



Beccles Neighbourhood Plan Decision Statement

(The Neighbourhood Planning (General) Regulations 2012 – Regulation 18)

1. Summary

1.1 Following an independent examination, East Suffolk Council and the Broads Authority now confirms that the Beccles Neighbourhood Plan will proceed to a Neighbourhood Planning Referendum subject to the modifications set out in section 3.

2. Background

2.1 Beccles Parish Council, as the Qualifying Body, successfully applied for Beccles Parish to be designated as a Neighbourhood Area under The Neighbourhood Planning (General) Regulations 2012. The [Neighbourhood Area](#) was designated by (former) Waveney District Council and the Broads Authority on 8th November 2017.

2.2 The Beccles Neighbourhood Plan was published by Beccles Parish Council for pre-submission consultation (Regulation 14) between 7th June and 19th July 2019.

2.3 Following the submission of the Beccles Neighbourhood Plan ([submission version](#)) to East Suffolk Council and the Broads Authority the Plan was publicised and comments invited over a eight week period commencing on 14th December 2020, closing on 8th February 2021.

2.4 East Suffolk Council and the Broads Authority, with the agreement of Beccles Parish Council, appointed an independent examiner, Nigel McGurk BSc (Hons) MCD MBA MRTPI to review the Plan and to consider whether it met the Basic Conditions required by legislation and whether it should proceed to Referendum.

2.5 The Examiner's Report received 16th May 2021 concluded that subject to modifications identified in the Report, the Beccles Neighbourhood Plan meets the basic conditions.

2.6 The Examiner recommends that subject to the modifications listed in the Report, the Beccles Neighbourhood Plan should proceed to referendum. He further recommends that the referendum area should be the same as the designated neighbourhood area, with there being no substantive evidence to demonstrate otherwise.



2.7 Following receipt of the Examiner's Report, legislation requires that East Suffolk Council and the Broads Authority consider each of the modifications recommended, the reasons for them, and decide what action to take. This is set out in the table below. Ahead of this consideration, the Examiner's Report and its findings have been subject to discussion between East Suffolk Council, the Broads Authority and Beccles Parish Council.

3. Decision and Reasons

3.1 East Suffolk Council and the Broads Authority, under powers delegated to the Head of Planning and Coastal Management, have considered each of the modifications recommended and concurs with the reasoning provided by the Examiner in his Report dated 16th May 2021. With the Examiner's recommended modifications, East Suffolk Council and the Broads Authority have decided that the Beccles Neighbourhood Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, is compatible with the Convention rights and complies with provision made by or under Sections 38A and 38B of the Planning and Compulsory Purchase Act 2004. The Neighbourhood Plan was taken to the Broads Authority Planning Committee on 16th July 2021.

3.2 As a consequence, the submission version of the Beccles Neighbourhood Plan will be modified as recommended for it then to proceed to referendum.

3.3 East Suffolk Council and the Broads Authority have considered the referendum area as recommended by the Examiner and has decided there is no reason to extend the neighbourhood area for the purposes of referendum. The Referendum area will be the same as the designated Neighbourhood Area for the Beccles Neighbourhood Plan.

3.4 The list of modifications and actions required are set out in the following table. As a consequence of these changes the Beccles Neighbourhood Plan will be re-published and titled the Beccles Neighbourhood Plan (Referendum Version).

A handwritten signature in black ink, appearing to read "Philip Ridley", with a long horizontal flourish underneath.

Philip Ridley BSc (Hons) MRTPI
Head of Planning and Coastal Management

Dated: 16/07/2021



A handwritten signature in black ink, appearing to be "M.P. Tighe".

Marie-Pierre Tighe
Director of Strategic Services

Dated: 16/07/2021



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><u>Para 1.9</u> Change to “<u>The</u> Neighbourhood Plan can...within the Parish of <u>Beccles</u>. it is important that the Plan takes into account issues of relevance in the adjacent parish of Worlingham in particular. <u>The</u> built-up area of...to this Neighbourhood Plan.”</p>	<p>The Neighbourhood Plan can only apply to the Neighbourhood Area</p>	<p>Agree. Paragraph amended as recommended.</p>
<p><u>Para 4.3</u> Delete Para 4.3 ‘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.’</p> <p>Replace with “<u>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. The Waveney Local Plan requires this to be provided in a central location within the Garden</u></p>	<p>There is no requirement for the community hub to be located in the Neighbourhood Area and there is evidence to demonstrate that the community hub and its facilities may fall outside of the Neighbourhood Area.</p>	<p>Agree. Paragraph deleted and replaced as recommended.</p>



