



# **Southwold Neighbourhood Plan 2020-2039**

**Regulation 16 Consultation  
Consultation Statement  
March 2021**

## Table of Contents

<b>Section</b>		<b>Page</b>
<b>1</b>	<b>Introduction</b>	<b>3</b>
<b>2</b>	<b>How Community Consultation Shaped the Regulation 14 Policies</b>	<b>5</b>
<b>3</b>	<b>Regulation 14 Consultation</b>	<b>11</b>
<b>4</b>	<b>Second Regulation 14 Consultation on Revised Housing</b>	<b>14</b>
<b>5</b>	<b>Strategic Environmental Assessment</b>	<b>16</b>
<b>6</b>	<b>Habitats Regulations Assessment</b>	<b>16</b>
<b>7</b>	<b>Appendices</b>	<b>17</b>

# 1. Introduction

The Southwold Neighbourhood Plan (NP) grew out of the Southwold Town Plan (October 2013), a community-led initiative that recommended the town should have a NP. Southwold Town Council (STC) accepted this recommendation and established a Neighbourhood Plan Team (NPT).

Between September 2014 and November 2018, the Team consulted with the community through drop-in events, a public meeting, questionnaires, focus groups and interviews. This lengthy period of consultation, during which there were hiatuses for analysis, evidence gathering, drafting and re-drafting, resulted in the Regulation 14 draft of the NP. Appendix 1 contains a summary timeline of the NP consultation process through May 2020.

There were many helpful representations made during the Regulation 14 consultation that enabled us to use the opportunities created by changes in the planning 'toolkit' (the 2019 versions of the NPPF and Waveney Local Plan, case law, and Planning Appeal decisions) to expand and modify policies so that the Regulation 16 Plan Proposal more closely aligns to the community's aspirations.

In particular, the Regulation 14 feedback on the housing section resulted in the drafting of four new housing policies. East Suffolk District Council advised that these new policies should be resubmitted for a new Regulation 14 consultation. This took place between November 2020 and 31 January 2021 and was then extended to 5 February 2021 to give the Police and Crime Commissioner additional time to submit further comments to their response, per their request. (None were submitted.)

The outcomes of the revised housing section consultation (overwhelmingly favourable) are discussed in Section 4 of this Consultation Statement.

In this Consultation Statement, we describe the entirety of the consultation process; what we learned about our community's concerns; and how these concerns, and the concerns of other statutory consultees and stakeholders, fed into the development of the policies.

## 1.1. How the Town Plan Shaped the Neighbourhood Plan

Although the Town Plan sits outside the NP Consultation Process, it shaped key events and decisions in the Neighbourhood Plan. The decision to undertake a Town Plan was based on concerns about the sustainability of Southwold triggered by a significant increase in the number of dwellings being used for second homes and holiday lets, and the perceived take-over of the High Street by national chains, leading to the loss of some independent businesses. The Town Plan resulted in a number of recommendations that were based on the results of a questionnaire that generated 475 responses from 917 household members. 78% of respondents supported the development of a Neighbourhood Plan.

In the early summer of 2013, before the Town Plan's publication, STC decided to investigate the NP process. One of its questions was whether it would be possible to regulate the number of second homes/holiday lets. This suggestion – radical at the time – was being considered by St Ives. The Town Council was advised that there could not be certainty on this issue until a Neighbourhood Plan with such a policy was made and upheld in the High Court. This happened in October 2016 when Mr. Justice Hickinbottom decided that the St Ives Neighbourhood Plan principal residence policy was lawful. (*6RLT Built Environment Ltd v Cornwall Council [2016] EWHC 2817 (Admin)*).

In February 2014, STC voted to set up a Task and Finish Group to deliver a NP. Its first decision was to determine whether the NP Area should be Southwold Parish or the District Council Ward of Southwold and Reydon. STC used the Town Plan to provide consultation evidence to the LPA supporting the former's view that the parish was the appropriate planning area. Appendix 2 contains the Area Designation Request letter, which cites the following data from the 2012 Town Plan questionnaire:

- 91% of respondents requested protection of community assets;

- 90% requested protection of Southwold's unique character;
- 73% requested restriction of infill development;
- 66% requested a local design policy.

Based on the Town Plan consultation evidence, LPA designated Southwold Parish as the Neighbourhood Plan Area in May 2014.

In early June of 2015, STC organised a public meeting attended by over 100 people to explain how it was progressing the Town Plan's recommendations. This involved a 50 minute session on the types of NP policies that could deliver the outcomes sought in the Town Plan.

A month after this meeting, building on heightened community awareness, the NPT developed a Vision and Priorities Questionnaire to assess which of the planning concerns identified by the Town Plan were still important to the community. The responses helped to develop the Regulation 14 policies.

## **1.2. The Neighbourhood Plan's Structure and Operation**

The NPT is a Town Council Task and Finish Group with delegated powers to deliver the NP. It consists of 50% Councillors and 50% community members. During the period 2014 – mid- 2017, it met on a monthly basis and, since then, as needed. It reports to the Town Council at the latter's regular monthly meeting. It has been supported by Navigus Planning, which specialises in Neighbourhood Plans. The NPT collected and analysed evidence and drafted most of the text of the NP but relied significantly on Navigus Planning to draft the plan's policies. The NPT organised the delivery of the three questionnaires used in the consultation to every resident household (including second homes but excluding obvious holiday-homes). Drafts of the plan have been made available on the Town Council website and at drop-in sessions. Events were advertised through three local print outlets, posters, Town Council newsletters, the Town Council's website and, beginning in 2018, on Facebook and Twitter.

## 2. How Community Consultation Shaped the Regulation 14 Policies

### 2.1. Overview

Although the NPT undertook various forms of community engagement, inevitably some efforts were more productive than others. The NP process was a long learning curve for both the Council and the community. At the outset, there were doubts about whether a made NP would actually make a difference. We also did not know how much freedom we had to innovate in order to address some of the most important community concerns – the percentage of housing not occupied full time; parking and traffic congestion; and the loss of independent shops because of high rents and rates. One of the values of the Regulation 14 consultation is that it told us that we could aspire higher.

### 2.2. Overview

Appendix 1 lists every type of outreach in chronological order. In this statement, however, we focus on the key events and key issues raised, which we have listed in Table 1 below. Certain themes have been consistent throughout the process: worry about the high percentage of second homes/holiday lets; parking and traffic congestion; and loss of Southwold's "character." Character is a multi-faceted concept in the community's mind, referring to urban design, the natural environment and the number of independent shops on the High Street.

**Table 1: Summary of Consultation Events & Key Issues Raised**

Date	Type of Event	Key Issues Raised
Dec 2014	All day Town Hall Drop-in	<ul style="list-style-type: none"> <li>• Second homes/Holiday lets</li> <li>• Loss of independent shops</li> <li>• Parking</li> </ul>
Jul 2015	Vision & Priorities Questionnaire	<ul style="list-style-type: none"> <li>• Preserving &amp; enhancing the town's character</li> <li>• Protecting gardens &amp; courtyards</li> <li>• Preventing flooding</li> <li>• Parking</li> <li>• Protecting the natural environment</li> <li>• More affordable housing</li> </ul>
Nov 2015	All day Ingleton Wood Design Framework Drop-in	<ul style="list-style-type: none"> <li>• High quality design fully supported</li> <li>• Market housing should be restricted to full time residents</li> <li>• Parking congestion</li> </ul>
Jan-Nov 2016	Business owners' interviews & focus groups	<ul style="list-style-type: none"> <li>• Lack of full time residents &amp; ageing population a problem for all businesses</li> <li>• Diversify tourism economy - more B1 affordable space</li> <li>• Parking &amp; traffic congestion a major problem</li> <li>• Need affordable housing for employees</li> <li>• High quality design, natural environment &amp; environmental sustainability all important</li> </ul>
Jan-Feb 2016	Residents' Focus Groups	<ul style="list-style-type: none"> <li>• Strong support for principal residence policy</li> <li>• Need for more diverse &amp; younger population</li> <li>• Parking</li> <li>• More affordable homes that stay affordable</li> <li>• Preserve beauty of town &amp; natural environment</li> </ul>
Jul 2016	NP Individual Questionnaire	<ul style="list-style-type: none"> <li>• Discourage more second homes/holiday lets</li> <li>• Build more affordable housing</li> <li>• Discourage garden &amp; courtyard infill</li> <li>• Require off-street parking for new developments &amp; prevent loss of off-street parking</li> <li>• Protect community facilities</li> <li>• Promote use of land for micro/small businesses</li> <li>• Prevent flooding</li> <li>• Plant native trees</li> </ul>
Oct 2018	Drop-in event to consult on proposed Reg 14 policies	<ul style="list-style-type: none"> <li>• Overwhelming support for all 11 proposed policies for Reg 14 consultation</li> <li>• Make principal residence policy more robust</li> </ul>

## 2.3. Stakeholder Letters

Early in the consultation process (Feb 2015), STC wrote to all businesses, landowners, sports users, the local amenity society (Southwold and Reydon Society), local schools, and others to seek their views on the NP. Appendix 3 contains a list of those contacted along with an example of the letter.

## 2.4. Drop-in Events Before Drafting Regulation 14 Policies

Before drafting policies, the NPT organised six drop-in events. These took place during the 14 month period between September 2014 and November 2015. See Appendix 4 for pictures of three of the drop-in events. Two events (Town Hall and Ingleton Wood, discussed in the next paragraph) had high turn outs and also produced information that significantly shaped the Neighbourhood Plan. The remaining drop-in events were typically attended by 20-40 people and were held at stand-alone informational stalls in the Market Square or in conjunction with other events, e.g. the Lions Fete; the Arts Festival; and a Waveney District Council Affordable Housing Open Day.

### Town Hall Drop-In Event, December 2014

Advance publicity for this event focused on Southwold becoming a “ghost town. Over 120 people attended. The most important “take-away” was that, although most people were troubled by what was happening to the town, there was uncertainty about how a Neighbourhood Plan could reverse the damage. The other two “take-aways” were frustration at the loss of independent shops and parking and traffic congestion.

### Ingleton Wood Architects (IW) Consultation, November 2015

Attended by 80-100 people, this event’s objective was to obtain the community’s views on a design framework commissioned by Southwold Town Council, which would be applicable to a handful of separately owned brownfield sites at the entrance to the town that were likely to be developed during the lifetime of the Neighbourhood Plan. The event was run by the architectural practice that developed the design framework, with the help of SNT members. The IW Statement of Involvement is contained in Appendix 5.

There were 19 responses to the consultation questionnaire, 21 further written comments and a number of verbal comments. 100% of responses to the questionnaire supported that the sites should be considered in a coordinated matter, with 89% supporting the high quality design approach identified.

The consultation’s two major themes were that housing should be affordable or restricted to permanent residents and parking:

*“It was highlighted that there is a need to revive and attract permanent residents to the area, locals would like to see restrictions placed on the sale of any houses for second homes and that affordable homes remain for that use in perpetuity... In peak times within the summer, Southwold is overrun with tourists, which has a massive impact on resident parking”*

The 19 written responses to the question on how the sites should be used in the future were, in order of frequency: market housing, affordable housing, retail/shops, and community facilities. Other uses included light industry, leisure, things to attract jobs, launderette, rentable housing, and a library.

The results of the IW Consultation have been incorporated into the policies on Housing, Design, Sustainable Transport and Development Sites.

After the IW Consultation, the NPT held a listening session with three local architects; John Bennett, Alan Greening and Brian Haward some of their views fed into the Design Policy.

## 2.5. Questionnaires

The NPT used three questionnaires to elicit the community's views on planning policies. Their outcomes and how these shaped the Regulation 14 version of policies is described below.

### "How do you see Southwold in 10 years time?"

This was distributed between December 2014 and June 2015. It was not productive possibly because of low public awareness, and its lack of focus.

### Vision and Priorities Questionnaire, July 2015

This questionnaire was distributed in July 2015, see page 8, along with the Town Council's Annual Report to every household (excluding holiday lets). Residents were asked to return it to the Town Hall – no deadline was set. In December 2015, we analysed the 80 responses received through the end of November. The results are set out on the next page.

- The responses to 9 and 14 helped to shape the policies for Housing. 14 showed an antipathy to building new market housing because of the perception that it is overwhelmingly occupied as a second home/holiday let.
- The responses to 1-4, in which over 80% sought strong protection for the character of the town's built environment, helped to shape the NP policies for Design.
- Response 3, protecting and enhancing the Town's character, fed into the small shops policy in Economy. (As noted earlier, we found that people use the term "character" to refer both to independent shops and urban design.)
- The responses to 6, 7, & 8 fed into the policies for Sustainable Transport and the Natural Environment.
- The responses to 10 and 11 helped to develop the policies for the Economy.

Besides feeding into the policies, the results of Vision and Priorities Questionnaire helped us to develop the Individual Questionnaire.

### Neighbourhood Plan Individual Questionnaire

Distributed in July 2016, this questionnaire built on what had been learned up to this point in time, including the outcomes from interviews and focus groups conducted in the first half of 2016. Before circulating it to every household in town (except holiday lets), it was tested on 11 people without a connection to the NPT. The NPT explained to test respondents, "We are looking for the questionnaire to be accessible to everyone in terms of the way questions are asked, and that they are understandable, without help."

A total of 337 people responded to the Individual Questionnaire, representing 40% of the electoral roll population (845). 147 of respondents were second home owners. For the most part, the views of residents and second homers were similar.<sup>1</sup> Appendix 6 contains the questionnaire and a detailed analysis of the results.

The results of the Individual Questionnaire played a major role in shaping the Regulation 14 policies. In addition, following the Regulation 14 consultation, we revisited the outcomes of the Individual Questionnaire to ensure that previous community consultation supported our strengthening the Regulation 16 version of policies on:

- housing (extending principal residence requirement; affordable housing; holiday lets);

---

<sup>1</sup> The NPT assumed that the second home owners responding to the questionnaire had a strong attachment to the town. This assumption is based on the facts that only 17.4% let out their homes were they were in Southwold and 65% said they were in town at least three months, with 16.6% saying that they resided in Southwold for over 6 months/year.

- extending the existing employment area to the Southwold Business Centre and Adnams work space; and
- retaining small shop premises.

## SOUTHWOLD NEIGHBOURHOOD PLAN

### YOUR VISION

In June this year, residents and visitors were asked which of a number of visions for Southwold were important or unimportant to them for development into policies for inclusion in Southwold's Neighbourhood Plan. The results to November 2015 are shown below.

VISION	Important	Not Important	Neutral/No Opinion
1 Preserving & Enhancing an Attractive Residential & High Street Scene	85%	0%	2%
2 Ensuring Excellence of Building Design & Materials throughout Town	84%	2%	4%
3 Protecting & Enhancing the Town's Character	83%	0%	0%
4 Protecting & Conserving the Conservation Areas & Historic Buildings throughout Town	83%	0%	2%
5 Preventing Flooding	76%	2%	1%
6 Preserving Gardens & Courtyards	76%	0%	10%
7 Providing Adequate Parking for all Residents & Visitors	74%	2%	10%
8 Protecting the Natural Environment, Wildlife & Biodiversity	68%	0%	14%
9 Building more Affordable Houses/Flats for Rent by the Council or a Trust	61%	20%	13%
10 Providing Shared Office Space for Small/Medium Businesses	42%	10%	32%
11 Providing more Commercial Space for Small/Medium Businesses	40%	18%	24%
12 Providing more Leisure Facilities	25%	20%	37%
13 Providing more Community Amenities	22%	19%	35%
14 Building more Houses/Flats that Owners can sell on the open market	5%	62%	13%

## 2.6. Proactive Community Engagement: Focus Groups and Interviews

The NPT proactively engaged with the community – both businesses and residents – through interviews and focus groups. Most of this engagement occurred in the first quarter of 2016.



## Business Leaders

As noted earlier, in February 2015, letters were sent to all of the businesses in the town to notify them of the NP and obtain their views. For different reasons, the response rate was low. (We were told that owners of independent businesses were hard pressed to find time for an additional community activity and did not understand how a NP could help them whilst the national chains did not feel locally committed.) In early 2016, the Team reached out to business leaders and conducted interviews and a focus group to obtain the views of nine business owners. Eight were micro/small independent businesses representing a mix of retail, hospitality, and marketing; one was the CEO of Adnams Plc<sup>2</sup>.

The independent businesses included several active in the Chamber of Trade, including its Head, who also owned the Post Office. Some of their concerns, especially the importance of the natural environment and the need for more business and commercial space suitable for small, start-up, growing and independent businesses, were amplified in the Chamber of Trade's response to the Local Plan consultation, submitted in 2016 and cited as part of the NP's evidence base in the Economy section.

## Resident Focus Groups

We segmented the residential community into young people (ages 13- 17 from the youth group, the Loft); young families with children in pre-school and primary school; over 70's; and Library Users. The latter is the most inclusive community facility, with its users representing the widest cross-section of the community. The number of participants in each group ranged from 8 to 12 people. There were small and expected differences in issues that they raised – for example, the young group did not express concern about parking since they use public transport or walk into the town. On the characteristics of Southwold that relate to housing, design, natural environment, and the economy, there was substantial unanimity.

Table 2 on the next page shows how the two questionnaires, the interviews and focus groups fed into the Regulation 14 policy areas.

---

<sup>2</sup> The independent businesses were: Spring; Suffolk Secrets; Post Office & Spots Toy Shop; Mills & Sons & Daughters Butcher; The Sail Loft Restaurant; Two Magpies Bakery and Café; Chapps Barber Shop.

**Table 2: How Consultation Shaped the Policy Areas: Individual Questionnaire; Business Interviews; Resident Focus Groups**

Policy Area	Individual Questionnaire	Business Interviews	Residents Focus Groups
<b>Housing</b>	93.5% of residents and 82.2% of second-homers thought affordable housing stock should always remain affordable	The need to reverse demographic decline and attract a more diverse population, especially younger people and families.	Too many second homes/holiday lets.
	87% of residents and 73% of second homers thought the NP should try to encourage full time residence of newly-built housing	More affordable housing to attract and retain employees	Need for housing that supports a larger and more diverse full time population, with younger people and families.
	81% of residents and 50% of second homers thought the NP should discourage the conversion of family homes to holiday lets		Loss of full time population, and the aging population are damaging to Southwold's sustainability. For over 70's, "if something goes wrong, there is no one to help you" because of lack of neighbours.
	47% of residents and 34% of second homers said that the high number made them worried about Southwold's sustainability.		More affordable homes that stay affordable (not what happened in Tibby's Triangle where affordable housing stair cased into second homes/holiday lets).
	Only 21% of respondents said that the high number of second homes and holiday lets have no personal impact on them.		More housing for rent.
<b>Design</b>	87% of respondents gave priority to a policy to discourage infill of gardens and courtyards;	The need for high quality design to retain Southwold's character and charm	High value placed on Southwold's beauty
	Aspects of Southwold's character that were given priority by over 40% of respondents were open spaces and historic building styles and materials;		Poor quality design in some new development
<b>Sustainable Transport</b>	85% of residents and 75% of second homers thought all new development, including conversions, should be required to have off-street parking	Need to tackle parking and traffic congestion, which is undermining local economy	Parking and traffic congestion are major problems
	62% of residents and 61% of second homers thought the conversion of garages to residential accommodation should be discouraged		
<b>Economy</b>	84% gave priority to the creation of space suitable for small and start-up businesses 59% supported diversifying the tourism-based local economy	The need to diversify the local economy so that it is not so dependent on tourism by growing/expanding more micro and small businesses.	A working Harbour is an important part of the local economy
		More space at affordable rents for businesses to locate and expand	High value placed on the independent businesses in the town – perceived as community facilities, investing in the town, caring about residents, employing more local people.
		Value to the town of independent businesses	Ability to work long distance important
			Need to diversify from tourism to create better jobs for young people to retain and attract them to the town.
<b>Natural Environment</b>	94% of residents and 93% of second homers thought we should have policies to reduce surface water flooding and promote water efficiency	The importance of the natural environment to Brand Southwold	High value placed on natural environment as a source of beauty/Southwold's character and for leisure/recreation
	46% wanted natives trees to be planted	Business and community can co-locate in same facilities	
	33% sought protection of the natural environment		

### 3. Regulation 14 Consultation

#### 3.1. Consultation on First Draft of Regulation 14 Policies

After analysing the results of all of the community consultation, the SNT published a summary of 11 draft policies, which were made available in the Town Hall, the Library, on the Town Council website, and at a drop-in event held at the Stella Peskett Hall on 22 October 2018. At this event, the SNP put up posters for each policy and members were available to answer questions. 42 people provided written comments. Of those who formed an opinion, there was overwhelming support for the policies, as shown in Table 3 below.

**Table 3: Draft Policies Consultation October 2018. Summary of Analysis of 42 Responses**

Policy No	Policy Subject	Supported	Not Supported	No Comment	% Supporting of those with an opinion
SWD1	Principal Residence	29	5	8	85%
SWD2	Design & Landscape	31	1	10	97%
SWD3	Private Parking	29	1	12	97%
SWD4	Convenience Retailing	25	7	10	78%
SWD5	Solo Workers, Micro Businesses & Small Businesses	25	5	12	83%
SWD6	Wildlife in Development	30	1	11	97%
SWD7	Private Garden Spaces	29	2	11	94%
SWD8	Local Green Spaces	25	5	12	83%
SWD9	Impact of Flooding	26	2	14	93%
SWD10	Community Facilities	29	0	13	100%
SWD11	Development Sites	25	3	14	89%

See Appendix 7 for the complete Analysis of Consultation Responses to Draft Policies, October 2018.

The most significant outcome of the consultation was to strengthen the Principal Residence Policy by deleting a viability clause because of community concern that this would make it less effective.

#### 3.2. First Regulation 14 Consultation

Regulation 14 (Pre-Submission) Consultation was undertaken between 1<sup>st</sup> November and 30<sup>th</sup> December 2019. The 8-week period reflected the fact that part of it coincided with the Christmas holidays.

The consultation was advertised through Facebook and Twitter, printed leaflets, the Town Council website, posters in the library, Stella Peskett Hall, several local shops, local print media (Gazette, Organ, Lowestoft Journal), town Notice boards and the A Boards in front of the Town Hall. The Plan and supporting documents were made available on the STC website. Hard copies of the Plan were made available to view in Southwold Town Hall and Southwold Public Library. Community Drop-In Days were

held in the Town Hall on two separate dates during the consultation period. Each lasted for a period of two hours and gave people the opportunity to ask questions and submit written comments.

The following statutory consultees were emailed to inform them of the Regulation 14 Consultation: East Suffolk DC; Suffolk County Council; the Parish Councils of Reydon, Walberswick, Blythburgh and Wangford; Natural England; Environment Agency; Historic England; Anglian Water; Essex and Suffolk Water; Suffolk Preservation Society and Southwold and Reydon Society.

In addition to the written responses from statutory consultees and other bodies, there were a handful of comments received as a result of the drop-in sessions. Appendix 8 contains the full details of how the SNT responded to the Regulation 14 comments. The reader is referred to Row 4 especially, which explains the changes to the Housing Policies, and the research that was done to support the changes.

In summary, policies were expanded, added to and modified to address the comments of East Suffolk Council (ESC), Suffolk County Council (SCC), and the Southwold and Reydon Society (SRS).

### Housing

Both ESC and the SRS highlighted that the principal residence policy in itself was unlikely to have significant impact on the town's demographic crisis. This comment caused us to revisit our community consultation evidence and conduct additional research. The research included up-dating our evidence base on holiday lets, and identifying other relevant made NP's, case law, and Planning Appeal decisions from areas facing similar challenges, researching Community Led Housing, commissioning Locality to conduct a viability analysis of Community Led Housing projects. During this process, the NPT worked closely with ESC Planning Policy to develop five new housing policies.

The first three policies (SWD1-3) support Community Led Housing development to build permanently affordable housing in Southwold.

The fourth (SWD4) extends the principal housing requirement to affordable housing and housing created through change of use. This means that if the right to buy is exercised or shared ownership dwellings staircase to full equity, then, if these units are sold onward as market housing, they will still be occupied by full time residents. Although this does not achieve the community's aspiration for all affordable housing to always remain affordable, it prevents affordable housing from becoming second homes or holiday lets.

The fifth policy (SWD5) deals with the adverse impact on amenity created by intensive use of housing for holiday letting.

As noted above, these five policies were then submitted for an additional period of Regulation 14 Consultation, described in Section 4.

### Design

In response to ESC comments, we added an appraisal of gardens conducted by Place Services to the Character Area Appraisals. We also responded to ESC's concern that the Design Policy left too much decision-making to the Appraisals by incorporating into the Design Policy the National Design Guide, which is to be applied to any development (other than permitted development) of sites consisting of between 1 and 10 buildings.

### Sustainable Transport

In response to comments by ESC and SCC, and with the help of SCC who assisted with re-drafting, we made substantial amendments to the context and policy with the objective of reducing car dependency and the impact of car use on the character of the town. In the context section, we identified the different types of demand for cars (origin and destination) and showed how Southwold's high demand for car parking at destination, coupled with the high number of holiday lets, is adversely affecting the town's character. The final result is a parking policy that is clearer and balances competing community concerns

– protecting high quality design and gardens from development, environmental sustainability, and reducing parking and traffic congestion.

### Economy

In response to comments by ESC, and to achieve the outcomes sought by the community of growing and diversifying the economy, we added a policy that extends the existing employment area to include the two major business conurbations outside the existing employment area – Adnams’ brewery, distillery, offices and workshops – all located in or near the Town Centre – and the Southwold Business Centre. During the consultation process, we had written to Adnams as a landowner, and also interviewed its CEO (the former Chair of the New Anglia Local Enterprise Partnership) who fully supported the need to create more business space to diversify the economy away from tourism and grow high value jobs. Adnams was not consulted on this specific policy, but will have the opportunity to do this in the Regulation 16 Consultation.

### Natural Environment

In response to comments by SCC, and to achieve the outcomes sought by the community, we have strengthened the local approach to promoting biodiversity.

### Development Sites

This section was adjusted to reflect changes “on the ground” since the Regulation 14 policies were submitted. This includes proposed development of the Millennium Field into a car park and visitor centre, and the mooted sale of the Scout Hut.

## 4. Second Regulation 14 Consultation on Revised Housing

4.1 Following East Suffolk Council's advice, the Neighbourhood Plan Team conducted a new Regulation 14 consultation on the housing section beginning 2 November 2020 and ending 5 February 2021. (It was extended from 31 January to 5 February at the request of the Police and Crime Commissioner to enable the latter to submit additional comments to their earlier consultation response. No additional comments were received.)

The responses to the consultation are analysed and addressed in Appendix 9.

In order to overcome barriers to communication created by the Covid-19 pandemic, the SNT publicised the consultation by:

- leafletting each household;
- publishing articles in the Town Council's monthly newsletter and the Southwold Gazette.
- posting the consultation on the STC website;
- emailing statutory and other consultees, including the holiday let companies that manage the holiday letting market in Southwold. (The latter were sent follow-up notifications, but made no response.) See Appendix 10 for the list of persons/organisations contacted.
- posting on Town Council social media and asking other groups to spread the word via social media. These groups included My Southwold (Chamber of Trade), whose notification was sent to 185 people; the Southwold and Reydon Society (local amenity society with approximately 400 members); and SouthGen (a community benefit society with a substantial number of second home owners amongst its 476 members).

4.2 The Neighbourhood Plan Team held four meetings via Zoom (set out below), attended by approximately 40 members of the public -- see Appendix 11 for the minutes of the Zoom meetings.

