



CONSULTATION STATEMENT

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Section 1: OUR CONSULTATION PROCESS 2018-2019

- 1.1 The Steering Group for the Reydon Neighbourhood Plan was appointed by the Parish Council in December 2017. It consists of four Parish Councillors (one of whom was appointed Chairman) and five volunteers from the village community. The Group already had the Reydon Village Plan of 2014 (available separately) and the Housing Needs Survey of 2016 (Attached as Appendix 2 below) as a starting point. Building on this foundation they organised two drop-in events; consultation with the primary school children; a stall at the primary school fete; a pre-questionnaire group consultation; and finally a village wide questionnaire. Each event was publicised on the Reydon village website, on notice boards and in the local press. The date and format of each is shown below.
- 1.2 Essentially, our consultation strategy was to work from an initial open-ended approach to more closed consultation on emerging issues and finally a draft plan. We held initial community engagement events, where we sought ideas from the community and local school children on six key areas, to more directed consultation where we asked specific questions based on the analysis of the open comments from the engagement events. This led to a full village survey which sought responses to potential areas of policy or actions which were under consideration for the plan. Finally, a draft plan was produced and a consultation took place with the Local Planning Authority (LPA, then Waveney DC, now East Suffolk DC). From this, the Steering Group developed a Pre-Submission Draft Plan and issued this for both a final community consultation and the Regulation 14 Consultation with statutory agencies and neighbouring parishes etc. Our community consultation at this stage was a closed questionnaire asking for agreement/disagreement with the policies and action in the draft plan. Here, however, as at all other stages of community consultation, opportunities were offered for comments and all comments received at each stage were analysed and considered by the Steering Group. Similarly, the statutory consultation simply asked the consultees to comment on the draft plan as they saw fit. These comments were considered carefully and appropriate changes were made to produce a Final Submission Draft Plan.
- 1.3 March 2018: Two drop-in sessions were held at Reydon Village Hall and the Randolph Hotel. Maps of the consultation area and proposed focus areas of the plan were set out and attendees were invited to use 'post-it' notes to leave their comments. Steering Group members were in attendance as required. There were approximately 100 attendees at each session. The results enabled us to identify the areas for further consultation. The comments of attendees and our analysis of their views are set out in Appendix 1 below.
- 1.4 July 2018: The Vicar of St. Margaret's was given a draft questionnaire to discuss with a group of parishioners. 66 parishioners were present. The results were used in formulating the final postal questionnaire of the whole village. Since, however, the questions remained largely the same, we were able to aggregate these results into the data from the postal survey.
- 1.5 July 2018: The Deputy Head of Reydon Primary School, arranged that each class, Year 1 through to Year 6, would give opinions on a range of questions based on the general questionnaire. This activity was led by the School Council as part of the school's citizenship work. There were many interesting responses but we can broadly conclude that our younger residents care a good deal, have clear opinions about the village, and their views are generally very much in line with those of the adult community. A summary of the views of these younger residents, which very largely match those of adult residents, is included in Section 6 below.

- 1.6 July 2018: A stall was held at the Reydon Primary School Fete. The rationale was to provide an opportunity to reach young families which was quite successful and important since this group was under-represented in the other consultation activities. 32 questionnaires were completed and data entered in the full results from the full village survey.
- 1.7 September 2018: The final version of the Questionnaire was delivered by hand to every household in September and they were given until the end of October to return them to collection points in the village. Response was prompted by announcements in the local press, posters, and roadside placards. 494 completed Questionnaires were received, including multiple responses from some households. See scope of returns by roads which indicates a full village coverage Appendix 3.
- 1.8 The full analysis is set out in Sections 4 and 5 below. The Steering Group consider the policies in the Plan reflect the views of the community as evidenced by this consultation.**
- 1.9 January to March 2019: A first draft of the Reydon Neighbourhood Plan was produced and agreed by the Steering Group and Parish Council. Consultation then took place with the Planning Policy team at Waveney District Council (the Local Planning Authority, LPA) and changes were agreed by the Steering Group. This second draft plan was then submitted to Waveney for a Strategic Environment Assessment Screening Opinion, involving consultations with relevant statutory agencies. The Screening Opinion is included as Appendix 1 to the Basic Conditions Statement.
- 1.10 April to July 2019: **Pre-Submission Consultation:**
When the SEA screening process was complete and established that a full assessment was not needed, we held a further Pre-Submission Consultation with our residents, including making the draft plan available on the village website, by email on request or in printed form from key locations in the village. We held two further drop-in events. Responses were collected in written form, by email or completed at the drop-in events. **These were collated and considered by the Steering Group and summarised in Section 3 of this report.**
- 1.11 **Regulation 14 Consultation:**
The Pre-Submission Consultation, as required by Regulation 14, included formal consultation with a range of statutory and other consultees:
- Suffolk County Council,
 - East Suffolk Council,
 - Historic England,
 - the Environment Agency,
 - the Suffolk Preservation Society (all of which made responses),
 - the neighbouring Parish Councils,
 - Anglian Water,
 - Essex and Suffolk Water (none of which made responses).
- In addition, written responses were received from:
- Northland Reydon (on behalf of two local landowners),
 - Reydon Action Group for the Environment
 - two residents: SC and TR.
- All these responses were considered by the Steering Group during June and July 2019 and a number of changes were made to the Pre-Submission Draft to reflect the advice and comments received. **The comments and responses are summarised in Sections 2 and 3 of this report.**

1.12 July 2019: Habitat Regulations Assessment Screening.

The proposed final draft plan, including changes made as a result of the Pre-Submission Consultation, was passed onto East Suffolk DC as the LPA for screening to determine whether an Assessment was required for Habitat Regulations compliance. The outcome of this screening exercise was received in December 2019 and is included as Appendix 2 to the Basic Conditions Statement. The LPA concluded that an assessment is not required.

1.13 Updated SEA Screening

In December 2019, after a further policy was added to the plan in response to the Pre-Submission consultation, ESC undertook a further SEA Screening. The results of this was an updated SEA Screening Determination, issued in February 2020 which confirmed that a SEA was not required. The Updated Screening Opinion is included as Appendix 3 to the Basic Conditions Statement.

Section 2: PRE-SUBMISSION (REGULATION 14) CONSULTATION WITH STATUTORY CONSULTEES, MAY-JUNE 2019: Summary of points made by consultees and changes made in response.

Note: the full responses received are included in Appendix 3 (statutory consultees) and Appendix 4 (Residents' written responses) to this report, pages 29 and 43 respectively

2.1 Suffolk County Council:

2.1.a *Land next to educational establishments*: Request to include provision in the form of a new policy excluding land adjacent to educational establishments from development to allow for any future need for expansion. Currently, there are no plans or forecast need for expansion of the village primary school and nursery. After discussion, however, the Steering group **agreed** to include such a policy which is now part of our final Submission Draft Plan (Policy RNP2).

2.1.b *Archaeology*: suggestion that the plan should refer to the rich archaeological heritage of the Parish. Although heritage issues are not a main focus of our proposed plan, and not part of its key objectives, the Steering Group **agreed** to reference this where appropriate and refer to the clear policies in WLP on archaeology. These are now incorporated into our revised Submission draft.

2.1.c *Flooding*: suggestion to include flood risk maps in evidence base. These were **already included as appendix** so no further action was required.

2.1.d *Public Rights of Way*: suggestion to refer to public rights of way not just footpaths and to alter wording of the proposed policy on improving footpaths to refer to Public Rights of Way and to the linking to or extending the existing network but planned to avoid disturbance of protected habitats. The Steering Group found this suggestion helpful and **agreed** to amend Policy RNP6 and RPC Action 3 as suggested and this is included in Submission Draft.

2.1.e *Safe Access to and from developments*: pointed out that the proposed wording of draft Policy RNP7 related only to vehicle access to and from developments and that the NPPF para 110 states that priority should be given to pedestrian and cycle movements. SCC suggested an improved wording of policy to refer to safe access for all users. This was **agreed** and included as Policy RNP8 in the Submission Draft.

2.1.f *Parking*: suggest that the plan should refer to relevant WLP policies. **Agreed** and included in Submission Draft 8.9, RPC Action 9.

2.1.g *Natural Environment and Habitats*: The draft Plan's attention to Climate Mitigation, Climate Adaption and Protecting and Enhancing the Natural Environment was welcomed. Referring to NPPF Para 170, it was suggested that additional wording be included Design Principles to require design features of development proposals to include provision which provides gains for biodiversity. This was **agreed** and included in the Submission Draft, RNP Policy 10.

2.2 East Suffolk Council:

2.2.a *Layout of plan*: Suggested alterations to layout and numbering. **Agreed** and Submission Draft now includes these as appropriate.

2.2.b *Local Plan*: Amend title of the Local Plan to East Suffolk Council – Waveney Local Plan reflect the establishment of ESDC. **Agreed** and Submission Draft references this as appropriate, using WLP as short reference following full wording and stated abbreviation in para 1.4.

2.2.c *Heritage Assets*: Suggestion that the plan could include new list of non-designated heritage assets. **Not agreed** as this is not one of the key focus areas of our plan but decided that the draft plan would be revised to refer specifically to the historic environment and refer to clear WLP policies on heritage assets etc, adopting the suggestion made by Suffolk Preservation Society (2.5b below)

2.2.d *Plan Period*: Suggest the Plan period is stated and that it should align with WLP, ie to 2036. **Agreed** and Submission Draft has been amended to this effect.

2.2.e *Housing Policies*: suggested that more evidence is required and that policies should refer more directly to the plan vision. This was **agreed** and draft text and policies amended accordingly. In addition, Policy RNP3 was amended to allow the development of up to 25 affordable houses on the boundary of the settlement in response to the response from Northland Reydon (see below 3.5.1a). See Section 4 of Submission Draft: Key issue 1 - Housing for Local People. For the revised text and policy.

2.2.f *AONB protection*: questioned the statement in pre-submission draft that currently planned development of housing at St Felix School and Copperwheat Ave is the maximum that be managed. **Agreed** to amend text make clear that this is the expressed view of the community – see para 5.5 of Submission Draft.

2.2.g *AONB protection*: questioned wording which stated that AONB protection can be removed in some cases. After consideration, it was **agreed to** change wording to refer to permitted exceptions – see para 5.1 of Submission Draft.

2.2.f *Footpath provision*: Draft Policy on Improving Footpath Access to the Countryside was challenged in that that S106 monies cannot be used for this purpose, nor funds raised through other planning conditions and also that smaller developments may not reasonably be expected to contribute to footpaths. **Agreed to** amend Policy RNP 6 of Submission Draft as proposed by SCC which also deals with these points (see also 2.1d above).

2.2.g *Local Green Spaces*: request for clearer map (**Agreed** and map revised). The LPA also questioned the appropriateness of sites some way from settlement. **Not agreed** as enhanced protection of Hen Reedbeds and Reydon Wood area key objective and the Neighbourhood Plan Area was agreed to extend beyond the Parish Boundary to include these sites. The wording of Para 6.5 of the Submission Draft was changed to make clear that these can be accessed by foot/cycle but draft plan continues to propose these as Local Green Spaces.

2.2.h *Safe Access*: suggestion that plan could include a walking/cycling strategy. This was **not agreed** but it was judged that current wording indicates priorities for improved provision. It was also suggested that smaller developments may not reasonably be expected to make this provision. **Agreed** to amend wording accordingly. (see Policy RNP 8, Policy RNP 9 and RPC Action 8 of Submission Draft, paras 8.5, 8.6, 8.7)

2.2.i *Design Principles*: suggest that the proposed requirement to adopt AECB standard was not appropriate. This was considered carefully and it was **agreed** to refer instead to relevant WLP policies but maintain requirement to meet or exceed WLP standards where possible (see Policy RNP 10 of Submission Draft).

2.2.h *Design Principles*: Questioned how applicable draft policy on open spaces and wildlife corridors is to all developments. This was considered along with suggestions of SCC (see 2.1g above). It was **agreed** to amend, using wording suggested by SCC (see 2.1.g which also addresses this issue) as can now be seen in Policy RNP 10 of Submission Draft.

2.3. Environment Agency:

2.3.a *Flood Risks and Coastal Protection*: The proposed RPC Actions to support relocation of properties at risk from coastal erosion and the strategy, when developed, of the Blyth Estuary Partnership to maintain the estuary were both endorsed. It was, however, suggested that the plan should refer explicitly to the Shoreline Management Plan. This was **agreed** and draft amended accordingly (see para 7.2 of Submission Draft and RPC Action 5, para 7.4)

2.3.b *Flood Risks*: Suggest inclusion of Flood Risk Maps. **Already included in appendix.**

2.3.c *Flood Risks*: Plan should require assessment of flood risks prior to development. This was **not agreed** as plan does not allocate any land for development but **agreed** to refer to relevant WLP policies in revised text of Submission Draft (para 7.2)

2.4 Historic England:

2.4.a *Historic Environment*: The agency suggested that we might undertake full historic environment assessment. This was **not agreed** as this exercise would fall outside the agreed focus areas of our plan but **it was agreed** include references to relevant WLP policies on historic environment and archaeology as also suggested by Suffolk Preservation Society (see 2.5b below and para 9.2 of Submission Draft).

2.5 Suffolk Preservation Society:

2.5a *Landscape Appraisal*: The Society suggested that we include a landscape appraisal. This was **not agreed** but the text of the Submission Draft now includes their helpful alternative suggestion of referring to the relevant policies in WLP (Para 9.2 and the Context, Section 3.1, and Para 5.3 of the Submission Draft both refer to the 2016 Settlement Fringe Landscape Sensitivity Study).

