

# Late Responses to Beccles Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

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## Late Responses

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# Waveney, Lower Yare and Lothingland IDB (Water Management Alliance)

Please see our standard advice to new developments that are located within the Internal Drainage District and within the Boards Wider Watershed Catchment.

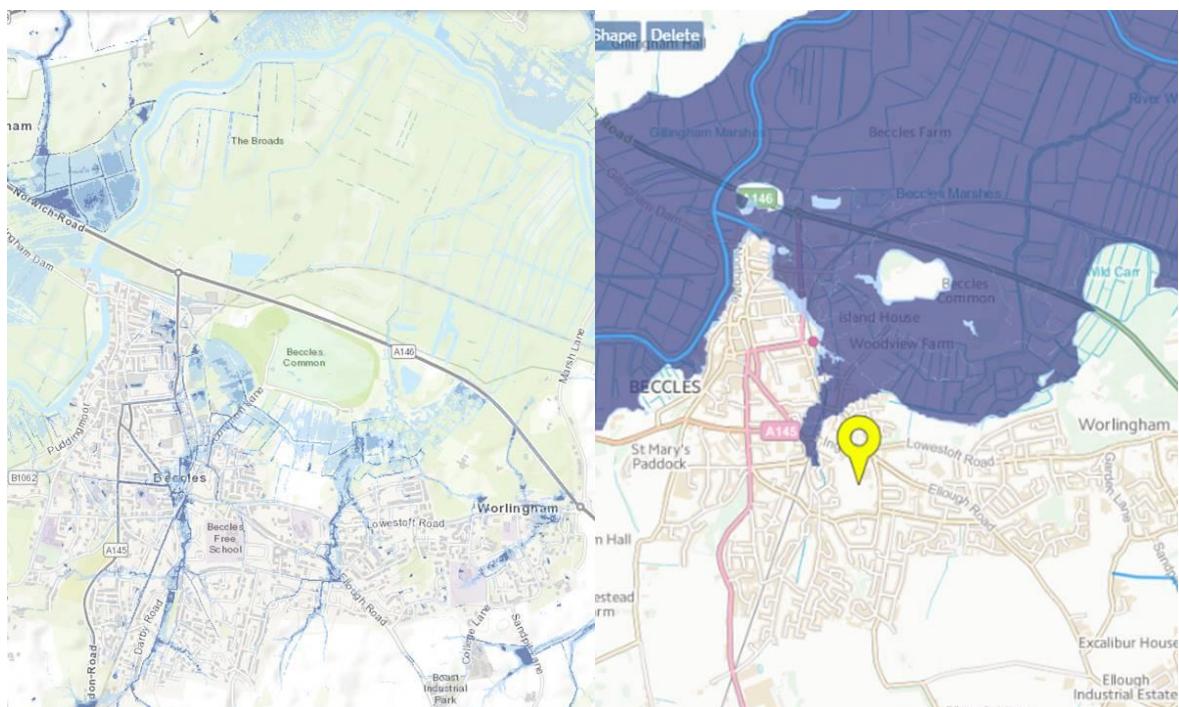
- The Parish is located partially within and near to the Internal Drainage District (IDD) of the Waveney, Lower Yare, and Lothingland Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. A copy of the Board's Byelaws can be accessed on our website (<https://www.nicholsonslaw.com/cms/document/byelaws.pdf>), along with maps of the IDD (<https://www.nicholsonslaw.com/cms/document/map.pdf>). These maps do not show which watercourses have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB.
- If a development intends to discharge surface water to a watercourse the proposed development would require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy.
- If a development wishes to discharge treated foul water to a watercourse, the proposal would require land drainage consent in line with the Board's byelaws (specifically byelaw 3).
- If there is the presence of a Board Adopted watercourse within or adjacent to the site boundary, and the development intends to do works within 7 metres of this watercourse, Consent would be required to relax Byelaw 10 (no works within 7 metres of the edge of drainage or flood risk management infrastructure).
- If works were proposed to alter a Board Adopted watercourse, Consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- If works were proposed to alter a riparian watercourse Consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- If a development proposes to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning

permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.

Within the consultation document, there is only a small reference made to flood risk under the section 'Effective Sustainable Urban Drainage Systems, biodiversity and flood risk'. We do not believe that the risk of flooding and existing potential issues within the drainage system have been discussed in appropriate detail, although it does reference the use of Sustainable Drainage Systems and how they can be used to promote Sustainable Development.

In addition to the above, the Board would draw attention to the two maps provided below, which show the Risk of Surface Water Flooding and the Risk of flooding from Rivers and the Sea, which both highlight there are a number of areas at risk from both types of flooding. The RoSWF map clearly identifies the presence of a number of overland flow paths that dissect the Parish with a High, Medium, Low and Very Low Risk. The Board would want to be consulted on any future developments within or near to its IDB, and also recommend the LLFA as well as Anglia Water are have an influence in the discussion of these.



# Worlingham Parish Council

## Paragraph 2.23

Worlingham is an independent Parish, the largest and closest Village to Beccles. With very few amenities we are sometimes seen as an attachment to Beccles, as is shown in the Local Plan.

It is good to see that the Beccles Parish plan 2.23 covers this “One principle that the NP wishes to see is that any blocks of development on the masterplan for the Garden Neighbourhood should respect the Parish boundaries.”

## 3.3 Neighbourhood Plan Objectives

The visions and objectives want to see a thriving town centre 3.3 (13) and (14) “Improve the town centre by exploring ways of making more car free spaces for pedestrians.”

This pedestrianisation could well have an adverse effect and would be detrimental to the residents of the towns outlying the central town of Beccles, in particular Worlingham.

The village residents are known to be older and therefore less mobile, so vehicular transport is essential rather than a choice. Removal of the short term on road parking spaces would benefit the few in favour of the local population, and would push shoppers to the out of town trading estates, none of which have local independent stores.

## 4. Community and Tourist Infrastructure and Facilities

It is also noted in the tourism section that there is insufficient tourist accommodation within the town itself. This pedestrianisation would further discourage tourists from just popping in to the town to use the many independent shops.