06.11.2020	SRS Executive Committee
26.11.2020	First zoom meeting - 3 members of public
27.01.2021	Second zoom meeting - 21 members of public
02.02.2021	Third zoom meeting - 1 member of public

4.3 In addition to the comments received in the Zoom meetings, there were 35 written responses from members of the public, analysed below.

<b>SWD</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
<b>Yes</b>	20	20	20	21	17
<b>%</b>	77%	80%	80%	81%	71%
<b>No</b>	2	1	1	3	3
<b>%</b>	8%	4%	4%	12%	12%
<b>Queries</b>	4	4	4	2	4
<b>%</b>	15%	16%	16%	8%	17%

4.4 The various publicity and consultation events are set out in chronological order below.

<b>Date</b>	<b>Event</b>
Nov-20	Leaflet drop started to every house in Southwold
Nov-20	Southwold Gazette - full page article
02.11.2020	Start of consultation period
06.11.2020	SRS Executive Committee meeting with NPT
26.11.2020	First zoom meeting - 3 members of public
21.12.2020	Town Council newsletter - 66 recipients - <a href="https://mailchi.mp/449837bf48d7/southwold-town-council-december-newsletter">https://mailchi.mp/449837bf48d7/southwold-town-council-december-newsletter</a>
02.12.2020	Documents on website
03.12.2020	Letters to businesses/stakeholders
07.12.2020	Letters to businesses/stakeholders
22.01.2021	Reminder sent to those who hadn't responded
25.01.2021	Town Team update - sent to 185 people - <a href="https://mailchi.mp/6d617b933102/town-team-update-business-association-launches-join-today-3610602">https://mailchi.mp/6d617b933102/town-team-update-business-association-launches-join-today-3610602</a>
27.01.2021	Second zoom meeting - 21 members of public
31.01.2021	End of consultation period
02.02.2021	Third zoom meeting - 1 member of public
	Various social media posts on Southwold Town Council and East Suffolk Council pages
	Further disseminated by My Southwold, Southwold and Reydon Society & SouthGen

## **5. Strategic Environmental Assessment**

East Suffolk Council undertook a screening exercise regarding the need for a Strategic Environmental Assessment (SEA) of the September 2018 draft of the Neighbourhood Plan. The draft Screening Opinion was sent to Natural England, the Environment Agency and Historic England for consultation. The subsequent opinion that the draft Plan did not require an SEA was published in February 2019. This is included in the Supporting Documents.

Following the amendments made to the Plan after Regulation 14, the new policies were subject to a screening exercise in March 2020 by East Suffolk Council. This determined that these new policies also did not require an SEA. The additional screening report is also included in the Supporting Documents.

## **6. Habitats Regulations Assessment**

East Suffolk Council undertook a screening exercise regarding the need for a Habitats Regulations Assessment (SEA) of the Regulation 14 draft of the Neighbourhood Plan (prior to the formal launch of the Regulation 14 consultation). The draft Screening Opinion was sent to Natural England for consultation. The subsequent opinion that the draft Regulation 14 Plan did not require an HRA was published in September 2019. This is included in the Supporting Documents.

Following the amendments made to the Plan after Regulation 14, the new policies were subject to a screening exercise in May 2020 by East Suffolk Council. This determined that these new policies also did not require an HRA. The additional screening report is also included in the Supporting Documents.



## 7. List of Appendices

<b>Appendix</b>		<b>Page</b>
<b>1</b>	<b>Chronological Summary of the Neighbourhood Plan Process</b>	<b>18</b>
<b>2</b>	<b>Area Designation Request Letter</b>	<b>19</b>
<b>3</b>	<b>List of Stakeholders Contacted in February 2015 and Sample Letter</b>	<b>20</b>
<b>4</b>	<b>Photographs of Drop-In Events</b>	<b>22</b>
<b>5</b>	<b>Ingleton Wood Statement of Involvement</b>	<b>23</b>
<b>6</b>	<b>Analysis of the Neighbourhood Plan Individual Questionnaire 2016</b>	<b>33</b>
<b>7</b>	<b>Analysis of Consultee Comments to Draft NP Policies, October 2018</b>	<b>69</b>
<b>8</b>	<b>Analysis of First Regulation 14 Consultation Response</b>	<b>77</b>
<b>9</b>	<b>Second Regulation 14 Consultation on Revised Housing Policies</b>	<b>109</b>

## Appendix 1 - Chronological Summary of the Neighbourhood Plan Process

Summary of Time Line of Consultation Process	
25 Jun 2013	STC tasks Planning and Development Committee to investigate process for undertaking a NP
1 Oct 2013	Town Plan publication
15 Nov 2013	Meeting with NP consultancy to consider the merits of a joint area with Southwold and Reydon and potential policies for second homes and holiday lets.
11 Feb 2014	Meeting of NP team with full Town Council re decision to proceed with NP; Navigus Consultancy present.
28 Feb 2014	MP letter of support for Southwold Area for NP
1 Mar 2014	Letter to Waveney DC setting out town Plan consultation evidence that supports Southwold being an NP Area
1 Apr 2014	Mayor attended Southwold and Reydon Society AGM to explain consultation
1 May 2014	Area designation received
27 Sep 2014	First community event: Market Square informational stall – over 40 members of public attended
6 Dec 2014	Town Hall Drop in Day. Day-long event with food and drink. Over 120 people attended
1 Jan 2015	"How do you see Southwold in 10 years" leaflet with questionnaire developed for distribution
5 Feb 2015	Letters sent with questionnaire to land owners, sports users, and businesses
16 Feb 2015	Market Square Drop-In Event
1 Mar 2015	NP explained to meeting of Women's Institute
1 May 2015	Chairman met with Suffolk Secrets, School and local businesses to explain NP
25 May 2015	Lions Fete NP stall
6 Jun 2015	Public meeting at St Edmunds Hall to report progress on implementation of Town and Neighbourhood Plans
1 Jun 2015	Arts Festival Drop-in Event
1 Jul 2015	Vision and Priorities questionnaire distributed to every household
1 Oct 2015	Town Council newsletter article and updates and asking for responses
1 Oct 2015	Responses to Vision and Priorities questionnaire analysed
18 Nov 2015	Drop-in event to consult on Ingleton Wood Design Framework for front of town
3 Dec 2015	Letter to three local architects, followed by NP listening session re design
1 Mar 2016	Focus group with Library users
18 Jan 2016	Business leaders focus group
6 Feb 2016	Focus group with young family members
10 Feb 2016	Focus group with Loft youth club
16 Feb 2016	Business interview with CEO Adnams Plc
23 Feb 2016	Focus group with over 70s
26 Feb 2016	Southwold Primary School Event
1 Jul 2016	Business interview with Scott, Chapps
1 Jul 2016	Delivery of Neighbourhood Plan Individual Questionnaire to all residents and second homes
5 Oct 2016	Business interview with Sail Loft Restaurant owner
8 Nov 2016	Business interview with George Mills, Butcher
1 Sep 2016	Deadline for responses to questionnaire
Nov 2016 - Oct 2018	Research evidence base, analyse consultation, draft and redraft policies
21 Oct 2018	Drop in event Consultation on draft policies
1 Nov - 31 Dec 2019	Regulation 14 consultation.
5 Dec 2019	Town Hall drop-ins
19 Dec 2019	Town Hall drop-ins
Jan-April 2020	Analysis of Regulation 14 responses, revision of NP Context and Policies; preparation of Consultation Statement
1 May 2020	Submission of Plan Proposal for Regulation 16 consultation

## Appendix 2 - Area Designation Request Letter

### SOUTHWOLD TOWN COUNCIL



Mrs. L. Beevor  
Clerk of the Council

Town Hall  
Southwold  
IP18 6EF

17<sup>th</sup> March 2014

Dear Sirs

#### Southwold Area Designation – Neighbourhood Plan – consultation response

Southwold Town Council has begun a process designed to deliver a *Neighbourhood Plan* for Southwold – Building on the findings of the *Town Plan (2013)* and engaging further with the people who have an interest in the Town through engagement events and other opportunities.

In choosing a Southwold Area Designation, the *Town Council* has responded to the overwhelming finding within the *Town Plan* that over 80% of Southwold respondents were in favour of the production of a *Neighbourhood Plan*.

The *Town Council* has, already, defined specific reasons for deploying insularity, citing defining factors within the Parish Boundary that make the place a wholly distinctive location within the Suffolk Heritage Coast.

Within the *Town Plan* question on matters relating to the built environment that should be considered within a *Neighbourhood Plan* the following Southwold responses were received;

- 91% of the Southwold respondents requested that consideration be given to protecting their community assets
- 90.2% requested that the unique character of Southwold be preserved.
- 85.4% requested that Local Building List be considered.
- 72.6% requested that Infill be restricted.
- 66.2% requested a Local design policy

**These are all concerned with Planning Policy that is specific to Southwold.**

From the *Town Plan*, and other sources of data, the following distinct areas for further engagement have also been highlighted (although the list is not exhaustive and should be examined in conjunction with detail, previously supplied)

- Local Design Policy – traditional or contemporary – construction materials etc.
- infill / courtyards
- principle Residence Policy

Telephone: 01502 722576  
Fax: 01502 725472

Email: [townclerk@southwoldtowncouncil.com](mailto:townclerk@southwoldtowncouncil.com)  
Mobile: 07572812124

## **Appendix 3 – List of Stakeholders Contacted in February 2015 and Sample Letter**

### **Businesses/Public Facilities**

Adnams  
Blyth Hotel  
Library  
Marks Chip Shop  
Craftco  
Le Roc  
Sutherland House  
Mantins  
Crown Hotel  
Durrants  
Swan Hotel  
Chapps  
Noir  
Brian Haward Architects  
John Bennett Architects  
Railway Shop  
Shoeme Balti House  
Anna Wolfenden Yoga  
Rebecca Huggins – Southwold Treatment Rooms  
MTM Consulting  
Post Office/Spots  
Halford & Wetmore  
Fifty One  
Enzos  
Observatory Opticians  
Cut Above  
Margary & Miller  
Jennie Jones  
Buckenham House  
Barclays Plc  
Lloyds Plc

Chattertons  
Co-op  
Costa Coffee  
Crew Clothing  
Fat Face  
Gun Hill Clothing  
Hughes  
Jack Wills  
Joules  
Norwich & Peterborough  
Quba  
Seasalt  
Tescos  
Waterstones  
WH Smith

### **Landowners**

BT  
RBS  
SCC Fire Authority  
Chris Rush Suffolk Police  
Adnams  
Mr & Mrs Gough – Southwold Pier  
Millennium Foundation

### **Sports Users**

Rugby Club  
Football Club  
Golf Club  
Pit Stop  
Cricket Club  
Tennis Club

# SOUTHWOLD TOWN COUNCIL



Mrs. L. Beevor  
Clerk of the Council

Town Hall  
Southwold  
IP18 6EF

5<sup>th</sup> February 2015

Dear Sirs

Southwold Neighbourhood Plan

As you may be aware the Community of Southwold is presently undertaking a Neighbourhood Plan. A Neighbourhood Plan will enable the community to develop a shared vision and to get the right type of development for Southwold over the next 10 years. Ultimately these visions will be translated into policies that become statutory planning documents.

As a landowner within Southwold, we would like to know your thoughts and vision for the town and the development and growth in the local area. A member of the Neighbourhood Plan Working Group would be pleased to make themselves available to discuss this with you further at a day/time that is convenient to you. Please could you therefore contact me at the above address so that this can be arranged.

Kind regards



**Appendix 4 – Photographs of Drop-In Events**



*Figure 1 September 2014 Market Square Drop-In Event: What Matters to You*



*Figure 2 December 2014 Town Hall Drop-In Event*

# Appendix 5 – Ingleton Wood Statement of Involvement

## CONTENTS

### 1.0 INTRODUCTION

### 2.0 COMMITMENT TO THE PUBLIC CONSULTATION PROCESS

### 3.0 CONSULTATION ACTIVITIES

3.1 The Approach

3.2 Meeting with the tenants

3.3 Public Consultation Event

3.3 Consultation

### 4.0 CONSULTANCY FEEDBACK SUMMARY

4.1 Summary of Written Responses

4.2 Summary of Verbal Responses

4.3 Design Responses

### 5.0 OVERALL SUMMARY

## APPENDICIES

1 Public Consultation Flyer

2 Public Consultation Exhibition Boards

3 Southwold Gazette Advertisement

4 Sample Public Consultation Feedback Forms

## **1.0 INTRODUCTION**

This Statement of Community Involvement has been prepared by Ingleton Wood LLP on behalf of Southwold Town Council. The Town Council instructed Ingleton Wood LLP to explore options for the potential redevelopment of the entrance to the Town. The sites in question occupy an important location; being the first thing people see when they enter the town. Accordingly the Town Council is keen to build on the planning policies within Waveney District Council's Adopted Development Plan, to provide a locally specific guide to influence future developments within the area and promote high quality design in this sensitive location. It is also intended that the initial work undertaken on behalf of the Town Council will be used to inform the preparation of the Neighbourhood Plan, which is currently being progressed.

This Statement explains the process of engagement that the Applicant has carried out in relation to community involvement with regard to the redevelopment options

## **2.0 COMMITMENT TO THE PUBLIC CONSULTATION PROCESS**

Southwold Town Council is fully committed to engaging constructively with the local community in respect of its intentions to help influence the future development of the entrance to Southwold.

Public consultation is essential in identifying the level of local support or opposition to a proposal and allowing local communities the opportunity to contribute towards shaping proposals. This is particularly important for this project as it allows the local community to comment on the future of a key site within the locality.

The importance of such initiatives are highlighted within the National Planning Policy Framework, published in March 2012, which notes that Local Planning Authorities should encourage applicants to engage with the local community before submitting their application. Whilst the consultation event will not, at this stage, be followed by a planning application the comments of the public are sought to influence the preparation of a document which in the future will be used as a material consideration in the determination of an application.



### **3.0 CONSULTATION ACTIVITIES**

#### **3.1 The Approach**

The project team prepared a strategy so that the community could engage fully and understand the intentions of the Town Council. This included a meeting with the tenants of properties on Station Road and a Public Consultation event.

#### **3.3 Meeting with tenants**

On Tuesday 17<sup>th</sup> November, one day prior to the public consultation event, a meeting was set up where a presentation was given to the existing tenants on Station Road. A total of 6 tenants attended and generally were supportive, particularly with regards to the expansion of the retail offer and the increased footfall to this particular area. However, concerns were also raised regarding parking and the impact the development would have on existing businesses during construction.

#### **3.3 Public Consultation Event**

A public exhibition was held on Wednesday 18<sup>th</sup> November 2015 at Stella Peskett Millennium Hall, Southwold between 2.00pm and 8.00pm. The exhibition was publicised by way of, 500 hand delivered leaflet drop to household/businesses of Southwold within the immediate locality of the site, Site Notices being placed throughout Southwold, and via the Southwold Gazette (see Appendix 6). The exhibition was staffed by members of Southwold Town Council and employees of Inlgeton Wood (Chris Stammers, Iain Hill and Samantha Jones) who were on hand to talk visitors through the exhibition boards, discuss any issues arising and answer any queries. The exhibition material comprised twelve exhibition boards (see Appendix 6) providing information about the framework and potential development options for each of the key sites.

The event was also used by the Town Council to present to the local community the progress that had been made in respect of the Neighbourhood Plan.

### 3.3 Consultation

It was estimated that 80-100 people attended the exhibition. They were encouraged to complete an attendance register and feedback form (see appendix) before leaving. A total of 49 people left their name and address and a total of 19 attendees filled in a feedback form at the event. A number of people who attended took away a form to fill in and were advised that they could return to the Town Council up until the end of November; no other forms were returned.



## 4.0 CONSULTANCY FEEDBACK SUMMARY

### 4.1 Summary of written responses

The responses from the 19 completed questionnaires can be summarised as follows:

1. Support that the sites' should be considered in a co-ordinated manner 19 votes (100%)
2. The top 4 choices of use that would be supported within the area (ranked in popularity):
  - Private Residential
  - Affordable Housing
  - Retail/Shops
  - Community/Facilities

Other highlighted uses included: light industry, leisure, things to attract jobs, laundrette, rentable housing, and a library

3. a. Support the priority of affordable housing 17 votes (89%)  
b. support the provision of low cost business space as priority 16 votes (84%)
4. Is it considered that the scale and density of the development is appropriate 12 votes (63%)
5. Support the high quality design approach identified 17 votes (89%)
6. Made comments made on other design features\* 10 votes (53%)
7. Made further comments\* 21 votes  
(Please note that some forms contained more than 1 comment)

*\*These are summarised in further detail below (see section 4.4).*

#### 4.2 Summary of verbal responses

The verbal responses received and noted on the day of the public consultation event can be summarised as follows:

- Concern that the overall approach to the scheme was not in keeping with Southwold.
- Highlighted issues with area being a tourist attraction and within the summer months parking is at its worse and therefore is this a sustainable areas for more housing.
- Concerns over the lack of parking already in Southwold and the development of the sites will only make this worse
- Concerned that Southwold would lose its garage



#### 4.4 Summary of further written comments

For ease of reference the comments received with regards to question 6 and 7 of the questionnaire have been categorised below. The key below identifies comments that specifically to: the design approach, potential ideas that could be considered, areas of concerns and issues, and any other comments relating to the study.

#### KEY

	Design Comments
	Potential Ideas
	Concerns
	Other

	In regards to the presented plans, there is a reasonable degree of variety, environmentally friendly approach and integrated design irrespective of ownership.
	Conservation Area needs to be reflected in design.
	Use sustainable methods in the design i.e. waste recycling in any plumbing systems.
	Want to see houses that are designed to blend in with the town. Some houses on plan look like multi-storey car parks.
	The plans shown appear to be dense/overdeveloped.
	The shown corner plots may cause access problems and further congestion.
	Pedestrianised areas need to be easily identified.
	Would like to see a tree lined entrance to the town.
	Low energy design and construction methods to be incorporated i.e. solar panels, renewable energy etc
	Ensure that the homes to rent and affordable housing retain their use is perpetuity.
	Would like to see the provision of a new swimming pool with no restrictions in use.
	Would like to see more landscaping in-between the blocks of housing.
	As the entrance to Southwold, design needs to be more natural with green spaces incorporated.
	Consideration is needed towards the traffic flow at the roundabout. In order to accommodate the development it may be required that the highways is upgraded.
	Address the need to improve drainage, sewage etc to accommodate new housing.
	Big square blocks are not attractive and not in keeping with Southwold.

	Issues around parking, important to make sure all schemes account for this.
	Concerns over high density affordable housing, would prefer a mix of uses.
	Concerns over the number of additional vehicle movement created through these developments, both on the roads and parking.
	Concerns with an ultra-modern design of the entrance to a heritage area.
	The designs appear to be lacking in parking spaces and garages.
	Comfort sought in that no second homes are developed.
	Definitely should avoid development of any supermarkets in the area under consultation.
	Need to attract permeant residents to the area.
	Consider the impacts of flooding and ways to mitigate against this.
	Important to retain existing businesses such as garage/shops etc.
	Local population is twice national average for over 60s and relocating these businesses –could cause problems.
	The drainage/sewage set up is inadequate at present and needs to be addressed before planning permission is granted.

## 5.0 OVERALL SUMMARY

Overall the comments received were relatively positive. The comments showed that it is important for the gateway of Southwold to be developed within a controlled manor and that the framework, would be a positive approach to steer future development within the study area. It was realised that the sites are exposed at present and this method would help gain an element of control.

From the feedback received, residents feel that the most suitable form of development in the locality would be for housing, both private and affordable. It was highlighted that there is a need to revive and attract permanent residents to the area, locals would like to see restrictions placed on the sale of any houses for second homes and that the affordable homes remain for that use in perpetuity.

One of the major concerns for the residents within Southwold and Reydon was the lack of parking in the area. It was stated that in high peak times within summer, Southwold is overrun with tourist; which has a massive impact on resident parking. In light of this, parking solutions need to be one of the key considerations given.

---

## **APPENDICES**

- 1 Public Consultation Flyer
- 2 Public Consultation Exhibition Boards
- 3 Southwold Gazette Advertisement
- 4 Sample Public Consultation Questionnaire/feedback form



# Appendix 6 Analysis of the Neighbourhood Plan Individual Questionnaire 2016

## Section 1.1 Summary

### Turnout

Total resident population over 18 (electoral roll 2014)	845
Total questionnaire responses from residents	337
Questionnaire responses from residents aged under 18	10
Questionnaire responses from residents aged over 18	327
<b>Resident turnout</b>	<b>39%</b>
Number of resident properties (electoral roll 2014)	547
Number of questionnaire responses from residents	230
<b>Resident turnout</b>	<b>42%</b>
Number of properties which are 2 <sup>nd</sup> homes (STP residence analysis)	477
Number of questionnaire responses from 2 <sup>nd</sup> homes	147
<b>2<sup>nd</sup> home turnout</b>	<b>31%</b>
Caveats: Totals may be affected by residents not on electoral roll, number of 2 <sup>nd</sup> homers on electoral roll, changes since 2014	

### Age distribution of resident respondents

	Respondents	2011 Census
Under 18	3.0%	6.9%
18-30	3.3%	5.6%
31-65	28.8%	34.9%
Over 65	65.0%	51.9%

Comments: Returns somewhat under-represent under-65s. Not much sign of difference in responses of over- and under-65s.

### Second-homers

65% of second homer respondents spend at least 3 months a year in Southwold and a surprising 16.6% say that they spend over 6 months a year in Southwold. Only 17.4% of second-homes are let out when owners are not in residence.

The views of second homers on the remaining questions are very similar to those of residents, even where there is a proposed policy to favour permanent residence. The age profile of second homers was noticeably younger than permanent residents.

### Allocation of affordable housing

56% of respondents thought 'key workers needed by communities' were either first or second priority, with 38% favouring 'people working in Southwold or Reydon' and 34% favouring 'families with dependent children'. Proportions were similar for residents and second-homers. 93.5% of residents and 82.2% of second-homers thought affordable housing stock should always remain affordable.

### Community buildings

93% of residents and 97% of second-homers thought it was important or very important that the Neighbourhood Plan has a policy that 'controls the future use of community buildings that become redundant'. The uses that had the most support as first or second priority were 'other community uses' (53%), 'affordable housing' (49%), and 'housing at market rates' (33%).

### **Housing**

On the question 'how does the high proportion of second homes and holiday lets affect you?', there was a broad spread of answers, with 'worried about the sustainability of the Southwold community' listed as 1<sup>st</sup> or 2<sup>nd</sup> priority by 47% of residents and 34% of second-homers. 87% of residents and 73% of second-homers thought the Neighbourhood Plan should try to encourage full-time residency of newly-built housing. 81% of residents and 50% of second-homers thought the Neighbourhood Plan should discourage the conversion of family homes to holiday lets. 85% of residents and 75% of second-homers thought all new developments or conversions should be required to have off-street parking. 62% of residents and 61% of second homers thought the conversion of garages to residential accommodation should be discouraged.

### **Land use**

As development sites become available in Southwold, 86% of residents thought affordable housing important or very important and 69% thought business developments important or very important. For second-homers these percentages were 82% and 71%.

### **Environment**

94% of residents and 93% of second homers thought we should have policies to reduce surface water flooding and promote water efficiency. 5.6% of respondents had experienced problems of surface water flooding and 12.5% had experienced sewage back-up in the past three years. This seems to be a very serious issue in the town.

### **Design**

The aspects of Southwold's character that respondents wished to protect and enhance were 'open spaces' (42.5% said 1<sup>st</sup> or 2<sup>nd</sup> priority), 'historic building styles and materials' (40.2%), and 'natural environment' (33.3%). There was support for 'energy efficient housing' (66.8%) and 'native trees to be planted' (45.6%), but little interest in 'bat conservation' or 'wildlife pond'. 87% thought a policy to discourage infill of gardens and courtyards important or very important.

### **Economy**

On the future economy there was support for 'non-tourism-based businesses (1<sup>st</sup> or 2<sup>nd</sup> priority 59%), 'more community facilities' (55%) and 'start-up units for new businesses (54%). 84% thought it important or very important for 'small, flexible-use premises for small and start-up businesses' to be provided.

## 1.2 Analysis – All Responses

### Individual Questionnaire

#### Q1) In which road/street of Southwold do you live?

Responses received from residents of 54 roads/streets. (Total 62 streets) n=630

#### Q2) How old are you?

Under 18	4.8%	31	
18 – 30	3.7%	24	
31 – 65	38.5%	248	
Over 65	53.0%	341	n=644

#### Q3) What is your gender?

Male	44.6%	288	
Female	55.4%	357	n=645

#### Q4) Is this your main residence?

Yes	52.3%	337	
No	47.7%	307	n=644

#### Q5) On average how often do you, or your immediate family, use this property?

Never	1.0%		
1-3 weeks each year	4.2%		
4-8 weeks each year	29.6%		
3-6 months each year	48.5%		
More than 6 months each year	16.6%	n=307	

#### Q6) Is your property let when you are not in residence?

Never	82.6%		
1-3 weeks each year	2.0%		
4-8 weeks each year	3.0%		
3-6 months each year	8.7%		
More than 6 months each year	3.7%	n=299	

### Affordable Housing

#### Q7) When affordable housing is allocated, which of the following should be given priority?

	Any Priority	1st Priority	2nd Priority	3rd Priority
Families with dependant children	47.0%	49.0%	24.2%	26.9%
Key workers needed by communities	69.8%	50.3%	30.3%	19.4%

People with family living in Southwold or Reydon	33.9%	40.5%	27.9%	31.6%
People working as volunteers in essential services, such as the fire service, RNLI, the Voluntary Help Centre	45.2%	16.4%	43.6%	40.1%
People working in Southwold or Reydon	58.9%	28.9%	35.8%	35.3%
Young people	30.2%	19.3%	38.5%	42.2%
Other	3.2%	15.0%	10.0%	75.0%

n=635

### Q8) Should affordable housing stock always remain affordable housing?

Yes	88.1%	
No	6.8%	
Don't Know	5.2%	n=621

## Community Facilities

### Q9) How important is it for you that Southwold's Neighbourhood Plan has a policy that controls the future use of community buildings that become redundant?

Very important	76.3%	
Important	18.6%	
Neither important nor unimportant	3.1%	
Unimportant	0.8%	
Not important at all	1.3%	n=619

### Q10) How would you like to see redundant community buildings used?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Affordable housing	72.4%	46.4%	21.4%	12.2%	9.5%	10.6%
Housing at market rates for full-time residents	57.3%	25.6%	32.2%	19.1%	10.0%	13.1%
Housing at market rates for second homes/holiday lets	9.3%	7.0%	22.8%	15.8%	35.1%	19.3%
Office units	32.6%	5.5%	13.0%	21.5%	34.5%	25.5%
Other community uses [e.g. library, community kitchen]	80.9%	44.8%	20.4%	21.8%	8.1%	5.0%
Retail	26.8%	3.7%	11.0%	23.2%	38.4%	52.9%
Shared work space	52.9%	3.7%	25.9%	25.6%	26.5%	18.2%
Small business units	73.9%	12.8%	22.1%	28.7%	21.6%	14.8%
Other	8.0%	24.5%	8.2%	16.3%	12.2%	38.8%

n=613

## Housing

### Q11) How does the high proportion of second homes and holiday lets affect you?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
It doesn't affect me at all	21.1%	87.0%	9.9%	80.0%	80.0%	1.5%
Inflated house prices	51.1%	33.0%	14.5%	13.8%	20.4%	18.2%
Lack of choice in the shops	29.6%	7.1%	16.9%	31.5%	22.8%	21.7%
Loss of community assets	60.5%	10.4%	30.9%	26.9%	17.8%	14.1%
Lack of neighbours	50.0%	19.6%	26.4%	22.5%	16.1%	15.4%
Loss of ordinary shops	64.5%	18.5%	27.2%	23.7%	16.7%	14.0%
Lack of volunteers	34.2%	6.1%	21.6%	24.4%	22.5%	25.4%
Worried about the sustainability of the Southwold community	71.9%	44.1%	18.1%	15.5%	15.2%	8.1%
Other	6.1%	29.0%	5.3%	5.3%	10.5%	50.0%

n=622

### Q12) Would you like Southwold's Neighbourhood Plan to try to encourage full-time residency of newly-built housing?

Yes	80.5%
No	13.5%
Don't Know	6.1% n=635

### Q13) Thinking about future development, do you feel the Neighbourhood Plan should have policies on any of the following?