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><i>Neighbourhood, with good accessibility from the existing community of south Beccles.</i>"</p>		
<p><u>Para 4.4</u> Delete Para 4.4 'Ultimately a versatile, multi-use space, managed by the local community (through an appropriate vehicle) will not only help to ensure that the community of Beccles can thrive, but that it gives residents a sense of ownership and belonging.'</p>	<p>This part appears to seek to control development outside of the Neighbourhood Area and in so doing, goes beyond the powers of the Neighbourhood Plan.</p>	<p>Agreed. Paragraph deleted as recommended.</p>
<p><u>Policy BECC1</u> Delete Part C 'The community of Beccles, through an appropriate management entity, is involved in the ongoing management of the community centre.'</p>	<p>This part appears to seek to control development outside of the Neighbourhood Area and in so doing, goes beyond the powers of the Neighbourhood Plan.</p>	<p>Agree. Policy amended as recommended.</p>
<p><u>Para 4.14</u> Add to second sentence "Beccles is also the Gateway to the Broads, making it a popular tourist town. Visiting tourists reasonably expect the availability of certain <i>public facilities in the town centre.</i>"</p>	<p>Only vague references to what facilities could be considered by this policy.</p>	<p>Agree. Paragraph amended as recommended.</p>
<p><u>Para 4.14</u> Add to third sentence "Existing community members are concerned about the proposed closure and poor state of public toilets in the town <i>centre, as well as the presence of empty shops. ...</i>"</p>	<p>Only vague references to what facilities could be considered by this policy.</p>	<p>Agree. Paragraph amended as recommended.</p>
<p><u>Policy BECC2</u> Delete the wording of Policy BECC2</p>	<p>The reference to the Local Plan policy results in an incorrect interpretation of the policy and the</p>	<p>Agree. Policy amended as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>A.—As required by Local Plan Policy WLP8.22, proposals for new community services and facilities will be supported if the proposal meets the needs of the local community. In Beccles, the provision of facilities to address the following local needs is strongly encouraged:</p> <ul style="list-style-type: none"> a. A ‘Youth Space’ incorporating indoor and outdoor areas. b. A Multi-Use Games Area (on the Beccles and Worlingham Garden Neighbourhood) which is capable of being used for a wide range of sports, including five-a-side football, tennis and hockey). This should ideally be complemented by the provision of appropriate changing facilities. c. A dedicated indoor play facility. d. Expansion of Beccles Library. e. An indoor swimming pool. <p>B.—Alongside new provision, proposals to improve the quality of existing indoor community provision are strongly encouraged.</p> <p>C.—Proposals to bring back into any active use disused facilities which enhance Beccles’s function as a tourist town are strongly encouraged, subject to ensuring that the use does not have a detrimental impact on the amenity of neighbouring uses.</p>	<p>development plan should be read as a whole. No indication of how provision of community facilities will be ‘encouraged’ and how this differentiates from being ‘strongly encouraged’. Also, only vague reference to what facilities could be considered by this policy.</p>	