2.5b *Heritage Assets*: It was suggested that we might do further work on non-designated heritage assets and historic environment. This was **not agreed** but the Steering Group adopted their alternative suggestion of referring to the relevant policies in WLP. (See paras 2.4a and 2.2c above and para 9.2 of Submission Draft.

Section 3: RESPONSES FROM RESIDENTS TO PRE-SUBMISSION CONSULTATION

3.1 Questionnaire Responses: 42 Questionnaires were returned. Many more residents took copies of the draft plan and gave informal oral feedback that they liked the plan and felt it reflected the views already submitted through the full village survey. As stated above, the survey design was a closed one, in which residents were asked to state agreement or disagreement to each proposed policy and Parish Council action. This was because the Steering Group was concerned about asking residents again to comment on the broader issues as we had already done in the full village survey. At this stage, with specific proposals to consider, themselves based on the views of residents gathered carefully over time and increasingly focused on the key issues identified by residents, we wanted to give the opportunity for simple yes/no answers but with the opportunity to add comments.

3.2. Questionnaire Analysis: From the formal returns, 30 stated complete agreement and the other 12 agreed with all except: RNP1 (1 against), RNP2 (7 against [one a non-resident], 1 abstention), RPC2 (2 against, 1 abstention), RNP3 (2 against, one a non-resident), RPC4 (3 against, one n/r), RPC5 (2 against), RPC6 (1 against).

Overall: Approval 80-100% which was also reflected in a great deal of informal feedback. The Steering Group was able to conclude that those residents who responded to the questionnaire (and many others who gave informal feedback) endorsed the Draft Plan as an accurate response to their previously stated views.

However, as with the full village survey, further development of affordable housing on the boundary of the settlement (RNP 2) attracted the highest level of concern. This issue was therefore considered again by the Steering Group as below.

3.3 The Steering Group agreed to strengthen the text of the plan to make it clear that Policy RNP3 should only be used when affordable housing comes forward but no suitable or viable site for affordable housing can be identified within the boundary of the settlement.

3.4 Other comments made were as follows:

- include all CWS (2),
- worries about impact of second homes,
- 20mph speed limit, 40 mph speed limit on all local roads east of A12 between Blythburgh and Wrentham, better cycling provision (2), repairs needed to footpath at Potters Bridge,
- more emphasis needed on housing for young single persons,
- Blyth Estuary strategy should be a “managed flood” approach, Development of farmland should not be allowed to pay for flood defences (2),
- Copperwheat development will negate all, Reydon in danger of becoming small town,
- Principal residence requirement vital,
- Easton Bavents owners knew risks and do not need support,
- Easton Bavents owners need support,
- Second homes increase will create ghost town,
- Map does not show recent houses,
- An excellent plan (12)

These comments are strongly in line with the views expressed throughout our consultation with residents. Since the draft plan reflected many of these views and others (eg about speed limits) were outside the

scope of the plan or were contradictory, the Steering Group did not feel any need to amend the plan in response to the comments, except as set out in 3.3 above.

3.5 Further Written Submissions from, or on behalf of, residents and response of Steering Group

3.5.1 Artisan for Northland Reydon (local landowners and residents)

3.5.1.a A request was made to identify land at Green Lane for development. This was **not agreed** as the site had already been rejected for WLP and our plan does not seek further major development. It was also pointed out that to allow for viable development of affordable housing on the boundary of the settlement (Policy RNP3), more than 20 dwellings could be needed (as at the recent development by Orbit Housing in Green Lane). **It was therefore agreed** to amend Policy RNP3 to allow up to 25 dwellings.

3.5.1.b *Housing Tenure Mix*: question our policy to restrict to affordable rented and shared ownership. This was **not agreed** for reasons stated in plan. The altered wording in response to ESDC comments makes this clearer (see 2.2e above and Section 4 of Submission Draft)

3.5.1.c This response also raised questions on proposed policies on Principal Residence requirement, extending footpaths, properties at risk from flooding and safe access. These were considered but **not agreed**, not least due to positive comments from other consultees (eg SCC).

3.5.2 RAGE (Reydon Action Group on Environment):

3.5.2.a *County Wildlife Site*: This residents' group, writing on behalf of 75 attendees at a recent meeting, made the suggestion that the whole of County Wildlife Site at St Felix is included in policy and maps of most valued parts of countryside. This was considered and recognised as an oversight by the Steering Group. It **was agreed** and the whole site is now included in Policy RNP 5 of the Submission Draft and revised policy map RNP Map 3.

3.5.2.c *AONB Protection*: A request was made to remove the qualifications to policy on protecting countryside. This was **not agreed** as these were added to align with NPPF

3.5.3 Individual Residents' Written Responses:

3.5.3.a Resident TR: *AONB Protection*: TR questioned the approach of identifying most valued parts of AONB as he stated all should be protected. The Steering Group accepted his point of principle but it was **not agreed** to alter this approach as our aim is to highlight the community's top areas of concern. He also suggested the inclusion of whole of St Felix CWS. This was **agreed** and draft amended accordingly (see 3.5.2.a above).

3.5.3.b Resident SC: *Principal Residence Requirement*: SC questioned the feasibility of Principal Residence requirement. The Steering Group **did not agree** any change as this is one of the most widely supported policies among the community.

SC also suggested inclusion of encouragement of minibus network in the plan. **Not agreed** as outside the scope of NP.

Section 4 – Full Village Survey Data



FULL VILLAGE SURVEY SEPTEMBER 2018 RESULTS Part 1: DATA

Thank you for taking the time to help Reydon Parish Council develop a Neighbourhood Plan for Reydon. Once the plan is completed and supported by a local referendum, it will become an adopted part of the Planning Rules for future developments in our village.

It is not necessary to tick all sections, you may leave them blank.

Reydon should be a village which: Is attractive and sustainable.

Enjoys its surroundings in outstanding countryside.

Meets the needs of local people.

Contributes to the local economy, including tourism.

Is prepared for risks from flooding, erosion, traffic and pollution.

KEY ISSUE 1: HOUSING FOR LOCAL PEOPLE

We want to know what kind of housing is needed for our community and how we can make sure that people who live or work here can afford housing. We want to see if the community supports new affordable housing and whether we should try to limit the increase of second homes.

1a. What type of housing should there be in any big developments in the village?							
	Agree	Maybe	Disagree		Agree	Maybe	Disagree
For single persons	348	74	44	For Couples	407	45	16
For Families	464	27	15	For the retired	364	55	49
For the disabled					357	37	23

1b. What kind of affordable housing should be included?			
	Agree	Maybe	Disagree
Social (Council) housing with rents up to 60% of market rates?	319	76	61
Affordable (Housing Association) rented housing at up to 80% of market rates	299	101	43
Shared ownership housing which can be part owned and part rented?	309	104	46

1c.		
	Yes	No
Would you support more small developments over the next 20 years like the one on Green Lane (where 23 affordable houses for local people are being developed)?	410	109

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1d.	Yes	No
Should new housing be the main or only residence of the occupiers?	498	33
What do you think are the key housing needs of local people?		

KEY ISSUE 2: PROTECTING THE COUNTRYSIDE AROUND THE VILLAGE

Almost all new development in Reydon, whether for housing or other uses, will be in the countryside at the edge of the built area of the village. This countryside is already protected by its status as an Area of Outstanding Natural Beauty – but recent experience has shown that this protection can be removed in some cases.

2a. What are the most precious parts of the countryside around the village?	Agree	Disagree
Reydon Wood	525	10
Hen Reedbeds	414	5
ReydonSmere and Potters Bridge Reedbeds	492	12
Riverside marshes and grazing meadows	473	6
Other, please state which	35	

2b. Should developments be allowed in the countryside	Yes	No
If there is clear evidence that it is required to meet local need and help maintain a sustainable community?	256	226
On less sensitive parts of the countryside and with strong measures to limit the impact on views, wildlife etc	356	134

2c. Can access to the countryside for local people be improved ?
Do you have any suggestions?

KEY ISSUE 3: PROTECTING COMMUNITY ASSETS AND GREEN SPACES WITHIN THE VILLAGE

3a. Which of these key green spaces in the Village should be protected ?					
	Yes	No		Yes	No
Reydon Recreation Ground and Allotments?	482	20	Reydon Playing Fields?	475	17
Jubilee Green?	447	19	Reydon Corner?	503	8
Play Area at Churchill Road	423	17	Hen Reedbeds?	494	10
Reydon Wood?	505	5	Reydon Church Graveyards and Orchard	419	10
Others? Please state which					29

3b. Should our shops and other key facilities used by the community be protected when sold to allow time to find buyers who will maintain the facility for continued community use?					
	Yes	No		Yes	No
Our general stores: Boydens and Barbrooks	515	9	Sole Bay Health Centre, and Pharmacy	531	4
Playing Fields Pavilion	449	20	Reydon Church	439	12
Others? Please state which				8	

3d.	yes	No
Should new developments include green spaces?	479	30
Should new developments include play spaces?	389	68
Comment		

KEY ISSUE 4: FLOOD RISKS AND EROSION

Key areas of Reydon are at risk from the sea (farmland and property at Easton Bavents and, in the longer term, property around Bridge Road) and from storm surge flooding along the Blyth Estuary.

The Blyth Estuary Partnership is developing a strategy to maintain the estuary and protect the surrounding land from flooding. This will involve raising the river walls (mud banks) along the length of the estuary, the cost of which will fall onto local landowners and the local authorities.

	Yes	No
4a. Do you support the policies which offer help with planning permission for the relocation of properties under threat at Easton Bavents?	320	150
4b. Should The Plan identify and support new protection measures which may be needed in the long term for the Bridge Road area of the village?	429	34
4c. Should The Plan support raising of the Blyth Estuary river walls ?	421	45
4d. Should modest development on farmland be allowed to support the cost raising the river walls?	247	211

KEY ISSUE 5: SEWAGE, DRAINAGE, ROADS AND PARKING

All new development in the village must always be supported by appropriate infrastructure. Local residents are already concerned that local systems may be operating at – or beyond- their limits. The following statements reflect these concerns:

5a. Sewage	Agree	Disagree
Present provision for sewage disposal in the area will not cope with future large scale development without considerable investment and upgrading.	484	8
Comment		
5b. Drainage and local Flooding	Agree	Disagree
Any large scale development will increase the risks of localised drainage and flooding problems.	472	19

5c. Safety	Agree	Disagree
Safe access onto the main roads should be a priority from new developments.	501	6
Parking on pavements or grass verges should be prevented wherever possible.	497	19
Safe cycle paths should be developed wherever possible	423	37
Comment		
5d. Parking	Agree	Disagree
All new developments should provide generous space for residential and visitor parking, to ensure protection to pavements and nature friendly verges.	520	7
Comment		

KEY ISSUE 6: DESIGN PRINCIPLES FOR THE VILLAGE

To date, Reydon has been developed without much thought to the design or the look and feel of the built environment in which we live – so Victorian almshouses and older cottages are surrounded by bungalows and houses which could be found in many towns across the nation. In any new development, we have the chance to try and create a built environment that reflects some of the unique aspects of Reydon and its setting.

6a	Agree	Disagree
All new development should aim to enhance the attractiveness of the village and be in harmony with its past in shape and choice of colour and building materials. It should also be in harmony with the surrounding countryside	512	17

6b	Agree	Disagree
The edges of all development next to the open countryside should include sympathetic use of tree and hedge planting to soften its impact	528	7

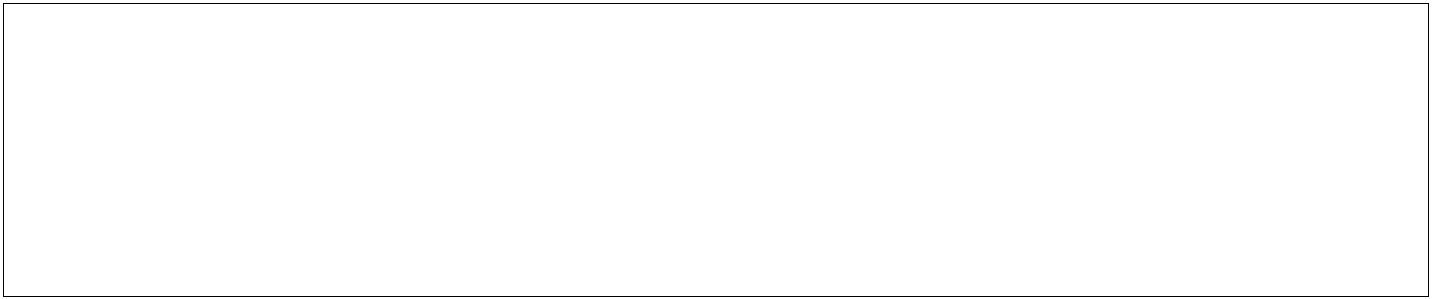
6c	Agree	Disagree
All new development should show consideration for the protection of wildlife by including open spaces and wildlife corridors.	527	6

6d	Agree	Disagree
In order to maintain the present approach to the village, and make it even more welcoming, all existing open spaces and well-established trees should be protected, and verges seeded with wild flowers	502	17

Finally – have your say!

Are there other issues not included, which should appear in the Reydon Neighbourhood Plan?

Please say briefly what and why:



It will help us to know a little bit about you so we can see how far we have reached all areas of the village and ages of our community. The proven support from village inheritance is necessary to have the Neighbourhood Plan approved. We assure you all completed Questionnaires will be destroyed once they are no longer required.

