

# Responses to Beccles Neighbourhood Plan

## Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 14 December 2020 to 8 February 2021

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## What is the purpose of this document?

Beccles Town Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 14<sup>th</sup> December 2020 to 8<sup>th</sup> February 2021.

# East Suffolk Council

A well written plan with very good content. We have some detailed comments to make as set out below.

Para 8.1 is a strong introduction to this section, which sets the bar for design quality.

The use of two separate policies, one for general design principles and one for the design of streets and public spaces, is a useful distinction.

## **BECC8**

A., a. – delete bracket after ‘Waveney Local Plan’.

## **BECC10: General Design Principles**

Part C of BECC10 could refer back to the Heritage Policy BECC5 for clarity.

D. – the requirement to meet the technical standards for Nationally Described Space Standards should be supported with evidence to comply with national planning policy and meet the Basic Conditions.

## **BECC12: Multi-Value Sustainable Drainage Systems, Biodiversity and Flood Risk**

A. – this part states that it does not apply to householder developments. Is householder development also exempt from the other parts of the policy (parts B-E)? Most parts do not seem to apply easily to householder development.

D. - This part of the policy is supporting a sequential approach to layout of development on sites which feature some risk of flooding. This sequential approach is already set out in national planning policy (para. 163 of the NPPF). The general thrust of this part of the policy is supported, but the wording varies from the NPPF and it is not quite clear exactly how both this policy and the NPPF should be applied to development. Given the content of the NPPF, it is perhaps not necessary to include this in the plan.

## **9 Policies Map**

This maps on pages 56 and 57 refer to ‘Waveney District’ Planning Authority (which no longer exists), rather than East Suffolk Council Planning Authority.

## **Heritage Comments**

Previous comments noted that having Heritage as a sub-section in the ‘Community and Tourist Infrastructure and Facilities’ section would not give it the weight that it deserves. Given that the town has such a strong historic character, it should be reconsidered to give

Heritage a separate section, or to include it in a Built Environment section with Design.

The NP is not proposing to add new NDHA's to the list. It is useful that the wording of 4.30 includes the potential for NDHA's to be identified outside the Conservation Area. The wording does not reference the ESC NDHA identification criteria or Historic England guidance, which would be useful.

Figures 4.1 and 4.2 showing the key designated and non-designated heritage assets are very useful.

The section 'Examples of suitable materials that reflect the local distinctiveness of Beccles' could be read as a design guide, however in combination with the photographs on the next page it is a useful illustration of some of the historic features that characterise the town. This supports the Policy well.

Policy BECC5 is still titled 'Heritage and Design'. This is somewhat confusing as there is a separate Design section. Keeping the Policy title as is would be an argument for including Heritage in a 'Built Environment' section, or perhaps the Heritage section should be titled as 'Heritage and Design'.

Otherwise the policy is well-written. Good use of 'enhancement of significance' and 'local distinctiveness', and emphasis on the importance of setting and context as well as design and materials. The earlier photographs are a useful evidence base for illustrating what the NP means by local distinctiveness.

The inclusion of Community Actions for Heritage is welcomed. This is a pro-active way of promoting continued interest in conservation strategies.

Please note these comments are made at Officer level and do not prejudice any future decision made by the Council.

# Alan Keeley

## **Tourist Facilities**

I'm glad to see that the Quay is recognised as the gateway to the Broads and one of the main tourist attractions for the area as well as a location enjoyed by local people. However I feel that the ambitions for this area falls short. To make this area succeed there is a need to remove the industrial aspect of the location to a more suitable location. The area utilised by Travis Perkins should be part of the tourism area and would be better served as a residential or community area. The added benefit would be to reduce the no of HGV's delivering to Travis Perkins. Trasvis Perkins would be more suited to the Industrial areas of Beccles.

Furthermpore, there is a need to create a safe route between the town centre and the Quay. The most popular route, Northgate, has narrow pavements, often blocked by illegally parked vehicles. Numerous busses use this road which is unsuitable for their use, as is the old Beccles Bridge. I would welcome a review of these areas as part of the vision for Beccles

## **Hertage and Design**

I'm pleased to see that Heritage and Design are key factors in the vision for Beccles. I would welcome some incentive to reinstate the original front boundaries to some of the establised roads in Beccles. In particular Station and Denmark road where front boundaries have been replaced with a mixture of designs and materials. Similar projects have been undertaken in other towns and greatly improved the appearance of the area.

## **Transport and Movement**

There is particular reference to the congestion along Ingate and Blyburgate. Could I suggest that this has been made worse by traffic being unable to access George Westward way via Grove Road. The reversal of direction of travel along Grove Road would reduce the no of cars entering the town.

## Alison Woodstock

Thank you for the opportunity to feed into the Beccles neighbourhood planned, although I am not a town resident I live locally in one of the surrounding villages and use the town centre for shopping and recreation.

My major concern with any development on green sites is the impact on the environment and in particular increased risk of further flooding in Beccles and along the River Waveney.

We have witnessed the devastation of flooded homes this winter and whilst the surrounding flood plains have been effective the river banks, drains and ditches were breached causing devastation along the Waveney Valley.

I am in favour of building on brown field sites but not green sites.

Housing authorities, planners and designers need to do more to make homes more resilient to protect against floods at the design stage.

More joined work of local government at all tiers needs further robust cooperation across the Waveney Valley to avoid over development and the potential impact and consequences of further increased flood devastation we have seen recently.

Flood plains in the main have been underwater since Dec 25th 2020.

I do not think the neighbourhood plan goes far enough into residents concerns about flooding and more reassurance is needed to alleviate residence concerns.

# Anglian Water Services Ltd

The following comments are submitted on behalf of Anglian Water as sewerage undertaker for the parish.

## **Policy BECC10 - General Design Principles**

We welcome the reference to water re-use measures being incorporated into new developments wherever feasible as this has wider community and environmental benefits. This includes a reduced impact of new development on the existing public sewerage network.

## **Policy BECC12 – Multi Value Sustainable Drainage Systems, Biodiversity and Flood Risk**

Reference is made to new development providing Sustainable Drainage Systems on site unless there is clear reasons why is not possible and demonstrating multi-functional benefits of proposed SuDs features.

Anglian Water fully supports the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.



## Beccles Society

Members of Beccles Society have been kept fully informed of progress on the Beccles Neighbourhood Plan by Paul Fletcher, who until recently was chairman both of this Society and the Beccles Neighbourhood Plan Operational Group.

The Society would now like to express its support for the Plan, and specifically the material on Beccles' heritage, and on policies BECC5 'Heritage and Design' and Policy BECC10 'General Design Principles'.

# Beccles Twinning Association

It is good to see our links with Petit -Couronne mentioned on page 8, History of Beccle paragraph 2.4

Despite some differences there are many similarities between Beccles and the 2 towns, and there is much to be learnt in terms of town and neighbourhood planning.

We recommend that the the links between Beccles and her twin and partner towns continue to be actively encouraged over the next 35 years, and that during this time 'Best Practice' is shared, in particular in the management of open spaces and the development of the Quay area Becc3 and Becc12

# Broads Authority

## Main comments

- 4.33 – Depending on the location, character and context, UPVC might not always be acceptable. As such, this needs to say that this depends on the scheme and its location and also design advice of experts at the Local Planning Authorities. Our Heritage and Design Expert has concerns about this. Given that much of the Beccles Conservation Area is covered by an Article 4 direction which controls the replacement of windows (there is an Article 4 direction), this wording might be in opposition to the advice being given by the LPAs in most instances, or certainly where the works relate to a historic building or building in a sensitive location – which most of the CA will be. They need to refer to the Article 4 direction (perhaps include it as an appendix?) and the policy should state that ‘where windows are being replaced on a historic building, timber windows should be replaced on a like-for-like basis or opportunities taken to enhance the appearance of historic buildings by reinstating timber windows of traditional design where they have been lost.’ They could perhaps go on to state that in some instances UPVC windows may be considered appropriate where they are of high quality and good design and the building is not of historic importance or in a sensitive location.
- Para 4.35 doors: Our Heritage and Design Expert has concerns about this and suggests you replace ‘have a major impact on’ with ‘contribute greatly to’. I would be wary of saying that new development should use ‘Georgian or Victorian-style’ doors and doorcases, so would remove the phrases ‘wherever possible’ and ‘should’ but they could perhaps say ‘where appropriate they could be used on new development’.
- P33 red box – Community Actions – mention is made of degradation of the CA through inappropriate advertisements. Should there be a specific policy on shop signage and advertisements as this does have a major impact on the town centre (eg appropriate in scale, materials, type and level of illumination, number of signs, banner signs etc)?
- BECC9 – Considering the emphasis that the Plan makes on walking and cycling and tackling car use, it seems prudent that this policy should mention cycle parking and electric vehicle charging points.
- Policy BECC10C Replace with: ‘Proposals should seek to avoid any adverse impact on heritage assets (including archaeological assets) on the development site or in its surroundings.’
- BECC10 E – Any development of any size can impact the considerations in this part of the policy. It is more about the location, context, character and proposed design than the size or scale, although of course size and scale can have an impact. It is not

clear why a threshold of 10 or more has been used. This is an area that needs further consideration as it seems prudent that all development considers these aspects.