To encourage full-time residency of newly-built housing	83.6%
Discouraging the conversion of family homes to holiday lets	66.6%
All new developments or conversions are required to have off-street parking in order to ease parking problems in the Town	80.6%
To discourage the conversion of garages to residential accommodation	61.7%
Have you any other suggestions for possible policies?	16.4% n=622

## Land Use

**Q14) As sites with the potential for development become available in Southwold, what are your priorities for development?**

	Any Response	Very Imp	Important	Neither	Unimport	Not Imp
Affordable housing	94.0%	69.3%	20.3%	5.6%	1.2%	3.5%
Business	83.6%	28.4%	55.2%	11.7%	3.0%	1.8%
Housing sold at the market rate	76.3%	13.5%	27.6%	29.8%	11.7%	17.4%
Other?	11.4%	58.0%	21.7%	13.0%	4.4%	2.9%

n=603

## Environment

**Q15) How important is it to you that the Neighbourhood Plan promotes policies that reduce surface water flooding and promote water efficiency?**

Very important	72.9%
Important	20.2%
Neither important nor unimportant	5.6%
Unimportant	1.1%
Not important at all	0.2%

n=623

**Q16) In the past three years, has your property experienced problems of flooding due to surface water flooding?**

Yes	5.6%	35
No	90.5%	
Don't Know	3.9%	n=624

**Q17) In the past three years, has your property experienced sewage back-up problems?**

Yes	12.5%	78
No	81.4%	
Don't Know	6.1%	n=623

**Q18) If funding is generated from a levy on new developments in the Town, what would be your spending priorities for the benefit of the Southwold community?**

Free text

## Design

### Q19) What aspects of Southwold's character would you want to protect and/or enhance?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Alleys and footpaths	56.7%	15.1%	15.4%	25.4%	21.7%	22.5%
Historic building styles and materials	79.8%	27.5%	22.9%	17.2%	15.4%	7.1%
Local landmarks	65.3%	15.6%	23.0%	23.5%	18.6%	19.3%
Natural environment	66.4%	27.5%	22.6%	18.5%	14.6%	16.8%
Open spaces	76.5%	29.0%	26.5%	19.1%	16.1%	9.3%
Streetscapes	33.8%	10.5%	19.6%	20.1%	23.0%	16.8%
Trees, gardens and courtyards	54.0%	8.7%	11.8%	21.9%	29.0%	28.7%
Views into, within, and from the Town	48.3%	16.1%	20.7%	16.7%	18.4%	28.1%
Other?	7.3%	13.3%	4.4%	6.7%	0.0%	75.6%

n=619

### Q20) In terms of the following, would you like to see a policy in the Neighbourhood Plan that encourages new developments to have landscaping for wildlife and is environmentally friendly?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Bat conservation	23.9%	11.9%	9.8%	17.5%	31.5%	29.4%
Eco concrete to reduce water run-off	67.9%	21.7%	25.4%	23.9%	17.5%	11.6%
Energy efficient housing	84.3%	56.4%	22.8%	11.9%	4.6%	4.4%
Native trees to be planted	79.9%	25.1%	32.0%	28.9%	9.8%	4.2%
Nature reserve	59.2%	13.6%	20.6%	24.3%	25.4%	16.1%
Solar panels for each house	38.3%	14.4%	28.8%	21.4%	20.1%	15.3%
Wildlife pond	36.0%	7.0%	14.9%	20.0%	21.0%	37.2%
Have you any other suggestions?	6.2%	16.2%	10.8%	10.8%	13.5%	48.7%

n=598

### Q21) How important to you is a policy that discourages infill of gardens and courtyards?

Very important	70.1%
Important	17.0%
Neither important nor unimportant	8.1%
Unimportant	2.9%
Not important at all	1.9%

n=619

## Future Economy

**Q22) Thinking about the future economy of the Town, would you like to see policies in support of any of the following?**

	Any Priority	1st Priority	2nd Priority	3rd Priority
More retail units	22.7%	17.5%	6.5%	46.0%
More community facilities	75.8%	43.5%	28.8%	27.7%
Non-tourism-based businesses	73.3%	36.8%	43.8%	19.4%
Start-up units for new businesses	75.8%	40.6%	30.6%	28.8%
Tourism-based businesses	20.0%	22.3%	33.1%	44.6%
Other	6.1%	24.3%	5.4%	70.3%

n=604

**Q23) How important is it for you that small, flexible-use, premises are provided for small and start-up businesses in Southwold?**

Very important	48.8%	
Important	35.6%	84.4%
Neither important nor unimportant	13.7%	
Unimportant	1.3%	
Not important at all	0.8%	n=619



## 1.3 Analysis – Resident Responses

### Individual Questionnaire

#### Q1) In which road/street of Southwold do you live?

Responses received from residents of 42 roads/streets. (Total 62 streets) n=325

#### Q2) How old are you?

Under 18	3.0%	10	
18 - 30	3.3%	11	
31 - 65	28.8%	97	
Over 65	65.0%	219	n=337

#### Q3) What is your gender?

Male	43.3%	146	
Female	56.7%	191	n=337

#### Q4) Is this your main residence?

Yes	100.0%	337	
No	0.0%	0	n=337

#### Q5) On average how often do you, or your immediate family, use this property?

Never  
 1-3 weeks each year  
 4-8 weeks each year  
 3-6 months each year  
 More than 6 months each year

#### Q6) Is your property let when you are not in residence?

Never  
 1-3 weeks each year  
 4-8 weeks each year  
 3-6 months each year  
 More than 6 months each year

### Affordable Housing

#### Q7) When affordable housing is allocated, which of the following should be given priority?

	Any Priority	1st Priority	2nd Priority	3rd Priority
Families with dependant children	49.9%	52.7%	21.6%	25.8%
Key workers needed by communities	65.7%	46.4%	33.6%	20.0%
People with family living in Southwold or Reydon	36.1%	44.6%	24.0%	31.4%

People working as volunteers in essential services, such as the fire service, RNLI, the Voluntary Help Centre	43.0%	13.9%	45.1%	41.0%
People working in Southwold or Reydon	55.2%	28.7%	37.3%	34.1%
Young people	35.2%	16.1%	43.2%	40.7%
Other	3.6%	25.0%	8.3%	66.7%

n=335

**Q8) Should affordable housing stock always remain affordable housing?**

Yes	93.5%	
No	3.7%	
Don't Know	2.8%	n=321

**Community Facilities**

**Q9) How important is it for you that Southwold's Neighbourhood Plan has a policy that controls the future use of community buildings that become redundant?**

Very important	82.0%	
Important	10.8%	
Neither important nor unimportant	4.0%	
Unimportant	1.2%	
Not important at all	1.9%	n=323

**Q10) How would you like to see redundant community buildings used?**

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Affordable housing	68.9%	43.9%	23.5%	14.5%	9.5%	8.6%
Housing at market rates for full-time residents	56.4%	27.6%	35.4%	16.6%	9.4%	11.1%
Housing at market rates for second homes/holiday lets	5.3%	0.0%	47.1%	11.8%	23.5%	17.7%
Office units	35.2%	4.4%	15.9%	18.6%	31.9%	29.2%
Other community uses [e.g. library, community kitchen]	82.6%	48.7%	21.1%	20.0%	6.4%	3.8%
Retail	26.8%	1.2%	9.3%	24.4%	30.2%	34.9%
Shared work space	53.0%	1.8%	23.5%	25.3%	28.8%	20.6%
Small business units	73.2%	11.9%	18.3%	29.8%	22.1%	18.9%
Other	10.9%	28.6%	11.4%	14.3%	5.7%	40.0%

n=321

## Housing

### Q11) How does the high proportion of second homes and holiday lets affect you?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
It doesn't affect me at all	9.6%	87.5%	12.5%	0.0%	0.0%	0.0%
Inflated house prices	56.9%	34.7%	15.3%	12.1%	20.0%	17.9%
Lack of choice in the shops	32.0%	8.4%	16.8%	28.0%	22.4%	24.3%
Loss of community assets	64.7%	10.2%	33.8%	21.3%	18.1%	16.7%
Lack of neighbours	59.0%	23.9%	23.9%	22.3%	17.3%	12.7%
Loss of ordinary shops	70.7%	14.8%	23.3%	28.4%	19.1%	14.4%
Lack of volunteers	43.4%	6.9%	22.8%	28.3%	17.9%	24.1%
Worried about the sustainability of the Southwold community	77.0%	44.4%	16.7%	12.8%	16.0%	10.1%
Other	6.9%	26.1%	4.4%	4.4%	8.7%	56.5%

n=334

### Q12) Would you like Southwold's Neighbourhood Plan to try to encourage full-time residency of newly-built housing?

Yes	87.0%
No	7.6%
Don't Know	5.4%

n=331

### Q13) Thinking about future development, do you feel the Neighbourhood Plan should have policies on any of the following?

To encourage full-time residency of newly-built housing	90.6%
Discouraging the conversion of family homes to holiday lets	81.2%
All new developments or conversions are required to have off-street parking in order to ease parking problems in the Town	84.8%
To discourage the conversion of garages to residential accommodation	61.7%
Have you any other suggestions for possible policies?	17.3%

n=329

## Land Use

**Q14) As sites with the potential for development become available in Southwold, what are your priorities for development?**

	Any Response	Very Imp	Important	Neither	Unimport	Not Imp
Affordable housing	93.8%	73.6%	18.2%	5.0%	1.0%	2.3%
Business	82.0%	28.3%	55.9%	12.5%	2.3%	1.1%
Housing sold at the market rate	74.0%	13.0%	28.5%	25.5%	11.3%	21.8%
Other?	13.3%	67.4%	17.6%	7.0%	0.0%	8.0%

n=323

## Environment

**Q15) How important is it to you that the Neighbourhood Plan promotes policies that reduce surface water flooding and promote water efficiency?**

Very important	75.3%	
Important	18.6%	
Neither important nor unimportant	5.5%	
Unimportant	60.0%	
Not important at all	0.0%	n=328

**Q16) In the past three years, has your property experienced problems of flooding due to surface water flooding?**

Yes	5.5%	18
No	90.9%	
Don't Know	3.6%	n=329

**Q17) In the past three years, has your property experienced sewage back - up problems?**

Yes	17.4%	57
No	76.5%	
Don't Know	6.1%	n=328

**Q18) If funding is generated from a levy on new developments in the Town, what would be your spending priorities for the benefit of the Southwold community?**

Free text

## Design

### Q19) What aspects of Southwold's character would you want to protect and/or enhance?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Alleys and footpaths	63.6%	17.2%	15.2%	27.5%	17.2%	23.0%
Historic building styles and materials	77.0%	32.4%	25.9%	16.2%	18.2%	7.3%
Local landmarks	64.2%	18.5%	22.3%	22.3%	17.5%	19.4%
Natural environment	61.4%	27.4%	27.9%	17.8%	13.7%	13.2%
Open spaces	72.9%	30.8%	27.4%	18.4%	15.8%	7.7%
Streetscapes	31.2%	13.0%	25.0%	13.0%	23.0%	26.0%
Trees, gardens and courtyards	58.6%	10.1%	12.8%	24.5%	27.1%	25.5%
Views into, within, and from the Town	42.7%	16.1%	8.0%	19.7%	23.4%	32.9%
Other?	9.0%	3.5%	3.5%	6.9%	0.0%	86.2%

n=321

### Q20) In terms of the following, would you like to see a policy in the Neighbourhood Plan that encourages new developments to have landscaping for wildlife and is environmentally friendly?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Bat conservation	24.4%	18.7%	9.3%	20.0%	28.0%	24.0%
Eco concrete to reduce water run-off	69.4%	12.1%	28.6%	20.2%	18.8%	11.3%
Energy efficient housing	85.0%	57.1%	23.0%	10.3%	5.0%	4.6%
Native trees to be planted	77.9%	20.1%	29.3%	33.1%	12.1%	5.4%
Nature reserve	57.7%	14.7%	20.3%	24.3%	19.2%	21.5%
Solar panels for each house	45.6%	14.3%	29.3%	22.1%	20.0%	14.3%
Wildlife pond	31.6%	12.4%	12.4%	16.5%	22.7%	36.1%
Have you any other suggestions?	6.5%	5.0%	20.0%	10.0%	15.0%	50.0%

n=307

### Q21) How important to you is a policy that discourages infill of gardens and courtyards?

Very important	71.5%
Important	16.1%
Neither important nor unimportant	7.6%
Unimportant	2.5%
Not important at all	2.2%

n=316

## Future Economy

**Q22) Thinking about the future economy of the Town, would you like to see policies in support of any of the following?**

	Any Priority	1st Priority	2nd Priority	3rd Priority
More retail units	25.2%	21.5%	40.5%	38.0%
More community facilities	80.8%	47.8%	26.1%	26.1%
Non-tourism-based businesses	76.4%	36.0%	45.6%	18.4%
Start-up units for new businesses	77.6%	34.2%	30.0%	35.8%
Tourism-based businesses	10.9%	17.7%	35.3%	47.1%
Other	6.1%	31.1%	5.3%	73.7%

n=313

**Q23) How important is it for you that small, flexible-use, premises are provided for small and start-up businesses in Southwold?**

Very important	50.3%	
Important	33.0%	83.3%
Neither important nor unimportant	14.2%	
Unimportant	1.3%	
Not important at all	1.3%	n=318

## 1.4 Analysis – 2<sup>nd</sup> Home Responses

### Individual Questionnaire

#### Q1) In which road/street of Southwold do you live?

Responses received from residents of 46 roads/streets. (Total 62 streets) n=304

#### Q2) How old are you?

Under 18	6.9%	21	
18 - 30	4.3%	13	
31 - 65	49.4%	151	
Over 65	39.5%	121	n=306

#### Q3) What is your gender?

Male	46.3%	142	
Female	53.7%	165	n=307

#### Q4) Is this your main residence?

Yes	0.0%	0	
No	100.0%	307	n=307

#### Q5) On average how often do you, or your immediate family, use this property?

Never	70.0%	
1-3 weeks each year	4.3%	
4-8 weeks each year	29.8%	
3-6 months each year	48.9%	
More than 6 months each year	16.4%	n=305

#### Q6) Is your property let when you are not in residence?

Never	82.4%	
1-3 weeks each year	2.0%	
4-8 weeks each year	3.0%	
3-6 months each year	8.8%	
More than 6 months each year	3.7%	n=296

### Affordable Housing

#### Q7) When affordable housing is allocated, which of the following should be given priority?

	Any Priority	1st Priority	2nd Priority	3rd Priority
Families with dependant children	43.8%	44.3%	27.5%	38.2%
Key workers needed by communities	74.3%	54.5%	27.0%	18.5%
People with family living in Southwold or Reydon	31.1%	34.4%	33.3%	32.3%

People working as volunteers in essential services, such as the fire service, RNLI, the Voluntary Help Centre	47.8%	18.9%	42.0%	39.2%
People working in Southwold or Reydon	62.9%	29.3%	34.0%	36.7%
Young people	24.8%	24.3%	31.1%	44.6%
Other	2.7%	0.0%	12.5%	87.5%

n=299

**Q8) Should affordable housing stock always remain affordable housing?**

Yes	82.2%
No	10.1%
Don't Know	7.7% n=298

**Community Facilities**

**Q9) How important is it for you that Southwold's Neighbourhood Plan has a policy that controls the future use of community buildings that become redundant?**

Very important	69.7%
Important	27.2%
Neither important nor unimportant	2.0%
Unimportant	0.3%
Not important at all	0.7% n=294

**Q10) How would you like to see redundant community buildings used?**

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Affordable housing	76.5%	48.4%	19.5%	10.0%	9.5%	12.7%
Housing at market rates for full-time residents	57.8%	23.4%	28.1%	22.2%	10.8%	15.6%
Housing at market rates for second homes/holiday lets	13.5%	10.3%	12.8%	18.0%	41.0%	18.0%
Office units	29.8%	7.0%	9.3%	24.4%	38.4%	20.9%
Other community uses [e.g. library, community kitchen]	79.6%	40.4%	19.1%	23.9%	10.0%	6.5%
Retail	26.6%	6.5%	13.0%	20.8%	16.9%	42.9%
Shared work space	53.3%	5.8%	28.6%	26.0%	24.0%	15.6%
Small business units	75.1%	13.8%	26.3%	27.7%	20.7%	11.5%
Other	4.5%	15.4%	0.0%	15.4%	30.8%	38.5%

n=289



## Housing

### Q11) How does the high proportion of second homes and holiday lets affect you?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
It doesn't affect me at all	24.9%	86.9%	9.1%	1.0%	1.0%	2.0%
Inflated house prices	44.4%	30.2%	12.7%	16.7%	21.4%	19.1%
Lack of choice in the shops	26.4%	4.0%	17.3%	37.3%	24.0%	17.3%
Loss of community assets	55.6%	10.8%	27.2%	34.2%	17.1%	10.8%
Lack of neighbours	38.7%	12.7%	29.1%	23.6%	14.6%	20.0%
Loss of ordinary shops	58.1%	23.6%	32.7%	17.0%	13.3%	13.3%
Lack of volunteers	22.9%	4.6%	20.0%	13.9%	32.3%	29.2%
Worried about the sustainability of the Southwold community	65.5%	43.6%	20.4%	16.7%	14.0%	5.4%
Other	4.9%	35.7%	7.1%	7.1%	14.3%	35.7%

n=284

### Q12) Would you like Southwold's Neighbourhood Plan to try to encourage full-time residency of newly-built housing?

Yes	73.0%
No	20.0%
Don't Know	7.0% n=300

### Q13) Thinking about future development, do you feel the Neighbourhood Plan should have policies on any of the following?

To encourage full-time residency of newly-built housing	75.4%
Discouraging the conversion of family homes to holiday lets	49.5%
All new developments or conversions are required to have off-street parking in order to ease parking problems in the Town	75.4%
To discourage the conversion of garages to residential accommodation	61.3%
Have you any other suggestions for possible policies?	15.2% n=289

## Land Use

**Q14) As sites with the potential for development become available in Southwold, what are your priorities for development?**

	Any Response	Very Imp	Important	Neither	Unimport	Not Imp
Affordable housing	94.2%	63.9%	23.1%	6.5%	1.5%	5.0%
Business	85.5%	28.8%	54.7%	10.2%	3.8%	2.5%
Housing sold at the market rate	79.4%	14.2%	26.0%	34.7%	12.3%	12.8%
Other?	9.1%	40.0%	32.0%	20.0%	0.0%	8.0%

n=276

## Environment

**Q15) How important is it to you that the Neighbourhood Plan promotes policies that reduce surface water flooding and promote water efficiency?**

Very important	70.5%
Important	22.0%
Neither important nor unimportant	5.5%
Unimportant	1.7%
Not important at all	0.3%

n=291

**Q16) In the past three years, has your property experienced problems of flooding due to surface water flooding?**

Yes	5.8%	17
No	90.0%	
Don't Know	4.1%	n=291

**Q17) In the past three years, has your property experienced sewage back - up problems?**

Yes	7.2%	21
No	86.6%	
Don't Know	6.2%	n=291

**Q18) If funding is generated from a levy on new developments in the Town, what would be your spending priorities for the benefit of the Southwold community?**

Free text

## Design

### Q19) What aspects of Southwold's character would you want to protect and/or enhance?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Alleys and footpaths	48.6%	11.2%	16.1%	22.4%	28.7%	21.7%
Historic building styles and materials	83.0%	43.0%	18.9%	18.4%	12.7%	7.0%
Local landmarks	66.0%	12.4%	24.2%	24.2%	19.6%	19.6%
Natural environment	72.5%	27.7%	17.8%	19.3%	15.0%	20.2%
Open spaces	80.6%	27.4%	25.3%	19.8%	16.5%	11.0%
Streetscapes	36.4%	8.4%	15.0%	26.2%	23.4%	27.1%
Trees, gardens and courtyards	49.0%	7.0%	10.4%	18.8%	30.6%	33.3%
Views into, within, and from the Town	54.1%	15.7%	32.1%	14.5%	14.5%	23.3%
Other?	5.4%	31.3%	6.3%	6.3%	56.3%	75.6%

n=294

### Q20) In terms of the following, would you like to see a policy in the Neighbourhood Plan that encourages new developments to have landscaping for wildlife and is environmentally friendly?

	Any Priority	1st Priority	2nd Priority	3rd Priority	4th Priority	5th Priority
Bat conservation	23.3%	3.0%	10.5%	15.0%	35.8%	35.8%
Eco concrete to reduce water run-off	66.2%	22.6%	21.6%	27.9%	16.3%	11.6%
Energy efficient housing	84.0%	55.2%	22.8%	13.7%	4.2%	4.2%
Native trees to be planted	82.2%	30.5%	35.2%	23.7%	7.6%	3.0%
Nature reserve	60.1%	12.0%	21.1%	24.6%	31.4%	10.9%
Solar panels for each house	30.0%	15.1%	26.7%	20.9%	19.8%	17.4%
Wildlife pond	40.8%	2.6%	16.2%	23.1%	19.7%	38.5%
Have you any other suggestions?	5.6%	31.3%	0.0%	12.5%	6.3%	50.0%

n=287

### Q21) How important to you is a policy that discourages infill of gardens and courtyards?

Very important	68.2%
Important	18.1%
Neither important nor unimportant	8.7%
Unimportant	3.3%
Not important at all	1.7%

n=299

## Future Economy

**Q22) Thinking about the future economy of the Town, would you like to see policies in support of any of the following?**

	Any Priority	1st Priority	2nd Priority	3rd Priority
More retail units	19.4%	12.5%	32.1%	55.4%
More community facilities	70.1%	38.6%	32.2%	30.2%
Non-tourism-based businesses	70.5%	37.9%	41.9%	20.2%
Start-up units for new businesses	74.0%	47.4%	31.5%	21.1%
Tourism-based businesses	30.2%	24.1%	32.2%	43.7%
Other	5.9%	23.5%	5.9%	70.6%

n=288

**Q23) How important is it for you that small, flexible-use, premises are provided for small and start-up businesses in Southwold?**

Very important	46.8%	
Important	38.4%	85.2%
Neither important nor unimportant	13.1%	
Unimportant	1.4%	
Not important at all	0.3%	n=297

## 1.5 Summary of Narrative Responses

The Southwold Neighbourhood Plan Questionnaire included 9 questions which gave responders the option to write narrative comments to reflect other, alternative options to those suggested in the questions. Some 970 such narrative comments were received, many of which were repeated, albeit expressed in different words. This summary attempts to group repeated or similar comments into categories as shown in the tables below.

<b>Q7) When affordable housing is allocated, which other options should be given priority?</b>					
<b>Comment</b>	<b>1st Priority - Number</b>	<b>2nd Priority - Number</b>	<b>3rd Priority - Number</b>	<b>Total</b>	<b>% of Total</b>
Young / Low Income Local Workers	1	1	4	6	33%
Retired / Elderly		1	2	3	17%
Local Connections			3	3	17%
Refugees / Migrants			2	2	11%
WDC Housing List	2			2	11%
Armed Forces Veterans		1		1	6%
Disabled			1	1	6%
<b>Total</b>	<b>3</b>	<b>3</b>	<b>12</b>	<b>18</b>	<b>100%</b>

<b>Q10) Which other options would you like redundant community buildings to be used for?</b>							
<b>Comment</b>	<b>1st Priority - Number</b>	<b>2nd Priority - Number</b>	<b>3rd Priority - Number</b>	<b>4th Priority - Number</b>	<b>5th Priority - Number</b>	<b>Total</b>	<b>% of Total</b>
Cottage Hospital / Health Centre	5	1	1		2	9	15%
Indoor Activities / Gym / Pool		2	3		2	7	12%
Affordable Retail Units	1			2	1	4	7%
Sheltered Housing / Residential Home		1	1		2	4	7%
Small Business Units				1	3	4	7%
Arts Centre				1	3	4	7%

**Q10) Which other options would you like redundant community buildings to be used for?**

Affordable Housing	2		1			3	5%
Refugee Centre			1		2	3	5%
Laundrette / Dry Cleaner				2	1	3	5%
Free House Pub	1	1				2	3%
Live / work Units	1			1		2	3%
Toilets	1				1	2	3%
Centre for the disabled			1		1	2	3%
Youth Hostel					2	2	3%
Adult Education		1				1	2%
Covered Market				1		1	2%
Creche				1		1	2%
Outdoor Activity Centre					1	1	2%
Therapeutic Centre					1	1	2%
Cafe					1	1	2%
Police Station					1	1	2%
Red Cross					1	1	2%
CAB					1	1	2%
<b>Total</b>	<b>11</b>	<b>6</b>	<b>8</b>	<b>9</b>	<b>26</b>	<b>60</b>	<b>100%</b>

<b>Q11) How else does the high proportion of 2nd homes &amp; holiday lets affect you?</b>							
<b>Comment</b>	<b>1st Priority - Number</b>	<b>2nd Priority - Number</b>	<b>3rd Priority - Number</b>	<b>4th Priority - Number</b>	<b>5th Priority - Number</b>	<b>Total</b>	<b>% of Total</b>
Difficulty Parking	7	1	1	2	9	20	61%
Loss of Essential Shops for Residents				1	2	3	9%
Declining Residential Population				1	2	3	9%
Loss of Local Character					3	3	9%
Difficult seasonal business planning					2	2	6%
Litter / Dog Fouling				1		1	3%
Fewer young people					1	1	3%
<b>Total</b>	<b>7</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>19</b>	<b>33</b>	<b>100%</b>
<b>Note</b>	5 Respondents provided a robust defence of the number of 2nd homes and holiday lets which they say make a significant contribution to the economy of Southwold.						

