensure that development complies</p> <p>19.55 David Cook Wrong designation of Size of Village</p> <p>20.05 Michael Wright Change in needs.</p> <p>20.09 Carolyn Greer Walker support of the plan.</p>	<p>Video breaking up.</p>	<p>Proposals are assessed against the NP alongside WLP policies by PC and ESC. (23/3)</p> <p>Somerleyton designation as larger village by East Suffolk (Waveney) Local Plan (23/3)</p> <p>Recommended take issue with District Council. Future development and infrastructure Michael Wright will contact East Suffolk (23/3)</p>
<p>The Design Guide generally provides good guidance but will East Suffolk Planning Department adhere to this document or choose to ignore it if it suits them?</p> <p>Comments and observations:</p>	<p>Graham Kennedy</p> <p>Website</p>	<p>The Masterplanning and Design Guidelines are illustrative rather than definitive and any development proposal will be subject to the input of Suffolk Highways. Further detail will need to be provided by the prospective developer (23/3)</p>

The Somerleyton Concept Masterplan shown on Figure 33 and the Proposed hierarchy of routes in Somerleyton shown on Fig 13 contradict each other. There appears to be an option to have vehicular access from The Street on Fig 13 and this is also mentioned in the narrative. On Fig 33 the vehicular access is only off Station Road. To have 4 new junctions into the proposed site is excessive and does not follow normal Highways Design practice, one entrance should be sufficient with a maximum of two.

The layout of the dwellings shown on Fig 13 does not marry up with the indicative road layout shown on Fig 33. Apart from the positions and orientations of the dwellings facing the open spaces, the road layouts on Fig 33 shown winding about the site indicates that the dwellings too will be spread out unlike the terraces shown on Fig 13.

The hedgerows along the site boundary on both The Street and Station Road should be retained or most likely replaced. A proper pavement should be provided along the site boundary on both roads.

The open space indicated adjacent to The Street and total area specified in the guide is disproportionately small compared to the open area provided next to Morton Peto Close and The Street. Initial proposals a few years ago showed a larger area adjacent to The Street and Station Road.

Master Planning and Design Guidelines 6.4.1 state Existing mature vegetation along eastern and western boundaries need to be maintained and enhanced (23/3)

Open space will need to comply with (East Suffolk Council (Waveney) Local Plan (23/3)

NEIGHBOURHOOD PLAN – CONSULTATION PHASE 26 Jan '21 Ref your “an opportunity for you to comment” booklet please find my comment. I welcome your offer and intent to gather further comment and to incorporate into the proposed developments. It must be said that looking at the documentation so far not much of the village comment has had any effect on the very prescriptive regulations and consent and the overall plans. 1. Most of the work done has been to adopting local, regional, and national directives and regulations with little site and/or village specific studies/ surveys. 2. Fundamentals such as need, best locations, infrastructure and the impact of the extensive and rapid area developments are not addressed. No vision for the village for the next 50 years has been published. 3. Belief that East Suffolk Council and Westminster knows what is best for Somerleyton is too easily accepted and the impact of village comments are likely to be superficial. 4. Do the recent change in the Government approach to Green belt development have impact? The consequences of 1. 2. and 3. are the main causes of the high number of disgruntled and frustrated villagers. Village Specific. It seems reasonable to review and learn from the developments carried out in the village during the last 50 years with a view to avoid repeating errors and improve future development. This would include the Council Houses, refurbished Brickyard Cottages, Marsh Lane, Saville Lea, Morton Peto, the Marina and Somerleyton Staithe. There is no evidence that that this has been addressed or considered. Fundamentals. It is assumed and implied that there is a need for additional housing generated from within the village, no studies have been carried out to support this nor a vision which addresses this aspect compiled. The need for housing is external

Tony Cole
Email

Response to Tony Cole regarding need to comply with National and Local Plan Policies and benefits of Neighbourhood Plan on file (23/3)

and is generated without regard or consideration of “Somerleyton”, merely to comply with directives and area and national KPI’s of those far removed from the village. This does not mean that additional housing would necessarily be detrimental to Somerleyton but must be inline with the vision and based solely what is good for the village now and in the future. The location of any major development is crucial to preserving character, to enhance village living and to ensure the result will be a village that future generations will be proud of. There is no evidence that the locations have been assessed and the impact. No indication of infrastructure improvements for the foreseeable future have been published for the village, the B 1074 and none for the proposed sites. Somerleyton Street is saturated and is not suitable for current traffic let alone any additional traffic. It must be acknowledged that the current A 1074 road presents a considerable hazard to villagers and no data or surveys are available to predict the impact the huge building programmes currently being executed and planned for North Lowestoft and beyond will have on the A 1074 and subsequently on the village. The A 1074 and traffic generated by population and development within the village threatens its future and will dictate the quality of life for the foreseeable future. Affordable housing is not defined and its not acknowledged that an large proportion of housing in the village will most likely fall into that category. Housing densities greater that the village norm has been accepted but not justified. What is best for Somerleyton. A vision or statement of this is not yet available and will require considerable input and thought from several sources including the East Suffolk Council and Westminster for the regional and national developments that will impact or influence life in Somerleyton. However, the voice of Somerleyton must be the governing factor and based on the

<p>preservation of the village, its heritage, quality of life, and designed with future generations in mind. The source of employment for the increase in residents is not addressed. The challenge of how “Somerleyton” can be best represented and by whom has been addressed by the Neighbourhood and much effort and work done. However, it is difficult to see how and extremely unlikely that any meaningful impact can be made on the decision taking bodies, they control and hold the power, are in a self-fulfilling situation, removed from the village with little reason why “Somerleyton” should influence their decision taking and are rapidly enforcing their own point of no return. I apologise for these rather negative and late comments and hope that its proven wrong and in fact that studies, surveys and adequate groundwork has been conducted. By living and passing through the village today all can see the motor car has a negative impact on the village that will increase as developments in the area are completed. The proposed development sites proposed within the village will greatly exacerbate the situation and add to what will become life threatening situations. We look forward to the end of the present endemic so that public meetings can be held, and presentations of where we are and the next steps and, for open discussions to take place. Yours Sincerely A D Cole Marsh Lane</p>		
<p>Response to the Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan</p>	<p>Michael Wright email</p>	

These responses apply to the proposals for Somerleyton only and address the Mill Farm field proposals in particular.

1.4 Introduction – Local residents accept.... Although Suffolk Coastal and WDC have approved plans for housing in Somerleyton, I don't believe that the Mill Farm field proposal is an appropriate development, neither is it necessary to maintain our community. Where is the evidence for this? The large number of dwellings proposed for this village-central site would impact hugely on our rural image and on the village as a whole. The village responses suggest that the majority of residents also consider this to be inappropriate with only 33% in favour.

How does this proposal equate with 3.7 of the Profile of the Parishes paragraph?

Based on the above, the ASH population of 427 would rise by a minimum of 100. This sees a population increase of at least 25%. Consider then the impact of increased traffic in the village. We already have congested parking in The Street with one property having a minimum of five vehicles ascribed to it. (Note 8.3 Traffic and Parking)

In my opinion, small scale development, including infill, is the way forward in terms of overall development. Infill has previously been discouraged possibly forbidden, but the recent development of the Orchard Barn site suggests otherwise.