- BECC11 – With the Plan having such emphasis on promoting cycling, it seems prudent that this policy should include cycle parking.
- BECC11 Part C – please be aware that the Broads has intrinsically dark skies and seeks to address light pollution through its Local Plan. Low energy lighting is one consideration, but the need for lighting in the first place, how it is pointed so as not to add to light pollution are other considerations that need to be put in the policy.
- Policy BEC11G: it should seek – ‘not to adversely affect any heritage assets on the development site or in its surroundings’.
- I wonder if somewhere they need to define what they mean by ‘heritage assets’. They could then just refer to ‘heritage assets’ rather than ‘historic architectural or archaeological assets’ as they have done. Obviously, there is a difference between ‘designated heritage assets’ and ‘heritage assets’, which would include locally identified heritage assets as well as all of those that are designated (SAMs, LBs, CAs, RPGs). This wider term would probably be the most appropriate term for them to use.
- P60 Heritage / Conservation Area ‘enhance its character and appearance’ rather than quality. Partners should be the BA as well as ESDC.
- Page 61, lighting row - please be aware that the Broads has intrinsically dark skies and seeks to address light pollution through its Local Plan. Lighting near the Broads should be thoroughly justified and well designed so as to not add to light pollution. Perhaps the Broads Authority should be a partner as well.
- Better reference to the Broads: The following changes are requested to better refer to the Broads and the Broads Local Plan. They are fairly minor in nature and do not necessarily affect policy direction, but it is important to ensure the context is correct:
  - Do you want to mention what the Local Plan for the Broads says about Beccles – like allocating residential moorings at Hipperson’s Boatyard etc?
  - 1.10 – what about the vision in the Local Plan for the Broads?
  - 4.26 – and Broads Local Plan
  - 4.29 – Broads has undesignated heritage assets too. The Conservation Area is partly in the Broads.
  - Page 60, Conservation area row, add Broads Authority - as part of the CA is in the Broads.

### Comments relating to evidence

- Figure 2.1 – In September 2019, the Indices of Multiple Deprivation were updated. Does this section therefore need updating?

### Observations

- 2.9 and actions on page 38 and then 5.9 – is there a slight contradiction here. People saying that there is too much traffic in the town, but that parking should be cheaper, but more need to walk and cycle.

### Queries/suggestions

- The introduction says that Beccles is the gateway to the Broads, but the challenges, objectives and vision do not mention the Broads. Should they?
- 2.10 – is there any monitoring to show if there is less traffic in the town as a result of the relief road which is now in place?
- The Beccles Today graphic, pages 14-17. It might be that I'm reading it wrong but some of the statements below the diagrams don't seem to correspond to the information contained within them – eg 'Large proportion of retirees, smaller number of working people' – to me the graphic shows a smaller number of retirees (total of 27%) against a higher proportion of working people (total 47% - or potentially 7% more than that if you add 18-24 year olds); 'lots of small 2 bed houses and fewer larger family houses' the proportion of 3/4/5+ houses (59%) is actually more than the number of 1 or 2 bed houses (41%).
- 5.19 – do you wish to have a local standard for electric vehicle charging points, until a national standard comes in?
- Should Policy BECC3 make reference to the provision (or at least consideration) of interpretation as part of any proposals?
- Policy BECC4 suggests the re-use of existing buildings for hotel accommodation, which might be fine. However, should there be something to say 'and for the re-use of existing historic buildings, provided the conversion is not detrimental to the significance of the building or its historic fabric'.
- BECC5 f: 'Provide clear justification and a description of mitigation measures...
- BECC5 C – 'and mitigation measures'.
- BECC6 – where does the traffic come from? Is it mostly short journeys starting within and ending in Beccles? If so, is there a community project that tackles travel behaviour of people rather than focusing on the impacts of vehicles or focussing on just hard infrastructure?
- BECC6 wording, in relation to cars and movements of motor vehicles uses 'must'. Whereas the wording in BECC7, to do with walking and cycling, is 'encouraged'. Does that need thinking about considering the emphasis in the Plan about seeking better walking and cycling facilities?
- BECC12 D – how does that fit with the EA and NPPF and our Local Plan requirements? Is it different? If so, what is the justification? If it is the same, is it needed?
- P50-51 – lots of mention of the importance of public spaces – provision for the ongoing and regular maintenance of these spaces should be considered and included in Policy BECC10F

- Section 7 – anything about the healthy design of new development? Anything about active lives etc?
- 8.11 – is there merit in referring to the Future Homes Standard that is being considered by the Government?

#### **Comments relating to access and recreation**

- Consider lowering the quay heading in places to allow specific use for canoeists/kayakers to get in and out of the water. If not possible then consider small floating pontoons to promote paddle sports.
- Consider increasing the number of cycle routes and cycle parking facilities. This could be achieved by upgrading current footpaths or creating cycle lanes on any new paths.
- There has also been a lot of queries from anglers concerning where they can fish from in and around Beccles. Could some areas be dedicated for fishing?

#### **Comments relating to formatting**

- BECC11 – bullet point number is a bit odd – maybe make the sub bullet point of A numbers or Roman numerals (minor point)

# Bungay Cherry Tree Angling Club

**Main Comment: “Regrettably there is no Mention of Angling, or Fishing Pursuits, to be found in the Document.”** Fish and Fishing, which are an important part of the Town in 2.4; (not just “Boats” as mentioned), sadly are omitted here and in 2.12 and 2.17. “Local Context and History” are missing out on couple of historically related fishy items as an interest for Tourism publicity. This is unacceptable to us, plus the many non-Club anglers, and requires recognition.

## 2 LOCAL CONTEXT – (Document)

Extract: 2.4 There are good bus services to Norwich and Lowestoft and rail connections to Ipswich and then on to London Liverpool Street. For some years now Beccles has been known as gateway to the Broads and it is boats that bring many of the tourists to Beccles each year.

Extract: 2.12 Equally, the Neighbourhood Plan engagement has shown that there is a great need for opportunities, activities, and places for youth and the younger ‘pre-retirement’ age groups. Comment: 2.12 & 2.17. Environment Agency Angling Licences (over 335,000 licences sold), show an upturn of 123% they say for this year, with new anglers and those returning to Angling after many years of not fishing. This is a most important leisure development, and Angling’s popularity, merits better recognition. Angling brings good Economic substance and strength to Beccles as the multi-million pound Angling Direct with a £32.1 million turnover (up 21% this year), having the confidence in the Town’s ability, to centrally position one of its 38 shops. Its web site boasts 3.7 million users. Avenue Angling with a more Family posture and widely used, has a shop at Ellough as well as Norwich and with a fine Community Spirit supporting Junior Angling and several Clubs’ events very generously each year.

Extract: 2.17 Beccles Quay has the opportunity to be enhanced and improved as a community place. Community engagement showed that people would also like to see an improvement to Beccles Common, Beccles Neighbourhood Plan Submission Stage (Reg. 16) Consultation Draft 12 turning it into an area with a sense of purpose and place rather than just being a public space.

Comment: on History Item 4 and 4.2 Tourism:

Facts from “The Norfolk Broads” by W. A. DUTT’s 3rd Edition of 1923 include **Waveney and Broadland’s Biggest ever Fish** Lubbock records having seen a picture of one taken high up on the Waveney having an inscription:

***“This Sturgeon was taken upon the shoals above Beccles Bridge on the 7th April 1753” the fish is said to have weighed 11 stones 9 lbs.”***

The Pickerel, Puddingmoor - Beccles pub history index “A listing of historical public houses, Taverns, Inns, Beer Houses, and Hotels in Beccles, Suffolk. The Bury St Edmunds, Suffolk listing uses information from census, Trade Directories and History to add licensees, bar staff, Lodgers and Visitors. . . White's Directory. . . “ It is now a Private Dwelling but both highlight a species of fish which are river extinct today, in Beccles History.