Name.....(Please leave this out if you wish)

Street in the village where you live.....

Ages completing this form Under 12...**2**.12-17...**6**...18-34...**28**.35-59...**149** 60+...**406**.....

COMMENTARY ON FULL VILLAGE SURVEY DATA

The data set out above shows clear support for the focus areas (Key Issues) and proposed policies of the developing Neighbourhood Plan. Section 5 of this report provides a summary and analysis of the comments made alongside the questionnaire responses. Section 5, therefore, provides strong evidence of the thinking behind the responses of residents as well as their further thoughts on specific issues.

The developing draft plan has sought to implement the wishes and priorities of the community as set out in their responses to the survey.

Section 5: Full Village Survey Comments and Analysis

Full Village Survey Results Part 2 **Summary and Analysis of the comments received**

5.1 Key Issue 1- Housing for local people, key housing needs.

It is clear from the comments received that the overriding concern of local residents is that any new building development should focus primarily on local needs, should take into consideration the limitations of local road networks and, if any further development takes place, they show a preference for smaller rather than bigger developments.

The outstanding need of the local community of Reydon is for housing which is primarily for young people starting out, young couples and young families, preferably with local ties and should be affordable for those working in the area, taking into account the level of wages available. The community already has an increasingly aging population, and those older residents rely on the services provided by those of working age, and who preferably are able to live locally. There is a shortage of sheltered housing, retirement complexes and housing catering for disability. There is also a shortage of reasonably priced rented accommodation or council housing for young people and families just starting out.

It would be good if all new housing provision could be protected by covenant from being sold on for profit as second homes or holiday lets of which there are already too many, and which deaden the life of a community. There is considerable antipathy to more second/holiday homes.

Developers should be required to outline the effect their development might have on the community. As more people will put more strain on infrastructure and facilities, developers should be required to contribute towards the cost of extra facilities, amenities, improvements to infrastructure (such as new roads, increased sewage provision, school and health services provision, transport and shops etc.).

Once again, we wish to emphasize that the main concern of Reydon residents is that all new housing is affordable and sensitive to the needs of those living and working locally, supporting those with existing links to the area, and ensuring a continuing and vibrant local village community. Many feel that overdevelopment will detrimentally change the character of the village.

5.2 Key Issues 2 & 3 - Protecting the countryside around the village and protecting community assets and green spaces.

On the whole it was agreed that Reydon is well-provided for in the way of footpaths and byways. The main concern expressed being that many footpaths become overgrown in summer and need more maintenance to encourage use. There is also a need to liaise with local farmers to ensure that they respect rights of way and footpaths across their land. New footpaths / cycle paths are urgently needed along the busy access roads to the village, inside hedges or tree lines to create safe walking and cycling. There is a lack of accessibility to some footpaths for wheelchairs or mobility scooters. Better signage to green areas, supported by easily available local maps, would be appreciated, as would sympathetic parking places near the start of walks. A bus service linking local villages (or the reinstatement of the Southwold railway and station!) providing transport until sunset, would reduce the need for individual car use.

All existing community assets and green spaces listed in the Survey should be conserved and protected, as well as all land designated as an AONB, including the Smere, St Felix, Reydon Marshes and the Blyth estuary. Green spaces and gardens are necessary on all new developments as they are essential to the wellbeing of the residents, particularly to family welfare. Specific play areas for youngsters are not as essential as local green space and current play grounds provision is good.

The local Shuttle Bus is a valuable asset for the elderly of the village and is to be valued and appreciated. Local buses are well used, although there is a lack of service running after 6pm.

5.3 Key Issue 4 – Flood Risk and Erosion

Most residents are in favour of the measures outlined in the questionnaire. However so far as relocation from Easton Bavants, it was felt that this should only apply to residents who have lived there for a significant number of years. There is a much smaller majority in favour of modest development on farmland, especially if the houses end up as holiday homes.

5.4 Key Issue 5a - Sewage and Drainage:

The greatest concern is that current sewage problems and provision should be addressed BEFORE any new development goes ahead. There is also considerable concern around the ability of local water companies to cope with any sizeable increase in housing development. The perception is that there has been no investment in sewage and drainage provision, despite more housing in the area and problems will only get worse. There is, therefore, little support for large scale development.

It is the opinion of many that the developer should be required to share in the cost of improving and upgrading the provision of piping and sewage to meet the increased demand, before receiving planning approval. There is clearly an increasing incidence of local flooding, some of it due to climate change. This must be recognised and allowed for, and preparation made. Drains being cleared more regularly would help. During heavy rain, some areas in Reydon already experience the overflowing of sewage and drains. On new developments and when homes are extended, permeable surfaces should be used for parking, rather than tarmac and concrete which prevents natural soak away of rainwater, together with more green spaces and gardens. Adequate surface drainage is essential and must be improved to cope with any new housing. Increased number of bathrooms in new builds and extensions further adds to the drainage and sewage problem.

A number of people commented that the problems at Potters Bridge should be sorted, ie sluices cleared and that maintenance of wetlands is shown to reduce flooding.

5.5 Key Issue 5b – Safety and Parking

Parking is becoming a major issue, perhaps made worse by the lack of parking in Southwold which encourages people to park in Reydon and that proposed developments will make it worse. It is felt that there should be clear ‘no parking’ signs and infringements should be enforced. There are also a number of parking trouble spots in the village, eg Jermyn’s Rd/Covert Rd; Barbrooks, Boydons, Hurn Crag, Seaview and Lowestoft roads. It is essential that all housing developments have generous parking provision for residents and their visitors and these areas should be permeable rather than tarmac or concrete to avoid water run-off. Many consider that there should be increased parking at the Health Centre to take account of the increased populations of Reydon and Southwold and the outlying villages that the Health Centre serves and that this increase will impact negatively on the roads. It is felt that the increase of the local population will have repercussions on the primary school. There is a lot of concern regarding access to/from the proposed St Felix development onto the Halesworth Rd and other developments onto major roads. Various traffic calming measures were suggested: speed limits, (20mph through the village), on the Halesworth Rd to the A12 and Wrentham Rd; speed humps; chicanes. Concern was expressed about the suitability of the roads in the villages to cope with increased usage by cars and modern HGVs; Cox’s Lane being one such example given.

More cycle paths are considered a necessity; however inconsiderate use of footpaths by cyclists is becoming more of a problem. Suggested cycle routes were Shepherd’s Lane to Blyth Rd and Southold to Pakefield.

Footpaths should be improved to take account of wheelchair users/pushchairs and hedges/trees cut back for the safety of pedestrians. It was suggested that the footpath on the Wangford Rd be extended beyond the church and that verges be protected to enable them to be wildlife friendly.

5.6 Key Issue 6 – Design

A large majority of residents agree with the four principles set out in this section of the Questionnaire. It is considered essential that developments next to open countryside should use sympathetic tree and hedge planting to soften the impact and that wildlife be protected by wildlife corridors, open spaces, bat boxes, etc.

There are a large number of residents who consider further development of any size unnecessary and that over-development will detrimentally change the character of the village.

5.7 And finally...

However, smaller developments well suited to the needs of local people who wish to live and work in the area, are acceptable, as long as 'affordable' means just that; they should be ring-fenced primarily for local people. Any larger developments bring the danger of 'urban sprawl' which could quickly spoil the feeling of the village. Any further increase in housing sold only as second homes may mean that Reydon becomes a 'ghost village' with community life suffering and the village gradually becoming only a declining retirement community.

Many felt that the local voice is not listened to, heard or taken account of. Decisions taken by the County Council or the District Council should reflect the wishes of the residents, remembering that Councillors are there to represent and defend the wishes of their electorate.

More housing clearly equals more cars which equal more traffic problems. It also demands more school places, puts increasing pressure on the Health Clinic and on local amenities. If a possible increase of 1000 in population takes place, these challenges need to be carefully considered and planned for before planning approval is given by County or District Councils.

Support for local businesses and jobs is essential and could revitalise the village. There is a need to replace the police presence now that Southwold Police Station is closed, and a mobile Police Station, covering several villages might remind people of what local policing is about, and reduce some of the anti-social problems that arise. A local supermarket including a petrol station would cut the need of many to travel outside Reydon, and could be part of the Reydon Business Park area.

Provision for teenagers is poor in the area and a greater range of sports facilities – indoor as well as outdoor, and including not only football, but tennis courts, a skateboard park, and a cycling track could be incorporated into existing provision, and encourage youngsters to be proud of their village. Increased community access to the St. Felix swimming pool would be greatly welcome.

There is not yet a defined centre to the village and although Reydon Corner and the Jubilee Green are appreciated, the introduction of small shops and a café near the Green might meet this need. The development of a care home or sheltered housing near the Health Clinic is to be recommended.

As to traffic, there is universal concern about the speed of vehicles through the village, and a speed limit of 20mph on all access roads as they approach the village would be welcomed. There is a clear need for Southwold and Reydon to co-operate and agree on all traffic concerns.

Parking in both Southwold and Reydon is always an issue, especially in holiday seasons, and both parking and speeding offences need to be regularly enforced. There is clear need for a pedestrian crossing on the Halesworth Road opposite Lakeside, which would in itself slow traffic as it approaches the village.

Finally, many comments reflect an appreciation of being able to live in a caring, well-intentioned community where people show considerable consideration for one another, and a wish and determination to make sure this is maintained.

5.8 Response to the Analysis of Survey Comments

Together with the data from the Full Village Survey, the analysis of the comments made on the survey above was used to inform the text and specific policies and actions proposed in the draft Neighbourhood Plan.

Section 7: CONSULTATION WITH REYDON PRIMARY SCHOOL PUPILS

7.1 In June 2018, the School Council of Reydon Primary School worked with their Deputy Head and the Chair of the Neighbourhood Plan Steering Group to conduct a consultation exercise with all pupils of their school from Year 1 to Year 6. A set of questions was devised, based on the issues used at the earlier Community Engagement events. The members of the School Council used these to lead a discussion with each class and recorded the responses of their peers. This exercise, therefore, captures the views of some 150 Reydon residents aged 5 to 11. The full set of questions and the responses from each class are below.

7.2 Overall, this exercise shows that the children care deeply about their village and its environment. They, understandably, were particularly interested in the facilities for recreation and sport and made many suggestions of what more could and should be provided. Although this is not a key issue for the Neighbourhood Plan, it remains a priority for the Parish Council and work continues to improve facilities at Reydon Recreation Ground, the Playing Fields and Pavilion and new open spaces and/or play areas are to be included in the developments at Green Lane and Copperwheat Avenue.

7.3 On the other issues, the children were both very clear and strongly aligned in their views with those of older residents. Key issues for the children were:

7.4 New Housing should be primarily for local people, especially younger families and those with particular needs such as the homeless or disabled people. There should be provision for visitors but most of the children wanted to stop the increase in second homes in the village while recognising that we should continue to welcome and provide for holiday-makers.

7.5 The Countryside around the village is very important to the children and they identified other most valued areas, including Reydon Wood (sometimes referred to as bluebell wood), the Hen Reedbeds, the marshes, common and the coast.

7.6 Open Spaces in the village were seen as extremely important (see comments above about recreational facilities) as were **Community Assets** such as the local shops, schools, health facilities etc.

7.7 Flood Risks and Erosion were recognised by the children but they had less to say on these issues. Their were mixed views about policies to support relocation of properties at Easton Bavents. Most, however, agreed that we should protect areas, such as around Bridge Road, which are vulnerable to flooding.

7.8 Infrastructure Issues provoked strong responses. Considerable concern was expressed about issues of road safety for pedestrians and cyclists. Many wanted to see traffic calming measures, pedestrian crossings and cycle routes. Unsafe parking caused a marked reaction, especially around the school, and there was support for ample off-street parking in new developments. Flooding in key areas was highlighted too.

7.9 Design Principles questions received varied responses. Some wanted traditional house design, others wanted eco-friendly construction but strong support was expressed for good modern design which would give some unique character to the village. Most supported provision of green spaces and wildlife corridors.

7.10 CONCLUSION

This large sample of the younger residents gave very similar responses to those of older residents. This suggests, therefore, that the results from the later full village survey which was completed mainly by older residents are a good reflection of the views of the whole community.

APPENDIX 1: RESPONSES FROM FIRST STAGE OF COMMUNITY INVOLVEMENT, MARCH 2018

1. Two events were held on 12 and 17 March, attended by a total of around 100 residents, coming from most areas of the village. Participants were asked to write short answers or comments on the topics below, using the questions as prompts. Most participants engaged readily and several expressed the view that the proposed focus areas for the plan were the right ones and that the questions and prompts provided were useful. The Steering Group considered all the comments and completed an analysis which is set out below.

2. VISION FOR REYDON

Proposed: Reydon should be a village which:

- **Is attractive and sustainable**
- **Enjoys its surroundings in outstanding countryside**
- **Meets the needs of local people**
- **Contributes to the local economy, including tourism**
- **Is prepared for risks from flooding, erosion, traffic and pollution** Do you agree with these aims?
What would you add or change?

Analysis of Comments

There was broad agreement with the proposed aims. Not surprisingly housing is seen as the biggest issue, in particular the need for affordable homes, and the lack of desire for second homes, which really goes hand in glove with such comments as the need for a village hub, keeping its identity, especially being separate from Southwold (not a suburb of Southwold).