WLP 5 and WLP 7.5 sites allocated in the East Suffolk (Waveney) Local Plan cannot be amended Neighbourhood Plan will reflect community aspirations in development. (23/3)

Policy WLP7.6 requires heritage impact assessment (23/3)

Policy WLP 7.1 states: The development requirements in the larger and smaller villages in the rural areas will be delivered through site allocations in the Local Plan. Further smaller sites would be contrary to the

<p>If there is any majority view, it is the 49% in favour of developing the forge and garage site which would constitute a smaller scale development with much less impact.</p> <p>4. Our Vision for 236 – This paragraph states amongst much else that, New housing development will not have changed the distinct nature of the villages.</p> <p>How can this be achieved with such a heavy impact?</p> <p>7.2.1 and 7.2.2 Housing Development – Responses from the Neighbourhood Plan Questionnaire indicate that proposals for large groups of new dwellings in excess of 10 are considered inappropriate but smaller groups of new dwellings would be accepted. This paragraph alone contradicts the Mill Farm field proposal and, in fact, so does the whole of 7.2.</p> <p>9.3 Community Aspirations for Somerleyton and Lound</p> <p>9.2.7 mentions the regrettable closure of the village shop and post office and yet paragraph 9.3.3 anticipates its re-establishment as a community enterprise. I contend that this will not happen without the positive input</p>		<p>East Suffolk (Waveney) Local Plan (23/3)</p> <p>Smaller groups of new dwellings endorsed in the Masterplanning and Design guidelines (23/3)</p>
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<p>and co-operation of Lord Somerleyton and the Somerleyton Estate. Evidence suggests that such intentions in the past have not materialised.</p> <p>The proposals for the Somerleyton Playing Field and Village Hall are positive and worthy of community support. However, at least three robust and thorough previous attempts to seek funding have failed due to the inability to prove need.</p> <p>eastsuffolk.inconsult.uk 7.44 states “New development will contribute towards the improvement of existing community facilities such as a replacement village hall.” The building of 49 houses in Somerleyton is insufficient in enabling a significant investment in a replacement community centre.</p> <p>In the section of Supporting Evidence for The Neighbourhood Plan, I refer to 5. Character of existing Somerleyton village. Paragraph 5.10 refers to Hobart House. Since no such house name exists in the village, I assume that it refers to my dwelling, Brisbane House.</p> <p>Furthermore, there are references to Morton Peto Close in 5.12 and 5.15, both of which have incorrect spellings.</p> <p>There is a further reference in 5.22 to the former village shop and Post Office and the fact that some of the Victorian signage and shopfront details have been lost thus diminishing the character of the Conservation</p>		<p>Neighbourhood Plan can support community aspirations. Referred to AHS Parish Council (23/3)</p> <p>Neighbourhood Plan can only express support for improved village facilities (23/3)</p> <p>Change Hobart House to Brisbane House (23/3)</p> <p>Correct spelling (23/3)</p>
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Area. This lies entirely with the Somerleyton Estate at the time of the building's conversion to a dwelling and cycle shop without prior planning permission. It is further regrettable that the building now has Heritage England protected status which would have prevented its conversion.

General Points

With the ongoing large scale developments in the neighbouring locations of Blundeston (prison site), Camps Heath and Oulton (Sands Lane area) and the proposals for the North Lowestoft Garden Village Development of 1400 homes, plus a school, care home, shops and businesses in Corton, Somerleyton, as a conservation village, need not suffer the urban scale development of Mill Farm field. This is a green field site and therefore contradicts the rewilding ethos of the Somerleyton Estate and, as already stated, would impact hugely on the rural nature of our environment.

The Neighbourhood Plan for 2014 to 2036 has been overtaken by the current pandemic and should therefore take into account that, at this unprecedented time in all of our lives, a reassessment of both local and the wider community needs, is necessary. Life in general, as well as working lives and business practices, has already changed drastically and this is bound to have a major impact on any future planning.

<p>Furthermore, I contend that current government predictions for the rising need for more and more housing, is not matched by the predictions for population growth. Falling fertility rates are seen in all of the world's wealthiest nations and the UK is no exception. Provisional figures from the Office for National Statistics suggest that the birthrate has fallen from 1.9 in 2012 to just 1.65 in 2019 and down to 1.6 for 2020. This is the lowest rate since before the Second World War.</p> <ul style="list-style-type: none"> • Source – Office for National Statistics <p style="text-align: right;">Michael Wright, Brisbane House, Somerleyton January 2021</p>		<p style="color: red;">These issues not within the remit of the Neighbourhood Plan Full response to Michael Wright on file (23/3)</p>
<p>It has taken 5 years of extremely hard work (meetings, surveys, presentations, document reading and analysis) by the Neighbourhood Planning Group members to get to this Final Draft stage.</p>	<p>David Cook email</p>	

We should be particularly grateful to Jenny Livingstone, Miles Thomas and Paul Strowlger who, over the last year, have been liaising with East Suffolk Council and agreeing the final revisions and amendments.

Louis Smith should also be remembered for his 4 years of enthusiasm and drive and getting the plan off the ground in the early days.

Somerleyton is a beautiful, quaint and unspoilt village that lies within the Broads National Park. The majority of the village sits within a Conservation Area and many of its houses are Grade 2 listed buildings. In total the village has 57 listed buildings* which is considerably more than larger villages in the District such as Blundeston (7), Corton (2) and Hopton (20).

Every care should therefore be taken to preserve its image and status.

Under Neighbourhood Plan legislation, Somerleyton, despite only having a population of 300-400 people, was regarded as a 'Large Village', due to the fact that it has a Railway Station and School, although both are used extensively by members of the public residing outside of the village.

Its 'Large Village' status has meant it was given a larger allocation of houses for future development than many "Smaller Villages" in spite of

many of those having a larger population, including Lound (pop 359 – 14 homes allocated), Mutford (pop 471 – 8 homes allocated) and Westhall (pop 390 – 19 homes allocated)**. It is right therefore that any development, in spite of the village status, should be proportional to a) its size and b) its heritage and environmental protection policies.

Unfortunately, large scale developments of the types that are being proposed will have a major detrimental impact on our village and are not proportional to its size and heritage. Surely, the need for larger housing developments will be satisfied by the huge developments planned or underway in Corton, Hopton, Blundeston and Bradwell.

There are currently only 116 properties that lie within the main village and whose occupants need to use 'The Street' for access. If these large developments were to go ahead, it could mean a 38% increase in cars and traffic.

Parking and vehicle access is already a major problem within the village and any proposals that make matters worse should not be considered.

Small scale housing developments, gradually introduced to assess their impact, would be a better direction to follow and would be favoured by the majority of villagers who do accept that some development is necessary.