**Extract: 3 VISION AND OBJECTIVES Challenges for Beccles**

Environment • Inconsistently maintained heritage buildings, unsightly brownfield sites and pet fouling. • Pollution of the River Waveney. • Flooding.

**Community facilities 3.** To provide new community facilities especially for parents with young children, and teenagers, plus a new leisure centre and/or indoor pool. 4. To enhance existing open spaces, play areas and other facilities including the library and the Waveney Centre. 5. To develop Beccles Quay as an asset for residents and visitors.

Beccles Quay B. Proposals to improve the environment of Beccles Quay are strongly encouraged, particularly if they address any of the following issues: a. reduce the impact of flooding on the Quay; b. increase the provision of public green space on the north side; c. expand the quantity and quality

**4. COMMUNITY AND TOURIST INFRASTRUCTURE AND FACILITIES** Community facilities  
Community hub

**Extract: 4.2** There are a number of groups and types of activity that would benefit from such provision. This includes users as diverse as sports clubs, theatre companies, musical groups and religious groups. d. increase the range of outdoor leisure facilities for all ages.

**Comment: JUSTIFICATION: Dr Graeme Storey, Environment Agency Acting Deputy Director for Fisheries and Natural Environment, said:**

“Since the lifting of restrictions on recreational angling it has been encouraging to see not only anglers returning to the sport, but also people trying fishing for the first time. Responsible fishing is an excellent way to engage with nature and enjoy being outdoors, which in turn can provide positive health and welfare benefits.

As a consequence of the revenue generated through the sale of rod licences, anglers are at the heart of protecting and improving the very things they care about.

Fishing really is an activity that most people, of any age, can participate in and enjoy. Whether looking for a moment of solitude or a family day out, I would encourage anyone thinking about it to give it a go. It is important to remember that if you decide to return to



fishing or take it up for the first time, you must have a valid fishing licence and adhere to current government guidelines on social distancing.”

### **Free Fishing in the relevant Beccles Area: 2.17 The Beccles Quay and River banks**

**downstream** have been used in this way for a recorded 170-year period long before the Fen Trust set about its perversions of the ancient Charter. Now it is also hampered by Car Parking charges of £3.50 per day. The free 2-hour period, for Anglers, is consumed by the walk to their selected position to fish and tackling and/or packing up, taking about an hour. That leaves barely an hour to actually fish. With the intended Fen Trust imposition of a £3 charge, a total £6.50 cost looks now to be involved where it was free before. Not good for a working-class Family fishing foray here anymore. No doubt the pretend National Park Broads Authority could soon see this as a justifiable precedent as being able to impose an Angling Fee throughout their Area control, including non-tidal River Banks too. This extends right up to Bungay and Earsham. The Broads Angling Services Group and Angling Trust appear to support such a principle, to quote their Officer Kelvin Allen:

*"If we could tap into the tourism element of broads fishing, from what is current all free and giving nothing to support the*

*Broads Fishery, local anglers will largely benefit with this additional investment."*

*"As you know, BASG thoughts are that anglers need to pay their share for such amenities, but if the feelings are that strong locally. You need to lodge them within this local plan.*

We will make a response to reflect this.”

### **Comment: Quotation Activities – Extract of how the wealthy Fen Trust Charity is to spend its money:**

*"To employ the profits of the Beccles Fen for the benefit of the people of Beccles in the form of grants to organisations, providing buildings /facilities/open spaces and providing services ... "*

### **ROYAL CHARTER GRANTED 13/05/1605 AS AMENDED ON 24/01/2011 AS AMENDED ON 24/07/2012**

*PRINCIPLE Charitable objects as extracted from the Fen Trust Accounts Return:*

*"The profits of the same fen, to be employed to the common benefit and utility of the inhabitants of the said town.*

### **Comment: Not as we would see it - a very small Essex-orientated Cv19 vulnerable Group.**

7) To do any other **lawful** thing that is necessary or desirable for the achievement of the objects.”

**Comment:** Local Anglers canvassed do not accept this dangerous “paying” precedent claim and are outraged. Only the Essex based “Nine” who made a Sunday £3 Match-peg-hire Fen Trust Agreement are happy about it. An Angling Trust (approx. only 15,000 members) annual Affiliation is not taken up by 95% of local Clubs\* totalling approximately 3000 members. There are less than 20 BASG members according to their website.

**Comment: The following could fit in with Extract 4.7.** “The community of Beccles would like to see a greater range of activities and opportunities for young people and families by. . .”

**Puddingmoor Park** is an excellent example of the Council’s facilities for Leisure pursuits. Four or five fishing places are possible with free Parking and a short easy grassy walk to the supported river bank all safe, very nicely maintained and in the Beccles 1967 Conservation Area of Item 2. 2.3

**The Scores** too provide an excellent opportunity for Free Fishing. This extract I compiled for a

voluntary Working Party, as a Health & Safety Assessment of the River Waveney Trust, and demonstrates the facilities, all within easy walking distance of the Bus Station and little publicised.

**EACH SCORE HAS ITS OWN PARTICULAR FEATURES AND PROVISIONS AT MID-TIDE RISE:**

LOCATION	Frontage width	Immediate Depth	T/T Mobile Reception	Life Aid fixed present	Rating Assessment
TANNERY SCORE (Northgate)	9’ 3”	48”	5 bars	Jacket Form	Excellent
RAILWAY SCORE (Northgate)	4’ 8”	54”	5 bars	Life Buoy	Good
CAMBRIDGE SCORE (Northgate)	4’ 0”	65”	4 bars	Jacket Form	Poor
THE SCORE (Saltgate/Northgate)	20’ 2”	60”	1 bar	Jacket Form	Fair
CHURCH SCORE (Puddingmoor)	14’ 1”	58”	1 -2 bars	Jacket Form	Good