<b>Q13) What other possible policies would you like to see in the Neighbourhood Plan?</b>		
<b>Comment</b>	<b>Total</b>	<b>% of Total</b>
Introduce parking charges, resident parking permits & proper enforcement	43	38%
Discourage the increase of 2nd homes & holiday lets	17	15%
Encourage the provision of affordable housing for permanent residents	9	8%
Limit overdevelopment of existing properties	9	8%
Encourage small and start-up businesses	5	4%
Enhance character of High Street and mix of independent shops	5	4%
Improve dog, seagull & litter control and street cleaning	5	4%
Improve road and rail public transport services.	5	4%
Introduce 20 mph speed limit & pedestrian zones	5	4%
Encourage high quality design to retain and enhance character of Southwold	4	4%
Encourage mix of new builds for both young and old	3	3%
Encourage sea front and pier development for water sports & cruise ships	2	2%

**Q13) What other possible policies would you like to see in the Neighbourhood Plan?**

Encourage wind and water power generation	1	1%
<b>Total</b>	<b>113</b>	<b>100%</b>

**Q14) What other developments would you like to see on sites with the potential for development become available?**

Comment	Very Important	Important	Neither Important or Unimportant	Unimportant	Very Unimportant	Total	% of Total
Affordable Housing	7	2	3	1	1	14	21%
Parking / Private Garages	7	2	2	1		12	18%
Leisure Centre / Swimming Pool	4	3	1			8	12%
Library / CAB / Creche /etc	7	1				8	12%
Small Business Units	2	2	3			7	10%
Unspecified Community Use	1	3	1			5	7%
Useful Shops / Services for residents	2	1				3	4%
Medical Centre / Care Home	3					3	4%
Public Garden	3					3	4%
Refugee Sanctuary		1				1	1%
Live/Work Units	1					1	1%
Mixed Use			1			1	1%
Food Re-cycling	1					1	1%
<b>Total</b>	<b>38</b>	<b>15</b>	<b>11</b>	<b>2</b>	<b>1</b>	<b>67</b>	<b>100%</b>



**Q18) If funding is generated from a levy on new developments, what would be your spending priorities for the benefit of the community?**

Comment	Total	% of Total
<b><u>PARKING</u></b> : More car parks; residents parking permits; better control & enforcement	102	18%
<b><u>COMMUNITY FACILITIES</u></b> : Library; Police & Fire Station; TIC; Drop-in centre for the elderly; creche or soft play area for the young; Youth centre	78	14%
<b><u>TOWN HOUSEKEEPING</u></b> : Better dog & seagull control; More bins and litter collections; More street cleaning; Provision of recycling centre. Town is looking dirty & untidy.	58	11%
<b><u>HOUSING</u></b> : More affordable / subsidised / social housing for all but particularly for young families and local workers.	50	9%
<b><u>HEALTH &amp; WELFARE</u></b> : Cottage hospital; Medical centre; Care home;	49	9%
<b><u>ENVIRONMENT</u></b> : Maintain & enhance the natural and build environmental of Southwold. It's looking very tired and uncared for.	33	6%
<b><u>PUBLIC TOILETS</u></b> : More & better toilets with improved maintenance & cleaning	29	5%
<b><u>INFRASTRUCTURE</u></b> : Repair or resurface roads, cycle paths and footpaths. Tidy up and improved signage; Upgrade subterranean infrastructure (water & electricity services, drainage and sewage treatment)	24	4%
<b><u>LEISURE CENTRE</u></b> : Provide swimming pool, gymnasium, indoor sports, cinema.	21	4%
<b><u>LOCAL SHOPS</u></b> : Increase & protect local independent shops & services to provide wider range of essential goods for residents year around. Subsidise rents for local shops.	21	4%
<b><u>COASTAL PROTECTION</u></b> : Maintain & improve flood protection and sea defences	18	3%
<b><u>SMALL BUSINESSES</u></b> : Support small and start-up businesses and provide affordable or subsidised rented premises.	17	3%
<b><u>TRAFFIC</u></b> : Introduce pedestrian zones (particularly High Street), pedestrian crossings, & lower speed limits. Make Mights Bridge a Toll Bridge for non-residents	13	2%
<b><u>SEA FRONT</u></b> : Improve & better maintain the beach, promenade and pier; Erect clear PSPO notices; Install showers.	9	2%
<b><u>PUBLIC TRANSPORT</u></b> : Improve public transport links (buses) to nearby towns & regional centres; Introduce park & ride schemes.	8	1%
<b><u>ARTS &amp; CULTURE</u></b> : Promote more arts, culture and other festivals.	8	1%
<b><u>BOATING LAKES</u></b> : Restore Ferry Road boating lake to use & dredge Pier boating lake and restore water supply up to Mights Bridge	6	1%
<b><u>SCHOOL</u></b> : Keep school open	3	1%
<b><u>BROADBAND</u></b> : Improve broadband to provide 4G coverage	3	1%
<b><u>ENTRANCE TO TOWN</u></b> : Redevelop the vacant plots at the entrance to town (Mights Road & Station Road)	2	0%
<b>Total</b>	<b>552</b>	<b>100%</b>

**Q19) What other aspects of Southwold's character would you want to protect and/or enhance?**

Comment	1st Priority - Number	2nd Priority - Number	3rd Priority - Number	4th Priority - Number	5th Priority - Number	Total	% of Total
<b>TOWN HOUSEKEEPING:</b> Better dog & seagull control; More bins and litter collections; More street cleaning; Provision of recycling centre. Town is looking dirty & untidy.	8	1	1		8	18	30%
<b>DESIGN:</b> Improve architectural design and planning quality	1				11	12	20%
<b>DEVELOPMENT:</b> Improve entrance to town; Prevent infill; Preserve historical buildings		1	1		4	6	10%
<b>SEA FRONT &amp; HARBOUR:</b> Improve maintenance of sea front; Protect Harbour from over development.	1	1			4	6	10%
<b>LOCAL SHOPS:</b> Increase & protect local independent shops & services to provide wider range of essential goods for residents year around. Ban chain stores					5	5	8%
<b>INFRASTRUCTURE:</b> Improve roads, paths & signage; Eliminate sewage smells	2				2	4	7%
<b>TRAFFIC:</b> Introduce pedestrian zones (particularly High Street), pedestrian crossings, & lower speed limits.	1				3	4	7%
<b>PARKING:</b> Improve provision and policing of parking	1				1	2	3%
<b>PUBLIC TOILETS:</b> More & better toilets with improved maintenance & cleaning					2	2	3%
<b>ARTS &amp; CULTURE:</b> Promote more arts, culture and other festivals.					1	1	2%
<b>Total</b>	<b>14</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>41</b>	<b>60</b>	<b>100%</b>

**Q20) What other policies would you like to see in the NP that encourage new developments to have landscaping for wildlife and is environmentally friendly?**

Comment	1st Priority - Number	2nd Priority - Number	3rd Priority - Number	4th Priority - Number	5th Priority - Number	Total	% of Total
<b>WILD LIFE:</b> Provide nesting boxes, hedges & bird friendly planting; Cull pigeons; Ban cats; Provide hedgehog habitat	2		1	1	3	7	23%
<b>SOLAR PANELS:</b> Comments split 1/4 for/against				1	4	5	17%
<b>BUSS CREEK &amp; MARSH:</b> Improve sewage management; Introduce reed bed filtration; Develop into community fishing & recreation area.	1				3	4	13%
<b>FLORA:</b> Programme of wild flower & indigenous tree planting & environmentally friendly landscaping			1		3	4	13%
<b>GARDENS:</b> Ban paving over gardens	1	2				3	10%
<b>INFRASTRUCTURE:</b> Promote rainwater harvesting & biodigesters				1	1	2	7%
<b>NATURE RESERVE:</b> No new reserves but preserve & maintain existing ones			1			1	3%
<b>ENVIRONMENTAL TOWN:</b> Make Southwold a wildlife hub for environmental groups					1	1	3%
<b>EASTON BAVENTS:</b> Enhance appearance of Easton Barents coastline					1	1	3%
<b>HARBOUR:</b> Develop natural surroundings of Harbour and riverside. Demolish redundant sheds.				1		1	3%
<b>BUILT ENVIRONMENT:</b> Prevent over-development			1			1	3%
<b>Total</b>	<b>4</b>	<b>2</b>	<b>4</b>	<b>4</b>	<b>16</b>	<b>30</b>	<b>100%</b>

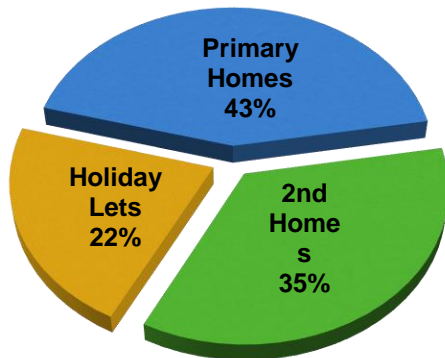
**Q22) Which other policies would you like to see to support the economy?**

Comment	1st Priority - Number	2nd Priority - Number	3rd Priority - Number	Total	% of Total
<b>COMMUNITY FACILITIES:</b> Care home; Library; TIC; Adult education	2	3	6	11	30%
<b>FAIRS &amp; MARKETS:</b> Encourage more antique fairs, vintage car/bike events, sports events etc			1	1	3%
<b>LOCAL SHOPS:</b> Increase & protect local independent shops & services to provide wider range of essential goods for residents year around. Ban chain stores	1		11	12	32%
<b>SWIMMING POOL:</b> Indoor heated swimming pool.			3	3	8%
<b>CYCLE PATHS:</b> provide more out of town cycle tracks.			1	1	3%
<b>HARBOUR:</b> Support for Harbour users	1			1	3%
<b>TOWN HOUSEKEEPING:</b> Tidy up and clean up Southwold. It is looking very tired and dirty; Control dog fouling	1		1	2	5%
<b>PARKING:</b> provide out of town car park.			1	1	3%
<b>PUBS:</b> End Adnams monopoly on pubs in Southwold	1			1	3%
<b>DEMOGRAPHY:</b> Reduce imbalance between residents and visitors			3	3	8%
<b>BUSINESSES:</b> Support local businesses.			1	1	3%
<b>Total</b>	<b>6</b>	<b>3</b>	<b>28</b>	<b>37</b>	<b>100%</b>

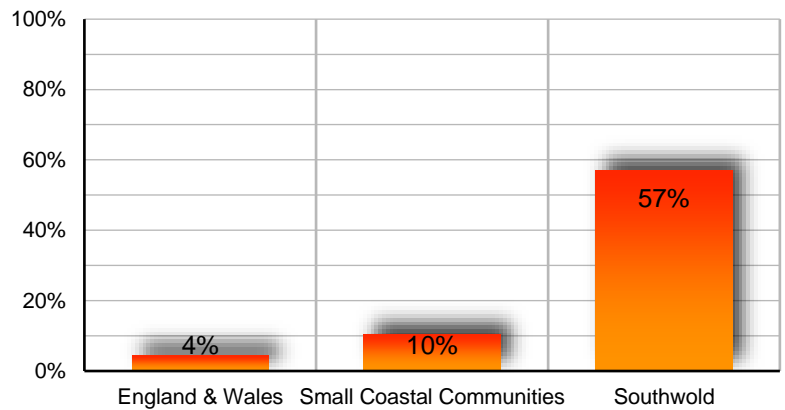
## 1.6 Evidence Related to Human Impact of 2<sup>nd</sup> Homes

### Use of Dwellings in Southwold

Source: STC Housing Survey 2015



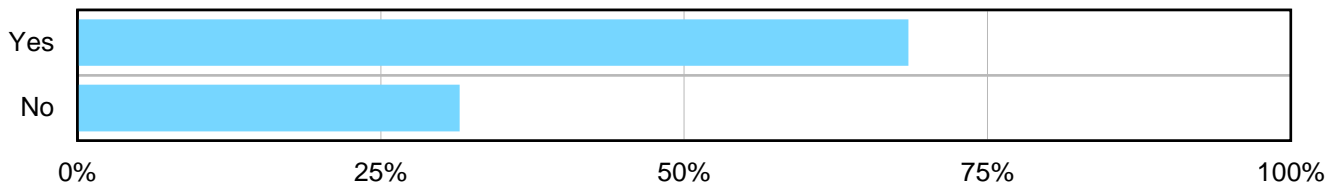
### Comparison of Proportion of 2nd Homes & Holiday Lets in Communities in England & Wales



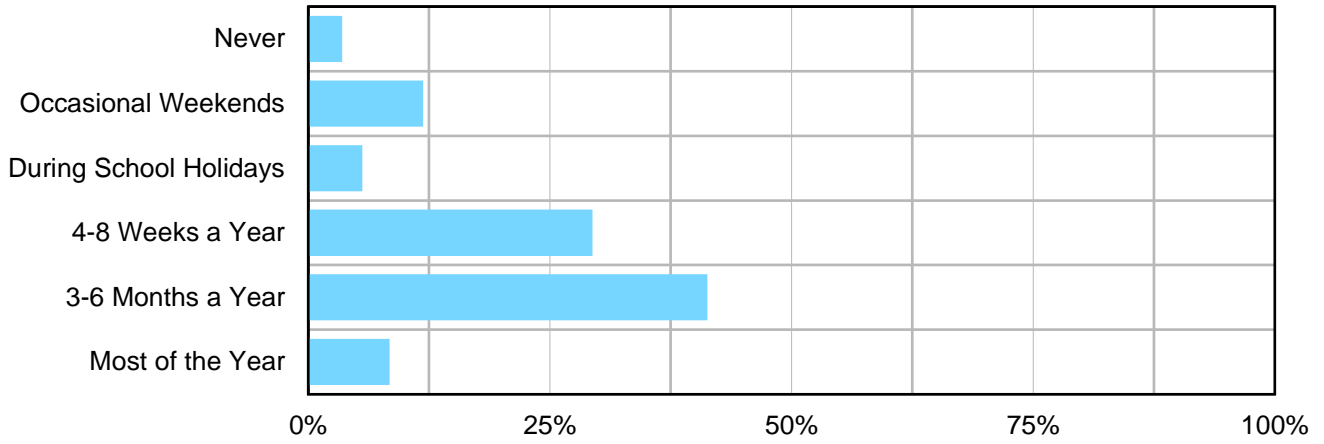
Source: 2011 Census - Coastal Communities + STC Survey 2016

Source: Southwold Town Plan Questionnaire ~ October 2013 ~ Turnout 475 (56.9%)

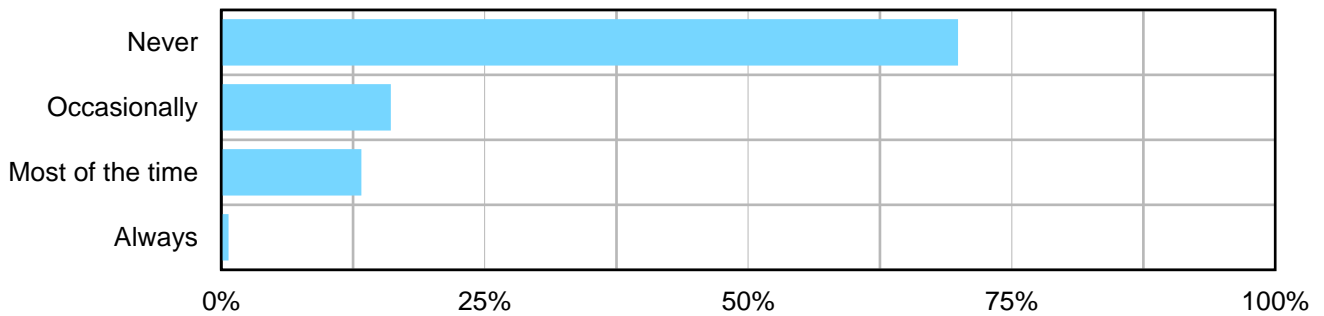
Household Q2	Is this your main residence?
Yes	68.5%
No	31.5%



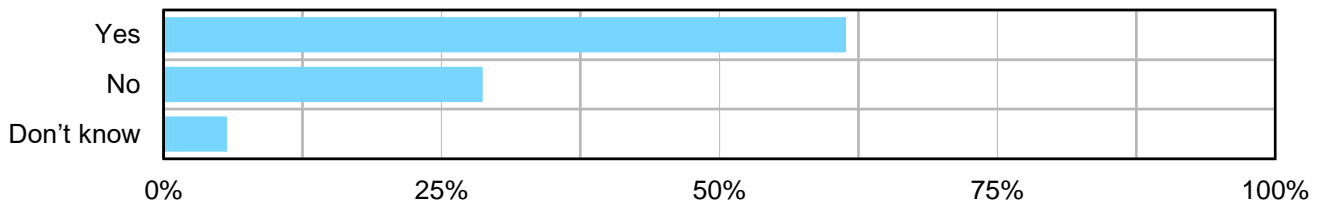
Household Q3	How often do you use this property?
Never	3.5%
Occasional Weekends	11.9%
During School Holidays	5.6%
4-8 Weeks a Year	29.4%
3-6 Months a Year	41.3%
Most of the Year	8.4%



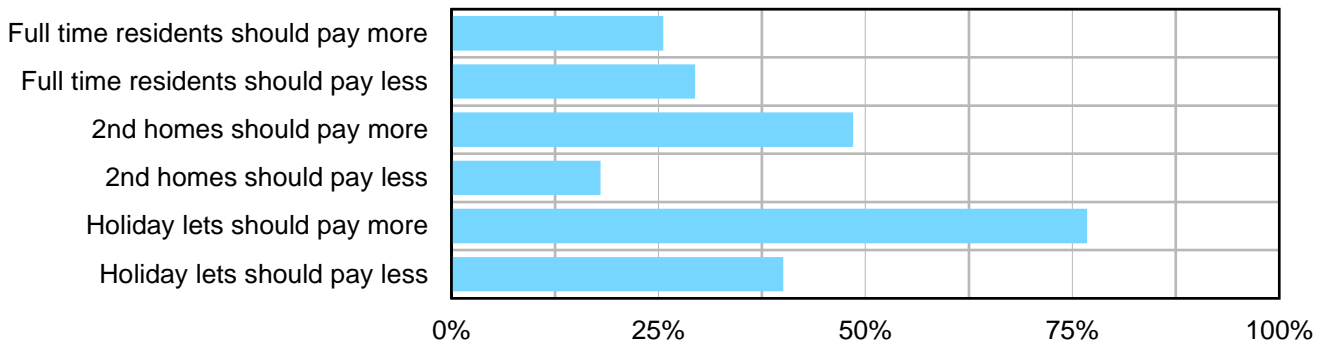
Household Q4	Is your property let when you are not in residence?
Never	69.9%
Occasionally	16.1%
Most of the time	13.3%
Always	0.7%



Individual Q13	Should all dwellings in Southwold be taxed at the same rate? (Occupied residences, 2nd Homes, Holiday Lets)
Yes	61.4%
No	28.7%
Don't know	5.7%

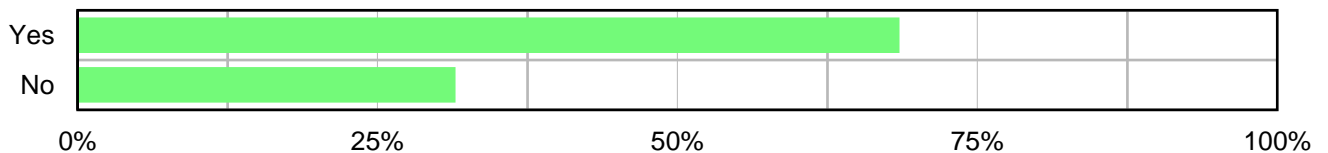


Individual Q14	Which dwellings should pay more or less in taxes?
Full time residents should pay more	25.6%
Full time residents should pay less	29.4%
2nd homes should pay more	48.5%
2nd homes should pay less	18.0%
Holiday lets should pay more	76.8%
Holiday lets should pay less	40.1%

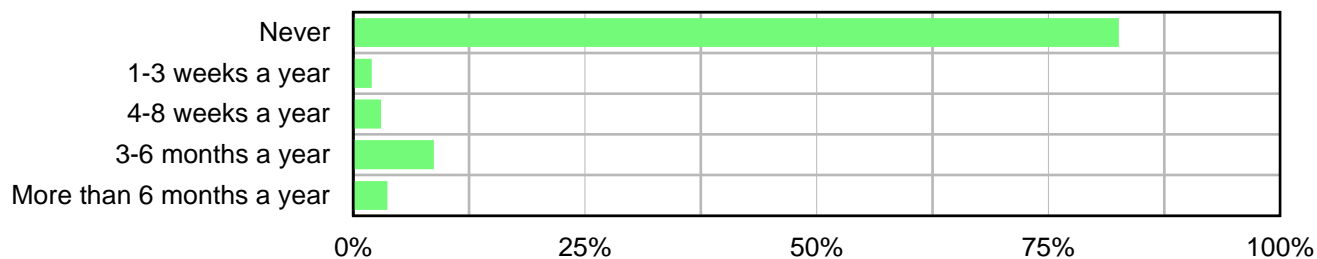


Source: Southwold Neighbourhood Plan Questionnaire ~ September 2016 ~ Turnout 630

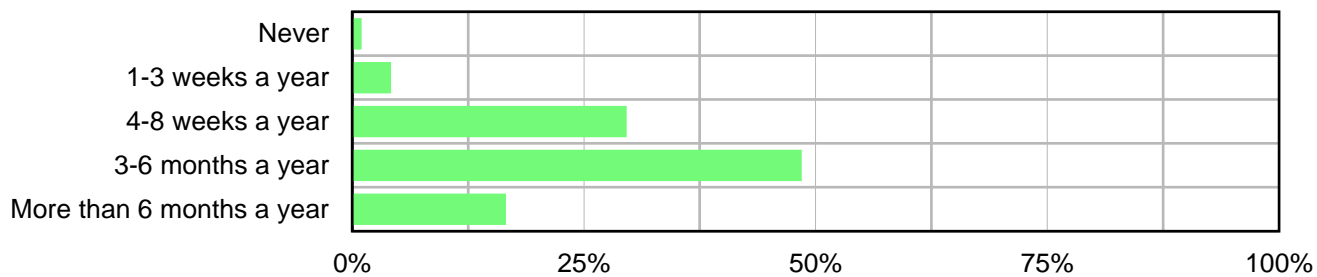
Q4	Is this your main residence?
Yes	53.3%
No	47.7%



Q5	How often do you use this property?
Never	1.0%
1-3 weeks a year	4.2%
4-8 weeks a year	29.6%
3-6 months a year	48.5%
More than 6 months a year	16.6%

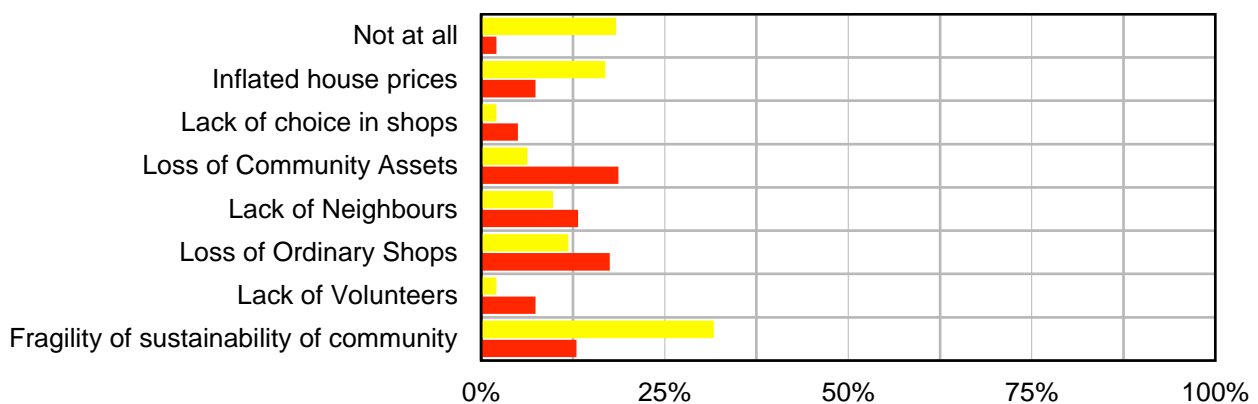


Q6	Is your property let when you are not in residence?
Never	82.6%
1-3 weeks a year	2.0%
4-8 weeks a year	3.0%
3-6 months a year	8.7%
More than 6 months a year	3.7%

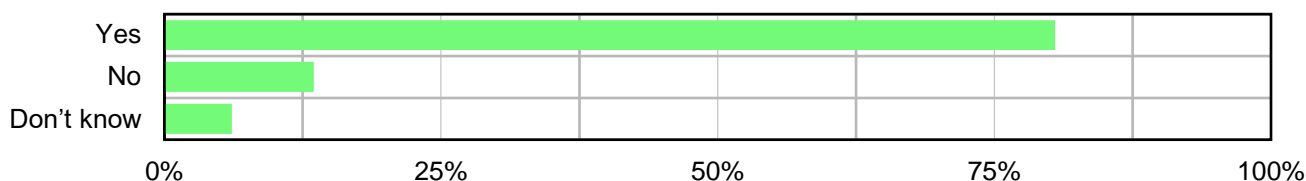




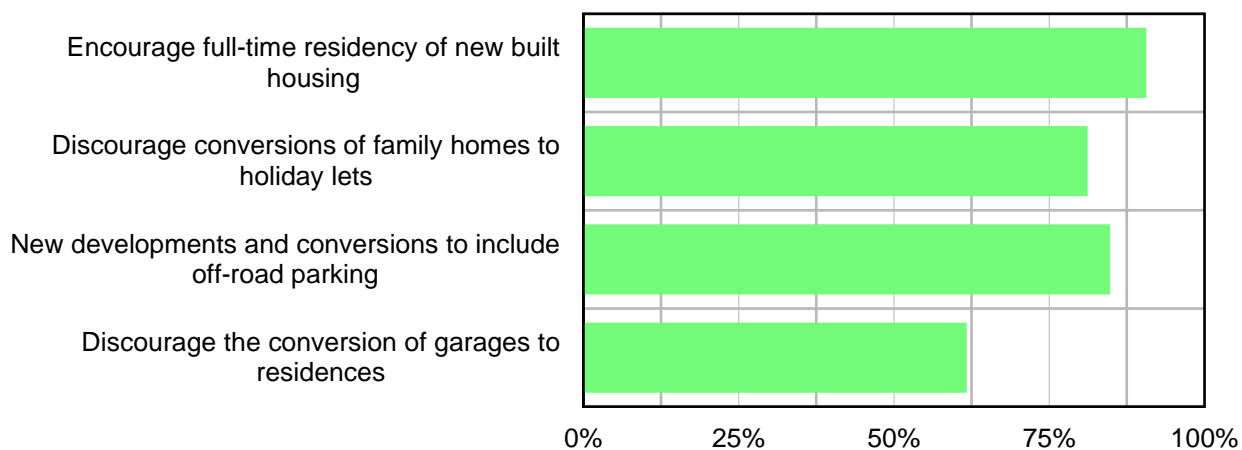
Q11		
How does the high proportion of 2nd homes & holiday lets affect you?		
	1st Priority	2nd Priority
Not at all	18.4%	2.1%
Inflated house prices	16.9%	7.4%
Lack of choice in shops	2.1%	5.0%
Loss of Community Assets	6.3%	18.7%
Lack of Neighbours	9.8%	13.2%
Loss of Ordinary Shops	11.9%	17.5%
Lack of Volunteers	2.1%	7.4%
Fragility of sustainability of community	31.7%	13.0%
Free Text Comments on other affects	Too many 2nd homes	
	Southwold becoming a retirement town	
	Don't want town to have a dead core during week	
	Preponderance of 2nd homes skews commodities on sale towards visitors and away from residents	
	Some respondents provided a robust defence of the number of 2nd homes & holiday lets which they say make a significant contribution to the economy of Southwold	



Q12	Would you like the Neighbourhood Plan to encourage full time residency of newly built houses?
Yes	80.5%
No	13.5%
Don't know	6.1%



Q13	Do you think the Neighbourhood Plan should have policies on the following?
Encourage full-time residency of new built housing	90.6%
Discourage conversions of family homes to holiday lets	81.2%
Require all new developments and conversions to include off-road parking	84.8%
Discourage the conversion of garages to residences	61.7%
Free Text Comments on other polices	Better provision for and enforcement of parking (38%) Discourage the increase of 2nd homes & holiday lets (15%)