WLP 7.5 and WLP.6 identified in East Suffolk (Waveney) Local Plan (23/3)

Parking and access issues will be addressed in planning application (23/3)

<p>David Cook and Jenny Anderson</p> <p>*source – www.britishlistedbuildings.co.uk</p> <p>**source - Wikipedia</p>		<p>Policy WLP71 states the development requirements in the larger and smaller villages in the rural area will be delivered through site allocations in this Local Plan. Further smaller sites as suggested contrary to the East Suffolk (Waveney) Local plan (23/3)</p>
<p>Good Afternoon</p> <p>I attach representations on the Neighbourhood Plan made on behalf of the Somerleyton Estate. The plan is supported subject to comments on two areas. These are the housing mix, where we would like to see a few larger houses in the allocations as this provides more opportunities for families and supports the school and local businesses such as the pub. Secondly we are working on preparing designs for the Somerleyton allocations. We fully support the need for high quality design as required by the Local Plan and Design Guide. Having engaged architects and a consultant team who are carrying out detailed work some flexibility on the concept masterplans would give the opportunity for alternative layouts that could be just as good quality. We hope to be in a position to consult the village with detail on the applications for Mill Farm Field and the Forge after Easter. So I think we are in agreement on most of the issues subject to some clarity and flexibility in a few areas. If it would help to talk this through please let me know.</p> <p>Kind Regards</p>	<p>Evolution Planning email</p> <p>Link to supporting doc</p>	<p>The determination of housing mix (fundamentally described as policy LAHS 1) is as a result of the questionnaire results and a great deal of discussion and debate within the NP committee. The policy provides some scope for larger homes but steers development to focus on smaller homes to be within the financial reach of young and small or single person households.</p> <p>The Masterplanning and Design Guidelines sets down an acceptable proposal that meets the fundamentals of the NP, it follows however an alternative approach could equally meet the NP principles and policies, so scope is available to developers in this regard. (23/3)</p>

<p>David Barker MRICS MRTPI Director</p>		
<p>Dear Mr Thomas, and the neighbourhood planning group</p> <p>Thank you for consulting Suffolk County Council on the Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan at Reg14 Pre-Submission stage.</p> <p>Please see attached our comments</p> <p>Kind regards Georgia</p> <p>Georgia Teague</p> <p>Planning Officer Growth, Highways and Infrastructure Suffolk County Council</p>	<p>SCC email</p> <p>Link to supporting doc.</p>	<p>Refer to SCC doc. (23/3)</p>
<p>Dear Ms Livingstone,</p> <p>I am writing in relation to the following:</p> <p>NDP: Neighbourhood Development Plan</p>	<p>Historic England email</p>	<p>No action (23/3)</p>

<p>Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan, East Suffolk Council, Suffolk [Case Ref. PL00047015; HE File Ref. HD/P 5383; Your Reference.]</p> <p>Thank you for contacting Historic England about your neighbourhood plan. Unfortunately we do not currently have capacity to provide detailed comments, but please find a formal response attached with some links to our detailed advice document and other resources which you may find helpful. Please contact us if you have any specific queries.</p> <p>Yours Sincerely</p> <p>Edward James Historic Places Advisor, East of England E-mail: Edward.James@HistoricEngland.org.uk <u>Direct Dial: 01223 582746</u></p>		
<p>Dear all</p> <p>Please find attached our comments on the regulation 14 consultation.</p> <p>I trust there will be no surprises, however there are a few suggestions and these should reflect the conversation of 23.02.2021, held with Dickon Povey, Ruth Bishop and myself.</p> <p>If you do have any concerns or queries please do not hesitate to contact me.</p> <p>Kindest regards</p>	<p>East Suffolk Council</p> <p>Link to page</p>	<p>Refer to ESC doc (23/3)</p>

Melanie		
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Suffolk County Council Main

Date: 25 February 2021

Enquiries to: Georgia Teague

Tel: 01473 265054

Email: georgia.teague@suffolk.gov.uk

Dear Mr Thomas, and Somerleyton, Ashby, Herringfleet & Lound Neighbourhood Planning Group,

Pre-Submission version of the Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the pre-submission version of the Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan.

SCC is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Health and Wellbeing
- Libraries
- Minerals and Waste
- Natural Environment
- Public Rights of Way
- Transport

This response, as with all those comments which SCC makes on emerging planning policies and allocations, will focus on matters relating to those services.

Suffolk County Council is supportive of the vision for the Parish. In this letter we aim to highlight potential issues and opportunities in the plan and are happy to discuss anything that is raised.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in ~~strike through~~.

Archaeology

There are no considerations to archaeology or historic environment in the plan. The following wording is recommended to be included in section 7.4, in order to provide further information and give clarity to developers of future sites:

1

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www.suffolk.gov.uk

“Suffolk County Council manages the Historic Environment Record for the county. Non designated archaeological heritage assets would be managed through the National Planning Policy Framework, and Waveney Local Plan Policy WLP8.40. Suffolk County Council Archaeological Service advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework, East Suffolk Core Strategy (Strategic Priority 15) and Waveney Local Plan (Policy WLP8.40) are met. Suffolk County Council Archaeological Service is happy to advise on the level of assessment and appropriate stages to be undertaken.”

The plan could also highlight a level of outreach and public engagement that might be aspired to from archaeology undertaken as part of a development project. Increased public understanding of heritage assets is an aspiration of the NPPF, and provision in project designs for outreach and engagement are welcomed.

It is recommended that Section 8 could reference the historic environment with finds and monuments in the parishes with information from the Historic Environment Record (HER). The HER is held by Suffolk County Council Archaeological Service (SCCAS), with publicly accessible records viewable on the Suffolk Heritage Explorer, which can be viewed at: <https://heritage.suffolk.gov.uk/>.

It is suggested that the following information could be included in an appendix. Records here show that the parishes are rich in cropmark complexes, the most notable is an extensive area of cropmarks representing coaxial and rectilinear field systems, trackways and enclosure covering the area from Somerleyton and Lound (LUD 016). Which includes cropmarks of ring ditches (SOL 054, SOL 058 and LUD 014) and possible prehistoric enclosure (LUD 055).

Further cropmark complex can be seen to the east of Lound, which include rectilinear enclosures, field boundaries and trackways of possible prehistoric to Post-medieval date (LUD 017 and LUD 018). In addition to this, there are cropmarks of multiple ring ditch and former barrow mounds (LUD 072) within this area (including LUD 040, LUD 041, LUD 042, LUD 045 and LUD 046) likely indicates the presence of a large Bronze Age barrow cemetery.

NP text to include within 8.1 New developments must, as a requirement of the East Suffolk (Waveney) Local Plan, show SCC Archaeological Service requirements are met. (23/03)

Education

Early Years Care

The Pre School operating from the Village Hall is well supported by the Local Community. This relatively small amount of growth should help to further sustain Somerleyton Pre School.

Primary education

Based on current forecasting, Somerleyton primary school has sufficient surplus capacity to accommodate the additional pupils arising from allocated developments WLP7.5 and WLP7.6 in Somerleyton.

Should the demand for places change, developer contributions may be sought to provide expansion to the school, or other schools in the catchment area.

The number of pupils emanating from the Local Plan site WLP7.12 in Lound, alongside other planning applications, is likely to exceed the 95% capacity of Blundeston CEVP School. The proposed strategy for mitigating this growth is via The Limes Primary Academy, which has been designed to accommodate additional pupils.