Tannery



Railway



Cambridge

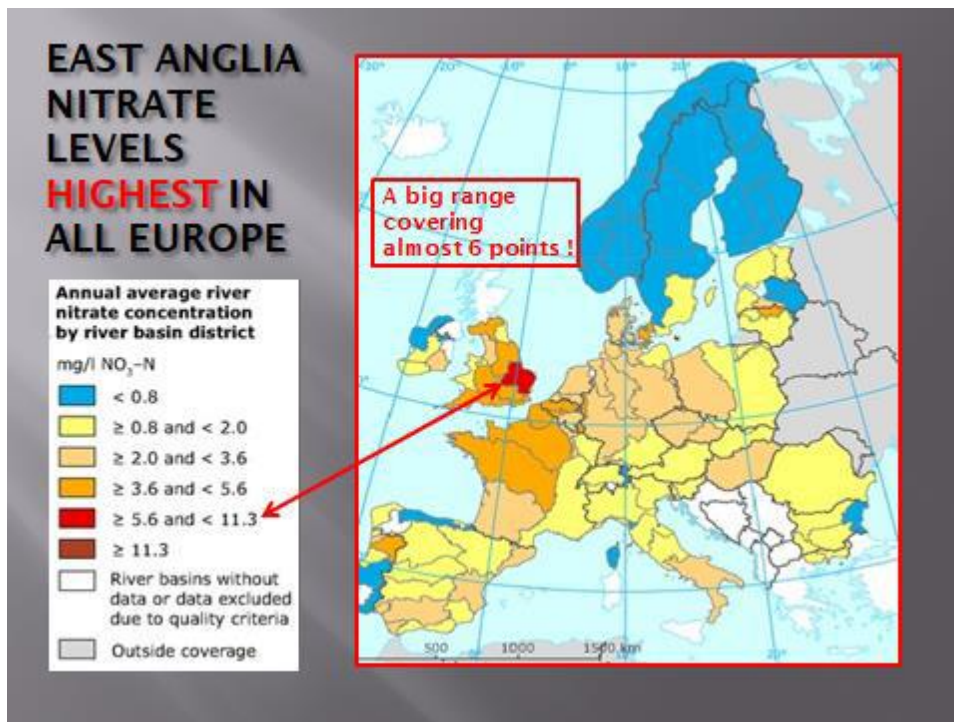


The Score



Church

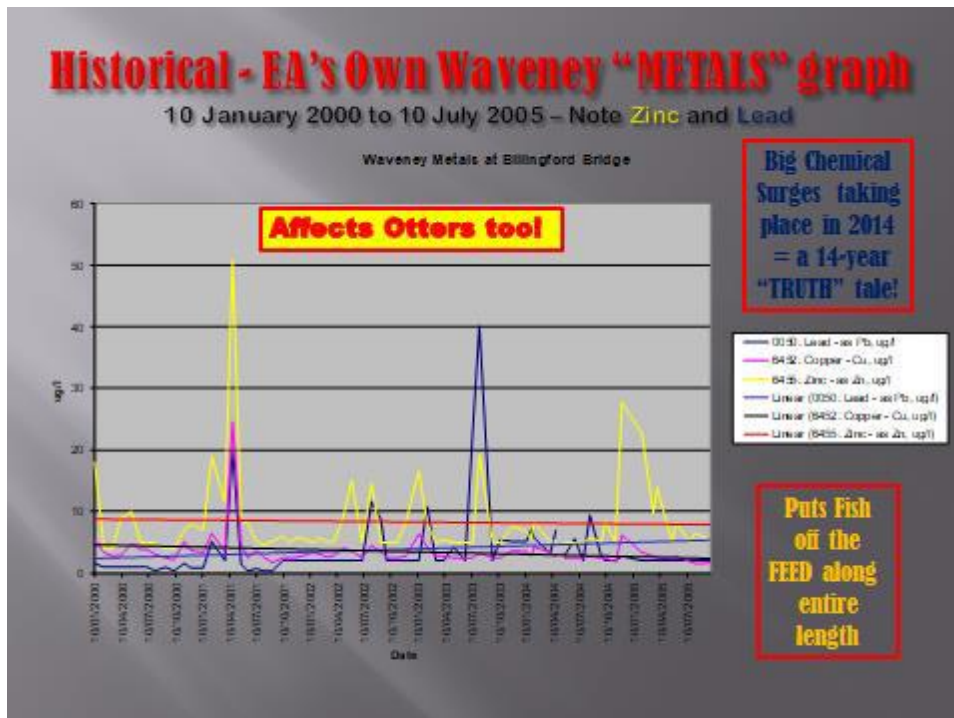
### Item 3. 3 VISION AND OBJECTIVES Challenges for Beccles - Pollution of the River Waveney



Reported in the National Press, and still on the Internet, the Waveney alongside the Wensum were reported as ***“The two most Chemically polluted rivers in the UK”***. This is a devastating judgement on the Environment Agency, and the ineffective Department of the Environment. It is not a new problem and we harshly say:

***“It requires strong, positive, new, and technologically informed challenges, from all of the interested or involved Bodies!”***

Holding the EA’s permission-released figures of twenty years plus from Billingford Gauging Station, often containing Chemical Analyses of excesses of Copper, Lead and Zinc, it still appears unclear where they arise from. Plus concentrated Pig presences at Earsham 80-100 yards from the River.



Whilst these excesses, along with an established history of dissolved oxygen deficiencies, are in the upstream areas, there is maybe some downstream Beccles faulting too?\*\*\* Some of the Upstream effects are clear to see in summer in the Town's reaches. Excessive Weed growths, the like of which have never been recorded before, have erupted over the last four years. These have led to more weed cutting and cost to the Broads Authority, and, made a lot of fishing simply impractical for Visitors and Locals alike. None of the relevant Bodies appear to have done anything yet about the feasible root of this Chemical Problem. Under question too is the abundance of **surface drainage water** into both normal and **flood overspill drains** leading into the River at a number of places.\*\*

\*\*Domestically the Beccles Car Wash in George Berrow/Gresham Road Way by Tesco's entrance, is open nearly 12 hours a day, every day of the week, and on a rainy day produces detergent bubbles taken by tyres, or overspill, on to the road surface which can be seen seeping along almost into the upper head of the Quay dyke, leaving room for improvement. We have Morrison's Supermarket on the roundabout near to the watercourse, Tesco's with its petrol station too. Newly established Lidl's rear is near the Cut. Then we see a main road which gets heavily Winter salted. At Diss, Tesco and Morrison's back on to the puny River's flow. A new McDonald's, 24-hour Marks & Spencer's, plus a BP Petrol Station at Scole roundabout, all unwelcomingly threaten the environment beside the river with its as yet immature and undeveloped flow. **"Small wonder then that the Tench has all but vanished throughout the whole River System!"**

\***Local Angling Clubs:** Beccles AC; Shrublands AC; Oulton Broad Piscatorial, Bungay Cherry Tree AC.; Fleece AC.; Earsham A.S.;

Harleston, Wortwell & District AC.; Diss & District AC; East Anglian Piscatorial; North Cove & Barnaby AC. Norfolk & Suffolk Veterans; and a Southwold Piscatorial Society.

## C Bickmore

Make sure policies address the following:

Transport-Co ordinate bus with trains including a stop by the station and timed to connect with train arrivals/departures. Include displays in bus shelters when bus arriving .

have adequate free short term parking provision for shoppers in town centre

Include cyclists contraflow lanes within one way system

Increase provision of cycle stands

Town centre-aim: vibrant historic town centre for local residents and visitors

Promote variety of independent shops in town centre as far as possible so Beccles becomes a historic niche area for shoppers including sale of local produce.

Maintain open market once a week at least

No more large supermarkets

Open spaces and recreation

No expansion of motorised boat parking on river -adequate supply

Address use for former timber yard by the Bridge

Enhance public Park by River Quay to benefit wildlife in keeping with Broads -including reducing large expanses of mown grass

## David Bennett

It is difficult to find fault with the plan. The objectives and proposals are sensible and achievable. However, the recent debacle over traffic restrictions in the town centre in response to covid concerns illustrates the difficulty of getting the majority of the Beccles community onboard to support future changes. I hope lessons have been learnt that will ease the future implementation of desirable aspects of the plan. Considerable work has gone into producing this plan. I just hope that we will begin to see the implementation of the priority proposals, despite the economic constraints the covid crisis will impose on future budgets.

# Environment Agency

Thank you for consulting us on the above 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 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.

Building a better environment: Our role in development and how we can help:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289894/LI\\_T\\_2745\\_c8ed3d.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LI_T_2745_c8ed3d.pdf)

## **Water Quality**

It would be useful for the plan to acknowledge the importance of adequate waste water infrastructure planning within the parish, and is good practise to show that this is being considered at all levels of the planning process.

Sections 1.11 and 1.12 provide information on house allocations and other development. The 1738 houses mentioned and other facilities such as care homes and employment will result in substantial increases in foulwater flows to be treated. One of the Water recycling Centres likely to treat these flows is Beccles WRC, which is already very close to capacity. This needs to be acknowledged as a potential issue and early consultation with Anglian Water will be essential to ensure any development is planned sustainably so not to overload existing infrastructure, leading to a risk of deterioration in the water environment.



Chapter 8 mentions drainage and Policy BECC12 should mention foulwater as well as surface (rainfall) drainage. An additional point could be added to say that ‘foulwater drainage will be considered early in development to ensure there is capacity for treatment to prevent risk to water quality of local rivers and the environment’. It is good to see Policy BECC3 mentioning that any development ‘proposals must recognise and actively demonstrate sensitivity to the natural environment and must protect and, where appropriate, enhance it’. This section could be strengthened by referencing environmental legislation which is in place to protect various aspects of the environment, for example WFD and Habitats directive, and to mention the designated important protected areas along the Waveney. The plan could highlight local environmental information relevant to the area – much of this can be found on the Catchment Data Explorer or Gov.uk. <https://environment.data.gov.uk/> and <http://environment.data.gov.uk/catchment-planning/>.

### **Water Resources**

Beccles is located within the Suffolk Northern Central water resource zone, which is supplied by Essex & Suffolk Water. It is predicted that by the end of AMP7 (2020 – 2025), there will be a small surplus of approximately 9MI/d of water available for abstraction. However, during AMP8 (2025 – 2030) the Environment Agency will begin to implement license reductions so there will be limited capacity for growth within this water resource zone. During AMP8, there will also be an increased demand for water from the Sizewell site.

Therefore, any development within Beccles will need to ensure there is sufficient water resource availability and that any available water is used in an efficient manner.

### **Flood Risk**

Beccles has a history of flooding and parts of the town are at risk of fluvial & tidal flooding from the River Waveney according to our flood maps. We note development is not currently proposed in areas at risk from the River Waveney.