## 1.7 Responses on Sustainability, Flooding and Sewage by Street

This analysis only includes streets with a significant number of responses

### Q11 How does the high proportion of holiday lets and second homes affect you?

**Worried about the sustainability of the Southwold community:**

	Responses	Priority 1 or 2
Field Stile Road	16	45.7%
Hotson Road	21	58.3%
Marlborough Road	25	49.0%
North Road	15	48.4%
Pier Avenue	17	37.0%
South Green	10	41.7%
Stradbroke Road	15	53.6%
Victoria Street	18	40.0%
Total – all responses		43.2%

### Lack of neighbours

	Responses	Priority 1 or 2
Marlborough Road	15	29.4%
South Green	10	41.7%
Total – all responses		22.2%

### Q16 In the past 3 years has your property suffered problems due to surface water flooding?

	Responses	Yes	%
Centre Cliff	6	4	67.0%
Hotson Road	36	4	11.0%
North Parade	23	3	13.0%
North Road	31	3	10.0%
South Green	24	3	13.0%
The Common	8	3	38.0%
Total	644	35	5.4%

**Q17 In the past 3 years, has your property experienced sewage backup problems?**

	Responses	Yes	%
Centre Cliff	6	4	67.0%
Ferry Road	9	4	44.0%
Field Stile Road	35	13	37.0%
Hotson Road	36	5	14.0%
North Green	17	5	30.0%
North Parade	23	5	22.0%
North Road	31	5	16.0%
Pier Avenue	46	5	11.0%
Stradbroke Road	28	4	14.0%
Total	644	78	12.1%

## Appendix 7 Analysis of Consultee Comments to Draft NP Policies, October 2018

Consultees' Comments	Neighbourhood Plan Team's Response
<b>SWD1 – Principal Residences</b>	
<ul style="list-style-type: none"> <li>• Drop the get-out clause (x4)</li> <li>• Should the restrictions for occupancy be extended to <u>all</u> properties – not just new builds</li> <li>• Will houses still be required to be principal residence once sold (i.e. not a new build then!) how can SWT ensure this?</li> <li>• Policy not clear enough</li> <li>• This is unenforceable</li> <li>• Remove sentence “New unrestricted non-principal residences will only be supported in exceptional circumstances” – this opens the door to unrestricted housing – too woolly a term – what defines “exceptional”?</li> <li>• Where is the proof of a need for more and more social housing</li> <li>• Will they be prevented from buying and then selling on to a second-home purchaser after two years (as currently with Council housing)?</li> <li>• Don't see how this would work in practice. Would it remain in force in perpetuity? When houses resold?</li> <li>• I would like to formally register my concern about the “weasel clause” in the neighbourhood plan which allows developers to get round the residency requirement for new builds through a viability argument</li> <li>• As a resident, I'd like to register my opposition to an “exceptional circumstances” exemption to the principal residence policy. I think that this opens the door to developers keeping land values high because the cost of land can always be offered as a reason for not being able to build principal residences, which reduces the market value of housing by at least</li> </ul>	<ul style="list-style-type: none"> <li>• It is agreed that the exceptions clause should be dropped. It runs counter to consultation sentiment and creates a significant risk of undermining the policy's rationale. Moreover, other Neighbourhood Plans that have adopted principal residence policies have not included an exceptions clause.</li> <li>• The policy relates to all future sales of new built housing.</li> <li>• At this time, it is not legally possible to have a principal residence policy that applies to existing housing.</li> <li>• A number of the comments related to enforceability. The High Court has found that the principal residence requirement is enforceable and therefore sound. It should be noted that, as with any other enforcement issue, proactivity is essential.</li> </ul> <p><b>Actions:</b></p> <ol style="list-style-type: none"> <li>1. Amend policy and text to delete exceptional circumstances caveat.</li> <li>2. Insert in Projects a Southwold Town Council commitment to making this policy “stick” by:             <ol style="list-style-type: none"> <li>i.) working in partnership with the District Council to ensure that the evidence supplied in support of individual Section 106 agreements is sufficiently robust and easily enforced</li> <li>ii.) making it a planning enforcement priority</li> <li>iii.) being the “eyes and ears on the ground” to provide evidence of breaches</li> <li>iv.) gather information on how the policy is working in practice</li> </ol> </li> </ol>

<p>20%. The only justification I have heard for having this exemption is that it will enable Hastoe to develop the police and fire station site. However, if the sale is agreed, Hastoe's planning application will be decided well before our NP has sufficient legal weight to be applied as a reason for denying unrestricted market development on the site. In essence, we will have created an exemption that is not needed that will then neutralise the policy for future sites.</p> <ul style="list-style-type: none"> <li>• Basically this means the residency requirement is pointless because ALL developers will use this to increase profits</li> <li>• I am very concerned about the inclusion of a get-out clause for exceptional circumstances. Developers are notorious for using the issue of viability when trying to get a reduction in the proportion of affordable properties in a development. To give them on another excuse, in this case the effect that the principle residency requirement will have on the viability, will surely completely undermine the strength of the policy</li> </ul>	
--	--

**SWD2 – Design and Landscape**

<ul style="list-style-type: none"> <li>• The development on the old garage site is a good example where this hasn't happened</li> <li>• This policy would not allow proposed development at Station/Blyth Roads!</li> <li>• Ignores lack of parking for current residents.</li> <li>• I am unhappy about the current housing development on Mights Road and North Road (ugly, too big, not in the style of the town and a poor entry to such a beautiful place) and concerned regarding the apparent lack of power of the Council to influence the plans for the development of the police station/fire station site and I wish to state my objection to Clancy's being closed for an indefinite period during whatever construction takes place.</li> </ul>	<ul style="list-style-type: none"> <li>• The old garage development relates to a previous planning application and supports the need for the Neighbourhood Plan's design policies</li> <li>• These policies, supported by the character area assessments, should promote high quality design in the future if the Town Council's PDC uses them effectively, and, more importantly, the LPA applies them</li> <li>• The NPPF and New Local Plan support modern development that is sensitive to the character area. Southwold Town Council which owns Station Yard, commissioned a design framework study to support high quality design in the Gateway. The architects who provided the design framework (consulted on and no objections received) also designed the planning scheme for Station Yard.</li> </ul>
--	---

<ul style="list-style-type: none"> <li>I note that the new Local Plan permits windfall sites for residential development – this could include any parcel of land in Southwold except one-for-one replacements.</li> </ul>	<p>Their scheme was informed by a heritage statement by Bob Kindred, a leading heritage consultant, a Trustee of the Suffolk Preservation Society, who delivers training in heritage to parishes across the county</p> <ul style="list-style-type: none"> <li>The design policies apply to all sites, existing, new build, and windfall. This does not need to be explicitly stated</li> <li>All policies in the Neighbourhood Plan are “read together.” This should be made clear in the document, and reinforced as necessary in individual policies</li> <li>The comment about Clancy’s is not relevant to the proposed policy</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>Amend text as required to make it clear where specific policies are inter-related, such as design, parking, and landscape.</li> </ol>
---	--

### SWD3 – Private Parking

<ul style="list-style-type: none"> <li>Off street parking needs to be prioritised in future (not happened in past)</li> <li>Consideration should be given to the size of modern cars and the space taken up by these larger vehicles. The time has arrived for residents parking permits</li> <li>Agree – provided it doesn’t mean that local people’s current spaces are lost to them!</li> <li>Some of your maps/data are inaccurate/wrong.</li> <li>All very pie in the sky. Where it is already possible to adopt some of these policies they have not been! Building houses with insufficient parking spaces and then “renting” out designated parking lots in a car park! We should address our present needs more seriously before dreaming up further options.</li> <li>I am in favour of charging for parking on the common etc. <u>IF</u> it is less expensive than parking on the streets. Otherwise charge there will only add to</li> </ul>	<ul style="list-style-type: none"> <li>All the comments express frustration with the current parking situation in town, and therefore provide additional evidence in support of the need for the Neighbourhood Plan’s parking policies. They also highlight the need for effective enforcement.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>Include as a project that Southwold Town Council will proactively work to obtain more effective parking enforcement.</li> </ol>
--	--

<p>the pressures on street parking (probably with even more 'illegal' parking everywhere). Residents' parking should be for specific vehicles only – not one per house etc – as otherwise all parking slots will be filled by holiday makers.</p> <ul style="list-style-type: none"> <li>• Parking!! If this development happens the only parking available to us long-term residents will disappear. It seems this is now a town that only considers second home owners and visitors.</li> <li>• Policy doesn't address current lack of parking for local residents</li> </ul>	
<b>SWD4 – Convenience Retailing</b>	
<ul style="list-style-type: none"> <li>• Lose get-out clause.</li> <li>• If someone local wanted a larger shop this would work against them!!</li> <li>• It may suit the town to allow developments of this size. A policy such as this would “box” the Planning Committee to refusing an application when this might not be the case.</li> <li>• Too restrictive.</li> <li>• Let out clause should not apply. No bigger developments.</li> <li>• The aspirations as regards holiday lets and affordable housing, High Street shops with a more local appeal and the aim of making the town less reliant on visitors are laudable but I feel have come too late. STC have no control over private sector shop rents or the pricing of property owned by developers which are the driving forces of the local economy.</li> </ul>	<ul style="list-style-type: none"> <li>• This policy applies only to “convenience retailing”. The get-out clause balances the need to retain small shops for independent businesses with the need of such businesses to expand.</li> </ul> <p><b>Action:</b> None</p>
<b>SWD5 – Solo Workers, Micro Businesses and Small Businesses</b>	
<ul style="list-style-type: none"> <li>• Second option only (not integrated into residential areas).</li> <li>• How many start up spaces do we think we need? We can already have some on the hospital site, the Clancys site, the Kings Head.... Do we need more?</li> <li>• There seems to be empty shops and offices already.</li> <li>• Southwold already has two developments for new businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Given the constraints on development land in Southwold, the integration of business use with residential is justified. In addition, this was the traditional pattern of development in Southwold, as described in paragraph 2.7. The new Local Plan Design policies and the Neighbourhood Plan design policies provide strong support for protecting the amenity of neighbours. This policy</li> </ul>



<p>(Hospital and Kings Head) and plans for Station Road. Lack of convincing evidence that there is a need for this much business space.</p>	<p>applies in deciding applications for B2 commercial use.</p> <ul style="list-style-type: none"> <li>• Demand for business space is well-evidenced.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>1. Clarify that applications for business use development interface with design policies.</li> </ol>
<p><b>SWD6 – Wildlife Development</b></p>	
<ul style="list-style-type: none"> <li>• The issue of wildlife preservation is secondary to all of the other policies and implementation could cause major delays or expense in appropriate development. Bats, owls and great crested newts etc.</li> <li>• Why are St Felix building on their school grounds; a county wildlife site?</li> <li>• Bird and bat boxes could be included on current properties. Consideration should be given to controlling the rat population in Southwold.</li> <li>• Should adopt Aldeburgh’s policy of heavy fines for feeding seagulls.</li> <li>• No listing of <u>Electricity Green!!</u></li> </ul>	<ul style="list-style-type: none"> <li>• St Felix is outside the Neighbourhood Plan area.</li> <li>• Implementation of this policy should not slow down development or add significant expense.</li> <li>• Planning policies can only relate to applications for planning permission to change the use of land or build structures larger than permitted development.</li> <li>• Regulations controlling rats and seagulls are outside the scope of planning law.</li> </ul> <p><b>Action:</b></p> <ol style="list-style-type: none"> <li>1. Add Electricity Green to the list of local green spaces <i>if</i> our planning consultant considers it fits the criteria – the potential for its development is limited by its small size and the fact that it is owned by Southwold Town Council. Theoretically, however, the Council could sell it to the adjoining building and its new owner could apply for an extension into this space.</li> </ol>
<p><b>SWD7 – Private Garden Spaces</b></p>	
<ul style="list-style-type: none"> <li>• Surely there is a limit of plot ratio of building to remaining garden area?</li> <li>• <u>Definitely</u> no basement excavations!!</li> <li>• Infill is how the town has always dealt with expansion.</li> <li>• I do hope in-filling in gardens and the constant turning of one large house into an even larger one or splitting into two expensive dwellings can be halted.</li> </ul>	<ul style="list-style-type: none"> <li>• Three of the four comments support this policy.</li> <li>• There is no fixed limit in the Local Plan policies and it would be difficult to create a ratio because of the different size of gardens in Southwold. But we should put this question to our consultant and also ask whether we could have a basement policy.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>1. Put these two questions to our consultant.</li> </ol>
<p><b>SWD8 – Local Green Spaces</b></p>	

<ul style="list-style-type: none"> <li>• I don't think <u>any</u> building should be allowed on our greens. (x5)</li> <li>• What type of development would be allowed?</li> <li>• I have agreed with the Policy on the assumption that there will be no adverse deviations</li> <li>• We agree that the greens should be preserved. However, for example – East Cliff Green should just be grassed for ease of maintenance and to decrease the rat population.</li> <li>• Get rid of get-out clause</li> <li>• “<u>Unless</u>” clause could give WDC carte blanche to build on their greens. Keep the greens green please.</li> <li>• As a correction to a very minor mistake the residents of Barnaby Green do not maintain the grass or trees, Waveney Norse seem to be responsible nor do we have any social gatherings, this happened once during the millennium celebrations, there are only a few of us left.</li> </ul>	<ul style="list-style-type: none"> <li>• All of the comments support the policy by demonstrating a desire to strengthen it beyond what is permitted by law.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>1. Correct text on Barnaby Green to reflect the last comment.</li> </ol>
<b>SWD9 – Impact of Flooding</b>	
<ul style="list-style-type: none"> <li>• About time.</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>SWD10 – Community Facilities</b>	
<ul style="list-style-type: none"> <li>• No exceptions should be allowed.</li> <li>• Don't understand! (x2)</li> </ul>	<ul style="list-style-type: none"> <li>• Some flexibility is required unless the community facility is an Asset of Community Value.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>1. Clarify that this policy refers back to the New Waveney District Local Plan Policy 8.22 (Built Community Facilities and Policies.)</li> </ol>
<b>SWD11 – Development Sites</b>	
<ul style="list-style-type: none"> <li>• Second option only (not integrated into residential areas).</li> <li>• Well designed social housing should be substituted. Start up businesses in separate zone.</li> <li>• Development of sites to preserve character but also of similar design.</li> <li>• Any development of the former Police and Fire Station Site, Station Road Courtyard – priority should be given to</li> </ul>	<ul style="list-style-type: none"> <li>• There are essentially two themes to these comments that are relevant to planning policies: <ol style="list-style-type: none"> <li>i.) Segregate office development from residential development.</li> <li>ii.) Concern about the quality of design.</li> </ol> </li> <li>• Both of these concerns are addressed elsewhere in our responses.</li> </ul> <p><b>Action: None</b></p>

<p>existing businesses. The style of the property should be more sympathetic to the style of the town – <u>not</u> like the new build opposite the Fire Station.</p> <ul style="list-style-type: none"> <li>• No evidence of this policy in recent development plans!</li> <li>• Major concern ref Station Road site – loss of homes, albeit temporarily, for current local businesses. Clancys building of some local interest since only remaining old station building (was WH Smith). Relocation of garage subject to resiting for which planning consent has not been obtained. Courtyard space currently used for car parking for MOTs etc will be gone! Also – looking at initial design for Station Road development, the buildings being suggested do <u>NOT</u> meet with Policy SWD2 – they do <u>NOT</u> “contribute positively to the relevant character area, including the architectural style of the building itself and the spatial context”.</li> <li>• How many start up spaces do we think we need? We can already have some on the hospital site, the Clancys site, the Kings Head.... Do we need more?</li> </ul>	
---	--

**Other Non-Policy Comments**

<ul style="list-style-type: none"> <li>• Harbour Lands must be kept in control of Southwold Town Council (x2)</li> <li>• No properties for rental to receive business rate relief unless can be demonstrated actively seeking hirers and not used to justify second home.</li> <li>• All policies confusing and many with get-out clauses.</li> <li>• The policies address the needs of the town for now and in the foreseeable future <u>only</u> if they are carried through.</li> <li>• This summary requires that developers ensure that all new designs are sympathetic to Southwold. I suggest that developers have let us down in two recent projects and may do in a third planned one. They are: <ul style="list-style-type: none"> <li>a. New terrace of houses (currently for sale) on the east side of Station Road, near junction with North</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Control of Harbour Lands outside the legal scope of the Neighbourhood Plan.</li> <li>• Business rate relief outside the legal scope of the Neighbourhood Plan.</li> <li>• We will clarify any policies where there are specific comments that they are confusing.</li> <li>• Implementation of the Neighbourhood Plan is in the hands of the District Council.</li> <li>• The planning scheme for Station Yard has been granted.</li> </ul> <p><b>Actions:</b></p> <ol style="list-style-type: none"> <li>1. Clarify policies where lack of clarity has been highlighted.</li> <li>2. Project to work with the District Council to upgrade the quality of their design decisions so that Neighbourhood Plan will have teeth.</li> </ol>
--	--

Road. These houses are disproportionately high, are sited far too close to the main road and their design and the materials used – new red brick, slate grey roofing and window frames are harsh, oppressive and inconsistent with their Southwold environment.

- b. Plans for the Station Road, Blyth Road development and business hub mirror a) above with similar defects.
- c. The same formula seems to have been used for the relatively new block of flats at the sea/pier end of Field Stile Road. This building is very high profile in red brick with slate grey roofing and window frames. Again, this building and its style, the materials used and their colour are inconsistent with their Southwold architectural setting.
- No one ought to indulge in nostalgia in the face of economic sense, but considering how tiny the resident population of the town now is, compared to even a few short years ago, it must be in your gift to take whatever measures possible to build this back into some semblance of a healthy community.

## Appendix 8 Analysis of First Regulation 14 Consultation Response

East Suffolk Council Comments	SNP Responses
<p>Para 1.2 makes reference to the Neighbourhood Plan (the NP) becoming part of the development plan. It should also make clear that the development plan will be made up of the NP and the local plan.</p>	<p>Text revised</p>
<p>Paras. 1.8 – 1.10 – The WDC Core Strategy has been superseded by the East Suffolk Council- Waveney Local plan, adopted March 2019. East Suffolk Council formed in April 2019. These paragraphs should be updated to reflect this.</p>	<p>Text updated</p>
<p>Para 2.2: "...Reydon provides a source of affordable housing for people with a sense of connection to Southwold...". How is this statement supported? House price and affordability statistics tend to show that Reydon is still an expensive place to buy a house in the district.</p>	<p>Reydon is not cheap compared with other locations in East Suffolk, but is considerably more affordable than Southwold. Text revised with comparative house price data supporting this conclusion. See footnote 3 on page 8.</p>
<p>Para 2.3: Should this say: "The small <u>built-up</u> area of Southwold...?"</p>	<p>Text revised</p>
<p>3.3, bullet 2. The numbers of newly built housing in Southwold will be very small. There are no sites allocated here and the area is constrained for new development. Therefore an occupancy restriction on new dwellings is going to make a very limited contribution as things stand to the objective of making Southwold a vibrant place to be. Other elements will need to make the majority contribution in order to achieve the objective of vibrancy.</p>	<p>This thought-provoking comment caused us to:</p> <ul style="list-style-type: none"> <li>i) revisit our community consultation evidence;</li> <li>ii) conduct additional research: and</li> <li>iii) do some deep thinking.</li> </ul> <p>The result was significant changes in the housing section to extend the breadth of the principal residence policy and the drafting of four new policies. These changes were made to ensure that we achieved the community's objectives for housing and land use, as revealed by community consultation. ESC advised that the new policies required a second Reg 14 consultation on the housing section. This was undertaken and is described in Section 4 and the related appendices.</p> <p>The over-riding community objective is to increase the full time population of the town, especially younger people and families, as revealed in the evidence summarised below.</p> <ul style="list-style-type: none"> <li>• 87% of residents thought the Neighbourhood Plan should try to encourage full-time residency of</li> </ul>

	<p>newly-built housing (NP Questionnaire).</p> <ul style="list-style-type: none"> <li>• 81% of residents thought the Neighbourhood Plan should discourage the conversion of family homes to holiday lets (NP Questionnaire).</li> <li>• 93.5% of residents thought affordable housing stock should always remain affordable (NP Questionnaire).</li> <li>• As development sites become available in Southwold, 86% of residents thought building affordable housing on this land was important or very important. 69% thought business developments important or very important (NP Questionnaire).</li> <li>• 93% of residents thought it was important or very important that the NP has a policy that ‘controls the future use of community buildings that become redundant’. The uses that had the most support as first or second priority were ‘other community uses’ (53%) and ‘affordable housing’ (49%) (NP Questionnaire).</li> <li>• Focus Groups: the over 70’s group; library user’s group, and young families’ group all expressed concern about the impact of second homes/holiday lets on the town’s sustainability, including its age demographic.</li> <li>• The Business Leaders Focus Group identified lack of affordable accommodation for staff as a business threat. “Not everyone wants to live in Southwold but many do, especially in food production and sales”.</li> <li>• Two of the interviews of business owners – the butcher and a local restaurant – identified loss of full time residents as a significant business threat that was no compensated by seasonal tourism trade. The butcher stated: “Maintaining sales with the ever declining population. I would like to see more full time residents in the town. A constant stream of trade of ordinary meat is better than peaks and troughs.” The restaurateur noted the difficulty of attracting and keeping staff because of lack of affordable housing even in villages within easy reach of Southwold. “We</li> </ul>
--	---

would definitely be benefited by more full time residents even if this reduced the number of holiday premises because for 9 months of the year we would have people living in Southwold and hopefully coming here. We rely on visitors because we have to. Tourism is better than nothing, but not the all year round trade that we need” (The Sail Loft Restaurant).

- 85% of people commenting on Principal Residence policy of the first draft of the NP supported it. The most frequent comment was concern that insertion of a viability clause would limit this policy’s application.
- One comment to the above consultation asked “Will they be prevented from buying and then selling on to a second-home purchaser after two years (as currently with Council housing)?” This reflects concern about loss of affordable policy as a result of stair-casing of shared ownership and right to buy for social rent.
- In the Regulation 14 Consultation, the Southwold and Reydon Society expressed doubt about the efficacy of a principal residence policy in light of the limited amount of land for new development.

#### **Additional Research**

In light of the strong community support for measures that would deliver the community’s objective, we researched policies adopted by other tourism destinations that are seeking to mitigate the harm caused by disproportionate percentages of second homes and holiday lets. We:

- Reviewed the principal residence policy and holiday let policy in the North Northumberland Coast NP, spoke to its consultant and also spoke a senior planner in the Northumberland LPA;
- Reviewed the Cambridge LPA’s policy on holiday letting and two Inspectorate of Appeals decisions on holiday lets;
- Updated our survey of dwelling use in Southwold to see what changes, if any, had taken place in the number being used for holiday letting;

- Reviewed potential opportunities created by the new Local Plan in light of our experience of community led development at the Old Hospital where a housing association and community benefit society partnered together to develop nine affordable units and a community hub on land that had no statutory requirement for a developer to provide affordable housing.

**Changes to Housing Section’s Text and Policies**

This body of work resulted in the policy changes described below.

- We clarified that new build includes housing created through change of use. For example, if the Methodist Church, which has a tiny congregation, were to be sold and redeveloped as flats, the principal residence requirement would attach to this scheme.
- We expanded the principal residence requirement to affordable housing. This means that if the right to buy is exercised or shared ownership dwellings staircase to full equity, then, if these units are sold onward as market housing, they will still be occupied by full time residents.
- We have created 3 new policies supporting community led development of affordable housing on land previously used for community facilities or employment.
- We drafted a new policy on holiday letting, which sets out the circumstances under which change of use could be granted for a dwelling that is used so intensively for holiday letting that it has become a sui generis rather than a C3 use. This policy protects the amenity of the community and potentially could result in some holiday lets being converted to full time market rental, thereby increasing the permanent population.