Secondary education

The number of pupils arising from the Local Plan Sites, alongside other planning applications in the catchment area means that the Benjamin Britten Academy is currently forecast to exceed the 95% capacity. The proposed strategy for mitigating this growth is via monitoring the pupil movement and places available across local schools. The Benjamin Britten Academy is able to expand on the existing site, if required.

School Parking

SCC would like to address paragraph 8.3.4 and the desire for off road parking for Somerleyton primary school. The school site is very small at only 0.13ha, and as things stand, it would not be possible to provide additional car parking provision on the school site. If this were to be provided in the future, the school would need additional land, or parking would need to be provided elsewhere, separate from the school site.

This matter is currently with Somerleyton School (The Hartismere Family of Schools) and the Somerleyton Estate. (23/03)

Flooding

Despite the overarching Environmental Objective Env 6 (To plan for climate change, biodiversity and landscape conservation), and that new developments will be expected to take into account biodiversity and climate change (8.1), there is no specific reference to Sustainable Drainage Systems (SuDS) in the plan. Reference to SuDS could contribute towards objectives for climate change adaptation and biodiversity.

Therefore, it is suggested that the following wording could be included into Policy LAHS 4 Design of Residential Developments, or into Section 8 - Environment.

“New developments should not result in water run-off that would add to or create surface water flooding; and shall include the use of above ground open Sustainable Drainage Systems (SuDS) unless inappropriate, which could include wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/recreational areas and biodiversity benefits.”

This section on flooding to be added to Section 8 Environment as 8.5 (23/03)

Health and Wellbeing

Meeting the Needs of an Ageing Population

The neighbourhood plan makes reference to an ageing population in paragraphs 7.1.4 and 7.1.5, and the desire for the provisions of homes for older people, which is supported.

SCC would suggest that the plan could include the desire for smaller homes that are adaptable and accessible, which meets the requirements for both older residents as well as younger people and families.

Add to 7.1.5that are adaptable and accessible, which meets the requirements for both older residents as well as younger people and families. (23/03)

Building homes that are accessible and adaptable means that these homes can be changed with the needs of their occupants, for example if their mobility worsens with age, as these homes are built to a standard that can meet the needs of a lifetime. While it is understandable that each housing type may not be suitably accommodated on every site, efforts should be made where possible to ensure that each site contains a mixture of housing types. This can help prevent segregation by age group and possible resulting isolation.

The Waveney Local Plan Policy WLP8.31 Lifetime Design states that housing should meet the needs of the resident throughout their lifetime. It is suggested that the plan in the supporting text for Policy LAHS 1 could refer to this.

3

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Active Travel

Active travel, such as walking and cycling, is important in order to improve physical health and reduce obesity levels, as well as can help to minimise levels of air pollution from motorised vehicles. Policy LAHS 5 Provision of Footpaths can help to increase the level of walking and cycling, and we welcome the mention of “connectivity”.

Access to Green Spaces and Facilities

The mentions of health benefits arising from access to the allotments, in paragraph 9.1.5, is welcomed. A range of facilities and services can help a community feel more inclusive and cohesive, and is an important factor contributing to the mental health of residents of the parish.

SCC welcomes Section 11 The Promotion of Healthy Activity. It is suggested that Section 11 could include reference to the mental health and wellbeing benefits that can be gained from access to pleasant outdoor areas. There are proven links¹ between access to green outdoor spaces and the improvements to both physical and mental health and wellbeing for the population as a whole, including increasing the quality of life for the elderly, working age adults, and for children.

SCC would suggest the inclusion of the need to make green spaces and facilities accessible to residents with limited mobility (inclusion of benches and well-maintained paths etc), into Policy LAHS 3 Public Open Space. This could help to make an elderly population feel more included as part of the community and reduce isolation of vulnerable groups.

Add to Section 11 – Access to green outside spaces is recognised as contributing to improvements to both physical and mental health and wellbeing for the population as a whole, including increasing the quality of life for the elderly, working age adults, and for children. (23/03)

Change attending to tending (23/03)

Minerals and Waste

Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means the County Council makes planning policy and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan, adopted in July 2020.

The County Council has assessed the neighbourhood plan regarding the safeguarding of potential minerals resources and operating minerals and waste facilities and has no concerns with the proposals in the plan. As the plan is not making any proposals in addition to the Waveney Local Plan, there is no comment for minerals and waste.

Natural Environment

The neighbourhood plan states that protecting the environmentally sensitive and rural nature of the parish is important and sets 6 environmental objectives. However, Section 8 Environment would benefit from being more detailed, as detailed in the sections below.

Biodiversity and Climate Change

Objective Env 6 (To plan for climate change, biodiversity and landscape conservation) indicates that this is expanded upon in Policies 3, 4, 8 and 9, however SCC feels that this is not the case, and could be strengthened.

The following wording is recommended to Policy LAHS 3, in order to provide greater environmental protection:

“The provision of public open green space in any new development shall incorporate appropriate native trees and planting to enhance and protect natural habitats, and lead to a net gain in biodiversity through restoring and repairing fragmented networks.”

This has been considered thoroughly but it is believed that the Policy statement is adequate and straightforward. (23/03)

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5663018/>

SCC would like to see further detail in policy of how the plan aims to tackle the issue of climate change, as raised in Objective Env 6. Section 4 Renewable Energy states that large scale schemes would not be welcomed, which suggests that there is the possibility that small-scale schemes could be accepted. Section 8.1 states that ‘New developments will be expected to take into account the impacts on biodiversity and climate change’. SCC would recommend that this is explained further – for example, if new housing developments would be supported by the parish if they were to include features such as solar panels, rainwater

harvesting, or electric vehicle charging points, etc. SCC would recommend that such features are supported in Policy LAHS 4.

Views

The neighbourhood plan makes references to “rural” and “open” views, particularly in Objective Env 4 (To maintain our existing open countryside and rural views), and yet does not appear to state how it is intended for this to be achieved. Page 7 indicates that Policies 2,3 and 5 will expand on this objective, however this does not appear to be the case.

It is suggested that the plan should specifically protect views within policy and could create a map displaying specifically designated important views. It is important to ensure that the plan provides suitable supporting evidence to show why these views are important to the parish and therefore in need of protection. This information should include photographs or descriptions of the views, and numbered locations of the viewpoints, which must be publicly accessible and not from private land. This could help the parish to retain its rural and countryside aesthetic and feel, which is clearly an important feature to residents.

This is an interesting conundrum, because there is no right to a view, but aspirationally providing a well considered layout in line with the Masterplanning and Design Guidelines should best serve the overall interest of the Community at large (23/03)

Public Rights of Way

Section 8.2 Footpaths and Bridleways

SCC suggests that this section should be headed “*Public Rights of Way*” and include reference to the Angles Way, a long-distance promoted trail between Great Yarmouth and Thetford that passes through these parishes.