An added issue was the expressed need for improved cycleways and the demographic dimensions of the 'young/old' needs as well as catering for youth (not hanging around in the bus shelters or streets). Many wished to see the village retain its current character, keeping the surrounding AONB intact. The mooted developments gave rise to comments querying how the existing infrastructure will keep pace to cope e.g roads and traffic.

3. KEY ISSUE 1: HOUSING FOR LOCAL PEOPLE

Questions:

- 1a. What mix of housing types should there be in any big developments in the village?**
- 1b. How much of any new housing should be affordable?**
- 1c. What kind of affordable housing should be included?**
- 1d. Should we identify small sites on the edge of the village for developments 12 - 20 affordable houses?**
- 1e. Should any new housing be the main or only residence of the occupiers?**

Analysis of Responses

AFFORDABLE HOUSING (33 responses)

The provision of affordable/shared/rental housing (and additional comments or refinements on this topic) is by far the greatest area of interest. Only two respondents felt that a 35% provision was enough. Some advocated 50% and one up to 80%.

Comments included: “some to be disabled-friendly”, “designated for carers”, “25% for elderly”.

SITES AND DESIGNS (21 responses)

Small sites and use of brownfield are the most popular. Mix of styles and provision of up to 2 beds are next (preferred over 3+beds). Interestingly, thorough scrutiny of sites and styles comes last.

Comments included: “one parking space per bedroom”, “too many bungalows being enlarged”.

HOLIDAY HOMES (13 responses)

Fairly straightforward, as nobody in favour including one who is against preventing holiday use. Some wanted any new housing to be designated for residents only.

Comments included: “prevent profitable resale for holidays/retirement” (my edit), “residences should be lived in (work that one out!)”, “second home owners (should?) pay full council tax”

INFRASTRUCTURE (4 responses)

General concern that school and SBHC would not be able to cope with expansion. No specific mention of transport/parking/drainage.

4. KEY ISSUE 2: PROTECTING THE COUNTRYSIDE AROUND THE VILLAGE

Questions:

Almost all new development in Reydon, whether for housing or other uses, will be in the countryside at the edge of the built area of the village. This countryside is already protected by its status as an Area of Outstanding Natural Beauty – but recent experience has shown that this protection can be removed in some cases.

2a. What are the most precious parts of the countryside around the village?

2b. Should we seek to set conditions on any development in the surrounding countryside? ○

2c. Can we improve access to the countryside for local people?

Analysis of Responses

We received sixty comments on this issue. It was pointed out that it should be emphasised that being in an AONB is an asset which is a major attraction and brings tourism and money to the area. It was also felt that this may not be understood by some of the community.

Promotion of our area as an AONB was suggested and that it should have legally-binding protection.

With regard to protecting the countryside around the village, the feedback agreed that all the areas mentioned in our proposed Issues were precious, should be retained and protected, specifically Reydon Wood and Hen Reedbeds. Importance was also placed on Reydon Smere, Potters Bridge, St Felix playing field, the County Wildlife Site and the remains of Reydon Common.

It was felt that conditions should be set to protect the surrounding countryside from development as it is an AONB. Thus, any development should only take place if it is really necessary and meets local need and, essentially, is for local people not holiday homes or non-local people. Priority should be given to

restricting development outside the village boundary and on natural spaces. It was also felt that any development, preferably small, should only occur on less sensitive sites. The retention of mature trees on developments was considered to be important and would enhance that environment.

The majority of responses suggested access to the countryside could be improved by new footpaths and cycleways linking sites and avoiding roads. Particularly mentioned was a link between Reydon Woods and Hen Reed Beds and a safe footpath between Potters Bridge and The Smere, preferably avoiding the fast Wrentham Road. Also suggested was safe trails with information boards encouraging an interest in nature and the landscape. One response suggested there should be public bird-watching hides and a local wildlife group with a link to a Suffolk Group.

5. KEY ISSUE 3: PROTECTING COMMUNITY ASSETS AND GREEN SPACES WITHIN THE VILLAGE

Questions:

3a. What are the key green spaces in the Village that we should protect?

3c. Which buildings and services in the village are community assets which should be protected as far as possible and remain in use for the benefit of the community?

3d. Are there any new green Spaces you would like to see in or around Reydon?

Analysis of Responses:

Overall, there was strong support for protecting all community assets and green spaces. There was also a view that all built areas of the village should include green areas and play areas, or at least be in reach of these.

GREEN SPACES

It was pointed out that not all those listed are in Reydon (Hen Reedbeds and part of Reydon Wood, but protecting all those listed was strongly supported. Suggested additions were St Felix Playing Fields, Bridgefoot Marsh, Pottersbridge Marshes and Reydon Common.

COMMUNITY ASSETS

All who commented supported the aim of protecting those listed above. An suggested was St Margaret's Church. Several responses called for a village centre with more facilities such as a café and there was a plea for a public toilet.

6. KEY ISSUE 4: FLOOD RISKS AND EROSION

Questions:

Key areas of Reydon are at risk from the sea (farmland and property at Easton Bavents and, in the longer term, property around Bridge Foot Corner) and from storm surge flooding along the Blyth Estuary.

4a. Should we support the policies which offer help with planning permission for the relocation of properties under threat at Easton Bavents?

4b. Should we identify and support the new protection may be needed in the long term for the Bridge Road area of the village?

The Blyth Estuary Partnership is developing a strategy to maintain the estuary and protect the surrounding land from flooding. This will involve raising the river walls (mud banks) along the length of the estuary, the cost of which will fall onto local landowners and the local authorities.

4c. Should we support raising of the river walls and possibly allow modest development on farmland to support the cost of doing so?

Analysis of Responses:

SUPPORT FOR RELOCATION FROM EASTON BAVENTS

The majority (12) agreed that support should be given but 6 disagreed. Typical yes comments were: "for permanent residents only...not speculators or developers."

A typical no comment "people who bought properties at Easton Bavents in last 35 years knew the cliff was disappearing: properties were cheap because of that."

FLOOD PROTECTION FOR BRIDGE ROAD AREA

The great majority (12) agreed and a typical comment was: "Hold the line at Easton Bavents to prevent flooding at Mights Bridge and the marshes.... it would extensive work involving Southwold."

DEVELOPMENT ON FARMLAND TO FUND BLYTH FLOOD PROTECTION

Most identified responses (8) agreed but 5 did not. A number of those agreeing qualified their comment by stating that care needs to be taken when building the walls-- flood water needs to go somewhere and restrictions could lead to more flooding upstream...raising the walls should be done but not at the cost to landowners". A typical "no" response is "do not agree with building on farmland and green areas."

7. KEY ISSUE 5: INFRASTRUCTURE NEEDS (SEWAGE, DRAINAGE, ROADS AND PARKING)

Questions:

New development in the village must be supported by adequate infrastructure and we know that our residents have concerns systems which are already at or beyond their limit.

5a. Where do you see issues that need to be addressed with sewage, drainage, roads or parking?

5b. Do you have any ideas about the road access and parking provision required for any new developments in the village?

5c. Do you have concerns about places where the volume or speed of traffic poses a risk of pollution or safety for residents?

Analysis of Responses

SEWERAGE AND DRAINAGE

Sewage problems from blockage to inadequate foul water flows are noted in Covert Road, Wangford and Gorse Road areas. The main surface water problem is at the bottom of Covert road by Nicholas Drive junction.

There are many comments referring to foul smells emanating from the Sewage treatment plant in Blyth Road and inadequate flows from Reydon with concern that these problems will be exacerbated by the housing developments at St Felix , Copperwheat Avenue and Green Lane.

The proposed Copperwheat Avenue development, and that at St Felix, will put further pressure on the sewerage system and respondents are concerned that adequate investment is made by the developers

ROADS AND PARKING

There are many comments on parking of cars and lorries in the vicinity of both Reydon shops causing difficulties with egress from adjoining roads, Seaview Road next to Barbooks and Mount Pleasant outside Boydens Store. Single Yellow lines may assist and limited restricted time parking in close proximity along Lowestoft Road, but policing these options would be difficult.

Obstruction by parked cars in Jermyns Road close to Wangford Road and Green Lane near to Wangford Road were also noted although Green Lane will be eased by the car park at the new Pavilion at times of football etc.

TRAFFIC

Several concerns were expressed with traffic volume and speed. Most identified Halesworth Road, with others reporting concerns about Wangford and Lowestoft Roads, particularly difficulties in crossing of the roads, turning right against traffic flow and access onto the main roads.

If St Felix development is approved a roundabout at Keens lane junction would serve to calm the speed on Halesworth Road. The development of Copperwheat Avenue requires the site to be accessed from Copperwheat Avenue and The Crescents. Suffolk County Council as the Highway Authority have identified a need for improvements to The Crescents as well as a pedestrian crossing of Wangford Road. A comment mentioned difficulty with egress from Copperwheat Avenue onto Wangford Road because of visibility and speed of traffic.

The junction at Reydon Corner is mentioned as requiring both traffic and pedestrian improvement.

8. Key Issue 6: DESIGN PRINCIPLES FOR THE VILLAGE

Questions:

6a. Are there any buildings in the village which you consider particularly suited to the village and the countryside around it?

6b. Do you have any views about how the edges of any new developments should relate to their setting against the open countryside?

6c. Do you think there are places where we could create a more welcoming entrance to the village?

Analysis of Responses

STYLE OF HOUSING

A number of respondents wanted to retain a variety of styles of housing in the village and expressed the view that design should meet the needs of the occupiers rather than any fixed template. However, there was also support for a design approach that reflects the countryside environment but did not rule out modern designs. There was some preference for a modest, unobtrusive approach to design of buildings. There was a significant view against more generic "box-style" designs and use of cheap materials.

LAYOUT

There was strong support for maintaining a green element in any new developments and extending those we already have. Wildlife corridors, green spaces and play areas within developed areas, screening and ragged edges to developments and retention of trees, were all seen as important.

ENTRANCES TO THE VILLAGE

Support was expressed for retaining or improving the appearance of the entrances to the village, including a dislike of the aspect created by the business park.

9. ANYTHING ELSE?

Question:

Are there any other issues about building development which you think we should try to tackle in the Neighbourhood Plan?

Analysis of Responses:

There is no collective single issue here. From the responses here it is reasonable to conclude that most of the key issues of concern to participants are covered elsewhere in the responses.

APPENDIX 2

Reydon Local Housing Survey Dec 2016

1. Summary and Analysis

A full village survey was carried in 2016 to determine the housing stock and housing need in the village of Reydon on behalf of the Parish Council.

A total of 597 responses were received, spread across 75 road names throughout the village 89% of respondents own their home, 75% without mortgage. Of the remainder, most are Council or Housing Association, with just 3.5% being private lettings or tied to employment. Correlation of responses to Questions 1,2 and 3 shows that larger, detached properties are invariably owner-occupied. Council and housing association properties are almost all of 3bedrooms or fewer, and none are detached.

52 responses (9%) are from second-home owners. This is lower than the figure from the Village Plan Survey of 2014, which was 12%. A few responses indicated that this is a temporary state, e.g. preparing to move here permanently, or in the process of moving into care.

30 (5%) say they have household members living there because they can't find or afford their own accommodation, a total of 35 people.

27 (4.5%) say that members of their household have moved out of Reydon because they can't find accommodation here, a total of 39 people.

56 (9.4%) say that members of their household will need accommodation within the next 5 years, a total of 81 people.

The general sense of the responses, though, is that a majority of respondents favour the development of single or small groups of modest homes of a mixture of types and tenancy terms, preferably occupied full-time and accessible to local people, couples and families, and to those making a permanent home within the Reydon community. Additionally, that these homes should not subsequently be sold on for profit, nor as holiday lets or second homes left unoccupied for much or the year.

One specific element stands out head and shoulders above all others, being mentioned in more than half of all responses that new developments should be of affordable homes.

A copy of the Full Results of the Reydon Village Housing Survey is below.

Reydon Local Housing Survey Dec 2016 - Full Results

A total of 597 responses were received, spread across 75 road names throughout the village (Question 9). Respondents showed a good spread of time of residency (Question 8), as follows:

- 28% under 10 years
- 23% 10 to 19 years • 15% 20 to 29 years
- 10% 30 to 39 years
- 6% 40 to 49 years
- 8% 50 to 59 years
- 10% 60 years or longer.

This suggests that the responses received are from a balanced cross-section of the population and so are genuinely representative of the views of the community.

89% of respondents own their home, 75% without mortgage. Of the remainder, most are Council or Housing Association, with just 3.5% being private lettings or tied to employment (Question 2). Correlation of responses to Questions 1,2 and 3 shows that larger, detached properties are invariably owner-occupied. Council and housing association properties are almost all of 3-bedrooms or fewer, and none are detached.

52 responses (9%) are from second-home owners (Question 3a). This is lower than the figure from the Village Plan Survey, which was 12%. A few responses indicated that this is a temporary state, e.g. preparing to move here permanently, or in the process of moving into care.

30 (5%) say they have household members living there because they can't find or afford their own accommodation, a total of 35 people. (Question 4)

27 (4.5%) say that members of their household have moved out of Reydon because they can't find accommodation here, a total of 39 people. (Question 5)

56 (9.4%) say that members of their household will need accommodation within the next 5 years, a total of 81 people. (Question 6)

Correlation of responses to Questions 4,5,and 6 with Questions 1,2 and 3 shows that there is no type, size or tenure that stands out as an indicator of likelihood of housing need – that is to say, respondents to Questions 4,5,and 6 are from the range of tenures, types and sizes in very similar proportions to the response overall.