The Environment Agency recently met with Beccles Town Council and shared the outcome of a study which investigated and identified options to improve the management of flood risk to the town from the River Waveney. The preferred option is to continue with the existing flood defences but upgrade the timber boards to flood gates or ramps and install property level protection for properties at risk on Puddingmoor. The installation of flood gates would make operation easier in the event of a flood and remove the need to store the existing flood boards. We will continue to work in partnership with Beccles Town Council to progress this project.

We note the addition of points D and E in Policy BECC12 in line with our advice. To elaborate and clarify point D we suggest the following wording:

Development should be located outside of flood risk areas where this is not possible development should be directed to the part of the site which is least prone to flooding. Further guidance on the sequential location of development can be found in the National Planning Policy Framework Planning Practice Guidance.

To provide further guidance on point E climate change we suggest including a link or reference to our climate change guidance available here:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

We previously advised that the Beccles Neighbourhood Plan should be supported by East Suffolk Council's 2018 Strategic Flood risk Assessment (SFRA). We suggest this is referenced in the plan as it assesses flood risk across the East Suffolk District and provides flood mapping and advice for all sources of flooding. It is available on the following link:

<https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/waveney-local-plan/local-plan-background-studies/strategic-flood-risk-assessment-level-1-april-2018/>

Please note that the view expressed in this letter are 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 this advice is helpful.

# Historic England

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We welcome the production of this neighbourhood plan, but do consider it necessary for Historic England to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice 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/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district 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 NP, where we consider these would have an adverse effect on the historic environment.

# Janet Lloyd

## Transport5.1

The desirability of preventing HGVs from travelling through Beccles seems to have been accepted, and yet the progress toward this seems to have been negligible. I and my husband have been involved in the Beccles Road Safety Group who have conducted their own surveys into HGV movements through the town. Despite these activities and support from individual counsellors, there seems to be huge inertia to take action over this concern. The numbers of HGVs have reduced since the opening of the Beccles Southern Relief Road, but we still see some regional hauliers using the town as a through route as well as European vehicles. The junction of Smallgate to Market Street and Station Road to Newgate, and progress along Peddars Lane are particularly problematic for HGVs.

# Kelvin Allen

Beccles Neighbourhood Plan Section 4

Section 4.5

Addition of "Angling Access Provision"

POLICY BECC2: COMMUNITY FACILITIES

A

Additional F To provide the provision of angling and angling competitions.

POLICY BECC3: BECCLES TOURISM

B

**Additional E To provide the provision of angling and angling competitions.**

# Larkfleet Homes

## 1.0 INTRODUCTION

1.1 These representations to the Submission (Regulation 16) version of the Beccles Neighbourhood Plan have been prepared by DLP Planning Ltd (DLP) on behalf of Larkfleet Homes who have the option on a substantial part of land comprising the Beccles and Worlingham Garden Neighbourhood including parts falling within the designated Neighbourhood Plan area.

1.2 A Neighbourhood Plan must demonstrate, inter alia, that it will support the achievement of sustainable development and is prepared in general conformity with the strategic policies of the development plan for the area. These elements form the basic conditions that a plan must meet. Section 2 of these representations sets out the relationship with national policy and guidance.

1.3 The submission version of the Beccles Neighbourhood Plan is to be assessed for its general conformity with the strategic policies of the development plan in force. At the time of writing, the adopted development plan includes the Waveney Local Plan (2019) and the Policies Map (2019).

## 2.0 NATIONAL POLICY AND LEGISLATION

2.1 A Neighbourhood Plan must meet prescribed basic conditions if it is to proceed to a referendum. These are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004:

- a. *having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).*
- b. *the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.*
- c. *the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- d. *the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
- e. *prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*

2.2 In relation to basic condition (e) a Neighbourhood Plan, to be in general conformity, must support the delivery of strategic policies contained in the Local Plan. Neighbourhood Plans cannot undermine those strategic policies (ID: 41-070-20190509).

2.3 Planning practice guidance confirms that Neighbourhood Plans should demonstrate how they may contribute towards environmental, social and economic conditions while ensuring adverse impacts are avoided (ID: 41-072-20190509). This is consistent with the objectives for a plan-led system and sufficient and proportionate evidence is required to demonstrate this.

2.4 The revised NPPF2019 emphasises that strategic policies should be clearly distinguished from non-strategic policies. Planning Practice Guidance specifically addresses the approach to understanding the implications of identifying strategic policies relevant to basic condition (e) and ensuring general conformity. Strategic policies can occur anywhere in the development. They will not solely relate to housing matters and can be required to address the range of priorities identified in paragraph 20 of the NPPF2019, including infrastructure and community facilities.

2.5 Groups preparing Neighbourhood Plans should apply a number of considerations when identifying and determining the role of strategic policies, including inter alia:

- *“whether the policy sets out an overarching direction or objective.*
- *whether the policy sets a framework for decisions on how competing priorities should be balanced*
- *whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the local plan or spatial development strategy*
- *in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the local plan or spatial development strategy.*
- *whether the local plan or spatial development strategy identifies the policy as being strategic” (ID: 41-076-20190509) (DLP emphasis).*

2.6 Infrastructure needs to be provided in the Neighbourhood Plan area should be considered at the earliest stage in plan-making. This should ensure that the planning system supports growth in a sustainable way. These considerations include:

- *“what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way;*
- *how any additional infrastructure requirements might be delivered;*
- *what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery; and*
- *what are the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which could help shape decisions on the best site choices” (ID: 41-045-20190509)*

2.7 The requirements for prioritised infrastructure to support development in the plan should be set out and explained within the Plan.

### **3.0 KEY ISSUES WITH THE BECCLES NEIGHBOURHOOD PLAN AND GENERAL CONFORMITY WITH STRATEGIC POLICIES**

3.1 It is important to note that the requirement for general conformity means that policies in the Neighbourhood Plan are in accordance with the adopted development plan, which in this case is the Waveney Local Plan (2019).

3.2 Policy WLP3.1 of the Local Plan allocates the Beccles and Worlingham Garden Neighbourhood for a comprehensive mixed used development including:

- Approximately 1,250 new dwellings;
- Retirement community comprising a care home/nursing home and extra care and/or sheltered dwellings;
- 2 form entry primary school and a pre-school setting (2.2 hectares);
- Country park, indoor/outdoor sports facilities, allotments, play areas and public open space (at least 25 hectares);
- Community Hub comprising a convenience store, local shops, community centre and pre-school setting; and,
- Employment development (falling under classes B1, B2 and B8) (5 hectares).

3.3 The proposed allocation falls across three parishes: Beccles, Worlingham and Weston respectively, however, the adopted policy does not specify the amount of built form to be brought forward in each respective parish area.

#### **Paragraph 2.19**

3.4 The supporting text of the Neighbourhood Plan at Paragraph 2.19 states that the Waveney Local Plan allocates land at the Beccles and Worlingham Garden Neighbourhood for the following:

- *“Approximately 1,250 dwellings (approximately 50% of this figure is likely to be located in Beccles parish, 40% in Worlingham parish and 10% in Weston parish but the final split will depend on what is granted planning permission);*
- *Retirement community comprising a care home/nursing home and extra care and/or sheltered dwellings;*
- *2 form entry primary school including a pre-school (2 hectares);*
- *Country park, indoor/outdoor sports facilities, allotments, play areas and public open space (at least 25 hectares);*
- *Community Hub comprising a convenience store, local shops, community centre and pre-school provision;*
- *Employment development (falling under classes B1, B2, and B8) (5 hectares)”.*



3.5 We have particular concern with this paragraph where it refers to a potential percentage split of units across the Parishes. As written, the supporting text is misleading and does not conform with Policy WLP3.1 as set out within the Local Plan. Reference to any notional split between the constituent parishes should be removed from the supporting text to ensure that it does not conflict with the strategic policy. The Neighbourhood Plan should not be a tool to fetter the proper planning of the Garden Suburb in accordance with the relevant policies of the adopted development plan.

3.6 In addition, the supporting text states that the area of land for the 2-form entry primary school including a pre-school is 2 hectares. Policy WLP3.1 of the Local Plan requires a site of 2.2 hectares. The text should be amended so that it does not conflict and countermand strategic policy.

#### **Paragraph 2.21**

3.7 Paragraph 2.21 of the Neighbourhood Plan identifies that a significant proportion of the area of the Garden Neighbourhood is outside the parish boundary of Beccles. A Neighbourhood Plan cannot include policies that directly concern development that is proposed outside the designated area. In this instance, and for this reason, policies that seek to determine the form, scale or other criteria relating to development should not be included in the Beccles Neighbourhood Plan so far as the development should be brought forward on a comprehensive basis following consistent development criteria established in the Local Plan and in accordance with a master plan that will be approved by the Local Planning Authority.