This section could also be more aspirational to create new off-road links between villages, the school, the Angles Way and to promote access. In addition, the plan could include an aspiration to develop new public rights of way including a link along the river wall between Herringfleet Mill and Somerleyton. *Ashby, Herringfleet and Somerleyton all require new condition surveys and suggestions for new links between public rights of way and important parish locations. This task has been identified by the PC and a working group has been initiated to carry out the task. Due to volunteer resource limitations this activity can only commence after the submission of the NP and its referendum. (30/3)*

It is recommended that there could be reference to other strategies that support this neighbourhood plan, such as Suffolk County Council’s Green Access Strategy (2020-2030)². This strategy sets out the council’s commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.

Policy LAHS 5 Provision of Footpaths Agree to change of Heading to Provision of Public Rights of Way (30/3)

As above, this should be headed “*Provision of Public Rights of Way*” so as not to limit the reference to just one status of right of way.

Supporting Document

The following amendments are recommended for the Supporting Document, Page 9: 4. Existing Public Rights of Way:

- 4.1.1.3 Should refer to Footpath 3 and Bridleway 3A
- 4.1.1.4 should refer to Bridleway 4, not Footpath 4.

² <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/suffolk-green-access-strategy-2020-2030.pdf>

5

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX
www.suffolk.gov.uk

- 4.1.2.3 should refer to Bridleway 14, not Footpath 14.
- 4.1.3 Somerleyton Public Rights of Way omits Footpath 6 which joins to Footpath 1 at the slipway and goes west to the River Waveney.

Noted (30/3)

Transport

Parking

SCC, as the Highway Authority, supports the allocated housing development sites from the Waveney Local Plan (WLP7.5 Somerleyton - Land north of The Street; WLP7.6 and Somerleyton - Mill Farm Field; WLP7.12 Lound - Land east of The Street); subject to highway related design matters such as access, layout, and parking.

It is recommended that there is provision for a proportion of on-street parking for new developments. Having well designed and integrated on-street parking can help to reduce inconsiderate parking on unsuitable roads that are too narrow, which can restrict access for emergency services and refuse collections, as stated in paragraph 8.3.3 on the plan, and parking on pavements that hinder pedestrian access and safety. Please see pages 25-28 of Suffolk Guidance for Parking 2019³ for further guidance.

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

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

It is also recommended that “configured location” is removed from Policy LAHS 6, as this is ambiguous. SCC would recommend the plan include reference to Suffolk Guidance for Parking 2019 in the supporting text.

Add a sentence in preamble to LAHS 6 that SCC guidance for parking 2019. (30/3)

Paragraph 8.3.4 relates to school parking on the B1074. As the Highway Authority, additional off street parking provision for the school may be acceptable, but only if it is feasible and in accordance with policy and guidance, notwithstanding the issue of available land, as mentioned above.

Sustainable Travel

SCC acknowledges that due to the rurality of the parishes, car usage and ownership is high. The mention of the bicycle hire shop in Somerleyton, and regular cycle events is welcomed, as this can help to encourage the community to use more sustainable mode of transport.

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

Therefore, the following additions are suggested to policies:

Policy LAHS 6 Parking Provision for new Residential Developments:

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

The Masterplanning and Design Guidelines includes provision for cycle storage, not required as a policy statement (30/3)

³ <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf>

Policy LAHS 8 Support of Local Community Facilities:

“Proposals that retain, enhance or provide local services and community facilities such as meeting places, village halls, sports venues, public houses and places of worship will be supported. Support will be given where facilities include provisions that encourage travel by sustainable modes of transport, such as walking and cycling.”

The policy is expressly pertaining to rural community facilities and is not appropriate for sustainable transport statements. The focus on footpaths reflects feedback from our community questionnaire (30/3)

General

Maps

It is strongly recommended to include a Policies Map in the neighbourhood plan. This map should visibly show all of the important policies of the plan, in one clear consolidated image. For example, using colour coding to indicate housing sites, public open and green spaces such as the allotments, village greens and ponds, and other important facilities listed in policies, such as the community centre, all located within the parish boundary. It is recommended that important views, as mentioned above, should be displayed in the Policies Map too.

It is recommended that maps should be labelled clearly - e.g. "Map 1: Neighbourhood Plan Area", "Map 2: Housing Allocations in Somerleyton, from the Local Plan" etc.

Children's Play Area

It is suggested that paragraph 9.3.8, regarding the desire for children's play area, could be expanded stating who is expected to be providing the play area, and how funding will be sourced. Clarity is advised here, as it is unclear if this is required from developers as part of the proposed new housing developments, or if this desire is an action for the community to fund and commission themselves.

This is a Parish Council issue and not considered appropriate for the NP (30/3)

Local Green Spaces

SCC notes that the neighbourhood plan has variety of green spaces that are used regularly by the community. It is suggested that in order to help the parish protect the community open spaces, that sites such as The Mardle and Playing Fields could be designated as Local Green Spaces, in accordance with paragraphs 99 to 101 of the NPPF. This could aid in protecting community assets from inappropriate development.

Noted. This action is considered to be more appropriately actioned by the Parish Councils, if they see fit. (13/4)

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the SCC's Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources.

The guidance can be accessed here: [Suffolk County Council Neighbourhood Planning Guidance](#).

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague

Planning Officer
Growth, Highways, and Infrastructure

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX
www.suffolk.gov.uk

Representations on the Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan 2014 to 2036 Made on Behalf of the Somerleyton Estate



February 2021

Prospect House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

T 01359 234099
E enquiries@evolution-planning.co.uk
W evolution-planning.co.uk

Opus House

01359 233663

Representations on the Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan 2014 to 2036 Made on Behalf of the Somerleyton Estate

Client: Somerleyton Estate

Content Amendment Record

This report has been issued and amended as follows:

Issue	Revision	Description	Date	Signed
1	0	Draft	11.02.21	DB
1	0	Reviewed	23.02.21	SH

Reference: E374.C1.Rep21 Disclaimer

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1.0 Introduction

1.1 These representations have been prepared on behalf the Somerleyton Estate. The Estate is a significant employer and landowner in the villages of Somerleyton, Lound and Fritton, and has a close and long term interest in the success and vitality of the local area.

For the record Fritton is not within the NP area (30/3)

1.2 The Estate owns and runs the Grade II* Somerleyton Hall and Gardens which are open to the public. The Hall is an important local tourist attraction and employs around 15 people as well as numerous local trades involved in the maintenance and upkeep. The various activities on the wider Estate are carried out with the aim of maintaining and improving the Hall, for example funding the restoration of the 17th

Century gardens. The current owner, Hugh Somerleyton, strongly believes that the local area needs sustainable development in order to thrive.

1.3 The Estate aims to develop housing that is attractive, environmentally exemplary and which meets local needs in a way that will be appreciated by current and future residents. A number of housing developments have been built on estate land from Victorian estate worker housing to the Morton Peto Close in the 1980's. The Estate has 2 housing allocations in the Waveney Local Plan which it intends to develop. In addition, the Estate is involved in many local businesses including The Kings Head pub and the marina in Somerleyton. In Fritton, the Estate has the Fritton Arms and Fritton Lake holiday resort which provides holiday accommodation and leisure activities. These businesses have been purchased, or created by, the Estate. They have received investment from the Estate with the aim of supporting local infrastructure and jobs and generating an income to support the upkeep of Somerleyton Hall. The Estate has a large farming operation based in Somerleyton village. Hugh Somerleyton is a founding trustee of Wild East which seeks to rewild 250,000 acres of East Anglia. The Estate is leading the way with an extensive rewilding project on 1,000 acres of its own land.