We appreciate that the amount of housing affected by our Housing policies will not be great. However, it is important to bear in mind that Southwold, due to population decline, has become, in effect, a village in



	<p>a town. Its current population, based on the electoral roll, is about 850. This means that even a small number of additional dwellings occupied as principal residences as a result of the above policy changes can have a beneficial effect on the quality of its community.</p>
<p>Para. 4.8 refers to a SNP audit in 2016 – what is this? I can't find any other reference to an audit and seems to be important in underpinning your policy. It should be clarified what this is referring to. The data and findings from the audit could be provided as an appendix or supporting document. A principal residence policy needs careful evidencing and you are encouraged to provide justification for this policy as fully as possible in order to convince an Examiner that the policy should be included in your plan.</p>	<p>This was an error. We now describe this source of evidence (renamed SNP Building and Use Survey, 2016) and we have included it in our evidence base. See page 23 - 4.18. We have also updated it to reflect changes in holiday let use between 2016 and January 2020. See page 24.</p>
<p>How does this policy (SWD1) apply to new dwellings created through change of use development (as opposed to newly constructed dwellings)? Clarification here would be helpful.</p>	<p>An excellent point. We have changed the wording to make clear that we do intend the policy to apply to new dwellings created through change of use. See above.</p>
<p>How is it proposed to monitor and enforce policy SWD1? The policy refers to East Suffolk Council carrying out the task of checking on proof of principal residence information – has this been discussed with the Council? Consideration of how a policy will be implemented (including monitoring and enforcement) will be important in creating an effective policy.</p>	<p>We spoke to senior planners in St Ives and Northumberland to learn from their experience. They have not yet had occasion to enforce the policy. St Ives provided us with two appeal decisions upholding the application of the policy and Northumberland provided an example of a Section 106 planning obligation with a principal residence requirement. We gave these documents and the results of our discussions to ESC. In essence, the planning obligation is a restriction on the title. It is anticipated that if a breach occurs, this will come to the notice of the LPA via a complaint from the Town Council. Then the LPA Enforcement Officer would have the full array of enforcement tools to address the breach. It is understood that enforcement is under-resourced and there are competing demands on staff. (This is also the case in St Ives and Northumberland.) However, STC would request ESC to make enforcement of the principal residence policy a priority to ensure that it receives appropriate attention, and, in the event of a breach, an example is set which deters further breaches.</p>
<p>Potentially a principal residence condition could harm viability of development sites. This could be of concern where development sites in Southwold are supported in the NP but the</p>	<p>Given the lack of land for development, the NP anticipates that delivery of affordable homes will not be developer-led. Rather, new affordable homes with</p>

<p>deliverability is restricted by viability, of this leads to a reduction in the provision of Affordable Housing.</p>	<p>emerge through community led development.</p> <p>There is only one site in Southwold (the BT Exchange) that is large enough to be redeveloped with 11 or more units, where the statutory obligation to build 40% affordable housing applies. As explained in the revised section on Affordable Housing, the remaining sites that could potentially be developed are likely to have employment uses and be located within an existing employment area or be community facilities. In either event, these sites are likely to deliver less than 11 units. The Neighbourhood Plan anticipates that such small sites could be developed as affordable housing through partnerships between community groups and housing associations, using the model of the Southwold Hospital.</p> <p>Hastoe Housing Association, which has three projects in Southwold (one completed; one under construction; and one in pre-planning) advises that the principal residence policy will facilitate building affordable housing because it will lower the cost of land, making partnership schemes viable to create affordable housing on sites that would not otherwise attract developer-led affordable housing.</p> <p>This is now explained in the new section on Affordable Housing, and in the section on Development Sites.</p>
<p>If you have not already done so then you may wish to consider viability testing of this policy to see what impact it will have on the deliverability of the sites in SWD11 and the NP objective of increasing the stock of Affordable Housing.</p>	<p>We do not believe this is necessary or appropriate in light of the above comment, and the view of Hastoe Housing Association that a principal residence policy, by lowering the price of land, will make it easier to deliver community-led affordable housing development.</p>
<p>'Over-development' is mentioned a number of times and has its own section but the plan does not explain what it is (or what it considers it to be). This is a subjective term and it can arise from varying and multiple factors. Making clear to the reader what is considered to be 'over-development' and how this fits in with the plan's objectives and policies would benefit the plan</p>	<p>We have added a new paragraph, which provides a definition of over-development.</p>
<p>Character and Context Section – how does the Character Area Appraisal fit with the Southwold Conservation Area Appraisals, produced and published by ESC? The NP should make this relationship clear. See here: <a href="https://www.eastsuffolk.gov.uk/planning/design">https://www.eastsuffolk.gov.uk/planning/design</a></p>	<p>We have clarified the relationship of these two documents, explaining how they differ and how each should be used.</p>

-and-conservation/conservation-areas/conservation-area-appraisals/	
Para. 5.22 – “...the Design and Access Statement needs to demonstrate...” – just the Design and Access Statement, or the development as a whole?	Text clarified.
The policy (SWD2) hands a lot of influence on decision-making over to character areas. As mentioned above, the NP needs to be clear on how this relates to the existing Conservation Area Appraisals documents.	We agree with the first sentence, which as always a concern of ours, and have given additional thought to how we can improve the design policy so that it provides clearer guidance without being overly prescriptive. Since the original drafting, the Govt has published the National Design Guide, which LPAs are directed to use if they do not have a local design guide. The Local Plan incorporates Building for Life on major developments (over 11 units), but has no design guide for the small scale development that is typical of Southwold. Our NP has been revised to adopt the National Design Guide. We have discussed how it can be used in a proportionate way.
The last part of the policy introduces a test to preserve and enhance quality where simplicity or uniformity exists. Should this test be restricted to areas which demonstrate simplicity/uniformity?	We have removed this from the policy.
The policy gives special weight to preserving simplicity or uniformity. Why is this? It is not apparent that Southwold evidences either of these character traits to such a high level that they warrant special mention – almost the reverse, in fact. Southwold’s architecture is impressively varied and this is an over-riding character trait, within which are areas of uniformity in respect of eg terraces/layout of a particular build period. The Southwold Character Area Appraisal does not make much of the characteristics of simplicity or uniformity, therefore we would query where the justification for this part of the policy lies.	We have clarified the text to make it clear that where simplicity or uniformity is part of character, this quality should be respected.
Comments from Economic Development Team: We agree with the Neighbourhood Plan. It has identified the need to diversify the economy and the need for more business space in the town. The policies reflect our understanding of the economy and support the types of developments we would like to see come forward in Southwold.	Agreed
Provision of units is very scarce in Southwold and demand outweighs supply. We have seen evidence of demand in the nearby Reydon Industrial Estate for small business units both	Agreed

<p>start up and move on space for B1, B2 B8 . Size of unit varies from small starter units 6m x 8m, to 100m2 to 150m2. All units at Reydon and Southwold Business Park are full to capacity with no specific representation of Sector. This is reflected across the nearby market Towns of Halesworth, Bungay and Beccles with little or no capacity for business growth.</p>	
<p>Where are the floor space figures in para. 7.2 taken from? This should be stated.</p>	<p>We have made substantial revisions to the Economy Section, adding hard data obtained from the Retail Impact Threshold Advice for Waveney District Council Final Report, Jan 2018 and the People and Places survey of Southwold Town Centre. See pp. 40-41 and the footnotes with sources.</p>
<p>Para. 31 of the National Planning Policy Framework (NPPF) states that policies should be underpinned by relevant evidence. This is echoed in National Planning Practice Guidance. The plan provides no justification for the 150m2 maximum floor space. Without evidence to support this requirement, this part of the policy should be removed. The policy could express support for retention of smaller units but there is no basis provided for floor space maxima.</p>	<p>We have broadened the policy to protect small business space, not only convenience shops and have removed specific reference to 150 m<sup>2</sup>.</p> <p>We revisited this policy in light of the comments. We never thought this policy went far enough but we had been advised by our consultant that this was the best we could achieve. After receiving ESC's comment, we returned to our consultant, who devised this version, which provides some protection for retaining small shop units, regardless of the type of retail, unless a comprehensive marketing campaign shows that the smaller shop unit is not commercially viable.</p>
<p>The plan should be read as a whole, therefore it is not necessary to stipulate compliance with policy SWD2. This policy applies to all development proposals and therefore will apply to B-class developments regardless.</p>	<p>We have cut out reference to SWD2</p>
<p>It is not clear what this section on page 32 is aiming to achieve. Local plan policy WLP8.12 is quoted and sources of evidence are cited which could support allocating Southwold Business Centre as a protected employment area, but no policy follows. Is it the intention to have a policy in the plan to protect employment in this area? If not then then the second and third paragraphs are a little confusing and could be removed.</p>	<p>This was an error. We have now inserted a specific policy extending the existing employment area the Local Plan to include both the Southwold Business Centre and the Adnams plc Business Complex. The latter consists of the brewery, distillery, office, machine shop, and related buildings. Our community consultation strongly supports increasing the amount of land used for employment purposes in the town. In our previous draft, we had not realized that the Local Plan's existing employment area excluded the Adnams Business Complex. We have corrected the policy to remedy this omission. One of our community consultation initiatives was to write to land owners seeking their views</p>

	<p>on the NP. A letter was sent to the Chair of Adnams in early 2015. In early 2016, we interviewed the CEO of Adnams who was fully supportive of the NP and efforts to create and retain business space in order to diversify the local economy and bring new entrepreneurs into the town. As part of the Regulation 16 consultation, we will notify Adnams of this policy.</p>
<p>We recommend adding reference to nearby European sites in para. 8.2 along the following lines:</p> <p>“Southwold includes and is surrounded by areas designated to be of high wildlife value. To the south, the Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI) includes the Town Marshes. Minsmere-Walberswick Special Protection Area (SPA); Minsmere-Walberswick Heaths and Marshes Special Area of Conservation (SAC) and Minsmere-Walberswick Ramsar site lie slightly further to the south and west. The northern border of the town stops just short of the Pakefield to Easton Bavents SSSI, with Pakefield-Easton Bavents SPA and Pakefield-Easton Bavents Lagoons SAC further north.”</p>	<p>Proposed text added</p>
<p>We would recommend including the following text in this section to make readers aware of ESC’s Recreational Avoidance and Mitigation Strategy (RAMS) which is in place:</p> <p>“East Suffolk Council have developed the to mitigate recreational disturbance impacts caused by new development on habitats sites. The approach set out in the RAMS document will apply across the Neighbourhood Plan area.”</p>	<p>Proposed text added</p>
<p>Much development in private gardens is ‘permitted development’ and does not require planning consent. Therefore the NP cannot control this and the policy will not apply. The NP should make reference to this to help readers understand this situation and avoid the expectation that all types of development in gardens can be controlled by the NP.</p>	<p>This, and the following comment, as well as comments from SCC caused us to rethink how best to achieve our objectives. This resulted in a re-wording of the policy, and the accompanying of the text. Now, we are identifying the specific gardens that require enhanced protection, and we have clarified how the remaining gardens should be treated by requiring development to meet three criteria. This addresses all of the issues raised by ESC related to this policy.</p>
<p>Criterion ‘A’ seems unduly restrictive and a little confusing. As written this would seem to preclude any garden development if the garden is in an area that makes a positive contribution to the character area. Firstly, it is conceivable that development in a garden could be complementary to the character area and also</p>	<p>See above.</p>

<p>provide benefits such as biodiversity net-gain. A blanket opposition to such development seems unreasonable. Secondly, it is not very clear to me from the wording used in 'A', which areas garden development would be acceptable in and which areas it wouldn't. The Character Area Appraisal is not particularly directive on this point and so it is not clear how this policy should be applied. If there are particular character areas where garden development needs extra care or is a particular problem then the plan could say this and provide clarity. Otherwise it is not clear how a decision-maker should be applying this part of the policy, contrary to the NPPF (para. 16) and National Planning Practice Guidance (Paragraph: 041 Reference ID: 41-041-20140306)</p>	
<p>The wording contained in Criterion E "previously used for car parking" may give rise to issues with implementation and would benefit from more precision. For example, it may not always be clear if part of a garden was previously used for car parking. If it is not formally laid out as drive way or parking then this is likely to be unclear. If part of a garden is used for parking very intermittently does this make its use parking, or garden? If part of a garden was once used as a parking space but has been changed to garden use, does this count as parking or garden?</p>	<p>See above.</p>
<p>The policy does not take account of whether part of a garden is currently used for parking, it uses the term "previously used for car parking". In evaluating this, how far back through the history of the site should one look? Over the past one year, or the past one hundred years? The policy might be easier to apply if it addresses garden space that is currently used for parking. If the policy seeks to review the history of the site for parking uses then this should be justified.</p>	<p>See above.</p>
<p>Some additional precision in respect of this wording would benefit the application of the policy. Simple and reasonable changes could be: "Where part of the garden is currently used for car parking..." or "where part of the garden is laid out for use as car parking..."</p>	<p>See above.</p>
<p>Para. 8.30 – the NPPF at para. 163 states that planning applications should not increase flooding elsewhere</p>	<p>Our wording is slightly different, that 'Development will not be permitted in flood attenuation areas where that development would reduce the ability of these areas to alleviate flooding.' An example would be excessive use of concrete or other solid ground-cover, which while not necessarily increasing flooding elsewhere, would</p>

	reduce the ability of the immediate area to alleviate flooding.
The 2019 NPPF contains the tests for Local Green Spaces in para. 100. The reference in para. 8.21 requires updating.	Reference updated
Appendix 5.2 is not in the plan. I would expect this map to be part of the main NP document and not an appendix.	Appendix 5.2 moved into main body of plan
Para. 8.27 – “Areas of the town for which development may be considered...” – on what basis would these areas be considered for development? What is this comment based on?	This section has been expanded and clarified. Planning applications are regularly received in the specified areas.
Para 8.28 state that the waste water and sewage system is probably at capacity. The Waveney District Council Water Cycle Study (2017) ( <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Waveney-Water-Cycle-Study.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Waveney-Water-Cycle-Study.pdf</a> ) supports the local plan. This piece of evidence does not identify any capacity issues for Southwold in respect of water supply, sewage capacity and environmental capacity. For accuracy, unless you have alternative evidence which credibly concludes something different to the Water Cycle Study then this part of the NP should be re-written to reflect the evidence base. (there is nothing wrong with the objective of minimising the load placed on the system)	Wording revised.
Check NPPF para 163	Done.
Which areas are considered to be flood attenuation areas (SWD9) ? It will be helpful for readers to be clear on this.	Text added in 8.28.
Does ‘D’ (in SWD11) only apply to the sites in ‘B’? If so this should be made clear.	No, it applies also to future developments. We have clarified this.
Is there any guidance or are there expectations or requirements for a development brief? Who should produce this? The plan could usefully set out what is expected here and the reasons for requiring a brief, even if it is only in the supporting text.	We have eliminated this requirement.

<p><b>Glossary</b></p> <p>Affordable Housing – I would recommend referencing the definition in the NPPF. This is the latest definition and includes forms of Affordable Housing not mentioned in this definition. You could include a broad description here but you might find that any definition becomes out of date as/if national policy changes.</p>	<p>Reference added</p>
<p>CIL – this is chargeable on <u>some</u> types of new development, not all. In the former Waveney District it is currently chargeable on residential, supermarkets and holiday lets. An East Suffolk CIL review is due to take place</p>	<p>Text clarified</p>
<p><b>Appendices</b></p> <p>The appendices make the Neighbourhood Plan document itself very long (177 pages in total) and not easy to navigate. We would recommend that a single NP document focuses on the policies and maps. Other elements can be split out in to separate supporting documents which can then be accessed as required by readers.</p>	<p>Some maps and the Character Area Appraisals added to main document (so that the latter have force in the NP). Other appendices are in the supporting document.</p>
<p>‘3. Community Involvement’ and ‘2. Responses to Neighbourhood Plan Questionnaire’ should be moved to the ‘Consultation Statement’ when the NP is submitted to East Suffolk.</p>	<p>Agreed and done.</p>
<p>The Habitat Regulations Assessment is a supporting document and does not need to be part of the actual NP document itself.</p>	<p>Agree and done.</p>
<p>I see no reference to any of the maps in appendix 7 in the NP</p>	<p>References to maps now included.</p>
<p>I see no reference in the main NP document to the audit of open spaces in appendix 5</p>	<p>This audit now in the main text.</p>
<p>Maps should be the first appendix to support</p>	<p>Key maps added to main document</p>
<p><b>Maps</b></p> <p>7.1 Buildings and Uses – what is the purpose of this map? There is no reference to it in the document. If it has no purpose in the NP it should be removed or moved to a separate background information section.</p>	<p>Reference added to text</p>
<p>7.2 Character Area Assessment Areas. There is no reference to this particular map in the main document. This map could be useful in the main document but it should be referenced so readers know it is there.</p>	<p>Reference added in text and map is in Section 13</p>



7.3 Availability of and Demand for Parking by Zone. This is very difficult to read. It appears to be incorrectly referenced in para. 6.4	Revised and corrected reference
7.4 Location of County Wildlife Sites in Southwold – this map should be referenced if it is to be included.	Reference added
7.5 Key Development Sites in Southwold – this appears to be incorrectly referenced in para. 10.1.	Reference corrected
7.6 and 7.7 Policies Maps – some of these are not policies and should be shown on a constraints or context map e.g. AONB, Conservation Area.	Revised.
The policies maps should be part of the main document rather than in appendices so that it is clear they should be given full weight in decision making.	Added to main document
It is not clear which policies are being shown. Policies for town centre boundary and Southwold Harbour should be referenced.	Revised
These maps show settlement boundaries linked to policy SWD11, however policy SWD11 does not set out any settlement boundaries. The plan needs to be clear what these settlement boundaries are. If they are taken from the local plan then say so. If they are generated by yourselves then you need to be clear on this and the policies that apply to them.	Clarified.
The 'Greens' maps should be referenced in the main part of the document if they are to be include.	Added reference
Footnote 7 directs to Green Spaces instead of the Character Area Assessments	Footnotes all checked and corrected
Para. 5.17	Substantially revised
Table in 11.3 – the “Suffolk Design Review Panel” – the full title is “RIBA Suffolk Design Review Panel”.	Corrected
<b>Suffolk County Council 14 Comments</b>	<b>SNP Responses</b>
<i>Site Allocation Policy</i> The plan allocates three sites in policy, however it is typical for allocation policies to specify the type and size of development which will take place on specific sites. Development type is stated in explanatory text (paragraphs	Section and policy significantly revised to explain type of development and the maximum number of dwellings if this is relevant. .

<p>10.6-10.8) rather than in policy. This potentially risks site proposals coming forward that were not intended by the Town Council.</p>	
<p>In particular specifying an expected number of dwellings on residential sites is useful to understand the impact a development may have on existing infrastructure. As drafted the neighbourhood plan does not specify this.</p>	<p>See above.</p>
<p>It is recommended that each site has its own policy allocating each site for specific uses. On residential sites dwelling number should be included. Policies can also include other requirements, some of which will be covered in other sections of this response. When the Town Council has a clearer indication of dwelling figures please contact the county council in order to discuss potential impacts on infrastructure and changes to the plan that may be required.</p>	<p>This issue has been discussed with SCC, and we have indicated the maximum number of dwellings where this is possible.</p>
<p><i>Primary Education</i></p> <p>Southwold Primary School is expected to have a surplus of 67 places within the next 5 years. As the site allocation policies do not mention specific dwelling numbers the county council is unable to assess how the growth of the plan will impact on available school capacity. The county council normally expects 25 primary school pupils for every 100 houses developed.</p>	<p>Text added</p>
<p><i>Economy</i></p> <p>The county council supports the principle of encouraging a diverse economy within Southwold and notes the desire within the plan to protect employment uses in the Southwold Business Centre. A policy in place stating B1, B2, B8 and other relevant uses should be protected from redevelopment, along with definition of the area on a policies map, would likely be require achieve this. It is recommended that this is included in future drafts of the plan.</p>	<p>Have opted to emphasize B1 use in SWD7 because the size and urban grain of the town does not lend itself to B2 or B8 uses.</p>
<p><i>Flooding</i></p> <p>The county council is the Lead Local Flood Authority in Suffolk, meaning the council has a coordinating role between:</p> <p>The county council, who are responsible for managing water surface water flooding issues;</p> <p>The Environment Agency, who are responsible for managing flooding from rivers and the sea; and</p> <p>Anglian Water, who are responsible for managing flooding from their own assets.</p>	<p>Explanatory text explains role of these agencies and current national policy. It also emphasises the particular flood risk of Southwold, both in terms of the 1953 floods and the current climate change emergency.</p>

<p>The relevant national policy with regards to flooding is NPPF paragraphs 155 to 165. Locally, flooding is addressed by policy WLP8.24 of the Waveney Local Plan. As currently drafted, policy SWD9 does not add value to decision making as, all the issues addressed in policy are addressed by the NPPF and policy WLP8.24.</p>	<p>Text emphasizes role of NPPF and WLP8.24. Because of past history topic of flooding cannot be omitted from the NP.</p>
<p>In addition, the policy does not align with some aspects of existing policies in some areas. Part A of the policy states that the flood risk within the parish should be “minimised”, whereas NPPF paragraph 163 states development should “ensure that flood risk is not increased where”. In effect the word “minimise” sets a lower standard than set out in the NPPF. NPPF and policy WLP8.24 states that development should utilise SuDS and other policies within the local plan encourage development to include rainwater harvesting.</p>	<p>Wording revised to be consistent with national policy.</p>
<p>In general, Southwold does not have any unique issues with regard to flood risk that cannot be addressed through existing policy. Policy SWD9 could be removed from the plan without impacting decision making.</p>	<p>See above comments</p>
<p>There are some points that are useful to highlight in the text of the plan, but don't need to be in policy. It is generally the preference of the Lead Local Flood Authority that new culverts are not permitted, existing culverts are reopened and that open water courses are not lost. While these measures are generally preferred it is not always possible due to other flood risk and water management considerations, so it is inappropriate to require this through policy. It can however be stated as a preference in the explanatory text.</p>	<p>Bullets C and D removed from policy, but are in context text.</p>
<p>Should the Town Council still wish to include a policy addressing flood risk the following wording is recommended to align with national and local policy.</p> <p><i>Development proposals should mitigate flooding from all sources (fluvial and pluvial). Development should not increase flood risk elsewhere.</i></p> <p><i>Sustainable Drainage Systems (SuDS), should be used unless this is proven to be inappropriate. SuDS should be well integrated into a development and provide multifunctional benefits, such as landscaping, open space and biodiversity gains.</i></p>	<p>Suggested additional text adopted</p>

<p><i>Health and Wellbeing</i></p> <p>NPPF paragraph 92 states that plan should contribute towards other local strategies. The Southwold Neighbourhood Plan has the opportunity to contribute towards the four priorities of the Suffolk Health and Wellbeing Strategy, which are: (1) Every child in Suffolk has the best start in life. (2) Improving independent life for people with physical and learning disabilities. (3) Older people in Suffolk have a good quality of life. (4) People in Suffolk have the opportunity to improve their mental health and wellbeing.</p> <p>More information on each of the principles and priorities can be found here: <a href="https://www.healthysuffolk.org.uk/board/our-priorities">https://www.healthysuffolk.org.uk/board/our-priorities</a>. The county council would welcome consideration of these priorities within the neighbourhood plan.</p> <p>The ageing population is an issue across Suffolk, but the issue is particularly acute in Southwold. The plan provides a detailed analysis of the population, however could do more to actively address the issue. For example the plan could make explicit reference to designing for an older population by creating well connected and legible built environments. This is mentioned in policy WLP8.29 of the Waveney local Plan, meaning it is not necessary for the neighbourhood plan to repeat this in policy, however specific reference to designing for age and disability could be referenced in the explanatory text of the plan. This could be included under the section "Recurrent Design Issues".</p>	<p>Suffolk Health and Wellbeing Strategy referenced. Designing for age and disability discussed in design section.</p>
<p>The plan policies could also include policies which support housing with care. In particular the county council is keen to support extra care housing, which is similar to sheltered housing, but with a greater level of support. The county council would be happy to provide more advice on this issue.</p>	<p>The shortage of development site opportunities make it difficult for us to make this a priority. Also, Southwold has affordable sheltered housing for the elderly in Cricks Court and St. Barnabas, a charity providing residential care for the elderly. Also, Reydon has two residential care homes.</p>
<p><i>Minerals and Waste</i></p> <p>The county council are the minerals and waste planning authority for Suffolk. This means the county council determines planning applications and makes plans on minerals and waste. Current planning policy for minerals and waste consist of the Minerals Core Strategy and the Waste Core Strategy, however it is expected that the new Suffolk Minerals and Waste Local Plan SMWLP will supersede these documents in 2020. As such policies</p>	<p>Noted.</p>

<p>within the SMWLP will be referred to here.</p> <p><i>Mineral Resource Safeguarding</i></p> <p>Policy MP10 of the SMWLP safeguards potential mineral resources from being unnecessarily made inaccessible (sterilised) by development. The county council have considered the plan proposals in relation to mineral resources and does not consider there to be any safeguarding issues</p>	
<p><i>Waste Facility Safeguarding.</i></p> <p>In the north of the neighbourhood plan area there are three co-located waste facilities. These are:</p> <ul style="list-style-type: none"> <li>• Anglian Water Waste Water Recycling facility;</li> <li>• Sole Bay Recycling secondary aggregate recycling facility</li> <li>• Sole Bay Car Spares Metals and End of Life Vehicles facility.</li> </ul> <p>In order to prevent the operation of these sites from being prejudiced by new development, Policy MP18 of the SMWLP safeguards these sites to ensure their continued (use). Development proposed within the plan is not in close proximity to any of the listed waste sites, therefore there are not expected to be safeguarding issues.</p>	<p>We note the existence of these waste facility sites in Southwold. The Sole Bay Recycling Centre is now closed.</p>
<p><i>Natural Environment</i></p> <p>The county council aspires to make Suffolk the greenest county through the Greenest County Partnership. The county council encourages participation in the initiative wherever possible and policy that will lead to decisions that provide improvements to the environment. The key themes of the partnership are:</p> <ul style="list-style-type: none"> <li>• Climate mitigation</li> <li>• Climate adaptation</li> <li>• Protect and enhancing the atural environment</li> </ul> <p>Measures within the neighbourhood plan which contribute to these themes are strongly supported.</p>	<p>We refer to this aspiration and have now incorporated it into our design, sustainable transport, and environment policies.</p>
<p><i>Biodiversity</i></p> <p>The principle of SWD6 is supported, however as currently drafted it does not provide much additional detail than is already in local and national policy. Some of the examples in paragraph 8.13 of what development could do could be brought into policy. Policy could also support the retention and enhancement of ecological networks. It is suggested the policy</p>	<p>SWD9 and SWD10, and their supporting text, have been revised to strengthen the local approach to promoting biodiversity.</p>

<p>makes reference to “biodiversity net gain” to align with the language of the NPPF.</p>	
<p>Alternative policy wording is suggested below.  <i>“Development proposals that incorporate features which provide net gains to biodiversity. Examples of such features could include:</i>  <i>Bird Boxes</i>  <i>Bat Boxes</i>  <i>Nectar rich planting schemes for pollinators</i>  <i>Hedgehog runs</i>  <i>Landscaping and planting should encourage wildlife by connecting and enhancing wider ecological networks. Existing ecological networks should be retained”</i></p>	<p>Have adopted this wording</p>
<p>Public Rights of Way</p> <p>In the section “Amenity – Sense of Space and Visual Amenity” Rights of Way are referred to are referred to in a private sense (i.e. privately owned routes leading to dwellings or groups of dwellings, which are not adopted by a local authority). This has potential to cause confusion with Public Rights of Way (PROW), which have a legal status and are protected within the planning system.</p> <p>In general PROW are routes within or leading to the countryside, their main purpose being to deliver access to the countryside for leisure purposes.</p>	<p>Wording corrected</p>
<p>There are four kinds of PROW:</p> <p>Public footpath – The public has a right to pass and repass on foot with normal accompaniment such as a pram, a wheelchair or with a dog;</p> <p>Bridleway – The public has a right to pass and repass on foot, on horseback and on a pedal cycle;</p> <p>Restricted byway – The public has a right of way on foot, on a pedal cycle, on horseback or leading a horse, or with a horse drawn vehicle. Restricted byways do not carry public rights for motor vehicles; and</p> <p>Byway open to all traffic - The public has the right to pass and repass on foot, on a pedal cycle, on horseback, or with a vehicle (horse drawn or motorised) but the route is mainly used by pedestrians, pedal cyclists and/or horses.</p> <p>While their primary purpose is leisure, they also provide other benefits. PROW provide opportunities for exercise and access to the countryside which benefits both physical and</p>	<p>Noted and clarified.</p>

<p>mental wellbeing. The county council is keen for planning policy to both protect and enhance the PRow network where possible. in the Waveney Local Plan improvements to PRow are sought through Policy WLP 8.21. In order to avoid confusion, it is recommended that when referring to private routes the phrase "right of way" is not used. It could be replaced with "paths", "routes", or similar wording. If the Town Council wishes to include more information in the plan on the PRow network more information can be found on Suffolk's <sup>1</sup> public right of way website . The definitive map of PRow in Southwold can be found on the <sup>2</sup> county council's website .</p>	
<p><b>Parking</b> Inclusion of the county council parking guidance in policy is welcome, however the <sup>3</sup> parking guidance was updated in 2019 , so the policy should be amended to reflect this. Additionally, as currently worded the policy only applies to residential development, whereas the guidance for parking actually covers multiple types of development. A minor change to part A of the policy would widen the application of this policy to other types of development.</p>	<p>After helpful discussions with SCC who assisted us with re-drafting, we made substantial amendments to the text and policy with the objective of reducing car dependency and the impact of car use on the character of the town.</p>
<p>The principle of part B of the policy is supported, however a more positive wording could make it clearer to development what is wanted, rather than what to avoid. It is recommended the wording requires development to provide well integrated on street parking, which ensures safety and avoids obstruction to all users, especially pedestrians and cyclists.</p>	<p>See above.</p>
<p>Part C of the policy would benefit from reference to the Character Area assessment made within the explanatory text accompanying the policy.</p>	<p>See above.</p>
<p>It is recommended the words "where appropriate" to the last sentence of part A of the policy, as permeable surfaces for car parks are not suitable for all circumstances.</p>	<p>See above.</p>
<p>"A. [Residential] <i>Where relevant</i> development proposals including extensions and conversions which potentially increase the accommodation capacity of the development must provide the minimum number of parking spaces required open spaces or garage/car ports permanently available for parking use. Where open spaces are provided, permeable</p>	<p>See above.</p>