Question 7 asked whether respondents' current accommodation satisfies their needs. The vast majority of respondents (94%) indicated that their current housing does meet their needs.

However, 35 respondents (6%) say it does not. The issues they raise are as follows:

- 10 need a larger home
- 9 need a bungalow
- 3 need to be near to their family
- 2 need adapted accommodation
- 2 want to move away from Reydon (at least one of these to be near family)
- 2 want or need improved bathroom/toilet facilities
- 2 expect to lose their current home to erosion
- 2 need to or foresee needing to move for financial reasons
- 1 needs a smaller garden
- 1 needs to move to full-time residential care
- 1 needs a bedroom (currently in a bed-sit)
- 6 need a smaller home

Please note that some respondents indicated multiple needs, so the sum of these responses is actually greater than 35.

There were 2 Questions numbered 9 on the Survey form; responses to the second of those have been recorded and dealt with here as Question 10.

Question 10 asked as an open question, what sort of housing respondents think is needed in Reydon.

- 22 (3.7%) said expressly that no further building is wanted
- 65 (10.9%) gave no answer to this question. Whether this indicates they oppose further building, or simply that they have no opinion as to what type or tenure is needed, is open to interpretation. Even if all abstainers are taken as opponents of development, these would still constitute a small minority of the whole (14.6%).

The remaining 510 (85.4%) offer a wide assortment of suggestions, from single word or very short answers ('affordable', or 'council, affordable for local people'), to much longer lists of types, sizes and tenures, by whom they should be occupied and how they should be passed on subsequently.

Mining these answers for key terms gives the range of these suggestions and the relative frequency with which specific elements occur.

However, it would be unwise to take these as absolute indications of favour or disfavour for each element; the impression one gets from reading all these answers is that most respondents tended to pick a few elements to give the sense of a response, rather than constructing a definitive list of the things they favour to the exclusion of all others. Of course, a few respondents did give very definitive descriptions of what they approve or disapprove.

The general sense of the responses, though, is that a majority of respondents favour the development of single or small groups of modest homes of a mixture of types and tenancy terms, preferably occupied fulltime and accessible to local people, couples and families, and to those making a permanent home within the Reydon community.

Additionally, that these homes should not subsequently be sold on for profit, nor as holiday lets or second homes left unoccupied for much or the year.

One specific element stands out head and shoulders above all others, being mentioned in more than half of all responses:

- 305 (51%) Affordable

The other key elements that were mentioned quite frequently were Council (25.3%) and Rented (22.4%) – but Ownership (18.3%) and Shared ownership (12.4%) also featured strongly.

Here are the detailed figures:

With regard to housing types:

- 55 (9.2%) suggest a mixture of all types
- 52 (8.7%) mention bungalows
- 48 (8.0%) mention houses
- 29 (4.9%) mention flats
- 55 (9.2%) mention semi-detached
- 46 (7.7%) mention terraced
- 19 (3.2%) mention detached
- 22 suggest sizes, in various combinations:
 - 7 say 1-bed ○ 15 say 2-bed ○ 13 say 3-bed
 - 4 say 4-bed

With regard to tenure:

- 39 (6.5%) suggest a mixture of all tenures
- 151 (25.3%) mention Council
- 134 (22.4%) mention rented
- 109 (18.3%) mention ownership
- 74 (12.4%) mention shared ownership
- 21 (3.5%) mention Housing Association

With regard to occupancy:

- 45 (7.5%) want some restriction on second-home or holiday usage
- 39 (6.5%) want homes for young people
- 38 (6.4%) want preference for local people
- 29 (4.9%) want properties for couples or families
- 25 (4.2%) want starter homes or homes for first-time buyers
- 7 (1.2%) want properties for single people

(For clarification, the percentages given above are the % of all 597 responses received, not the percentage of respondents who gave an answer to this question)

The final question (not numbered) asked about issues with flooding. 119 responses were received to this, although 28 of these were raising concerns about other infrastructure issues, and a few more were anecdotal, addressing non-specific concerns or historic or trivial issues.

20 complain of sewage or foul water overflowing from combined drains, usually after heavy rain. This is primarily in the central area, along a line from Green Lane - Windsor Road – Churchill Road – Covert road and on down to Hillside Road. **The volume and nature of these responses indicates that this is still a serious problem which merits action.**

68 of the responses (11.4% of all responses) relate to the flooding of roads by surface water after heavy rain. Places most frequently mentioned are:

- Wangford Road (15)
- Covert Road / Churchill Road / Nicholas Drive / Jermyns Road . (14)
- Green Lane / Green Lane Close / Windsor Road (7)
- Halesworth Road / Keens Lane (5)
- Nightingale Avenue / Shearwater Way (4)
- Gorse Lane / Three Marsh Lane / Lakeside Park Drive (4)
- Cox's Lane (3)
- Mount Pleasant (2)
- Rissemere Lane East (2)
- Non-specific / general (6)
- Other locations getting single mentions are:
 - Reydon Corner ○ Old School Drive ○ Loftus Avenue ○
The Crescents ○ School Lane
 - Fairfield Road

14 responses complain of the smell from drains or from the sewage processing plant.

8 of these are from the lower end of the village, i.e. around or below Halesworth Road, and the remainder are evenly spread through the rest of the village.

The 28 responses relating to other infrastructure issues break down as follows:

- 10 complain of the condition of the footpaths, and lack of clearance of vegetation etc encroaching on the footpath and roads. Locations mentioned are Wangford Road, Cox's Lane, Covert Road and Reydon Corner.
- 6 complain of the volume, size and speed of traffic, especially through Cox's Lane
- 3 complain of poor water pressure, especially in the summer
- 4 complain of poor mobile reception and/or broadband, and interruptions in service • 2 complain of road subsidence, in Wangford Road and Lakeside Park Drive
- Plus individual complaints of:
 - Poor street lighting at Reydon Corner
 - Youths misbehaving on the Primary School Grounds at night ○ Waste burning in Rissemere Lane East ○ Frequent power cuts in Lakeside Park Drive
 - Dog fouling in Hillfield Court
 - Drinking water tainted / smelly in Mallard Road

(Again, please note that some responses mention more than one problem, so the total number of items mentioned exceeds the number of responses (28))

Around 15 respondents requested advice on housing issues and these were passed on to councillors in December for follow-up.

(John Skinner, 8/1/2017)

APPENDIX 3: REGULATION 14 RESPONSES FROM STATUTORY AGENCIES

1. Suffolk County Council

Date: 10th June 2019 Enquiries to: Cameron Clow Tel: 01473 260171
Email: cameron.clow@suffolk.gov.uk

Dear Reydon Parish Council,

Pre-Submission version of the Reydon Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the pre-submission version of the Reydon Neighbourhood Plan.

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

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

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

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

Archaeology

It is recommended that the plan mentions some of the archaeological potential of the parish. The Suffolk Historic Environment Record (HER) has 177 records of archaeological finds in Reydon. Finds in the HER can be browsed here: <https://heritage.suffolk.gov.uk/>. It is also recommended that the plan states the Suffolk County Council Archaeological Service is consulted for advice as early as possible as the planning process.

Education

Early Years

There is currently a surplus of early years places in the parish. Planned growth in the Waveney Local Plan (WLP) will exceed this capacity, however this is noted in the WLP and capacity issues will be addressed as they arise. As the Neighbourhood Plan does not propose any further development the county council has no comment to add on early years.

Primary

The strategy in the WLP to address primary school needs that arise from growth in the Reydon and Southwold area was to re-organise existing primary school catchments to make use of capacity elsewhere. It would have been the county council's preference to expand Reydon Primary School to 315 places which could have been secured through a land allocation. However, the school expressed they did not want to expand to this size. As delivery was not certain the land required was not allocated in the WLP and alternative strategy was found.

There is a possibility the school may change their position and wish to expand in the future. This would be preferable as it would mean more children from local development would be able to attend the local school. Ideally the county council would like the neighbourhood plan to allocate land that would allow the school to expand, however understands that this could potentially delay the plan making process, which is undesirable to the parish council.

An alternative recommendation would be for the neighbourhood plan to include a more general policy to prevent development from limiting education facilities ability to expand. Should the Parish Council choose to include such a policy some recommended wording is below:

"Development adjacent to existing education facilities should not compromise the ability of the facility to expand to an appropriate size in the future."

This would allow for flexibility in school place provision.

Secondary

Secondary school impacts have been addressed as part of the WLP and as the Neighbourhood Plan does not propose any further growth SCC have no further comments to make.

Flooding

SCC is the Lead Local Flood Authority in the county. It is not considered necessary for the Neighbourhood Plan to include further policies on managing flood risks, as the policy in the adopted WLP is appropriate. However, it may be beneficial for plan to provide more detailed information about local flood risk. Recognition of the flood risks from the Blyth Estuary and the risk of coastal erosion is welcome, however it would also be helpful to include information on surface water risk.

There is some risk of surface water flooding within Reydon, most notably there is a drainage flow path along Covert Road. There is record of minor flood events within the village however these have not resulted in property damage. In general, the flood events are not correlated with areas of flood risk, which would indicate these are caused by the highway drainage system reaching capacity.

Accompanying this response are flood maps showing the areas of flood risk for both flooding from rivers (fluvial flood risk) and flooding from surface water (pluvial flood risk) and the county council would encourage these to be included in the plans evidence base.

Minerals and Waste

The County Council is the minerals and waste planning authority for Suffolk, meaning it decides planning applications and makes policy for minerals and waste facilities. There existing policy is the Minerals Core Strategy and the Waste Core Strategy. It is expected that these will be replaced by the Suffolk Minerals and Waste Local Plan, which will be examined in Public in late June 2019. Both existing and emerging documents contain policies that safeguard existing and potential minerals and waste sites and facilities and minerals resources

Waste

There is one currently operating waste facility within the parish, which is the Adnams Distribution Plan anaerobic digestion plant. It is not expected that any of the policies or proposals within the plan would prejudice the operation of this facility as such the Neighbourhood Plan raises no safeguarding issues.

Minerals

The majority of the parish is covered by both the existing and revised minerals consultation area, indicating that there are potential minerals resources throughout the parish. As there are no further development proposals in the Neighbourhood Plan it does not raise a mineral safeguarding issue.

There is an existing minerals extraction site bordering the parish and the neighbourhood plan area, and a proposed extension to this extraction within the parish which are safeguarded. It is not expected that the plan proposals would prejudice mineral extraction and as such the Neighbourhood Plan raises no safeguarding issues.

Natural Environment

As a member of the Creating the Greenest County partnership, the county council encourages participation in the initiative wherever possible. The key themes of the partnership are:

- Climate mitigation
- Climate adaptation
- Protecting and enhancing the natural environment.

It is noted that the neighbourhood plan gives consideration to these themes, which is welcome. One area where the Neighbourhood Plan could go further is the wildlife protection section of Policy

8. National Planning Policy Framework paragraph 170 states that planning policies and decisions should provide gains for biodiversity.

To enhance the provisions for wildlife through the plan the following policy wording is recommended

“Development proposals should incorporate into their design features which provide gains to biodiversity. Landscaping and planting should encourage wildlife, connect to and enhance wider ecological networks, and include nectar rich planting for a variety of pollinating insects. Divisions between gardens, such as walls and fences, should still enable movement of species, such as hedgehogs, between gardens and green spaces.

Existing ecological networks should be retained”

More information about Creating the Greenest County can be found on the partnership website:

<http://www.greensuffolk.org/about>

Public Rights of Way

It is noted that access to the countryside and protection of footpaths is an important aspect of the plan. SCC is supportive of protecting and enhancing access to the countryside. Numerous parts of the plan refer to footpaths, however it is recommended that this terminology is changed to Public Rights of Way (PRoW) in both text and policies. This is because PRoW consist of a variety of types of routes which are listed below:

- public footpath – the public has a right access on foot with normal accompaniment such as a pram, a wheelchair or with a dog;
- bridleway– the public has a right to access on foot, on horseback and on a pedal cycle;

- 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. (All RUPPs were reclassified as restricted byways under the Countryside and Rights of Way Act 2000); and
- byway open to all traffic (BOAT or BY) - 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.

By only listing footpaths the plan it has unintentionally limited its ability to provide improvements to countryside access. The word “footpaths” was noticed in the following sections of the plan: in the 5th bullet point on page 3 and in Policy RNP5.

Policy RNP5

It is recommended that this policy is redrafted to improve its clarity and effectiveness. As currently drafted the policy limits PRoW improvements to residential development, however there is potential for other types of developments to also deliver improvements. Specifically noting section 106 agreements and conditions in the policy is not necessary and it is recommended that specific mechanisms are not included in order to provide flexibility in how the policy can be implemented. A recommended wording is suggested below.

Policy RNP 5: Improving Public Rights of way and Access to the Countryside from new Developments
New development should protect and where appropriate enhance Public Rights of Way and access to the countryside. Where possible new development should enhance the Public Rights of Way network through the provision of new connections the Public Rights of Way network, new or extended routes, or other improvements.

Transport

Policy RNP7

It is noted that this policy is concerned with the safety of vehicular access to the site. As the highway authority and a statutory consultee to planning applications the county council assess planning applications and highlight where it considers vehicular access to be unsafe . National Planning Policy Framework paragraph 110 states that development should “give priority first to pedestrian and cycle movements...”.

As currently drafted policy RNP7 could be misinterpreted to mean that priority should be given to vehicle movements, which would not be in line with national planning policy. This is not to say that the safety of vehicle accesses is not important, but that the policy should be inclusive of all users, not just vehicle users. A recommended amendment to the policy is suggested below.