1.4 The Estate supports the preparation of the Neighbourhood Plan and has worked with the Neighbourhood Plan group for several years. The Estate is grateful to the volunteers who have prepared the Neighbourhood Plan and supports many parts of the Neighbourhood Plan.

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

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2.0 Policy LAHS 1 Housing Mix

2.1 The Estate supports the aim of this Policy to encourage smaller homes. The Waveney Local Plan has a Policy reference WLP.8.1 – Housing Mix that requires that 35% of new dwellings on residential developments are 1 or 2 bed properties. The Neighbourhood Plan Policy LAHS 1 states a preference for 1, 2 and 3 bed properties.

~~2.2~~ We question whether stating a ‘preference’ in a Policy means that it is a Policy or an objective?

2.3 It is important that the mix of homes that is provided includes some 4 bed homes and that the Policy does not prevent development of these types of homes. In recent discussions the village school in Somerleyton and businesses have voiced support for some 4 bed homes to be developed to ensure that the village has sufficient families to support the school and local businesses such as the pub. Appendix 1 of this report contains correspondence from the operators of the pub and the Headteacher of the Village School on the need for some larger homes. This was previously circulated to the Neighbourhood Plan group at the start of 2020. The correspondence refers to other possible projects that were being discussed at the time and which can be disregarded for this consultation. This shows the benefits that a mix of housing would bring to local businesses and the school which is particularly important as the country recovers from the pandemic.

2.4 We suggest that the Policy could be amended to say that '*more weight*' will be given to the provision of smaller homes rather than a preference. This would show that positive support will be given to planning applications that help to achieve the aim to deliver smaller homes without preventing the delivery of some larger homes. This change would ensure that the Neighbourhood Plan meets the basic condition of achieving sustainable development, which is recognized in the Local Plan Policy on housing mix.

The Policy has been debated at length and it is decided that the community questionnaire response should prevail. (30/3)

3.0 Policy LAHS 2 Development of Allocated Sites

3.1 Policy 2 identifies the 3 allocated sites in Somerleyton and Lound. It refers to the AECOM Design Guidelines that are contained in the Lound and Somerleyton, Suffolk Masterplanning and Design Guidelines June 2019. The Policy states that the development of each site should be in conformity with the Concept Masterplan and the Design Features section of the Guide for each site.

3.2 The AECOM work was carried out before any detailed site investigations were undertaken or before any detailed work on ecology, drainage or landscape design. The Concept Masterplans were prepared before any detailed architectural work was carried out which requires an in depth understanding and assessment of the sites. The proposals in the Design Guide may be appropriate

however, they have not been carried out with the rigour or range of professional input that would be required for a planning application. There should be flexibility in the Policy so that appropriate alternative designs can be considered. It is accepted that any proposals will have to meet the strict requirements of the Waveney Local Plan Policies for the development of the sites and the aspirations of the Design Guide.

3.3 To meet the basic conditions, Neighbourhood Plans must have regard to the desirability of preserving any listed building or its setting, preserving or enhancing the character and appearance of any Conservation Area and must contribute to achieving sustainable development.

3.4 To achieve these aims there should be flexibility so that any development makes reference to the Concept Masterplans and Design Guide and, if necessary, is allowed to explain and justify why it may be appropriate to propose an alternative layout or design of development and for a reasonable alternative to be approved.

3.5 For example, on the Mill Farm Field site in Somerleyton, integrating open space within the development has benefits. The northern open space as shown on the Design Guide Concept Masterplan would be behind a hedge if, as required by the Design Guide, the boundary hedges are retained. This approach hides the open space which would be inconsistent with open nature of other public spaces in the village. An alternative approach of a more central open space could be acceptable. The Neighbourhood Plan should contain sufficient flexibility to allow an architect, who will consider the site in more detail than has been possible so far, to deliver a high quality scheme. This will ensure that the finished developments best deliver the quality that

is required by Local and Neighbourhood Plan Policies.

3.6 To meet the basic conditions the Policy should be amended to state in each of the 3 bullet points (new words underlined and existing words crossed out): ...'*should have regard to be in in conformity with the concept masterplan.....*

3.7 At the end of the Policy a new sentence should state: '*Departures from the Concept Masterplan and Design Guidelines should be*

explained and agreed with the Local Planning Authority' **Noted – The Masterplanning and Design Guidelines provide a concept that meets and satisfies the requirements laid down by the NP. It shall be adopted by default but alternatives that equal or surpass this arrangement may be proffered by developers. (30/3)**

4.0 Policy LAHS 4 Design of new Residential Developments

4.1 We make similar comments on this Policy to LAHS 2. The Policy states that: *'All new development will be expected to comply with the requirements of the Masterplanning and Design Guides.'* There should be flexibility so that any development makes reference to the Concept Masterplans and Design Guide and, if necessary, is allowed to explain and justify why it may be appropriate to propose an alternative layout or design of development and for a reasonable alternative to be approved. At the end of the Policy a new sentence should state: *'If the design of the allocated sites changes from the Concept Masterplans and Design Guidelines this should be explained and agreed with the Local Planning Authority'*. See 3 above (30/3)

5.0 Lound and Somerleyton, Suffolk Masterplanning and Design Guidelines

5.1 As set out in our representations on the Neighbourhood Plan Policy LAHS 2, the AECOM on the Masterplanning and Design Guides work was carried out before any detailed site investigations or any detailed work on ecology, drainage or landscape design. The Concept Masterplans were prepared before any detailed architectural work was carried out.

5.2 To meet the basic conditions, Neighbourhood Plans must have regard to the desirability of preserving any listed building or its setting, preserving or enhancing the character and appearance of any Conservation Area and must contribute to achieving sustainable development.

The Design Guide should recognize that there should be sufficient flexibility to allow architects to design a high quality scheme and to be allowed to justify and improve on the Concept Masterplans if this gains the support of the Local Planning Authority. This is important in order to deliver high quality design that best responds to historic character and delivers sustainable development.

Examples of where flexibility would be helpful is in respect of site WLP 7.6 known as Mill Farm Field off The Street and Station Road in Somerleyton. The retention of the boundary hedges, the location of open space, the transition to neighbouring woodland and the location of access points are important considerations in the design process. The retention of the boundary hedgerows is important and a sensible aim. Part 6.5 of the Design Guide describes it as '*crucial*' and recognizes the ecological benefits of retention.

However, this aim makes the creation of open space to the north of the site difficult because the boundary hedge would cut off the open space from The Street in a manner that will be out of character with the village, where open spaces are not enclosed. Open space may be better located within the site surrounded by attractive built frontages. A positive frontage to the north of the site could be created with attractive homes that would meet the aim of the Design Guide which is to sensitively deal with this

important area.

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The suggestion in 6.5 of the Design Guide that the primary access route should be from the north is difficult to achieve, as shown on the Concept Masterplan. This shows the pedestrian and cycle link to The Street, not the primary access route. It would be sensible if this bullet point indicated that there should be pedestrian and cycle access from The Street.