<p>surfaces will be encouraged <i>where appropriate</i>.</p> <p>B. The use of on-street parking in order to satisfy the requirements of Policy A above, [will only be permitted where it can be demonstrated that it would not result in obstruction of the local road network to a degree that would create safety concerns for pedestrians and cyclists] <i>should be well integrated into the layout and street scene, ensuring safety and avoiding obstruction for all users, in particular pedestrians and cyclists</i>, and that there is sufficient spare on-street parking space within the zone of the proposal to accommodate the additional demand.</p> <p>C. Development that results in the loss of existing off-street or on-street parking will be required to provide, in addition to the minimum provision detailed in A above, at least the same number of new parking spaces in the zone in which the proposed development is located.</p> <p>D. By avoiding the appearance of car dominated development, parking areas at the front of a property that use the front garden will only be acceptable where this is the prevailing pattern of parking in the character area. Proposals for open frontages to create new parking areas will not be acceptable in areas where enclosed front boundaries prevail.</p> <p>This Policy should be read in conjunction with SWD7, Loss of Private Garden Space”</p>	
<b>Natural England Comments</b>	<b>SNP Responses</b>
No specific comments	
<b>Environment Agency Comments</b>	<b>SNP Responses</b>
<p><i>Flood Risk</i></p> <p>The Neighborhood area is at parts in risk of flooding as it falls within flood zones 2 and 3, the medium and high risk of flooding, it should be recognised that if any future proposed development is allocated within this site then the development should be accompanied by a Flood Risk Assessment and be sequentially sited</p>	Noted, text needs to be added
<p>The section on Flooding and drainage (from section 8.27 to Policy SWD9) focuses on surface water, although predominantly with reference to culverts. Clearer references should be made to the risk of tidal flooding and the impacts this have and how future development will be affected by this and how mitigation should be included.</p>	Have referred to flooding from all sources



<p>The Neighbourhood plan could also encourage and review adaptation longer term and this could be embedded into the plan, incorporating consideration of the impacts of climate change. Given future uncertainties and the need to adapt, perhaps policy could encourage funds to be set aside for this purpose when required.</p>	<p>Should include climate change impact and adaptation</p> <p>Not sure that a parish council is capable of setting aside funds that could impact on this.</p>
<b>Historic England Comments</b>	<b>SNP Responses</b>
<p>We welcome the production of this neighbourhood plan, but do not wish to make any comments at this time. We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <a href="https://historicengland.org.uk/advice/planning/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/planning/plan-making/improve-your-neighbourhood/</a>.</p>	<p>We have read this document</p>
<b>Anglian Water Comments</b>	<b>SNP Responses</b>
<p>It is noted that the Neighbourhood Plan includes a number of criteria based policies which are intended to be used in the determination of planning applications within the Parish but does not identify any specific sites. These do not appear to raise any issues of relevance to Anglian Water.</p>	<p>Noted</p>
<p>The currently adopted Waveney Local Plan 2007 does however incorporate Policy WLP8.24 – Flood Risk relating to Sustainable Drainage Systems and water recycling infrastructure.</p> <p>As the Development Plan is intended to be read as a whole it is not considered necessary to include similar policies in the Neighbourhood Plan. Therefore we have no comments to make relating to the Draft Neighbourhood Plan.</p> <p>Southwold Parish is also located outside of our area of responsibility for potable (clean water) services. Comments should therefore be sought from Suffolk and Essex Water, given their responsibility for this matter.</p>	<p>Noted</p>
<b>Kenneth Waters Comment</b>	<b>SNP Responses</b>
<p>2nd homers can register on the Electoral Roll and should be encouraged to do so and to use their vote in East Suffolk.</p>	<p>This is outside the scope of the NP.</p>
<b>Anonymous Comment</b>	<b>SNP Responses</b>

<p>Does not feel marshes have adequate protection, criticizes farmer for using fertiliser, finds Ferry Rd wildlife garden risible, feels opportunity lost after recent gorse fire. Contrast with vibrant Wenhaston Common Community Group.</p>	<p>This is outside the scope of the NP.</p>
<p><b>Southwold and Reydon Society Comments</b></p>	<p><b>SNP Responses</b></p>
<p>Overriding Issue – Extent of Neighbourhood Area</p> <p>Many of our concerns over the Draft stem from the Neighbourhood Area designation which is restricted to the parish of Southwold, ie excluding Reydon.</p> <p>This is not a new concern. In the 2014 consultation on the Neighbourhood Area there were 49 responses. 41 opposed the area designation as submitted and only 8 were in favour. Objectors all considered that Southwold should not produce a neighbourhood plan without including Reydon (see WDC Neighbourhood Area Decision Notice dated 19.5.14).</p> <p>SRS believes it is unfortunate that the Neighbourhood Plan Working Group chose to ignore that overwhelming consultation response, both at the time and in its subsequent development of the Draft.</p> <p>As a simple statement of fact, Southwold and Reydon are mutually interdependent. There is passing reference to this interdependence in the Draft (e.g. paragraph 2.2) but the analysis underpinning policy proposals largely ignores it.</p> <p>In contrast, the newly adopted Waveney Local Plan recognises this interdependence and treats Southwold and Reydon as a single entity (one of the market towns).</p>	<p>This matter was settled in 2014. Desirable though a joint Southwold and Reydon Neighbourhood Plan might have been, Reydon Parish Council were not ready to think about a NP in 2014.</p> <p>We will add reference to the developing Reydon Neighbourhood Plan.</p> <p>When both Plans are adopted, it will be possible for future updates to cross-reference between the two plans.</p>
<p>The Draft rightly stresses that Southwold has a declining resident population but ignores the fact that the population of Reydon has steadily increased over recent years and is expected to increase dramatically over the first part of the period of the Local Plan. It is unrealistic to base policy on a declining population in Southwold when that decline is more than compensated by population increase in Reydon, most of which is less than a mile from the centre of Southwold.</p>	<p>Residents of Southwold are not content to see the population dwindle towards zero, leaving a hollowed-out theme park.</p>
<p>The limitations resulting from the Neighbourhood Area designation are most obvious in relation to housing. In the Local Plan</p>	<p>The percentage increase in number of new dwellings in Southwold over the current decade is likely not to be</p>

<p>strategy for Southwold and Reydon, no development sites have been allocated for housing in Southwold. All development (other than for windfall sites) is planned to take place in Reydon. As such, housing policy in the Draft is unlikely to achieve its intended effect.</p>	<p>insignificant. See the revised Housing Section.</p>
<p>In relation to employment, again it makes no sense to consider Southwold in isolation from Reydon. It appears from the limited evidence available on employment patterns (Draft Appendices p76) that of the people who work in Southwold, rather more live in Reydon than in Southwold. The largest employer in Southwold and Reydon is Adnams with about 350 employees. Of those, only about 100 work in Southwold (Draft Appendices p76) with the remainder based in Reydon.</p>	<p>Reydon too, has a high proportion of over-65s. Number of jobs in Southwold is significant (400 compared with 800 in Reydon)</p>
<p>The draft ignores the extent to which in recent years employment has migrated from Southwold to Reydon (notably with the opening of the Adnams Distribution Centre at Reydon but also with the closure of Southwold Hospital and GP surgery and the opening of a large new health centre at Reydon). Although up to date employment figures for Reydon are not available, almost certainly as many people now work in Reydon as in Southwold.</p>	<p>We recognise this.</p>
<p>In relation to Southwold's role as a service centre, shops and businesses in Southwold depend for much of their trade on the population of Reydon. That is especially the case for those businesses that cater primarily for year round local rather than tourist/holiday demand.</p>	<p>We recognise this.</p>
<p>It is also surprising that the Draft contains no mention of the emerging Reydon Neighbourhood Plan much less any suggestion that the two emerging plans should be co-ordinated.</p>	<p>We will refer to this.</p>
<p>In our view, a Draft which purports to address issues of population, housing, employment and community services for Southwold in isolation from Reydon is unlikely to achieve its intended purposes.</p>	<p>The Southwold NP is not considered in isolation from Reydon.</p>
<p>SRS believes that this fundamental flaw in the Draft can only be addressed adequately by re-designating the Neighbourhood Area to include Reydon (obviously subject to the agreement of Reydon Parish Council) so that a single Plan can be developed encompassing both communities. SRS notes that there is recent statutory provision to replace two or more existing neighbourhood areas (ie Southwold and Reydon) with a single neighbourhood area</p>	<p>No evidence that Reydon PC wish to do this.</p>

<p>– see s 61G Town and Country Planning Act 1990 added by s5 Neighbourhood Planning Act 2017.</p>	
<p>SRS acknowledges that it is late in the day for such a fundamental change but believes that it would be better to pause the process than to proceed with a Plan that will struggle to command the support of both communities and is unlikely to produce tangible benefits.</p>	<p>There is no evidence to support these assertions.</p>
<p>General Comments</p> <p>The main theme of the Draft is the changing demographic of Southwold: the long-term decline of the resident population of the town and its high and increasing average age.</p> <p>Leaving to one side the artificial separation of Southwold from Reydon, it is a truism to state that the population of Southwold is in long-term decline. But that is common if not the norm for small rural and coastal towns and villages up and down the country.</p> <p>Even taking the demographic of Southwold in isolation, there is little consideration of the socio- economic background. For example, the Draft makes no mention of the almost universal tendency of young people to migrate from the countryside to cities and larger towns. That tendency can only have been exacerbated in Southwold by the fact that there has not been a state secondary school serving the town since 1990 (and even then, it was located in Reydon rather than Southwold). We are concerned that minor changes to planning policy will not arrest, much less reverse this general tendency.</p> <p>There is also little consideration of the reverse tendency of (increasingly affluent) older people to retire to the coast, particularly to an attractive seaside town like Southwold.</p> <p>Rather, the changing demographic is attributed largely to the increase in the proportion of second and holiday homes in Southwold. That is clearly important but is only one cause. And even that is in part a reflection of long term changes in holiday habits that have resulted in a reduction in demand for guest house and bed and breakfast accommodation and a rise in demand for holiday and second homes. The extent to which such long-term social and economic changes can be modified by local planning policy is open to question.</p> <p>In the light of the decline of traditional industries (especially fishing), the Draft notes the importance of tourism to the local economy and suggests a pivot away from tourism towards 'knowledge sector businesses'. SRS accepts that diversification of the local</p>	<p>The NP does not reject tourism; rather it promotes a more balanced economy.</p>

<p>economy is desirable but doubts that much can be achieved via the planning system. Southwold will always be too small to achieve critical mass for knowledge based industries and lacks many of the obvious pre-cursors to success such as a locally based higher education sector and good transport links.</p> <p>In considering diversification of the economy away from tourism, it is important not to throw the baby out with the bathwater. Notwithstanding its seasonal nature, tourism is a success for Southwold and should be recognised as such. SRS would wish to encourage development opportunities that are likely to add value to the year round tourist and cultural offer</p>	
<p><b>HOUSING</b></p> <p>Southwold is an attractive place to live with a highly constrained supply of housing due to the lack of sites suitable for development within the town settlement limits. As such, it is inevitable that there should be long-term upward pressure on house prices and, realistically, planning policy will not change this.</p> <p>The obvious corollary of the constrained supply of housing is that there is likely to be demand for more intensive redevelopment of existing housing yet the Draft fails to deal adequately with that inevitability. Apart from a policy on development of private gardens (SWD7) which is considered primarily as an environmental issue, the Draft contains no general policy on infill development or on housing density. Infill development, particularly in the Southwold Conservation Area, is an acknowledged issue which regularly features in planning applications. SRS would like to see an overarching policy on infill development and density.</p> <p><b>SWD1 Principal Residence Requirement</b></p> <p>It is arguable whether the principal private residence policy would be effective in meeting its objectives of stabilising house prices and halting the apparently inexorable rise in the number of second and holiday homes which are not occupied year round.</p> <p>Be that as it may, as the policy applies only to new build, it cannot bite in the absence of significant new housing development.</p> <p>The Draft refers with approval to a similar policy adopted by St Ives in Cornwall but St Ives is not comparable to Southwold. The key difference is the availability of land for development. In St Ives, the relevant Local Plan provided for a minimum of 1100 new dwellings over the plan period. In Southwold,</p>	<p>Although the policy will apply to only a small number of developments, any shift towards permanent resident occupation will be beneficial. Other policies in the NP will also contribute to this goal.</p> <p>The revised policies on housing, design and garden in-fill address some of these concerns. We do not accept the assertion that at a principal residence requirement is irrelevant.</p>

<p>the Local Plan provides for no new dwellings. Of course, there may be some 'windfall' development but that is likely to be very limited in the absence of undeveloped sites.</p> <p>The policy is irrelevant to Southwold and should be discarded.</p>	
<p><b>Affordable Housing</b></p> <p>As one of the objectives of policy SWD1 is to increase the supply of affordable housing, it is surprising that the Draft does not contain any policy on affordable housing.</p> <p>The Local Plan says (at paragraph 8.19):</p> <p>Neighbourhood Plans may identify specific localised needs for affordable housing. Where local evidence has been prepared of affordable housing need and viability, Neighbourhood Plans can require a higher proportion of affordable housing to be provided to that set out in Policy WLP8.2</p> <p>The Local Plan requires provision of 40% affordable housing in developments of 11 or more units in Southwold and Reydon. If 40% affordable provision is viable in Reydon, Southwold with its far higher land values would almost certainly support a higher level of affordable provision: perhaps 50% or more.</p> <p>Any affordable housing policy in the Neighbourhood Plan should also include provision for occupation by people with a local connection (as far as that is possible) and should also include a policy on tenure and housing mix.</p> <p>SRS acknowledges that any affordable housing policy is subject to the same objection we have already made that it will have little or no effect in the absence of new development but we think it would nonetheless be worth including as there may be a very small number of windfall developments which exceed the 10 unit threshold.</p>	<p>A section on affordable housing added and a new policy inserted.</p>
<p><b>Other Housing Policies</b></p> <p>We have already said that SRS would like to see an overarching policy on infill development and density.</p> <p>Additional policies which SRS would like to see are:</p> <p>A requirement for electric vehicle charging points in all new developments;</p> <p>A requirement for cycle storage in all new developments; and</p> <p>A stronger requirement for wildlife provision in all new development (see comments on policy</p>	<p>The revised design and garden policies addresses most of the issues raised in this paragraph.</p> <p>Cycle storage is already a requirement of the Local Plan.</p> <p>The Development Site policy for the Millennium Car Park encourages sustainable transport.</p>

SWD6 below).	
<p><b>DESIGN</b>  SWD2 Design and Landscape Character  SRS generally supports the aspirations expressed in the background text for this policy.  Unfortunately, the policy itself is rather vague. It does nothing to address the issue of over development highlighted in paragraphs 5.8 – 5.13.  Although it refers to the Conservation Area status, it is not clear how it is intended to interact with (and perhaps supplement) Conservation Area requirements. In practice, it will provide no clear guidance for the assessment of future planning applications.</p>	This section has been revised
<p>SRS would like to see far clearer statements of how the Character Area Appraisals are expected to inform planning applications. This might, for example, include positive guidance on building height and rooflines, fenestration, building materials, detailing and shopfronts.  SRS would also like to see specific mention of non-listed heritage assets which should be afforded protection</p>	<p>The CAA includes buildings that merit local listing or should be considered as un-designated heritage assets.  The character of Southwold is too variable to be overly prescriptive on architectural detailing.</p>
<p><b>PARKING</b>  SWD3 Private Parking Provision  There is an unresolved policy contradiction in that provision of additional parking spaces will encourage increased car usage whereas there is a strong argument that the policy objective should be to discourage car usage in the confined spaces of Southwold – both for environmental reasons and to help preserve the character of the town.  Paragraph D of policy SWD3 aims to limit new parking provision in front gardens but in our view it should be strengthened so as to prohibit such parking outright.</p>	The sustainable transport policy has been revised to address this issue.
<p>More generally, SRS would like to see some policy provision for public car parking spaces. For example, it ought to be possible to devise a policy that would reserve a proportion of parking spaces in existing and any future public car parks for use of residents as an alternative to private parking provision.</p>	Being addressed as part of STC Strategy
<p>SRS would also like to see an explicit provision for new parking to make appropriate provision for electric vehicle charging.</p>	National Design Guide, incorporated into the Design policy, supports this objective.
<p><b>ECONOMY</b>  SWD4 Convenience Retailing</p>	Policy has been revised to protect small shops.

<p>Despite the title, this policy attempts to restrict the size of shop units so as to encourage local independent shops and discourage national chains. SRS supports this objective but has reservations as to whether it will work as intended.</p> <p>SRS believes that any such policy should be evidence based but there is no evidence in the Draft to support the restriction on total floor space to 150sq</p> <p>Further, although the policy is intended to restrict national chains, it would equally prevent expansion of a successful local independent shop which surely cannot be desirable.</p>	
<p>Insofar as the objective is to preserve the existing retail offering, consideration should be given to a restriction on change of use from retail to other use classes in the Primary shopping area. Otherwise, it may well be that an effect of the policy would simply be to encourage such applications.</p>	<p>See above.</p>
<p>On a drafting point, the policy refers to 'Primary' and 'Secondary' shopping areas of Southwold without defining them.</p>	<p>These are defined in the Local Plan and included in the Southwold and Reydon Policy Map</p>
<p>SWD5 Solo Workers, Micro Businesses and Small Businesses</p> <p>Whilst SRS supports the general policy objective of encouraging the provision of additional B- class business space we have reservations as to whether it will work as intended.</p> <p>The underlying assumption is that the only thing preventing the establishment of new small businesses in Southwold is the lack of suitable premises. That is questionable (as witness the intense recent public debate over the proposed redevelopment of Station Yard). In population terms, Southwold is a small/medium sized village. The Draft does not explain why small businesses would choose to locate in or relocate to Southwold rather than to larger population centres.</p>	<p>ESC Economic Team takes a different view</p>
<p>Insofar as the policy concerns conversion of existing buildings (paragraph A), it would support conversion from dwelling and retail use. On the face of it, this would directly conflict with housing and retail policies. We suggest this needs further consideration.</p>	<p>Disagree.</p>
<p>On a point of detail, the supporting text refers with approval inter alia to financial services and consultancy. However, the policy as drafted does not allow those uses as use class B1 (Offices) specifically excludes those that fall</p>	<p>Text has been changed.</p>



<p>within A(2) – financial and professional services.</p>	
<p>Paragraph 7.18 concerns Southwold Business Centre (St Edmund’s Road). The text suggests that the site should be protected from redevelopment or change of use but it is not incorporated into the policy. Protection may be sensible in principle but it needs to be set out in a clear policy which is not unduly restrictive.</p>	<p>A policy has been added to address this issue.</p>
<p>NATURAL ENVIRONMENT  SWD6 Provision for Wildlife in Development  SRS supports the general policy objective but we have reservations over the drafting.</p> <p>The policy appears to be aspirational rather than effective. Design features of the type referred to in the text should be made mandatory in all new development.</p> <p>The first and second sentences of SWD6 are tautologous.</p>	<p>Revised</p>
<p>SWD7 Loss of Private Garden Space</p> <p>Again, SRS supports the general policy objective but we have reservations over the drafting.</p> <p>If it is to be effective it should be more tightly drawn so that any development of existing garden space is wholly exceptional.</p> <p>SRS would also like to see paragraph E (car parking) deleted so that the opportunity can be taken to increase rather than reduce garden space.</p>	<p>Revised</p>
<p>SWD8 Local Green Spaces</p> <p>SRS supports this policy but we are concerned about the proposed carve-out which would permit built development if it ‘is of a limited nature and is clearly demonstrated to be an ancillary use that is required solely to enhance the role and function of an identified Local Green Space’.</p> <p>This looks to us like a license for clutter. We would wish to see the greens kept as they are and would suggest that the words from ‘will not be permitted ‘ to the end of the sentence are deleted</p>	<p>Southwold residents have given examples of some limited ancillary developments that they would welcome.</p>
<p>SWD9 Minimising the impact of flooding from development</p> <p>SRS questions the need for this policy as it does not seem to add anything useful to flooding policies contained in the Local Plan and simply risks confusion.</p>	<p>Revised. Policy is supported by the Environment Agency</p>

<p><b>Other Environmental Policies</b></p> <p>The gaping hole in the Draft is the absence of any policy relating to development outside the current settlement limits but within the Neighbourhood Plan Area.</p> <p>The Draft acknowledges the importance to local people of such areas including the Common and the SSSI</p> <p>Such open areas of course have the benefit of the general protection afforded nationally to AONBs but this is inadequate to prevent inappropriate development. SRS would like to see a blanket prohibition on such development.</p>	<p>The Common and marshes are fully protected under the Local Plan</p>
<p><b>COMMUNITY SERVICES AND FACILITIES</b> SWD10 Loss of Community Facilities</p> <p>SRS supports policies to preserve community facilities but it is not clear that this policy adds anything useful to the referenced policy (WLP8.22) in the Local Plan.</p> <p>If this policy is to be meaningful, it should made clear what community services and facilities are to be protected.</p> <p>The policy should also seek to build on the assets of community value regime established by the Localism Act.</p>	<p>We have revised the definition of community facilities but purposely avoided text that would narrow the application of the policy so that it would not apply to community uses that we cannot foresee because they are outside of our experience.</p>
<p><b>DEVELOPMENT SITES</b> SWD11 Development Sites</p> <p>The former Southwold Hospital site already has planning permission for a mixed development and construction is in hand. There is therefore no reason to include it in this policy.</p> <p>The policy makes no mention of the Town Council's current proposals for redevelopment of Station Yard and the extant planning permission (DC/18/2406/FUL) for that site. We note that Station Yard currently includes two garages which are highly valued by the community and would be lost should the planning permission be implemented. The proposal appears to preclude future use as a garage meaning that these community services are likely to be permanently lost (cf policy SWD10).</p> <p>SRS supports the general concept of guidance for the development of the identified sites (excluding the Hospital site) and would add the site of the telephone exchange on Station Road which is understood to be largely surplus to current requirements of BT and therefore can be expected to become available for development within the lifetime of the Draft.</p> <p>All of these sites are in close proximity to each</p>	<p>The development site policy has been updated. STC created a Task and Finish Group to develop an alternative proposal for the Station Yard site, which would include a garage. The Group put forward three variations. The Council's business planning consultant financially modelled the three garage options. All would result in a negative NPF of between c.£950,000 to £1.7 million, and result in the Town Council losing a c £1 million grant from the Coastal Communities Fund. After careful consideration, the Town Council has decided to continue with its plans to create an Enterprise Hub on the site with B1 use and a convenience store.</p>

<p>other at the entrance to the town and would benefit greatly from a co-ordinated approach to development, both as to land use and as to design. The advantages of such a co-ordinated approach have in the past been recognised by Southwold Town Council as well as SRS. The Draft does not propose any such co-ordinated approach and in our view that is an opportunity wasted.</p> <p>All the Draft really says is that redevelopment for a mix of uses will be supported where that mix includes some or all of residential; small-scale business/retail space; and community space and that proposals should be informed by a development brief. That does not amount to a policy.</p> <p>We urge the Working Group to reconsider policy SWD11.</p>	
<p><b>TOURISM</b></p> <p>SRS notes that the Draft contains no policies specifically concerning tourism (to supplement policies WLP8.15 – 17 of the Local Plan) even though tourism is the lifeblood of Southwold.</p> <p>In particular, whilst the general trend has been away from catered accommodation in favour of self-catered accommodation, particularly holiday lets, it may be that it would be useful to have a policy in relation to catered accommodation which provides additional employment opportunities.</p>	<p>The Local Plan adequately supports new tourism accommodation.</p>
<p><b>Camping/caravan site</b></p> <p>The Draft contains no policy concerning possible development of the camping/ caravan site which has been the subject of discussion over a number of years.</p> <p>SRS would like to see such a policy developed, both in order to prevent inappropriate development and in order to provide positive guidance as to what sort of development (if any) should be supported.</p>	<p>This area is part of the setting of the Harbour Conservation Area, and within the AONB, with strong statutory protection from inappropriate design.</p>
<p><b>Harbour / Blackshore</b></p> <p>Another significant omission from the draft is any policy in relation to the Harbour and its Conservation Area.</p> <p>In our view, a full consideration of planning policy in relation to the Harbour is now apposite in the light of current proposals for change to the management of the harbour which are expected to be finalised in the early part of the currency of the Draft.</p> <p>SRS acknowledges that the Local Plan contains a policy (WLP 6.2) covering the Harbour. SRS suggests that, as a minimum</p>	<p>A supplementary policy to the Local Plan was considered and rejected as redundant, and therefore would not pass Inspection.</p>

there should be consideration of whether that policy is sufficient or whether it should be supplemented in any way.	
<b>MINOR DRAFTING ISSUES /CORRECTIONS</b> SRS notes: 1. The Draft still refers to the draft Local Plan – rather than the Local Plan as finally adopted;	Corrected
2. References to the NPPF are to the superseded 2012 version rather than to the current 2018 version.	Corrected
<b>IMPLEMENTATION AND MONITORING</b> The Draft is silent on how it is to be implemented and monitored. Monitoring is vital in order to assess whether the plan is achieving its objectives and whether it requires modification in due course.	A fair point, we have added a comment

## 9. Second Regulation 14 Consultation on Revised Housing Policies

Consultation held November 2<sup>nd</sup> 2020 – January 31<sup>st</sup> 2021, extended to February 13<sup>th</sup> for Police and Crime Commissioner

<b>9.1</b>	<b>Notes of Zoom consultation with Southwold and Reydon Society, 6/11/20</b>
<b>9.2</b>	<b>Notes of Zoom consultation with public, 26/11/20</b>
<b>9.3</b>	<b>Notes of Zoom consultation with public, 27/1/21</b>
<b>9.4</b>	<b>Notes of Zoom consultation with public, 2/2/21</b>
<b>9.5</b>	<b>Summary of responses to written submissions from consultees and public</b>
<b>9.6</b>	<b>Score sheet for written responses for the five policies</b>
<b>9.7</b>	<b>Quote from Reydon Parish Council submission to ESC SPD</b>
<b>9.8</b>	<b>Organisations and Persons notified of 2<sup>nd</sup> Regulation 14 Consultation</b>

## **9.1 Notes of Zoom consultation with Southwold and Reydon Society, 6/11/20**

### **Southwold Neighbourhood Plan, Regulation 14 consultation on revised Housing section, attendance at Zoom meeting of SRS EC, November 6<sup>th</sup> 2020, 11.15am**

By invitation, Cllrs Rowan-Robinson and Jeans attended the Executive Committee meeting of the Southwold and Reydon Society, to discuss the revised Housing section of the Neighbourhood Plan.

Cllr Rowan-Robinson explained that as a result of submissions to the earlier Regulation 14 consultation on the Southwold Neighbourhood Plan from East Suffolk Council, the Southwold and Reydon Society, and others, the Neighbourhood Plan team had recognised the need to strengthen the proposed policies, particularly in relation to affordable housing. While SWD4, on the residency requirement for new builds remained unchanged, there were three new policies on affordable housing. The reason there were three was that there needed to be separate provision for Assets of Community Value, for other community land and buildings, and for employment spaces. The fifth policy SWD5 places some restrictions on holiday lets and is especially directed at the issue of 'party houses'. Cllr Jeans then expanded on some of the detail of the policies and the thinking behind them.

The Committee strongly welcomed the proposals and expressed their support.

## 9.2 Notes of Zoom consultation with public, 26/11/20

### Southwold Neighbourhood Plan, Regulation 14 consultation on revised Housing section, Public Zoom meeting, November 26<sup>th</sup> 2020, 5.30pm

The meeting was attended by three members of the public: Iain Small, David Palmer, Vic Redington, and by three members of the Neighbourhood Plan Group: Cllr Michael Rowan-Robinson (Chair NP group), Cllr Jessica Jeans, Cllr Ian Bradbury (Town Mayor), with the Town Clerk in attendance.

The chair welcomed attendees and invited attendees in turn to talk about their concerns, comments and questions.

**IS** said that there was nothing in the Housing section or the wider Neighbourhood Plan that he disagreed with. He said that he spoke from the perspective of someone who had been a second-homer for a decade and had moved permanently to Southwold in 2019. His question was: what is to stop someone buying a new-build property as a prospective permanent resident, but then selling it on as a second home? **JJ** said that under our proposed policy someone buying a new-build property in Southwold would find that there was a covenant attached to the deeds that required the house to remain as a permanent residence in perpetuity.