Policy RNP 7: Safe Access From New Developments

Priority must be given in planning any new development to ensuring safe vehicle access to and from the development onto main roads for all users including provision of more than one access point where appropriate. Evidence of safe access will be required before any planning permission for development is granted, consistent with National Planning Policy.

Policy RNP 8

The County Council is supportive of this policy.

Parking

Reference to the County Council parking guidance in the Neighbourhood Plan is welcome. Parking is addressed in Policy WLP8.21 of the WLP and SCC will seek parking to this standard within development.

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

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

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

Yours sincerely,

Cameron Clow Planning Officer
Growth, Highways, and Infrastructure

2. East Suffolk Council

10th June 2019

Dear Mr O'Hear

Reydon Neighbourhood Plan Final (Pre-Submission) Draft April 2019

Please see below comments from the **East Suffolk Planning Policy and Delivery Team**.

General

- A lot of good content and it is evident that a lot of work has taken place to date.
- It will be helpful to number the paragraphs for ease of reference.
- We recommend making a clearer distinction between policy text, action text, and normal text in the document. It is not always that clear where the policy ends and normal text resumes. Putting policy text in a box or using different colour text would help in this respect.
- Waveney District Council no longer exists - references should now be to East Suffolk Council. The local planning authority is now East Suffolk Council.
- The new Waveney Local Plan is entitled "East Suffolk Council – Waveney Local Plan". It should be clear this is the local plan being referenced in the neighbourhood plan.
- There is little reference in the neighbourhood plan to heritage in Reydon. The neighbourhood plan represents a good opportunity to identify non designated heritage assets in the parish and provide them with protection.

Front Cover

- We recommend this identifies the plan period for the neighbourhood plan (the NP).

Policy RNP 1: Tenure Mix of Affordable Housing

- The plan should identify the evidence which justifies the policy requirement for shared ownership housing to be provided above other forms of Affordable Housing. The National Planning Policy Framework (NPPF) defines a number of types of Affordable Housing in its glossary – how have these other types been

considered? A 2012 housing report has been sent to the district Council but it is not clear if or how this supports the policy's requirements.

- Planning Practice Guidance (<https://www.gov.uk/guidance/neighbourhood-planning--2#evidence-to-support-a-neighbourhood-plan>, paragraph: 040 Reference ID: 41-040-20160211) states that: "Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...". The NP should demonstrate how this guidance has been applied in developing this policy.

Policy RNP 2: Affordable Housing on the Boundary of the Settlement

- This policy requires a mix of affordable rented and shared ownership accommodation. Does it exclude other types of Affordable Housing?
- If only affordable rented and shared ownership tenures are to be provided then see comments on RNP 1 above with respect to justification for these tenures exclusively.
- If the Settlement Boundary comes from the local plan then this should be referenced. If it is a different boundary then the NP should show how it has been drawn up.

Policy RNP 3: Principal Residence Requirement

- We have seen these types of policies successfully included in made neighbourhood plans, notably in St Ives' neighbourhood plan. As identified in the comments on policy RNP 1, it is important to provide justification for any policy in the NP. Looking at the Examiner's report on the St Ives plan (<https://stivesnplan.files.wordpress.com/2013/08/final-independent-examiners-report-on-the-st.pdf>), the Examiner takes account of the impact on the local community; delivering a wide choice of quality homes; and delivering sustainable development. The St Ives plan itself makes reference to the impact on their community from high numbers of second homes and holiday homes. The justification in the Reydon NP seems to concentrate on the effects on the local housing market. We would recommend that consideration in the NP is given to the broader effects of second homes and holiday homes in Reydon and the impact this may have on the community and delivery of sustainable development.
- It is recommended that the NP policies link with the NP vision. Doing this could help provide further context for this policy; root it in the wider objectives of the plan; and help to bolster the justification for the policy.
- Without robust justification and evidence then the policy could be vulnerable if challenged and/or may struggle at examination.

Page 10, first para.

- "- but recent experience has shown that this protection can be removed in some cases." AONB protection is not flexible and can not be removed. National policy in the NPPF provides protection for the AONB and policy WLP8.35 in the local plan also considers the AONB. It does not prohibit development in all cases and is an important material consideration for planning applications. We recommend rewording of this sentence to reflect this.

Page 11, first para.

- "...we regard the quantity of planned development to be at the absolute limit of what can be managed." – What is this statement based on? Is there evidence to support this? If not then this sentence should be re-worded to state a more balanced view.

Policy RNP 5: Improving Footpath Access to the Countryside from new Developments

- The principle of supporting the footpath network is fine, and development can be required to support this on site. However there is an issue with the financial contribution element of this policy. The Community Infrastructure Levy (CIL) is in place to provide some off-site infrastructure which includes footpath improvements. The CIL regulations require the Council to have a Regulation 123 list (<https://www.eastsuffolk.gov.uk/assets/Planning/Community-Infrastructure-Levy/WDC-Regulation-123-List.pdf>). This says what CIL will be spent on and, importantly, also restricts what can be funded through planning obligations (ie a S106 agreement). 'Pedestrian infrastructure' is on the Regulation 123 list which means that this will be funded through CIL and can not be funded through S106 agreements.
- Furthermore, financial contributions cannot be secured through a planning condition. Planning practice guidance at para 005 Reference ID: 21a-005-20140306 (<https://www.gov.uk/guidance/use-of-planning-conditions#what-approach-should-be-taken-to-imposing-conditions>) states that:

“No payment of money or other consideration can be positively required when granting planning permission. However, where the 6 tests will be met, it may be possible use a negatively worded condition to prohibit development authorised by the planning permission until a specified action has been taken (for example, the entering into of a planning obligation requiring the payment of a financial contribution towards the provision of supporting infrastructure).”

As covered in the bullet point above, a planning obligation can not be used for providing pedestrian infrastructure. As such, this policy as worded would not comply with the CIL regulations as they stand.

In any event, the Neighbourhood Plan would need to provide direction on the amount of contribution required and how this is calculated. The Neighbourhood Plan should also consider the impact of any financial contribution required in addition to the CIL payment and affordable housing requirement on the viability of development to ensure that development remains viable and deliverable.

[Note: draft CIL legislation has recently been put before parliament which removes the Regulation 123 list. If passed, this will remove the conflict with the CIL regulations mentioned above. However, viability of development must still be considered and a section 106 agreement will have to meet the tests set out in para. 56 of the NPPF.]

- The Neighbourhood Plan could set out a plan of where footpath improvements and potential new connections could be made. This network can then be supported/facilitated on-site through new development.
- Whilst access to the countryside for the public is to be encouraged, it should be noted that access to some areas close to European wildlife sites around Reydon needs to be carefully managed. European wildlife sites include Special Protection Areas, Special Areas of Conservation, and Ramsar sites. These can be viewed at: <https://magic.defra.gov.uk/>. A major source of disturbance to these protected habitats is from recreational walkers and dogs. The screening for 'appropriate assessment' under the Habitats Regulations [which is now required for the NP following a change in Planning Practice Guidance (Paragraph: 073 Reference ID: 41-073-20190509, <https://www.gov.uk/guidance/neighbourhood-planning-2#basic-conditions-for-neighbourhood-plan-to-referendum>)] will assess the likelihood of significant effects of the NP on European wildlife sites.

RNP 6: Local Green Spaces

- This section should make reference to map 4 which shows these local green spaces.
- You identify the criteria that a site must meet to be considered for designation as a Local Green Space and the plan states that the allocated sites meet all the requirements. We recommend that you include information to support why/how the identified sites meet all of these criteria.
- Some of the sites are close to 2km away (as the crow flies) from the edge of the built up area of Reydon where the majority of the community live. It is not clear whether there is safe and convenient footpath access to these sites. Consideration could be given in the supporting evidence to the distance from the community and the availability of adequate pedestrian access in addressing whether they are reasonably close to the community.
- It would be helpful for an examiner to describe special qualities that the sites offer to the community.

Policy RNP 8: Safe Walking and Cycling Routes

- Is this through the direct provision of physical infrastructure? This could be feasible for large developments, but developments such as householder development or single dwellings are unlikely to be able to provide this on site. Therefore some flexibility or re-wording of the policy would be needed. For example: "Where feasible, all development should include provision for safe cycling and walking routes on site..."
- How does this policy link to RNP 5 and the requirement for a financial contribution contained therein? Is this policy an additional requirement? Or an alternative requirement?
- Our comments on policy RNP 5 include the suggestion that the NP could set out a plan or map of footpath improvements which can be delivered on site through development. This could be extended to include cycle infrastructure and link in to this policy. This could form a walking and cycling strategy for Reydon which development should support.
- CIL would cover off-site highway improvements.
- The principle of this policy is supported but it is currently unclear what the specific aims are and how it should be applied to proposals for new development. It is also unclear how this policy is intended to work alongside NP policy RNP 5. We would recommend providing clarity on how this policy should be applied and re-wording of the policy if necessary.

Key Issue 6: Design Principles for the Village

- Specific references to support the statements made in the design discussion in the second paragraph would be useful, especially local examples in Reydon Parish. This would also help give direction on the 'historical Suffolk countryside styles' referenced in the policy text. This could go in an appendix or topic paper which would support the implementation of this policy.

RNP Policy 8: Reydon Neighbourhood Design Principles

- The NPPF states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. This would mean the use of the AECB Building Standard would be in conflict with the National Planning Policy. That said, there is scope to set standards higher than Building Regulations. However, such standards need to be justified by evidence of need and evidence of financial viability. It is not clear what evidence there is to underpin this requirement. The supporting text says that development will be encouraged to meet the AECB standard, whereas the policy itself goes further and says that new buildings should meet the standard wherever possible.

- Notwithstanding the above comment, there are some concerns from our Development Management team that AECB is very technical and potentially difficult to enforce. Pragmatically, this requirement may be difficult to apply through the planning application process.
- 4th bullet point: 'All new development should show consideration for the protection of wildlife by including open spaces and wildlife corridors.' - It may not be feasible for small developments such as householder schemes or single dwellings to provide open spaces and wildlife corridors. Major developments (ie. 10+ dwellings, residential sites of 0.5+ ha., commercial development of 1000+ m2) would be able to incorporate this in to their design. As such, we would recommend consideration is given to amending the policy so that this bullet point does not apply to all development in this way. Applying this bullet point to just major development or adding wording along the lines of "unless it can be demonstrated to be unfeasible" would address this. Smaller scale schemes can still contribute to wildlife for example by including planting of native species. Bullet point 3 (which applies to all developments) could be expanded slightly to include planting of native species to capture this.

RNP Map 2 – Reydon Settlement Boundary

- If the Settlement Boundary comes from the local plan then this should be referenced. If it is different then the NP should show how it has been drawn up.

RNP Map 3 – Most Valued Areas of the Countryside

- The text labels on the map are small and difficult to read.

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

Yours Sincerely,

Dickon Povey | Principal Planner
East Suffolk Council

3. Historic England

Dear Mr O'Hear

Ref: Reydon Neighbourhood Plan Regulation 14 Consultation

Thank you for your correspondence dated 25 April 2019 inviting **Historic England** to comment on the Regulation 14 Pre-Submission Draft of the Reydon Neighbourhood Plan.

We welcome the production of this neighbourhood plan, and are pleased to see that it considers the built and historic environments of Reydon. However, we regret that we are unable to provide detailed 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:

<<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>>.

For further advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Suffolk County Council.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries. Yours sincerely,

Edward James
Historic Places Advisor, East of England

4. Environment Agency

Date: 10 June 2019

Dear Mr O'Hear

Reydon Neighbourhood Plan (PRE-SUBMISSION) Draft

Thank you for your letter relating to the Reydon Neighbourhood Plan. We have assessed the draft Neighbourhood Plan as submitted and our letter contains our response and information in relation to environmental issues that should be considered during the development of the Neighbourhood Plan.

Our principal aims are to protect and improve the environment, and to promote sustainable development, we:

- Act to reduce climate change and its consequences
- Protect and improve water, land and air
- Work with people and communities to create better places
- Work with businesses and other organisations to use resources wisely

You may find the following two documents useful. They explain our role in in the planning process in more detail and describe how we work with others; they provide:

- An overview of our role in development and when you should contact us.
- Initial advice on how to manage the environmental impact and opportunities of development.
- Signposting to further information which will help you with development.
- Links to the consents and permits you or developers may need from us.

Our role in development and how we can help:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf

Coastal Protection

We support the aim of RPC Action 5 'Support and Protection For Property at Risk From Flooding or Erosion' In support of this Neighbourhood Plan, the Parish Council will support appropriate planning proposals for the relocation of properties at risk from erosion at Easton Bavents and any proposals made in the context of the Shoreline Management Plan to protect the housing in areas vulnerable to future flooding. In particular, reference to the Shoreline Management Plan for the area in the context of coastal zone planning is supported. We recommend that the Norfolk and Suffolk Coastal Authorities, Statement of Common Ground, Coastal Zone Planning is referred to within this section of the document. In addition, the document should reference policies SCLP9.3 Coastal Change Management Area and SCLP9.4 Coastal Change Rollback or Relocation from the emerging Suffolk Coastal Local Plan.

We also support the aim of RPC Action 6 Blyth Estuary Strategy: The Parish Council will continue to support the Blyth Estuary Partnership in its work to develop a preferred strategy to maintain the Blyth Estuary and will support appropriate proposals and related planning applications to deliver this strategy. The document should reference and directly support policy SCLP9.5 Flood Risk from the emerging Suffolk Coastal Local Plan.