These examples show how, by having regard to the Design Guide, an alternative and high quality development could be created that respects the historic character of the area and delivers sustainable development.

To allow architects and designers to have the opportunity to create high quality developments, the introductions to the Lound and Somerleyton sections in paragraphs 5.1 and 6.1 should be amended as follows (new wording is underlined and deleted wording is crossed out):

...distinctive features which ~~need to be reflected in~~ future development should have regard to.....

A new sentence should be added to the end of paragraphs 5.1 and 6.1 to state: *'If needed departures from the Concept Masterplan and Design Guidelines can be permitted and should be justified and agreed with the Local Planning Authority.'*

In order to provide design flexibility bullet points 2, 6, 7 and 8 in paragraph 6.5 should be amended as follows.

- *Creation of a green corridor along the southern boundary through the use of open space or suitable boundary treatments.*
- *Natural surveillance of ~~the public open space in the southern part of the site~~ will be created by properties facing onto the space and creating active frontages.*

- *If open space is located to the front of the development is it should be set back from The Street to create a positively green frontage to the development. This allows the built form to positively relate to the existing houses along Morten Peto Close.*
- *This site is adjacent to a mature woodland group beyond the eastern boundary along The Street and beyond the southern boundary. Development opposite the woodland to the south needs to have a positive relationship with the woodland and the design should incorporate open space or other landscape treatments to reflect this sensitive approach to the design.*

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

The Masterplanning and Design Guidelines have been commissioned and adopted by the NP committee, in order to embody and reflect the criteria that are of paramount importance to the NP philosophies. All developers may wish to reduce the demands and provide greater flexibility to meet their own commercial requirements. The NP relies upon the Masterplanning and Design Guidelines and dilution of its integrity would be to ignore the local community's aspirations. (30/3)

Appendix 1: Correspondence on the Need for Some Larger Homes

David Barker
Evolution Town Planning Limited
Opus House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

Dear Hugh,

I write in support of Somerleyton Estate's proposed planning application and their vision for Somerleyton village.

Following Somerleyton Primary School becoming part of the Hartismere Family of Schools Academy Trust, as Executive Headteacher/Chief Executive Officer I would support the inclusion of three/four bedroom homes in addition to the starter homes, within the plan to encourage young families into the area to ensure the sustainability and even expansion of the village school.

With the school as the 'Hub' of the village for all members of the community, I welcome the proposed plans to connect the school by off road secure footpaths to ensure safe access for all.

The inclusion of a sports field adjacent to the school would be of great benefit to both the school and local community as a whole. Somerleyton Primary has a duty of care to provide a broad and balanced PE curriculum that challenges and inspires students, this dedicated facility would enhance the school's curriculum along with the students' health and wellbeing.

If I can be of support in the next stages of the consultation process, please contact me via the address above.

Yours sincerely

James McAtear
Executive Headteacher
Hartismere Family of Schools

Suffolk County Council

Dear Sir or Madam

Response to Lound, Ashby, Herringfleet and Somerleyton Neighbourhood Plan Regulation 14 Consultation from Officers at East Suffolk Council

Please see the comments below.

Plan Section	Comments
General Comments	The plan responds well to the community's interests and concerns is considered to be acceptable overall. The plan sets out a positive framework to support the delivery of the local plan. Lots of hard work has clearly gone into this plan and will help to focus the appropriate level, scale and design of development and growth within the villages.
Community Engagement and Survey	There has been a good effort to reach the community in difficult circumstances, with hard copies available on request and on-line meetings arranged, the village website had links to the document and the opportunity to comment. It is important to document this (posters, flyers, adverts etc) to show that all efforts have been made to engage and to address consultation during the Covid-19 pandemic. Noted the flyers etc. will be attached to Supporting Documents (30/3)

Policies	
LAHS 1	<p data-bbox="521 240 1442 312">Housing Mix: Preference will be given to the provision of smaller scale 1, 2 and 3 bed dwellings within new developments.</p> <p data-bbox="521 360 1442 507">This is an aspirational policy; however, the policy is not particularly strong. ESC (Waveney) Local Plan policy WLP8.1 Housing Mix permits Neighbourhood Plans to set a more detailed approach to housing type and mix which reflects local circumstances.</p> <p data-bbox="521 555 1442 898">As written, policy LAHS 1 will have little impact in the determination of planning applications. It will carry full weight; it just won't do much to ensure that the size of dwellings and number of rooms are fixed in the determination of planning applications. This is because there is no evidence, such as a Housing Needs Assessment, to support the preference for smaller scale dwellings with 1, 2 and 3 bedrooms. For the benefit of the examiner, it is recommended to explain the reasoning behind not commissioning a Housing Needs Assessment in the consultation document.</p> <p data-bbox="521 946 1442 1369">A Housing Needs Assessment was discussed by the NP Committee. The understanding, after consultation at the time with WDC, was that such an assessment would take a protracted time and separate funds would need to be made available. It was considered that timescale was prohibitive and benefit over the community response was limited, after all the NP is fundamentally established to reflect community opinion and vision, not install a technically based philosophy. With the benefit of hindsight it is doubtful that undertaking a Housing Needs Assessment would have added extensive time to the process of establishing the NP; but what if it differed to the views of the Community, surely it should not be morally allowable to override it?</p>

	<p>So, the position is that the Community views stand, as indeed the purpose of the NP demands. (30/3)</p> <p>This policy is entitled 'Housing Mix' but it includes scale which is a design matter. The matter of scale would be better dealt with in the design policies. Including it here is confusing and muddles the policy, but a simple re-wording could resolve this.</p> <p>Housing Mix is considered to be appropriate and a well understood term (30/3)</p>
Section 7.3	<p>Include the reference to the Broads Authority's allocation for residential moorings for completeness.</p> <p>This has been discussed and included in actions emanating from Broads Authority (30/3)</p>
Para 7.33	<p>This refers to the 'WDC Local Plan'. WDC no longer exists – the local plan is the East Suffolk Council (Waveney) Local Plan.</p> <p>To be corrected (30/3)</p> <p>This para. also says the allocation was accepted by responders to your questionnaire. As part of the local plan strategy there is no option to reject this allocated site. This text is slightly misleading, and it is recommended that this part is removed.</p> <p>It is useful to note that the Community was largely supportive of the allocation even if there was no mechanism to reject them. It is important to record that the Community understands and accepts the</p>

	<p>need for change and growth. Change to “....allocation was supported by....” (30/3)</p>
<p>LAHS2</p>	<p>Slight re-word recommendation:</p> <p>“Development proposals for each of the allocated sites in the local plan shall adhere to the Lound and Somerleyton, Suffolk Masterplanning and Design Guidelines, June 2019.</p> <p>Revise LAHS2 to quote full title (30/3)</p> <p>In particular: WLP5.7 Land North of the Street...”</p> <p>It is suggested that you say allocations shall adhere to the concept masterplan. The Design Guide details several good design principles which different architects/ designers could interpret differently and result in good design outcomes.</p> <p>Revise to “adhere” rather than “be in conformity with”. This should also go some way to take on board the comments from Evolution Planning (on behalf of the Somerleyton Estate). (30/3)</p> <p>It feels more appropriate to refer to the proper title of the design guide (Lound and Somerleyton, Suffolk Master planning and Design Guidelines, June 2019), rather than the ‘AECOM Design Guidelines’.</p>
<p>Para. 7.3.5</p>	<p>This paragraph makes it sound like it is a straightforward option to bring a site forward outside of the Neighbourhood Plan or local plan. In reality this would be contrary to policy and it will be extremely difficult, especially in a somewhere like Somerleyton with such strong heritage</p>