**DP** raised a series of objections to paragraphs 4.39-4.46, which lead up to policy SWD5 on holiday lets.

On 4.39 he disputed the figures quoted from comparethemarket.com for average daily rental rates in Southwold. The chair undertook that these data would be checked. **JJ** pointed out that the purpose of this paragraph was to show the marketing of Southwold as a prime location for holiday let investment, not the truth of the numbers, and **DP**'s concern could be dealt with by making this clear in the drafting.

On 4.40 **DP** argued that **STC** should be pressing for business rates to be levied in full on holiday let businesses. While agreeing about this, the chair said this was a national issue and beyond the scope of the Neighbourhood Plan. **JJ** said that both **STC** and **ESC** had lobbied the government and our MP for this to be changed, unsuccessfully.

On 4.42 **DP** pointed out that there would in fact be very few opportunities for new builds in Southwold. The chair responded that there might be significant opportunities in the medium and long term, as current commercial and community buildings reach the end of their current use. There had in fact been several new builds in the past few years. Even if these opportunities are not huge they are significant and can help to stabilise the permanent resident population.

On 4.43 **DP** asked what is the evidence for un-neighbourly behaviour? The chair admitted the evidence was anecdotal, but the feelings of residents on the receiving end were very strongly felt. The other two participants, **IS** and **VR**, both contributed anecdotal evidence of their own. **IS** said that his property had been used by excessive numbers of people who had loud parties when he had let it, leading to a neighbour complaint. **JJ** said that the evidence about 'party houses' related to 4 or 5 properties in the town. **DP** reiterated that these issues should be dealt with by the police.

On 4.45 and 46 he queried the vagueness of the definitions of 'intensive use', 'other impacts', 'materially'. **JJ** replied that the wording of these paragraphs was in accordance with a High Court decision and Inspectorate appeals. It was drafted to conform to the law and could not easily be modified.

Overall **DP** did not like this section and policy SWD5 and did not feel this was the way to deal with the issues.

**VR** also raised the issue of holiday lets not paying business rates, discussed above. She also complained that people in holiday lets were often unscrupulous about rubbish disposal, and also have scant regard for neighbourly behaviour.

Other matters were discussed that were not pertinent to the Housing section of the NP.

The chair thanked the participants for their contributions and said that they would be studied carefully by the Neighbourhood Plan Group. The meeting closed at 6.45pm

## 9.3 Notes of Zoom consultation with public, 27/01/21

### Notes on Neighbourhood Plan Regulation 14 Housing consultation, Jan 27th 2021

The meeting was held on Jan 27th 2021 at 5pm by Zoom, attended by 21 participants.

Present: Cllr Michael Rowan-Robinson (Chair NP Working Group), Cllr Jessica Jeans (NP Working Group), Cllr Ian Bradbury (Town Mayor), Katie Flodin (NP Working Group), Wendy Green (NP Working Group), Hannah Wright (Town Manager), Prof Jonathan Hadgraft, Jo Hadgraft, Zoe Cox, Richard West, Rebecca Rix-Meo, Amanda Burgess, Geoff Rivers, Kalvyn Friend, Jeanette Carden, Kate Ingham, Don Miller, Shirley Smith, Jo McCarthy, David May, Barbara Hegarty, Mary Jones, Bill Steele, Clare Wain

The Chair outlined the format of the meeting. This was the last of the Regulation 14 consultation meetings. This stage of the consultation is focussed on the revised Housing section of the Draft Neighbourhood Plan. All other sections of the Neighbourhood Plan have been agreed by our consultees and stakeholders and are ready for final submission. The goals of the revised Housing section are unchanged, expressing the aspirations of residents and second-home-owners expressed in the Southwold Town Plan (2013) and Southwold Neighbourhood Plan (2016) questionnaires. However feedback received during the first round of Regulation 14 consultation, especially from East Suffolk Council and the Southwold and Reydon Society, had shown the need to strengthen and clarify the policies on Housing. The new policy SWD4, on residency requirement for new builds, is the same as in the previous draft of the NP. There are now three policies, SWD1-3, on affordable housing. There need to be three policies to separately cover Assets of Community Value, other Community Assets or Land, and Employment Areas. SWD5 covers holiday lets and is particularly directed at 'party houses' which is a particular problem in certain areas of the town.

The chair said that the members of Southwold Town Council and the Neighbourhood Plan Working Group were here to listen to the questions and comments of participants. He proposed to go round the participants, in the order that he could see them on the screen, and invite them to make their comments. The NP Working Group members would then try to answer the questions and comments, but warned that some might have to be dealt with off-line. There would be a full report on the meeting published on the Council website.

Professor Hadgraft commented that all houses being sold were becoming second homes or holiday lets, registering as holiday let businesses and thereby avoiding paying business rates or council tax. [see NP 4.16 for data on property sales between 2006 and 2016. 24% of sold houses were bought by permanent residents, 76% for second homes or holiday lets.]

Hannah Wright said she would be interested to hear the discussion. All the town businesses had received a copy of the Housing section of the NP and several had said they intended to comment. The Chair reminded her that they needed to do so by the end of January.

Zoe Cox said she was interested in hearing comments. She was particularly interested in the issue of change of use and was concerned that the NP would discourage the making of properties available for long-term rental. The Chair said that the Council were very supportive of the long-term rental sector and were keen to encourage it.

Richard West made several points. Firstly he recognised the need for some affordable housing but felt this was likely to be delivered in Reydon. He was concerned that the new restrictions would make it harder to let out properties and would take the town down-market. We only had to look towards Lowestoft and Great Yarmouth to see how a coastal town's economy can decline over time. He was concerned about restrictions on parking. He emphasized that his own business was now being run from home, whereas in the past he would have made many international flights during the course of a year. He said that the town should welcome wealthy people who want to have houses in Southwold. He asked who would buy the houses in Southwold if second-homers were excluded? He suggested that at the entrance to town we



should not have a launderette, but a visitor centre and an internet café. The chair commented that the Council does not have much control over what businesses start up in different locations.

Wendy Green said she was here to listen and had no comment at this stage.

Rebecca Rix-Mao said that the town had become unfriendly towards second-homers. How will the issue of 'party houses' be policed. There was a danger of neighbours just having a go at their neighbours. Has there been a survey of what sectors people in the town work in? And has Southwold thought of liaising with other towns with similar problem?

The chair said that the pandemic had triggered some negative feelings among residents towards second-homers because some of them had blatantly ignored Tier and Lockdown regulations in coming to their properties in Southwold. Prior to lockdown the mood of the town has always been welcoming to second-homers and holiday visitors, who are such an essential part of the local economy. On 'party houses' the police would always respond to complaints about late-night disturbances but the goal of SWD5 is to provide sanctions against landlords who allow their properties to be used in this way. The Southwold Town Plan (2013, available on Council website) analysed the employment sectors that Southwold residents work in. The NP group had liaised with St Ives, who have also introduced a residency requirement on new builds. RRM suggested we should be liaising with nearby towns like Aldeburgh.

Amanda Burgess had no comment at this stage.

Geoff Rivers said he was here to listen to comments.

Kalvyn Friend agreed with Jonathan Hadgraft (see above).

Jeanette Carden said that she had sent comments in. Why do the quoted figures all refer to Southwold, why isn't Reydon included in the discussion? And why hasn't the plan been done jointly with Reydon?

The Chair said that Reydon was mentioned and discussed in several different sections of the Plan. But back in 2014 the two parishes had decided to develop separate Neighbourhood Plans. He personally had been one of those advocating a joint plan back at the time. The Reydon Neighbourhood Plan has already been completed.

Katie Flodin said she was here to listen to questions.

Kate Ingham asked what the evidence was for second-homers who leave houses unoccupied and claim business rates. She asked about the criteria for allocating affordable and social housing. She was concerned that some of those allocated such housing had a tenuous connection to Southwold.

The chair said that the criteria were a combination of housing need and local connection, which could either be through residence, family or employment.

Within each band of need, those with a local connection had priority. In response to a query about what surveys have been undertaken to assess need for affordable housing, Cllr Jeans said that we had conducted two such surveys, the most recent in 2017. The chair said that in 2014, when the plan started to be developed, the need for affordable housing had been assessed at 100 units. Some of that need had been met by new builds of affordable housing in the interim, but the demand remained high. People who worked in the town in the tourist or retail sector, often on the minimum wage, would like to be able to live in the town. Southwold Town Council had a long history of providing affordable or social housing, witnessed by the municipal housing built in North Road and St Edmunds Road in 1905, among the first council houses built in the country, and intended to continue this tradition. [see NP 2.17]

Don Miller and Shirley Smith identified themselves as second-homers listening to the discussion.

Jo McCarthy said that she was a second-homer who didn't claim the business rates, had family here and had a great love of Southwold. She was concerned about the current unfriendliness of the town towards second-homers.

David May said that we should be concerned about the unintended consequences of the NP. The COVID pandemic had produced a massive change in methods of working and in the issue of working in cities or the countryside. Southwold has a massive opportunity here and should embrace it. We can't control the housing market and we should instead be making Southwold a place for people to come and live in and run their businesses from.

Jessica Jeans said that this was very much the clearly stated vision of the Neighbourhood Plan, laid out in section 3 of the NP, 'Vision and Objectives'.

Barbara Hegarty said that she was a listening second-homer. She and her husband were strongly involved in local activities, for example supporting the Arts Centre.

Mary Jones said that she had been a second-homer for 8 years and planned to make it permanent in the future. She asked if the questionnaire conducted in 2016 might be out of date and might need to be repeated. When would the plan be revisited?

The chair said that the second-homers who come here regularly and then settle here permanently are very welcome to the town. He and Cllr Jeans both fell into this category of second-homers who had settled here. He said that when the NP group carried out the questionnaire in 2016 they did not imagine we would still be working on the plan five years later in 2021, but it had been a long and complex road to develop the necessary policies. The Plan was due to run for 20 years but would be revisited regularly to check if it was functioning as expected, and it may be necessary to carry out a new survey in a few years.

Cllr Jeans said that she was Chair of the Town Council's planning committee. She commented on a number of the issues that had been raised.

In summary the chair thanked everyone for their comments. He was pleased that we had been able to hear the views of a significant number of second-homers. He reiterated that the town values second-homers who come regularly and recognises that many will end up as permanent residents. The pandemic has introduced some tensions, which hopefully will dissipate when conditions get back to normal. However the declining permanent population of the town is an issue which had to be addressed. Over the past decade the town has lost, on average 35 residents a year and projecting this forward would mean the permanent population would essentially be zero in 25 years. He wondered if people had been to some of those Greek holiday towns like Aegina, which hum with activity in the tourist season, but are empty in the winter as the workers return to their homes in the villages in the hills. The Neighbourhood Plan is purely about planning regulations and seeks to create a more level playing field between permanent residents on the one hand and second-homes and holiday lets on the other. Southwold is a holiday town and needs holiday lets, but it also needs a permanent population to sustain the shops, bars and restaurants, and numerous cultural and recreational activities, throughout the year. The chair undertook to check the wording of the NP narrative to ensure there was no anti-second-home rhetoric. [This check has been carried out, and there is no rhetoric hostile to existing second-homers. All comments and statistics are about the unsustainability of an ever-increasing proportion of second homes in Southwold.]

All the comments received as part of the Regulation 14 consultation will be written up as part of our submission. The Draft Neighbourhood Plan will be sent to East Suffolk Council who then, after Regulation 16 consultation, submit it to the Inspector, who may require some changes. Then the Plan goes out for referendum to the electors of Southwold. David May asked what the age profile of the town was, and was concerned that the outcome would be decided by the elderly when we should be listening to the needs of the young. The chair said the median age was 65 so half the town were under 65. He also pointed that some people a lot older than 65 were still very active. Cllr Jeans emphasized that it was Westminster that has decided that Neighbourhood Plans should go to a referendum of electors. The chair reminded the meeting that both in the Town Plan and Neighbourhood Plan Questionnaires, the differences in responses to all questions between residents and second-homers had been negligible. [For example NP 4.30 points out that, in response to the NP Questionnaire, 73% of second-homers were in favour of measures to encourage permanent residency, compared with 87% of permanent residents.]

## **9.4 Notes of Zoom consultation with public, 02/02/21**

### **Southwold Neighbourhood Plan, Regulation 14 consultation on revised Housing section, Public Zoom meeting, February 2nd 2021, 3.30pm**

The meeting was attended by one members of the public: John Kirkham, and by the Chair of the Neighbourhood Plan Working Group, Cllr Michael Rowan-Robinson.

The chair explained the purpose of the Regulation 14 consultation on the revised Housing section of the NP. JK said the he supported the proposals but wished to talk about his own proposal for an independent community group to raise funding for an affordable housing scheme of 40 units in the town. The chair explained that there was no site currently available in the town for such a big scheme. He imagined that the cost would be of order £10 million and he queried whether such an amount could be raised locally. JK said that the cost would be £8m and was confident that this could be raised. The chair said that a community group of the kind proposed could be a Community Led Housing Group, and that the new policies SWD1-3 emphasized the role of such groups for future developments in the town. He advised JK to pursue this idea with the STC Planning Committee. The meeting ended at 4pm.

## 9.5 Summary of responses to written submissions from consultees and public

Anglian Water Services	No comment	
East Suffolk Council, Dickon Povey	Various comments seeking further clarity in text and policies	<p>All agreed and changes made as follows:</p> <ul style="list-style-type: none"> <li>i. clarified in text how policies would work and agreed to monitor in five years' time;</li> <li>ii. removed text suggesting purpose of policies is to depress land values;</li> <li>iii. explained how the policies will indirectly protect community and employment land;</li> <li>iv. clear explanation of how hierarchy of uses is to be applied in both text and policies;</li> <li>v. clarified that ACVS can in exceptional circumstance be developed for community and affordable housing;</li> <li>vi. amenity issue in SWD3 addressed;</li> <li>vii. added requirement for evidence of marketing campaign;</li> <li>viii. cap set on amount of market housing;</li> <li>ix. included requirement for evidence that planning criteria have been met in order to obtain consent;</li> <li>x. removed vague clause on adverse impact on community services in SWD5</li> </ul>
Historic England	No comment	
Natural England	No comment	
Police and Crime Commissioner, Andy Scales	<p>SWD1 too restrictive, should be deleted, Assets of Community Value should be added to SWD2.</p> <p>They say they need additional time to consider impact of SWD1 and 2 on the Police Station Site.</p>	<p>Police wish to sell the former Police Station site, now declared an asset of community value, as market housing. A planning application for this has been refused.</p> <p>This is not the only ACV likely to come on the market over the 20 years of the NP and the community is entitled to have the opportunity to try to preserve ACVs.</p> <p>The PCC opposes limiting SWD1 to CLH Groups and asks that it include affordable housing built by Registered Housing Providers. However, this would not achieve our objective, which is to build <i>permanently</i> affordable housing in the town. See <a href="https://www.eastsuffolk.gov.uk/housing/community-led-housing">https://www.eastsuffolk.gov.uk/housing/community-led-housing</a></p>

		<p><i>'Cooperative and Community Land Trusts can prevent homes being sold on the open market and are 'Right to Buy' exempt.'</i></p> <p>Registered providers are not 'Right to Buy' exempt.</p> <p>The PCC asks ACV designated land be included within SWD2 on the ground that there are so many restrictions in SWD1 that development may not be viable. However,(i)SWD1 'liberalises' the more restrictive Local Plan policy, which prevents <b>any</b> change of use.</p> <p>(ii)The LPA advises that further liberalisation to allow for <b>any</b> alternative use for the whole of the site (as permitted for other types of community land by Policy SWD2) would be contrary to Local Plan Policy 8.22 which forbids any change of use for ACV land.</p> <p>(iii)Section 3 of SWD1 allows for some market housing to enable the delivery of a mix of community and affordable housing.</p> <p>In Paragraph 5, the PCC appears to argue that our NP should be redrafted to permit change of use of an ACV site to market housing for the whole of the site because of the benefits that would accrue to the community from the PCC reinvesting the proceeds of the sale into policing.</p> <p>We note that the PCC is not committing to reinvest the proceeds of the sale into policing in the Neighbourhood Plan Area. However, even if such a promise were made (and could be enforced), the benefit would be outweighed by the harm to the community of loss of land for community use. The most sustainable use of this site for Southwold is community or a mix of community and affordable housing, supported if necessary by a limited amount of market housing.</p> <p>The PCC requests additional time to comment on the NP following receipt of an offer by STC made on 14 January to buy the police station site, using a residual land value that was based, inter alia, on the proposed SWD1 policy.</p> <p>Although the Regulation 14 consultation on the revised Housing section has been open since Nov 2nd, 2020, giving ample time for a response, the NPT agreed to extend the date of consultation to 13 February.</p>
Suffolk County Council	No comment	Offered revised table for p.11 of NP, implemented
Bill Hancock, resident	Supports	
Southwold and Reydon	Supports	

Society, Ridley Burnett		
John Maidman, 2 <sup>nd</sup> homer	<p>Logic of SWD4 misconceived, will be counter-productive.</p> <p>Unneighbourly behaviour not confined to 2<sup>nd</sup> homers</p> <p>2<sup>nd</sup> homers did not have enough time to respond</p>	<p>Policies of this type have been implemented successfully elsewhere, policy has strong support among residents, and majority support from existing 2<sup>nd</sup> homers.</p> <p>The Neighbourhood Plan can only address Planning issues.</p> <p>Draft NP has been out for Regulation 14 consultation since Nov 1<sup>st</sup> 2019. Philosophy of revised Housing section is same as Nov 2019 version.</p>
Julie Carpenter, resident	Supports	
John Perkins, resident	<p>Opposes SWD4, believes it will lead to stagnation in housing market and loss of building jobs, will make visitors feel unwanted</p>	<p>The unfettered market is causing a steady decline in permanent residents which will lead to an unsustainable community. A surplus of building and cleaning jobs do not compensate for the loss of a sustainable year round mixed economy.</p> <p>Our goal is a stable and enhanced permanent resident population, with new all-year-round employment. The visitor and 2<sup>nd</sup> home sector remains vitally important, but should not be allowed to strangle the town.</p>
Kevin Cross, Wrentham resident	<p>Opposed to whole NP.</p> <p>Wants housing at entrance to town to be up-market.</p> <p>Thinks Town Council should concentrate on bins, the Common and Charities, leave the rest to the District Council</p>	<p>In a very small minority there. The NP has been developed in response to the clearly expressed wishes of Southwold residents and 2<sup>nd</sup> homers.</p> <p>Already have one such development at town entrance, mainly sold as second homes, unpopular with residents.</p> <p>Hastoe Housing Association is redeveloping the Fire Station site as mainly affordable housing.</p> <p>Not a planning issue.</p>
Linda Dowe, resident	Supports. Asks how the use of provided parking spaces can be enforced	Outside the scope of the NP
Martin Nicholls, resident	Supports. Wishes tax loophole which allows holiday lets and 2 <sup>nd</sup> homes	Outside the scope of NP

	to claim small business rate relief could be closed	
Nigel and Pam Hemmings, residents	Support SWD1-4, SWD5 commendable but unenforceable.	Legally enforceable per High Court and Inspectorate of Appeals.
Patrick Donague	Supports. Some general ideas about how to manage Southwold's popularity, surveying 2 <sup>nd</sup> homers about their long-term plans. Consider impact of Sizewell.	Outside the scope of NP This is commented on within the NP text (section 2.15).
Pip and Andy Piper, 2 <sup>nd</sup> homers	Support	
Mirella and Peter Cronin, 2 <sup>nd</sup> homers	Support SWD1-4. Oppose SWD5 as too draconian.	We think the consultees have misunderstood this policy as banning holiday lets. This is not the case at all. The goal is to curb irresponsible letters who allow their properties to be used as 'party houses' or in other ways that adversely affect neighbour amenity.
Richard and Elizabeth Dales, resident	Support. Concerned about enforcement of residency requirement, especially on resales.	Courts and Inspectorate say this covenant is enforceable. STC will need to work with ESC to make enforcement a priority.
Simon Meadows, 2 <sup>nd</sup> homer	Supportive. Concerned about enforcement of SWD1-4, questions about holiday lets.	There are several HMRC-recognised ways of demonstrating that a residence is permanent, e.g. registration address of car, registration with a local GP. Solicitors handling a property sale are legally required to ensure covenants are met. Situation will be very different from Tibby's Triangle. STC continue to explore how to get holiday let owners and their tenants to contribute more to the Southwold economy.
Lesley Short, on behalf of Mrs V. Fletcher, former resident, still owning property in town	A formal and lengthy objection to SWD4	This policy strongly supported by residents and most existing 2 <sup>nd</sup> homers, and by East Suffolk Council. Police SWD4 applies to people living in rental accommodation. It does not bar renting property for terms of 6 months or more.

Clive Chambers, 1 <sup>st</sup> Southwold Scout Group	No comment	
Issi Barrington	Would like to see more permanent rentals	Agree, our policies do not discourage this
Dr S.T. Smith, resident	Supports	
Mrs M.S. Turvill Smith, resident	Supports	
Richard Frost, resident	Supports	
Mrs E.W. Cooper, resident	Supports SWD 4 and 5. Concerned about how a Community Led Housing Group would be set up.	There are established routes to forming a CLH Group, either by the STC or others. There is a precedent, in the group which purchased the old Hospital site.
Jeanette Carden, 2 <sup>nd</sup> homer	Detailed comments on 14 paragraphs of the revised Housing Section.	<p>4.1 Issue of Reydon replied to during the Zoom consultation, which the consultee attended.</p> <p>4.3 Not relevant to these policies.</p> <p>4.8 See Reydon NP for policies relevant to Reydon.</p> <p>4.9 Yes, Tibbys Triangle contracts unsatisfactory.</p> <p>4.11 ESC administers 93 affordable units in Southwold, many with gardens.</p> <p>4.12 Statistics on numbers of Southwold residents working outside the town are given in the Town Plan 2013.</p> <p>4.14 Comment noted, but there is still unsatisfied demand for affordable housing in Southwold.</p> <p>4.15 See Viability Report prepared by Locality.</p> <p>4.23 Unlikely that local businesses will want to engage in housing provision.</p> <p>4.29 Southwold and Reydon Primary Schools do cater for all primary year groups.</p> <p>4.33 Agreed, local businesses need both residents and visitors.</p> <p>4.36 Enforcement of principal residency requirement discussed in several other responses.</p> <p>4.42 Obviously many properties in Southwold have been primarily holiday lets for over a century. The issue is whether we want all residences in Southwold to be holiday lets or 2<sup>nd</sup> homes.</p>



		4.47 Parking (and its availability) is addressed by other policies in the NP.
M.T. Osborne, Southwold business	Supports, but queries the management of STC's properties.	Not relevant to this consultation but should be taken up with STC.
Camelot Clare, resident, tenant	Supports	
Keith Thomson, resident	Supportive, but doesn't think there should be a total prohibition on market building.  How is residency requirement to be enforced?	SWD1-3 make clear that an element of market housing is permitted if needed to make an affordable housing development viable.  Addressed elsewhere.
Hastoe Housing Associaton	Support the revised Housing policies	

## 9.6 Score sheet for written responses for the five policies – SWD1-5

	SWD1	SWD2	SWD3	SWD4	SWD5
1	-	-	-	-	-
2	?	?	?	Y	?
3	-	-	-	-	-
4	-	-	-	-	-
5	N	-	-	-	-
6	-	-	-	-	-
7	Y	Y	Y	Y	Y
8	Y	Y	Y	Y	Y
9	-	-	-	n	-
10	Y	Y	Y	Y	Y
11	-	-	-	n	-
12	N	N	N	N	N
13	Y	Y	Y	Y	Y
14	Y	Y	Y	Y	Y
15	Y	Y	Y	Y	?
16	Y	Y	Y	Y	Y
17	Y	Y	Y	Y	Y
18	Y	Y	Y	Y	Y
19	Y	Y	Y	Y	N
20	Y	Y	Y	Y	N
21	Y	Y	Y	Y	Y
22	Y	Y	Y	Y	Y
23	Y	Y	Y	Y	Y
24	-	-	-	N	-
25	-	-	-	-	-
26	-	-	-	-	-
27	Y	Y	Y	Y	Y
28	Y	Y	Y	Y	Y
29	?	?	?	Y	Y
30	?	?	?	?	?
31	Y	Y	Y	Y	Y
32	Y	Y	Y	Y	Y
33	?	?	?	?	-
34	Y	Y	Y	Y	Y
<b>Total - Y</b>	<b>20</b>	<b>20</b>	<b>20</b>	<b>21</b>	<b>17</b>
<b>Total - N</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>3</b>
<b>Total - ?</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>4</b>

Y = Supportive N = Not supportive ? = Questions raised - = No comment

**Summary: overwhelming support for all 5 policies**

## **9.7 Quote from Reydon Parish Council submission to ESC SPD**

**Quote from REYDON PARISH COUNCIL**

**DRAFT RESPONSE TO ESC CONSULTATION ON**

**SUPPLEMENTARY PLANNING DOCUMENT ON AFFORDABLE HOUSING**

Do you have any other comments for us to consider in drafting the Affordable Housing SPD?

**Yes. The innovative policies being proposed in the draft Southwold Neighbourhood Plan for community led affordable housing schemes should be considered for use across ESC.**

Philip O'Hear, Chair of Planning. Nov 2020

## 9.8 Organisations and Persons notified of 2<sup>nd</sup> Regulation 14 Consultation

### **Neighbouring Parish Councils**

Reydon  
Walberswick

### **Other Parish Councils**

Blythburgh  
Wangford  
Frostenden & South Cove

### **Statutory Consultees**

Natural England  
Environment Agency  
Historic England  
Anglian Water  
Essex & Suffolk Water

### **Amenity Societies**

Suffolk Preservation Society  
Southwold and Reydon Society

### **Businesses**

Local Businesses  
Simply Southwold (Chamber of Trade)  
Southwold & Reydon Society  
Karen Hester – CEO Adnams  
Duncans Builders

### **Holiday Letting Agents**

Durrants  
Best of Suffolk  
Suffolk Secrets (So Southwold)

### **East Suffolk Council**

Tony Rudd  
Stephen Baker  
Kerry Blair  
Andy Jarvis  
Louis Boudville

### **Norse**

Hugo Forster  
Simon Gilbert  
Steve Falvey

### **Local Planning Authority**

Michaëlle Coupe  
Dickon Povey  
East Suffolk Planning Dept

**Ward Councillors**

SCC Cllr Michael Ladd

ESC Cllr David Beavan

**Landowners**

Suffolk County Council:

James Cutting

Steven Palmer

Police & Crime Commissioner, owner of police station site, ACV:

Mark Jackson

Tim Passmore

Chris Rush

Adnams, Andy Wood CEOS, proposed Designated Employer Area

Southwold Business Centre

Mike Osborne, proposed Designated Employment Area

Hastoe Housing Association

**Churches**

St Edmunds – Rev S Pitcher

Methodist – Judy Overy

URC – Rev C Croll

**Banks**

Lloyds – by post

Barclays – by post

**Community Groups and Facilities**

Scouts – Clive Chambers

Guides – Jenny Allen

Southwold Arts Centre

Stella Peskett Millennium Hall

Cardinal Newman

Constitutional Hall

Post Office

Sole Bay Health Centre

SouthGen

**Schools**

Southwold Primary School

Reydon Primary School

St Felix – Mrs Tansley

**Sports Clubs**

Football

Rugby

Tennis

Cricket/RDC