We note that the document references climate change on page 16 of the document. Section 7 (page 14) should also refer to the potential impacts of climate change in the context of flood and erosion risk, with particular regard to sea level rise and the possible impacts on the community. It will be important for any defence raising to consider these long term impacts whilst also respecting paragraph 155 of the National Planning Policy Framework.

Flood Risk

The majority of Reydon is in Tidal, Flood Zone 1. With areas within Flood Zones 2 and 3, the medium and high areas of flooding risk, to the North of Reydon from the Wrentham watercourse, and from the Blyth Estuary. Flood risk is mentioned in Section 7 of the Neighbourhood Plan (dated Feb 2019) and references the new Waveney Local Plan.

All development proposals within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment.

Sequential Approach

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it isn't possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Zone 3), an FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

Climate Change

Our guidance 'Flood risk assessments: climate change allowances' should be used to inform the spatial distribution of growth and the requirements of Flood Risk Assessments (FRA) for individual applications.

The National Planning Practice Guidance provides advice on what is considered to be the lifetime of the development in the context of flood risk and coastal change. The

'Flood risk assessments: climate change allowances' guidance provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. For some development types and locations, it is important to assess a range of risk using more than one allowance. Please refer to this guidance. <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. This advice updates previous climate change allowances to support NPPF and may result in flood extents being greater than they have been in the past. This does not mean out flood map for planning has changed, as these maps do not consider climate change, but fluvial flood maps that may have been produced as part of SFRA and other flood risk studies may be out of date. FRAs submitted in support of new development will need to consider the latest climate change allowances.

Environmental Permit for Flood Risk Activities

An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.

Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Anyone carrying out these activities without a permit where one is required, is breaking the law.

The Neighbourhood Plan should consider this when allocating development sites adjacent to a 'main river'. A permit may be required and restrictions imposed upon the work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk.

Natural Capital

Studies have shown that natural capital assets such as green corridors and green amenity spaces are important in climate change adaptation, flood risk management, increasing biodiversity and for human health and well-being. An overarching strategic framework should be followed to ensure that existing amenities are retained and enhanced. Section 15 (paragraphs 170-183) of the National Planning Policy Framework specifies the requirements for conserving and enhancing the natural environment through the planning and development process to minimise impacts on habitats and provide a net gain to biodiversity. SuDS are often part of building green infrastructure into design. For more information please visit <http://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html>

Please note that the view expressed in this letter by the Environment Agency is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.

We trust that this advice is useful.

Yours sincerely
Miss Natalie Kermath Planning Advisor

Direct dial 02077141064

Direct e-mail natalie.kermath@environment-agency.gov.uk

5. Suffolk Preservation Society

7 June 2019
Parish Clerk
Reydon Parish Council

Dear Sir
Re: Reydon Draft Neighbourhood Plan

I am writing on behalf of the **Suffolk Preservation Society (SPS)**, the only countywide amenity society dedicated to protecting and promoting the special historic and landscape qualities of Suffolk. We also represent the Campaign for the Protection of Rural England in Suffolk and work closely with parish and town councils and other bodies who share our objectives. As Neighbourhood Plans offer the opportunity for protecting or improving the heritage and landscape of an area, SPS are supportive of plans being drawn up in Suffolk, particularly where they are within designated landscapes such as Reydon. Having read the draft plan we would like to make the following observations.

Landscape

Reydon's special qualities are in large part attributable to its landscape setting and we applaud the recognition of this within the draft plan and set out in policy RNPpolicy4. However, we note that the plan does not make reference to the statutory duty under the CROW Act 2000, to conserve and enhance the AONB. Furthermore, the plan could be significantly strengthened by a supporting landscape appraisal, as part of the evidence base, to identify the special qualities of the countryside surrounding Reydon and to identify important characteristics including views.

As part of our work we review all emerging NPs across the county and we note that many Neighbourhood Plans have recently taken the opportunity to commission this important piece of analysis. We consider this results in a robust policy document that will maximise effectiveness in directing development and therefore SPS recommends that all plans, especially those within designated landscapes, are underpinned

by such a robust evidence base. Furthermore, we note that the draft plan does not refer to the AONB Management Plan. This is a statutory policy document which sets out the policy framework for the AONB. Reference to this important document would also serve to add significant weight to your efforts to protect the landscape setting of your village.

Heritage

As the draft plan identifies, Reydon's strengths include its rural setting and location within a nationally designated landscape. However, we note that the historic built environment is not referred to specifically and is not given any weight in the plan, which is surprising given that the parish of Reydon contains a total of 14 listed buildings. The inclusion of a dedicated historic environment chapter of the plan could not only affirm the importance that the community places upon its built heritage it could also be extended to include a local list of non-designated heritage assets which would ensure that the adopted plan forms locally-responsive planning policy.

Reydon's listed buildings benefit from statutory protection but the Neighbourhood Plan allows for the identification of other (non-designated) heritage assets which also contribute to the village's distinctive character. This will strengthen their protection from demolition or harmful development within their setting which would otherwise be limited. Historic England also advocates this approach and provides advice to local groups via its website, in particular its guidance note Neighbourhood Planning and the Historic Environment. We would therefore also encourage your Neighbourhood Planning team to consider compiling a list of non-designated heritage assets within such a chapter which, although unlisted, merit protection. However, given the advanced stage of the plan, it may be more appropriate to adopt criteria which could then be applied in cases where a locally listed building is identified at a planning application stage. I attach a copy of East Suffolk

Council's adopted criteria for your assistance which you may find helpful in this regard.

Design

We welcome policy RNP Policy 8 which sets out the principles of good design. In particular we welcome the reference to the use of appropriate colour and would recommend that reference is made to the AONB's recent adopted guidance on colour in design. This would substantially reinforce the proposed policy in the decision making process by the District Council.

We would be happy to discuss with you any of the matters raised in this letter further, please do not hesitate to contact us.

Yours sincerely,

Fiona Cairns

BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC Director

APPENDIX 4: PRE-SUBMISSION RESPONSES FROM RESIDENTS

1. Artisan on behalf of Northland Reydon

June 10 2019

Dear Reydon Neighbourhood Plan Team,

Reydon Neighbourhood Plan Final (Pre Submission) Draft. April 2019

We have the following comments to make on behalf of Northland Reydon Ltd who are option holders for the site off Green Lane owned by Messrs Doy and Gladwell.

Our comments are focussed and concentrated entirely on draft policies in the document and housing policies in particular.

Our client has made the Neighbourhood Plan Team (NPT) aware of the availability of the land in Green Lane for development throughout the course of preparation of the plan and we confirm that it remains available for development. We suggest that it is the most suitable site and location with which to deliver some of the vision, objectives and policies framed in the draft plan particularly if it is the intention to make further allocation of land which of course a Neighbourhood Plan can do. It is pointless having a Plan or Policies if there are no sites provided for their subsequent delivery.

Key Issue 1 Housing for Local People and draft Policies

RNP 1 Tenure of Affordable Housing. As drafted there is insufficient flexibility to reflect contemporary needs. The Policy is too restrictive in that the 50% proportion which is not to be affordable rent should be widened to embrace other forms of affordable housing and much more in line with the National Planning Policy Framework 2019 (the Framework) where the definition of affordable housing is set out in Annex 2 Glossary. The other 50% tenure (non-affordable rent) could and should include an option to provide discount market housing, starter homes, or any one of a number of alternative routes to low cost home ownership.

RPC Action 1 Protecting the future status of affordable housing

Whilst supporting the intent, policy makers should be aware of the needs of funders and providers for such development to ensure that the provisions of the policy are not prohibitive, unduly restrictive or prevent lenders from funding such schemes and initiatives. At the very least, the NPT and its Plan, must acknowledge step in rights for funders in default situations. Unduly restrictive policies can prevent affordable schemes getting off the ground in the first place.

RNP 2 Affordable Housing on the boundary of the Settlement

Fully support the objective but respectfully suggest that the imposed scale needs to be more flexible as is the case in para. 71 of the Framework for exception sites policies which RNP 2 is. The exception sites supported by an allocation under RNP 2 should not be already allocated in the Plan and the scale of development should not normally be more than 1 hectare of net developable area or the numbers of

dwelling proposed should not normally exceed more than 5% of the total existing household numbers for the village. In the case of Reydon those 2 figures would secure well designed developments capable of producing a suitable mix of housing, similar in size to the recent Orbit scheme in Green Lane.

At normal standard densities, 1 hectare would produce 25 dwellings but with higher design standards, more single storey dwellings need taking up more developable footprint and more expensive to deliver, and/or more open space and landscaping typical of the policy aspirations within the plan, slightly larger sites are likely to be required and hence the need to reference the 'developable area' of the site if a well-designed sustainable viable development is to be delivered.

On a settlement boundary/edge, significant landscaping is the usual requirement to provide an effective screen between countryside and built environment but the area of land required for landscaping (which is managed for ecological gain and biodiversity enhancement) is also land hungry and therefore the optimum scale of possible development for this purpose should be recognised. The numbers of dwellings seems like a sensible measure to work on but we suggest that it should be higher at around 25 dwellings. For example the orbit scheme for Green Lane was more than the 20 units suggested in the draft policy. So often, rising development costs and archaeology in particular, are such that developments need to be of a critical mass to get off the ground in the first place.

RNP 3 Principal Residence Requirement

We do not support this policy. Whilst completely understanding its laudable intention its impact on scheme viability has not been taken into account or assessed.

Last para. page 9 re Business use.

We consider that the normally resident population of Reydon (around 2700) is now such that an allocation should have been considered and made for new retail floorspace of a local scale (up to 300m² character to serve the indigenous population. The Reydon Business Park is not a suitable location for that allocation. Residents of Reydon should be able to shop for their day to day needs in a modern purpose designed facility without having to travel to Southwold or Lowestoft.

RPC Extending Footpath Access to the Countryside and RNP 5 could be delivered by an allocation of land in Green Lane.

Similarly, RPC 5 Support and Protection for Property at Risk from Flooding or Erosion could potentially be assisted by an allocation of land in Green Lane.

Policy RNP 7 Safe Access is unnecessary as this is a duplication of adopted planning policy at the District level and in the Framework. So too is RPC Action 9 where County wide standards have already been adopted and are in day to day use in development management by the Local Planning Authority.

RNP Policy 8 Design Principles whilst again the intention is understood the policy wording is too imprecise "new dwellings should be modest in character" has no meaningful definition which designers can work to. When is a tree or hedge used 'sympathetically' and consideration for wildlife should be more positively worded to show that development should achieve a net gain in biodiversity enhancement post development.

Thank you for the opportunity to comment and we would welcome the opportunity for further discussion with the NPT

2. Reydon Action Group for the Environment (RAGE)

Chairman, Reydon Neighbourhood Plan Steering Group By email: reydonneighbourhoodplan@gmail.com

2nd May 2019

Dear Philip

Reydon Neighbourhood Plan Final (Pre-Submission) Draft April 2019

The draft Neighbourhood Plan was discussed at RAGE's public meeting on 30 April which was attended by approximately 75 people. The meeting voted unanimously to make the following response to the draft Plan.

RAGE is generally supportive of the draft Neighbourhood Plan and is pleased to see that 'Protecting the Countryside Around the Village' is a key issue.

Policy RNP4 identifies 7 areas around the village which should generally be protected from development. RAGE would like to see 3 amendments to Policy RNP4 and Policy Map RNP 3 as follows:

1. The areas to be protected should include the Waveney 74 St Felix School Grounds County Wildlife Site, either as an extension of the riverside Grazing Meadows and Marshes Area or as a separate area. The wildlife and biodiversity value of the CWS is clear from the attached Waveney Wildlife Audit carried out by Suffolk Wildlife Trust on behalf of WDC (pp230 – 235);

2. We would also like to see the only exception to development in the designated areas to be that 'development is needed to preserve them', ie the first bullet point in the current draft. Recent experience with the St Felix School planning application for housing development on the current playing field shows that all but the most robust policy protection may be overridden, e.g. by framing a planning application as 'enabling development' and we do not consider that the other proposed policy exceptions are necessary or appropriate; and

3. We would like Policy RNP4 to reference explicitly the Great Yarmouth and Waveney Settlement Fringe Landscape Sensitivity Study December 2016 by Chris Blandford Associates on behalf of Great Yarmouth BC and Waveney DC (attached for ease of reference). Any development that is permitted in the designated areas should follow the recommendations of the Study.

I hope this is of assistance and would be pleased to provide any further information that the Steering Group may require.

Yours sincerely

Stephen Chessher Chairman, RAGE

Enc.

Waveney Wildlife Audit
Great Yarmouth and Waveney Settlement Fringe Landscape Sensitivity Study

3. Individual Resident Response from TR

PROTECTING THE COUNTRYSIDE AROUND THE VILLAGE

As well as being in the AONB, the Reydon countryside from just west of Quay Lane to the parish boundary with Easton Bavents (and between the northern and southern marshes) has been identified as two Landscape Setting Areas of “Very High Landscape Value” (Figure 5.6b and 5.69 Great Yarmouth & Waveney Settlement Fringe Landscape Sensitivity Study, December 2016).

This puts Reydon’s Landscape Setting Areas 1 and 2 in the top five of the 42 Landscape Setting Areas in the whole of the Great Yarmouth & Waveney area (Executive Summary). And their consequent “Low Landscape Capacity” (5.6.10) means that they have little ability to accommodate change or development without significant adverse effects on their character.