	<p>and character. This doesn't convey that the neighbourhood plan area has protection from such speculative attempts at development. Removing this paragraph may help with clarity and focus of the plan.</p> <p>Agree that future site allocations will be problematic for the proposer but that does not mean that no developer will attempt it in the NP period (in fact the NP committee is aware of a potential application at the time of writing, within the NP area but not in Somerleyton). The para should therefore be retained but reference to WDC Local Plan will be corrected. (30/3)</p>
Policy LAHS 3	<p>This policy reads much more legibly and gives clearer instruction on management, but it has some limited guidance for planting of native trees which would form part of a landscape agreement with the developer which would probably be managed via a condition or legal agreement.</p> <p>The Waveney Open Space Needs Assessment gives some indication about the types open space provision and deficit levels in rural areas.</p> <p>Reference could also be made to Local Plan policy WLP8.23 (Protection of Open Space), which seeks to protect open space as part of the development process.</p> <p>Noted. The NP does not seek to repeat overarching policies of which there are many and all developers will need to apprise themselves of. (30/3)</p>
Policy LAHS 4	A design guide has been created and will be adopted as part of the neighbourhood plan and be a key consideration for any development

	<p>and it is suggested that the NP uses the Design Guide's full title so there is no doubt which document you are referring to.</p> <p>Agree, title to be revised (30/3)</p> <p>Some clarity over what is intended by housing 'type' would be helpful. Could reference the Broads Authority Local Plan in the supporting text and note that developments that impact the Broads Authority area should take into consideration their policies as well as the design principles in the Neighbourhood Plan's Masterplanning and Design Guidelines.</p> <p>Reference the BA: their policies have been addressed within the BA comments. (30/3)</p> <p>Chapter 4 of the Design Guide contains extensive descriptions of several aspects of the built and natural environment of both Lound and Somerleyton, as well as design principles which explain how successful development can be incorporated within each of these settlements. Topics covered include street pattern and layout, connectivity, green space and public realm, gateways and landmark features, land use, boundary treatments, built form and views.</p> <p>Noted</p>
<p>Section 8 Environment</p>	<p>Is this section to address natural environment, built environment, historic environment, or all?</p>

	<p>The Section refers to all of these, so is not the answer to the question self evident? Having reviewed the text it is not considered necessary to revise</p>
<p>Policy LAHS5</p>	<p>Reference to Design Guide section 4.1.2 (Connectivity) could help to underpin the policy and potentially include more than just footpaths.</p> <p>Agree. Will add to LAHS5 - Development Proposals must also include, where appropriate to do so, the requirements of Section 4.1.2 (Connectivity) of the Lound and Somerleyton, Suffolk Masterplanning and Design Guidelines (30/3)</p>
<p>Policy LAHS 6</p>	<p>This is a more precisely worded policy, which specifies the number of parking spaces per number of bedrooms and it is recommended that the parking standards are “subject to design considerations” (as per policy WLP8.21 Sustainable Transport). Large amounts of on-site parking can result in poor quality designs and layouts of housing developments.</p> <p>However, there is no evidence base to support this policy, either in the document itself or the design guide. There is also no reference made to the Suffolk County Council Parking Standards (2019) for residential developments. However, this can be rectified quite easily by making reference to the document and won’t be overly onerous to include.</p> <p>Agree that SCC Parking Standards can be generically mentioned in the text for reference as “8.3.6. In addition to compliance with LAHS 6 new</p>

	<p>residential development proposals shall comply with Suffolk County Council Parking Standards (2019) for residential developments.”</p> <p>LAHS 6 is based on the clear and observable issues inherent in the NP area with respect to parking, and of course Community feedback. The policy is designed to ensure the current situation is not exacerbated, but rather new developments are “self sufficient” in parking as far as is practicable (30/3)</p> <p>Is a parking standards policy best placed in the ‘Environment’ section? Section 7 might be more appropriate.</p> <p>Noted but on balance consider positioning more appropriate. (30/3)</p>
Policy LAHS7	<p>The supporting text provides a list of community assets in both Lound and Somerleyton, which is a useful point of reference. The policy itself concerns the provision of a new community centre. From the supporting text directly above it is assumed that this refers to Somerleyton, but it would be helpful if this was added into the policy title.</p> <p>Agreed – Can be made Somerleyton specific. Also Design Guide title to be revised to full title (30/3)</p> <p>There is currently no identified site or information about what facilities the new community centre should contain. There is nothing about the design of the community facility because it still at a very early stage. As a result this is an aspiration rather than a policy. Delivery of a community hall is a major undertaking, and it is not clear how it will be delivered. Will be via private company (as part of the larger</p>

	<p>developments) or via public/PC? However, it gives general policy support to the aspiration which is positive.</p> <p>Noted. Indeed, it is somewhat aspirational but advice has been to include here as a policy to fix the baseline for a future proposal. (30/3)</p>
<p>Policy LAHS9</p>	<p>ESC (Waveney) Local Plan Policy WLP8.15 (New Self-Catering Accommodation) and WLP8.16 (New Hotel and Guest House Accommodation) already provide guidance about the scale and location of tourism development and so it may be that the second bullet point in policy LAHS9 is not necessary. It is notable that the ESC (Waveney) Local Plan policy WLP8.15 seeks to focus self-catering accommodation within the settlement boundaries. By contrast the neighbourhood plan is far less exacting and could permit poorly connected tourist accommodation in a remote location. Use of 'locations that are sustainable' is vague. A better wording might be: 'relate strongly to the settlement boundaries and do not harm...'</p> <p>WLP8.16 seeks to focus new hotel and guest house accommodation within town centres and seafront locations. Therefore, the Neighbourhood Plan is potentially at odds in stating that tourism accommodation is acceptable in a rural location such as Lound and Somerleyton. If the policy refers to self-catering accommodation, then this should be made clear in the policy text.</p> <p>Noted, but disagree. The potential for tourism and employment growth will come from those who have the vision and commercial ability to promote it. It would be stifling to the NP area to restrict proposals that</p>

	as yet are unborn. Tourist activities need not always be accommodation based, it can involve rural activities or crafts for example. The existing ESC (Waveney) Local Plan policy are restrictive enough. (30/3)
11. Health	<p>This section does not have any outcomes or objectives. It would perhaps be better as part of a plan introduction or overall context section.</p> <p>Noted, but Health was a headline topic in the Questionnaire and the structure of the NP plan is derived from the topics that were generated at the outset, so for this reason it should remain a separate heading and Community participants can follow the link back to the commencement of the process. (30/3)</p>

Please note that the above comments are provided at Officer level only and do not prejudice any future decision by the Council.

Yours faithfully

Ruth Bishop

East Suffolk Council