#### **Paragraph 2.23**

3.8 Paragraph 2.23 identifies an expectation that residential development areas in the Garden Neighbourhood should respect parish boundaries. In this instance parish boundaries do not (for the most part) follow any clearly defined boundaries on the land. It follows that local administrative boundaries should have no role in determining the proper master planning of the Garden Neighbourhood. To do so would be wholly unreasonable where it may impact on the integral design of an area and create divisions in the community which is explicitly intended to be a single new garden neighbourhood.

3.9 Supporting text in paragraph 3.18 of the Waveney Local Plan states that *“a comprehensive approach to development is essential to the success of this allocation”* adding at paragraph 3.22 that *“Neighbourhood Plans for Beccles, Worlingham and Weston can play a role in shaping the detailed design of development in this area, promoting local distinctiveness”*.

3.10 The Local Plan explicitly identifies that a comprehensive approach to development is sought across the masterplan area. On this basis, paragraph 2.23 is contrary to the

intentions of the development plan and should be removed to ensure conformity with Policy WLP3.1 of the Local Plan and its supporting text.

### **Paragraph 4.3**

3.11 Paragraph 4.3 of the Neighbourhood Plan sets out that *“a new community facility is being developed in neighbouring Worlingham, but this is required to address the needs of Worlingham residents. Beccles needs its own community space. The Beccles and Worlingham Garden Neighbourhood is expected to deliver a community hub, including a convenience store, local shops, pre-school and a community centre. This is required to be ideally in a central location within the Garden Neighbourhood within the Beccles Parish, and with good accessibility from the existing community of south Beccles. Such a facility is likely to be capable of addressing the needs of the existing community of Beccles but must be accessible to them. It is particularly important that accessibility by public walkways, along cycle paths and by public transport is provided, as well as by car”*.

3.12 Whilst we wholly support the suggestion that the Community Hub required by Local Plan Policy WLP3.1 should be accessible to the existing community; it is wholly unacceptable for the Neighbourhood Plan to seek to predetermine the location of the facility to ‘a central location’ and specifically on land within Beccles Parish. The new Garden Suburb is explicitly required to deliver a comprehensively planned approach to development. Local Plan paragraph 3.19 states that access will be required across the development land to adjoining boundaries to achieve integrated and comprehensive development of the new community and that this will be secured by conditions. Paragraphs 3.20-3.21 identify the essential importance of a comprehensive approach.

3.13 Whilst it is noted that paragraph 4.3 refers to Beccles needing its own community space, the Community Hub and the facilities identified to be provided in Policy WLP3.1 are for the purposes of meeting the needs of the new Garden Neighbourhood: they are not allocated for the purposes of meeting any perceived shortfalls in Beccles, although access to them may be facilitated for the existing community.

3.14 In this context any policy within the Beccles Neighbourhood Plan which seeks to undermine the proper comprehensive master planning of the area by way of seeking to predetermine key aspects of a masterplan is not in conformity with the basic conditions of a neighbourhood plan. Reference to the location of any specific facility in a central location and explicitly with Beccles should be removed from the Neighbourhood Plan.

3.15 As written, supporting paragraph 4.3 is in direct conflict with the strategic policies of the Local Plan.

### **Paragraph 4.4 and Policy BECC1: Provision of a Community Hub in the Beccles and Worlingham Garden Neighbourhood**

3.16 Paragraph 4.4 identifies that the community space should ultimately be a versatile, multi-use space, managed by the local community (through an appropriate vehicle). Policy BECC1 goes on to state that:

*“As required by Waveney Local Plan Policy WLP3.1, the development of the Beccles and Worlingham Garden Neighbourhood is expected to include provision of a community centre. Any such provision is expected to meet the following criteria:*

- a. The community centre should provide a flexible space which can address the identified needs of the community.*
- b. The developer must demonstrate that they have actively engaged the community on the design of the community centre space and that, as far as possible, the requirements of the community have been met.*
- c. The community of Beccles, through an appropriate management entity, is involved in the ongoing management of the community centre.*
- d. The community centre is easily accessible to the existing community of Beccles, particularly on foot and by bicycle through the provision of a network of high-quality public walkways and cycle paths which link up with existing walking and cycling routes in Beccles town”.*

3.17 Whilst in principle, we have no objections to parts a., b. or d. of this policy, any such policy must reflect that a significant proportion of the Garden Neighbourhood falls outside the designated Beccles Neighbourhood Plan area. Accordingly, either Policy BECC1 must acknowledge that its provisions are only applicable to those parts of the Garden Neighbourhood that fall within the designated Neighbourhood Plan area; or that, if it wishes to influence the overall comprehensive master planning and delivery of the Garden Neighbourhood, it should identify what mechanisms it proposes to enter into with which other stakeholder in pursuance of that comprehensive approach.

3.18 As such the policy as drafted appears to presume that the provisions of paragraph 4.3 will apply. For the reason set out that is not the case. Part c. in particular fails to address the realistic likelihood that none of the Community Hub and its facilities will fall within Beccles and as is highlighted at paragraph 2.21, the Neighbourhood Plan cannot include policies that directly concern development that is proposed in the other Parish area.

3.19 On this basis, Policy BECC1 should remove part c. and adjust its supporting text at paragraph 4.4 to ensure that it is not in conflict with the Local Plan.

3.20 As written, Policy BECC1 is in direct conflict with the provisions of Policy WLP3.1 of the Local Plan.

## **Policy BECC5: Heritage and Design**

3.21 Policy BECC5 A sets out that to ensure the conservation and enhancement of Beccles heritage assets, proposals must:

- a. *“a. Preserve or enhance the significance of the heritage assets of the town, their setting and the wider built environment, including views into and out of the conservation area.*
- b. *Retain buildings and spaces, the loss of which would cause harm to the character or appearance of the conservation area.*
- c. *Contribute to the town’s local distinctiveness, built form and scale of its heritage assets as described in the Beccles Conservation Area Appraisal and Management Plan documents, through the use of appropriate design and materials.*
- d. *Be of an appropriate scale, form, height, massing, alignment and detailed design which respects the areas character, appearance and its setting.*
- e. *Demonstrates a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context.*
- f. *Provide clear justification, through the submission of a heritage statement, for any works that would lead to harm to a heritage asset yet be of wider public benefit”.*

3.22 It is not clear whether this policy is being applied to all new development proposals within the Parish including those at the Beccles and Worlingham Garden Neighbourhood. Part A (c). of this policy would appear to suggest that the policy is a blanket policy approach to all new development proposals and not just those within the Conservation Area, however, the Beccles and Worlingham Garden Neighbourhood is a comprehensive site which will require a consistent design approach and palette across the site. As the Neighbourhood Plan has previously recognised, parts of the site also fall within the parishes of Worlingham and Weston and such policies cannot apply to development within those Parishes which would in turn render this policy in conflict with the provisions of the role of a Neighbourhood Plan.

3.23 On this basis, this policy needs to be adjusted explicitly to exclude the Beccles and Worlingham Garden Neighbourhood for which Local Plan Policies WLP3.1 makes provision for master planning and WLP8.29, design.

### **Policy BECC6: Local Road Junctions**

3.24 Section 5 of the Neighbourhood Plan identifies that the historical road network of Beccles has significant challenges with respect to congestion, partly due to the volume of vehicular traffic but also due to heavy goods vehicles which travel through the town centre. Paragraph 5.2 of the Neighbourhood Plan states that the growth planned in the Waveney Local Plan – particularly at the Beccles and Worlingham Garden Neighbourhood – is inevitably going to have a detrimental impact on this and whilst the Local Plan identifies specific transport schemes that are required to support growth including utilisation of the

Southern Relief Road and improving access to the Enterprise Zone at Ellough, the Neighbourhood Plan (as stated at paragraph 5.5), no other specific highways improvements are identified, yet there are a number of road junctions in Beccles already congested at peak times (paragraph 5.6).