The eastern part of the Reydon countryside between the marshes is, therefore, subject to Policy WLP8.35 in the adopted Waveney Local Plan as it comprises two “locally sensitive and valued landscapes”; and development “will not be permitted where it will have a significant adverse impact on locally sensitive and valued landscapes”.

The same policy also states that development “will not be permitted where it will have a significant adverse impact on the setting of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty”. This policy applies to all the countryside in the Reydon Neighbourhood Plan Area, not just the countryside outside the seven most valuable parts of the countryside, as implied by the first part of the last paragraph in Policy RNP4: “In the remaining countryside in our Neighbourhood Area, which is protected as part of the AONB.....”. This paragraph in Policy RNP4 should be amended to clearly indicate that all the countryside is in the AONB; and (like the reference in housing to WLP8.2) include the Local Plan policy which specifically protects the AONB and the two Landscape Setting Areas. May I suggest the following amended paragraph, which includes the second half of the original paragraph:

All the area between the Reydon Settlement Boundary and the boundaries of the Reydon Neighbourhood Plan Area is countryside in the AONB and, under Waveney Local Plan Policy WLP8.35, development will not be permitted where it will have a significant adverse impact on the setting of the AONB and on Reydon’s two locally sensitive and valued landscapes: Landscape Setting Area 1 to the west and north of the settlement boundary; and landscape Setting Area 2 to the east of the settlement boundary (see map on P19). Development in the AONB will only be permitted in exceptional circumstances and where it can be demonstrated it is in the public interest, e.g. to support a sustainable community, as in Policy RNP2.

The Reydon Neighbourhood Plan must surely celebrate the fact that Reydon’s two Landscape Setting Areas are two of the five most highly valued Landscape Setting Areas in the whole of the Great Yarmouth and Waveney Area, which has 26 settlements with a total number of 42 Landscape Setting Areas. The other three most highly valued Landscape Setting Areas are: Southwold’s single Landscape Setting Area (Southwold Common); one of Wangford’s two Landscape Setting Areas; and one of Wrentham’s four Landscape Setting Areas (Executive Summary).

Clearly, Reydon's doubly-protected Landscape Setting Areas need to be shown on a map. As this would probably have to be an existing map, the best of the five at the back of the plan would be the Reydon Nature Designations map on p19 as this shows the AONB and all the (unnamed) County Wildlife Sites, and named distinctive characteristics or components in Landscape Setting Area 1 are:

- Saint Felix School and associated parkland (part of which is a County Wildlife Site) (5.6.7)
- Reydon Fishing Lakes County Wildlife Site (S.6.7)

4. Individual Resident's Response from S and S C

Chairman, Reydon Neighbourhood Plan Steering Group

Reydon Neighbourhood Plan Final (Pre-Submission) Draft April 2019

I wrote to you on 2 May with comments on the draft Neighbourhood Plan on behalf of RAGE.

I set out below some further comments from myself and Sue which I hope will be useful. Needless to say, we endorse the comments previously made on behalf of RAGE in relation to Key Issue 2.

Housing

We have a concern that the sections of the draft Plan on the population profile (3.2), housing stock (3.3), working profile (3.4) and Key Issue 1 (Housing for Local People) do not fully address the underlying issues with the result that the policy proposals are unlikely to achieve their desired ends.

The draft Plan correctly points to the high proportion of elderly people living in Reydon and the correspondingly low proportion of people of working age. The draft Plan then appears to attribute the imbalance largely to a lack of affordable housing which it in turn attributes to high average house prices in the area. Relatively high house prices (as compared to the East of England average) are in turn attributed largely to the increasing proportion of second homes and holiday homes.

We do not believe that lack of affordable housing is the only reason for the age imbalance in Reydon. It is entirely normal for younger people to move from rural areas to larger towns for a variety of reasons including educational opportunities, work and social life. Realistically, that will not change, especially as there are no proposals in the draft Plan (or indeed the new Local Plan) to increase local employment.

We also note that if policy RNP3 is succeeds in reducing the proportion of second and holiday homes in the village, it may adversely affect employment since second and holiday homes support an extensive local service economy.

We consider that the relatively high local house prices reflect:

1. The mix of accommodation in the village which is weighted towards the more expensive end of the market. There is relatively little housing that would be most likely to attract and retain local young people, ie 1 and 2 bedroom flats and 'starter homes';
2. The large numbers of people who choose to retire in Reydon and who have above average disposable incomes;
3. The large number of properties in the village which in recent years have been extended and improved. To the extent that extensions and improvements are a function of second homes, Policy RNP3 will not address this issue.

We would like to see more emphasis in the draft Plan on encouraging social housing of the type recently built at Pitches View and Green Lanes which we consider would be the best way of making available genuinely affordable housing.

We also suggest that the draft Plan could usefully make a site allocation covering the vacant site adjacent to Sole Bay Health Centre which we understand is expected to be marketed by NHS. In our view this would be well suited to relatively high density social housing, perhaps with some mixed (commercial/retail) use.

Sustainable Transport

We note that the draft Plan makes virtually no mention of transport (sustainable or otherwise). The lack of public transport (including an adequate connection to the East Suffolk railway line at Halesworth and Darsham) is an acknowledged issue which has been highlighted by the recent reduction in local bus services.

Cllr Beavan has suggested the possibility of a community minibus network which might be run in conjunction with neighbouring parishes. We suspect that such a scheme would be a better use of limited subsidies available from the County Council than the existing poorly used bus services. It would also be a better use of s106 contributions from developers than, for example, the requirement for the proposed St Felix housing development to provide digital displays at the local bus stops – for a 2 hourly bus service! In our view, a policy requiring developers to prepare and fund transport plans to improve local bus services – and cycle routes – would be of great benefit.

Neighbourhood Plan Area

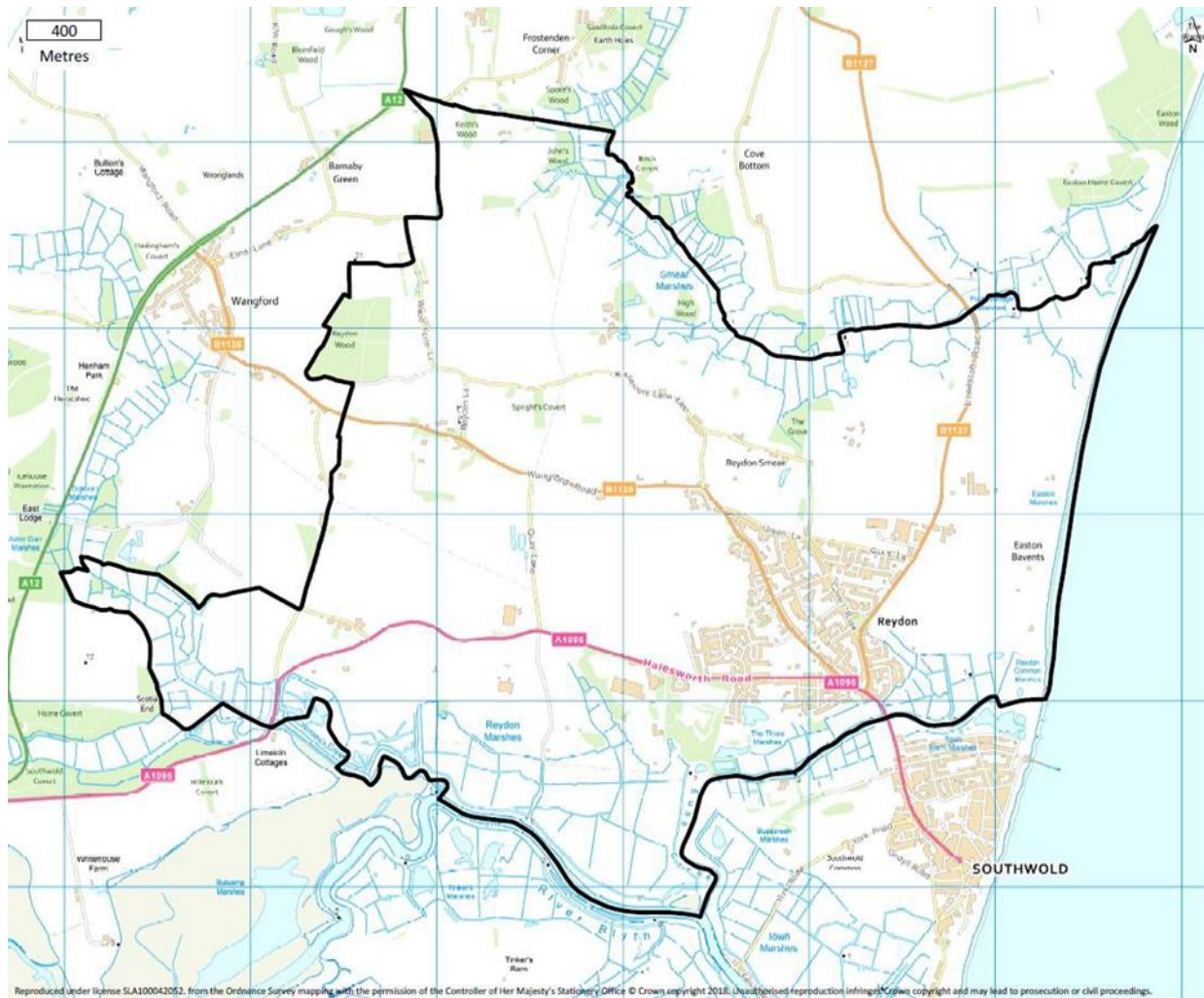
We note that the draft Plan area includes a part of Wangford Parish (hen reed beds and part of Reydon Wood) but there is no mention of liaison with Wangford Parish Council. This may be an oversight but is surely essential if these areas are to be included.

We hope this is of assistance.

APPENDIX 5: REYDON NEIGHBOURHOOD AREA DESIGNATION

Neighbourhood Area Determination and Decision
DECISION UNDER REGULATION 7 OF THE NEIGHBOURHOOD PLANNING (GENERAL)
REGULATIONS 2012 (as amended)

Name of neighbourhood area: Reydon Neighbourhood Plan
Parish /Town Council: Reydon Parish Council



Background:

The procedures governing the production of neighbourhood plans are set out in the Neighbourhood Planning (General) Regulations 2012 (as amended). The first formal stage in the neighbourhood plan process is the application by the “relevant body” to the Local Planning Authority for neighbourhood area designation.

This neighbourhood area application includes parts of Reydon and Wangford with Henham Parish Councils. The application was received by the Council on 3rd September 2018.

Consideration

Is the organisation making the area application the relevant body under Section 61G (2) of the 1990 Act?

Yes. Reydon Parish Council submitted the area designation application.

Has the application been submitted in accordance with Regulation 5 of the Neighbourhood Planning (General) Regulations 2012?

Yes. The application was accompanied by a map identifying the proposed Neighbourhood Area; a statement explaining why the area is considered appropriate to be designated as a Neighbourhood Area; and a statement that Reydon Parish Council is the 'relevant body' to make the application.

Is the Neighbourhood Area considered appropriate? Section 61G (4)

Yes. The Neighbourhood Area comprises the whole parish of Reydon and some parts of Wangford with Henham parish. There are no other existing boundaries of areas already designated as Neighbourhood Areas. Reydon Parish Council stated in the application that the parts of Wangford with Henham Parish which have been included in the Neighbourhood Area are valued by their community. They added that this had been agreed with Wangford with Henham Parish Council.

Has the application been properly publicised?

Yes. Waveney District Council undertook a six week consultation between 21st September and 2nd November 2018. The consultation was publicised on Waveney District Council's website in accordance with Regulation 6 of The Neighbourhood Planning (General) Regulations 2012 (as amended). Reydon Parish Council was provided site notices to display in appropriate places in the parishes.

Were any comments received during the consultation period?

Yes. A total of four responses were received during the consultation period.

Summary of comments received:

- Historic England stated they had no objection. Some background advice was provided on heritage matters and neighbourhood planning.
- Natural England stated they had no objection. Background advice for neighbourhood planning provided.
- Wangford with Henham Parish Council responded to say they had no objections.
- One member of the public supported the application.

All responses to the consultation can be viewed in full at:

<http://consult.waveney.gov.uk/consult.ti/reytonneighbourhoodarea2018/questionnaireResults?qid=5329347>

Are any modifications required to the Neighbourhood Area? Section 61G (6)

No. The matters the Council is required to take into consideration at this time are:-

- The desirability of designating the whole of the area of the parish council as a Neighbourhood Area; and
- The desirability of maintaining the existing boundaries of areas already designated as Neighbourhood Areas'

There are no reasons not to designate the whole of the area and there are no other existing boundaries of areas already designated as Neighbourhood Areas. No part of the specified area is specified in another area application.

Conclusion:

For the reasons set out above there are no valid reasons why Waveney District Council should not designate the Neighbourhood Area for Reydon Neighbourhood Plan as submitted.

Recommendation:

That following consideration by the Head of Planning and Coastal Management in conjunction with the Portfolio Holder for Planning and Coastal Management, designation of the Reydon Neighbourhood Plan area is Approved.

DECISION UNDER REGULATION 7 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (as amended)

The application for the designation of Reydon Neighbourhood Plan neighbourhood area is APPROVED.

Signed:

Dated: 3rd December 2018

Philip Ridley

Head of Planning and Coastal Management Suffolk Coastal and Waveney District Councils Riverside,
Canning Road Lowestoft NR33 0EQ