3.25 Paragraph 5.7 states that these local junctions may experience further congestion and safety issues as a result of growth created by the Garden Neighbourhood or by other developments that come forward over the plan period. Paragraph 5.8 then lists a number of junctions that are considered to be at risk of increased traffic levels and where mitigation may be required:

- *Blyburgate/Peddars Lane*
- *Ashmans Road/Fredericks Road*
- *Norwich Road/Loddon Road*
- *Yarmouth Road/George Westwood Way*
- *Norwich Road/Yarmouth Road*
- *London Road/St Mary's Road.*
- *Hungate/Blyburgate/Exchange Square.*

3.26 As a result, **Policy BECC6: Local Road Junctions** states that:

*"A. All Transport Assessments (for larger sites) or Transport Statements (for smaller sites) - as required by paragraph 111 of the National Planning Policy Framework - must address to the satisfaction of the highway authority the direct and cumulative transport impact on road junctions, in particular including the following, identified on the Policies Map:*

- a) Blyburgate/Peddars Lane*
- b) Ashmans Road/Fredericks Road*
- c) Norwich Road/Loddon Road*
- d) Yarmouth Road/George Westwood Way*
- e) Norwich Road/Yarmouth Road*
- f) London Road/St Mary's Road*
- g) Blyburgate/Hungate/Exchange Square*

*B. In particular, such transport impacts include the impact on the safety of cyclists and pedestrians at the respective local road junction".*

3.27 The Neighbourhood Plan is not supported by clear evidence which justifies this policy. The Local Plan has identified schemes for improvement based on its evidence base and on this basis, this policy is in direct conflict with the provisions of the Local Plan.

3.28 In addition, it is not the role of a Neighbourhood Plan to define what a Transport Assessment should or should not include but rather, this is the role of the Local Highways Authority.

3.29 In the case of the Beccles and Worlingham Garden Neighbourhood, the scope of a Transport assessment has been agreed with the Highway Authority such scope covering only those junctions where the Highway Authority consider that there is likely to be a material impact arising from the development.

3.30 This policy should therefore be amended to make clear that the list of junctions are locations that the Neighbourhood Plan considered to be at stress and as such may require to be considered in a Transport Assessment.

## Marine Management Organisation

In paragraph 1.5 there are references to the Waveney and Broads Local Plans. We would recommend you also make reference to the East Marine Plans here as the neighbourhood plan should have regard to the marine plans.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the East Inshore and East Offshore Marine Plans, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. The East Marine Plans cover the area from Flamborough Head to Felixstowe, including the tidal extent of any rivers within this area. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area.

A marine licence may be required for any activity that occurs “below mean high water springs” level. These activities may include private jetties or works on or over tidal waters, such as bridges.

## Martin Thompson

I've read through the Beccles Neighbourhood Plan a couple of times. Although frequently it mentions helping pedestrians and cyclists I feel 'the elephant in the room' is the powerful motoring lobby that puts convenience of car drivers over the quality of life and safety of local residents and tourists. I would like to see the balance greatly changed.

If, as The Plan says there is a desire to increase tourism, then making a safe and enjoyable route from the improved Quay to Town via Northgate is very important. This could include moving the bus station to the railway station, upgrading the Old Market and making Northgate "access only", two way, from the Ravensmere end.

As you know I took a poll of the residents of Northgate. All but one household thought, quite strongly in some cases, that the road is too dangerous to walk. The pavements are not wide enough in some places for two people to pass. On top of that is the "broken windows theory", that unchecked lawbreaking, in this case the speeding and the overweight vehicles using the road as a short cut, encourages more to do the same. Northgate is a "rat run" to the A143. This does not help tourism. Walking up Northgate when a twelve ton double decker bus comes down is a pretty edgy experience, something for a visitor to remember. By any stretch it is not safe.

I urge the Council to bravely tackle the motoring lobby so that pedestrians and cyclists can enjoy Beccles quietly in clean air without fear of stepping off the all too narrow pavements.



## Michael Ellwood

I've seen the calls for more pedestrianisation and the proposed schemes have been poorly thought out, forcing more traffic down fewer but still unsuitable streets. I would want to see reassurances in the plan that no more schemes would be considered until a proper traffic survey and management scheme for the whole town had been carried out, given the growth in housing on the periphery which will generate more traffic.

Northgate is an attractive link between the Quay and the town centre with many visitors wandering up it looking at the buildings and glimpses of the river without considering the traffic speeding down. Although the pavements have been widened they are still too narrow for people with small children or wheelchair users. It can be quite frightening with a bus less than a metre from your head. In fact the new buses with side exhaust vents at head height are deafening in the narrowest parts of the street where the sound re-echoes between the buildings.

People living in streets such as Station Road, Ravensmere or Ballygate probably think Northgate residents are making a fuss but Northgate is narrower than the others and the houses are right up to the pavement with buses and lorries about 1.5m from bedroom windows in places. It is so important that a traffic plan is developed for the whole town and the problem isn't made worse in another street because of a lack of planning or misguided pedestrianisation. There needs to be more in the plan about traffic management to have any real value as a document.

I would like to see Bridge Street and the Bridge made one way allowing people coming in from Norfolk but not out to discourage vehicles coming through the town and reduce the number of cars speeding down Northgate in the early hours at 40 mph. Hopefully the growth of electric vehicles will reduce the noise levels but bring the added risk to pedestrians who might not hear them coming, especially at the current speeds. I am a regular cyclist but find Northgate the most frightening road in town. Even when I am approaching 20 mph cars are still trying to over take – even going on the pavement.

I feel the plan has been somewhat overtaken by events with the changes brought by the pandemic and the alarmingly rapid decline of town centres including ours. I hope there will be an opportunity for this to be considered and proposals brought forward. It needs more thought than just creating empty pedestrianised areas, used for very occasional events, which emphasise the lack of activity. There needs to be more proposals to make the centre an attractive place to live and improve the quality of life who are there now, even if these needs a managed shrinking of the commercial area.

## Michelle Golding

I welcome the Beccles neighbourhood plan, and appreciate all the work that has gone into putting it together, however 15 years is a very long time scale for many of these objectives.

Living in Northgate within the conservation area (Becc5) and witnessing on a daily basis (especially during the current pandemic), the problems associated with heavy traffic (Becc6 and 7), in areas with very narrow pavements (Becc11), which make it difficult for pedestrians and residents to attempt to access the open space at the Quay (Becc 2 and3) which is subject to flooding (Becc12).

I am disappointed that Northgate itself gets so little mention (except in Appendix A), despite being considered a fundamental part of the Town's heritage, with photographs regularly appearing in national newspapers.

I sincerely hope that all the issues mentioned above, (especially where they impact on Northgate) can be addressed, sooner rather than later and immediate action, such as rerouting of the 8 buses per hour, be taken as soon as possible before there is any further damage to the infrastructure of our historic and vibrant market town, which depends so much on tourism.



## Natural England

Natural England does not have any specific comments on this Regulation 16 of the Neighbourhood Plan.

# Norfolk County Council

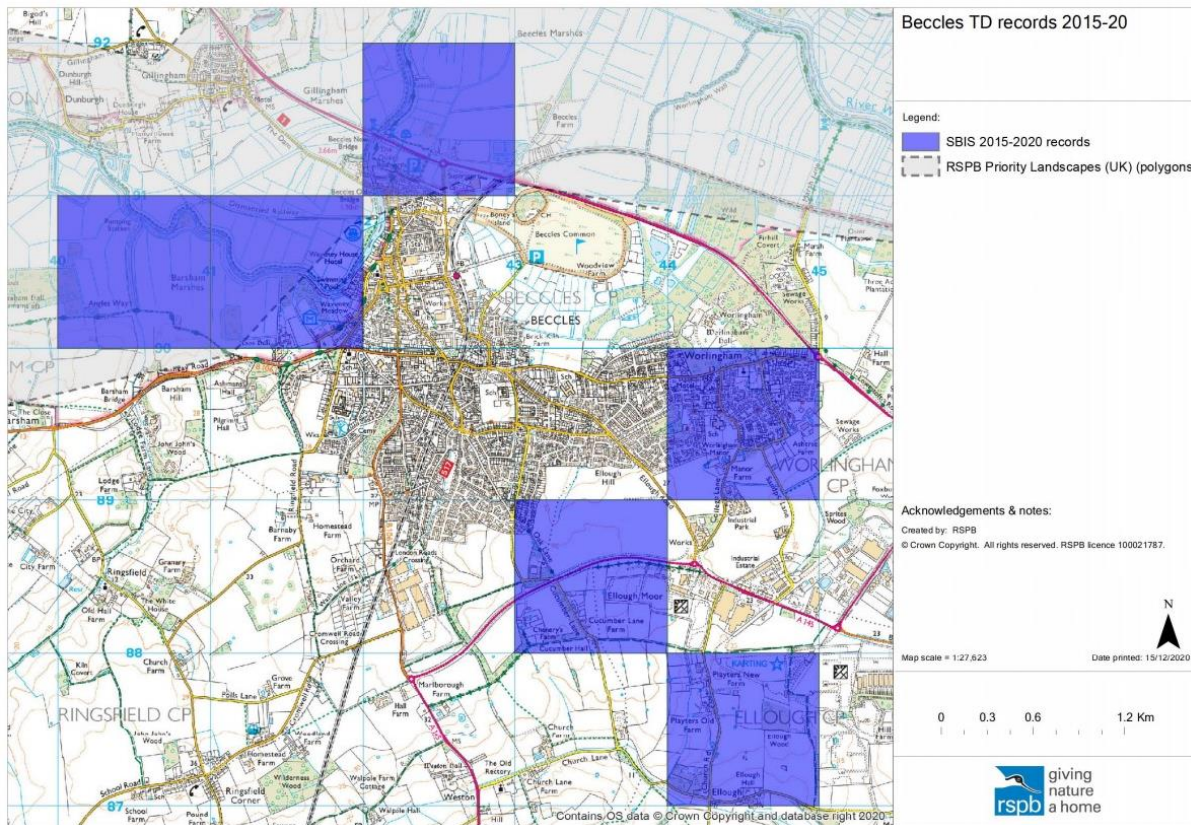
Thank you for consulting Norfolk County Council on the Beccles Neighbourhood Plan. We have no comments to make.

## RSPB

We would like to commend the authors for producing a well written plan and would like to offer a few additional comments. These comments focus on the natural environment which seems to be under-represented within the plan.

1. The grazing marsh to the north of the A146 would have potential for enhancement for breeding waders such as lapwing, redshank, oystercatcher and snipe. In addition, this area has had several recent records of turtle dove, a species which has suffered catastrophic declines in recent years. RSPB would be happy to help provide advice and assistance to further these aspirations if needed. This is relevant to page 55 BECC 12 C.
2. The Beccles and Worlingham Garden Neighbourhood has also been a site where records of turtle dove have been obtained in recent years. The NP objective 11 aspires to 'encourage the appropriate care and management of our wider green environment.' We suggest there would be opportunities when designing planting schemes, location of proposed allotments and the proposed country park to create habitat with the express purpose of attracting turtle dove and other threatened farmland birds. Once again RSPB would be happy to help provide advice and assistance to further these aspirations if needed.
3. On page 47 mention is made of Community Actions. We suggest that developing a group of community volunteers who could build and deliver a series of nature walks to help combat mental health issues and raise the profile and value of nature might be a worthwhile endeavour.
4. Page 50, section 8 focuses on design principles and we would suggest incorporation of 'swift bricks' is considered for any new build. Swift is another bird species under threat, and which has suffered dramatic declines in recent years. Once again RSPB would be happy to help provide advice and assistance to further this aspiration if needed.
5. BECC 10, B and E, points 8.4 and 8.5 make mention of the design of planting to encourage wildlife and create a nature-rich environment. This mirrors our comment, 2 above
6. Point 8.8 makes mention of SuDS and we would like to mention that accessible, small water bodies are important habitat features for turtle dove.

We hope you find these comments of use.



# Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Beccles Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

## **Transport**

SCC understands that there is the concern of HGV traffic through the town centre, however restricting lorries to access only may not be feasible, as these are often challenging to enforce, and may not be effective.

We have no further comments to make at this stage, and request to be kept informed and updated as the plan progresses.

# Suffolk County Council Archaeology

## Section 4.31

Thank you for consulting SCCAS, I have had a look through the document and archaeology is well represented. Only comment I would like to add in would be to see if would be possible for section 4.31 to have a link to the Suffolk Heritage Explorer <https://heritage.suffolk.gov.uk/>.

Please do get in contact if there is anything you would like to discuss.



## Suffolk Wildlife Trust

Thank you for sending us details of this application, we have the following comments:

Whilst we are pleased to see that the Beccles Neighbourhood Plan recognises the importance of the wetland habitats along the River Waveney, as well as enhancing SUDs for biodiversity within Policy BECC12: Multi-Value Sustainable Drainage Systems, Biodiversity And Flood Risk, we are concerned that there is no specific policy for biodiversity within the Neighbourhood Plan. As stated within the National Planning Policy Framework (NPPF) (2019) (section 174), development should seek to provide biodiversity net gain therefore, we believe that the plan should be expanded to further safeguard species and habitats from fragmentation caused by development.

A new policy should be created, which should state how the Neighbourhood Plan will protect and enhance biodiversity within the Parish, in accordance with the NPPF (section 174). It should incorporate those measures as set out within Policy BECC12 as well as being expanded to include the points below:

River Waveney County Wildlife Site (CWS), Beccles Marshes CWS and Beccles Common CWS are located within the Parish. County Wildlife Sites are non-statutory designation sites recognised within the National Planning Policy Framework as 'Locally Designated Sites'. Therefore, the County Wildlife Site should be referenced within a policy within the Neighbourhood Plan, to help ensure that the objectives of maximising the Parish's biodiversity are met.

The policy should reference safeguarding protected species, as well as Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006 from future development. The NPPF (section 174) identifies that all development should protect and enhance biodiversity, including to 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' Therefore, developments must demonstrate that they result in the net gain of Priority Habitats and not result in a negative impact upon protected and Priority Species.

There is no mention of biodiversity net gain within any of the policies within the Neighbourhood Plan. As the National Planning Policy Framework (NPPF, 2019) Chapter 15 States, planning policy should minimise impacts and provide net gains for biodiversity. Therefore, all development should seek an enhancement, not just an equivalent replacement of lost features. This should be referenced within a policy within the Neighbourhood Plan.

There is no mention within the Neighbourhood Plan of restoring and repairing fragmented biodiversity networks. A policy should be expanded to encompass both local wildlife corridors and landscape scale ecological networks. We believe that the concept of an ecological network can include the River Waveney and its encompassing habitats. In accordance with the NPPF (section 170), ecological networks should be established to ensure that they are more resilient to current and future pressures. Therefore, protecting and enhancing these should be within this policy and ensure this ecological network is maintained. We would be happy to provide additional advice if required.

All future development proposals should apply the mitigation hierarchy to help deliver biodiversity net gain and reduce, as far as possible, negative effects on biodiversity. The mitigation hierarchy requires that in the first instance impacts are avoided, if they cannot be avoided then they should be mitigated for and only as a last resort should impacts be compensated. Enhancement and delivery of biodiversity net gain i.e. an approach that leaves biodiversity in a better state than before should be part of all development proposals, in line with the Government's emerging Environment Act predicted to receive Royal Assent in 2021. This should therefore be referenced within a policy to ensure that future development will not have a negative effect on the area's biodiversity and will deliver a biodiversity net gain.

Please do not hesitate to contact us should you require anything further.

## Sustrans

This comment is on behalf of Sustrans, the charity that's enabling people to travel by foot, bike or public transport for more of the journeys we make every day.

Sustrans supports the Neighbourhood Plan's focus on making improvements for pedestrians and cyclists to encourage active travel within and around Beccles.

From our perspective, and focus on the National Cycle Network, we would like to see major improvements within the town, particularly on the NCN 1 and 517, and also on Regional Cycle Routes 30 and 31. These routes were deemed very poor on our Nation-wide assessment in 2018, predominately due to high traffic volumes and speeds. The Key Movement Routes highlighted in the Neighbourhood Plan align with the NCN and RCN. We would be keen to see more detailed plans on the improvements to walkways and creation of segregated cycle lanes.

Sustrans would be keen to work alongside East Suffolk Council to create improved routes, safe and accessible for all. We hope the Council will take these matters into account when determining this application.

# Theatres Trust

## **Paragraph 4.5/Policy BECC2**

The Trust welcomes recognition within the plan of the Public Hall as a community facility for the town and we are supportive of efforts to seek repair or upgrade. As such we are supportive of the inclusion of corresponding policy BECC2.B. However we suggest the plan might have gone further in seeking to protect Beccles' valued community, cultural and social facilities from loss and recommend consideration is giving to enhancing Policy BECC2 on that basis.

## Waveney Lower Yare & Lothingland Internal Drainage Board

Please note that any development proposals involving any increase or change in the surface water discharge is likely to require byelaw approval from the Waveney Lower Yare & Lothingland Internal Drainage Board. The Board should therefore be consulted on any detailed drainage proposals.