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>Replace with “<i>The provision of and/or improvements to the following community facilities will be supported, subject to development respecting local character, residential amenity and highway safety:</i> <i>a. A ‘Youth...</i> <i>...e. An indoor swimming pool.</i> <i>f. Improvements to existing community facilities.</i> <i>g. Proposals to bring back into active use disused facilities in Beccles town centre, including public toilets and empty shops.</i>”</p>		
<p>Policy BECC3 Delete the wording of Policy BECC3</p> <p>A.—Development proposals are expected to protect and enhance the features of Beccles that contribute to the tourism offer of the area. In particular, proposals that will enhance tourism in Beccles and its role as ‘Gateway to the Broads’ are strongly encouraged. Such proposals must recognise and actively demonstrate sensitivity to the natural environment and must protect and, where appropriate, enhance it, particularly in respect of the state of water quality of the River Waveney. Beccles Quay</p> <p>B.—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 of food and drink</p>	<p>Policy seeks to impose requirement to ‘protect and enhance’ tourism features which is not supported by national policy. Also, policy does not specify what these features could be and what could be considered ‘strong encouragement’. The plan does not establish what the current state of water quality in the River Waveney is or how development will actively demonstrate sensitivity to the natural environment.</p>	<p>Agree. Policy amended as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>provision; d. increase the range of outdoor leisure facilities for all ages. River moorings C.—C. Proposals to provide moorings on the River Waveney for tourist boating activities will be encouraged.</p> <p>Replace with “<i>Tourism development in Beccles, including the provision of moorings for tourist boating activities on the River Waveney, will be supported. Improvements to Beccles Quay, including flood control measures, increased provision of public green space on the north side and the provision of new tourist facilities, will be supported.</i>”</p>		
<p><u>Para 4.27</u> Change to “<i>It is important that new hotel accommodation in Beccles respects local character and that development is not detrimental to other town centre users.</i>”</p>	<p>Paragraph read as a policy requirement.</p>	<p>Agree. Paragraph amended as recommended.</p>
<p><u>Policy BECC4</u> Change the wording to “The provision of new hotel accommodation or the conversion of existing buildings to hotel accommodation within Beccles <i>town centre is supported, subject to development proposals respecting local character, residential amenity and highway safety.</i>”</p>	<p>Not clear what the character of the town centre is and appears to vary based on location. Also not clear what is meant by ‘encouragement’ and to amenity of ‘uses’.</p>	<p>Agree. Policy amended as recommended.</p>
<p><u>Para 4.28</u> Change second sentence to “... This is one of the reasons why it is popular with tourists and why <i>heritage is therefore an essential component of the vitality of the town.</i> ...”</p>	<p>Paragraph read as a policy requirement.</p>	<p>Agree. Paragraph amended as recommended.</p>



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><u>Para 4.34</u> Delete second sentence "Generally however, dormers will be supported only where they are contextually appropriate and roof lights only on rear slopes."</p>	<p>Paragraph read as a policy requirement.</p>	<p>Agree. Sentence deleted as recommended.</p>
<p><u>Para 4.35</u> Change to "Georgian and Victorian doors and door cases have a major impact on the <u>quality of the town.</u>" delete "and should be maintained on existing buildings and wherever possible and appropriate, should be used on new development."</p>	<p>Paragraph read as a policy requirement.</p>	<p>Agree. Paragraph amended as recommended.</p>
<p><u>Paras 4.36 and 4.37</u> Delete Paras 4.36 and 4.37 "Street furniture 4.36 One of the underlying principles of the Neighbourhood Plan is to encourage less clutter and where possible reduce this so that we reinforce local character through co-ordinated design. Enhancement proposals for paving should retain historic surfaces and contractors that disturb these surfaces are required to reinstate them. 4.37 New signs or street furniture should be integrated into the design of the street. A proliferation of signs and posts will be discouraged."</p>	<p>Paragraph read as a policy requirement.</p>	<p>Agree. Paragraphs deleted as recommended.</p>
<p><u>Policy BECC5</u> Change title of policy to "<u>Heritage</u>"</p>	<p>Heritage and design considerations were conflated, resulting in a confusing policy.</p>	<p>Agree. Policy renamed as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><u>Policy BECC5</u> Delete the wording</p> <p>A. To ensure the conservation and enhancement of Beccles heritage assets, proposals must:</p> <ul style="list-style-type: none"> 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. 	<p>Policy seeks to ‘ensure’ enhancement to heritage assets, whereas national and local policy require development to conserve or enhance them. The policy also extend beyond settings to the ‘wider built environment’ and ‘views’ which are not defined. Policy also includes requirements which conflate heritage and design. Finally, the policy contains an incorrect approach to how applications must be assessed.</p>	<p>Agree. Policy amended as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>B.—Proposals will not be supported where the harm caused as a result of the impact of a proposed scheme is not justified by the public benefits that would be provided.</p> <p>C.—Where a planning proposal affects a heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, the development proposal and an assessment of the impact of the proposal on the heritage assets.</p> <p>Replace with <i><u>“Beccles’ heritage assets and their settings must be conserved or enhanced in a manner according to their significance. Where a planning proposal affects a heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, including any contribution made by its setting.”</u></i></p>		
<p><u>Para 5.2</u> Change to “The growth planned in the Waveney Local Plan – particularly at the Beccles and Worlingham Garden Neighbourhood – is <i><u>inevitably going to have an impact on transport and movement. The above matters are recognised in the Waveney Local Plan and the Neighbourhood Plan considers: i. Junction issues, where growth could impact on traffic movements. ii. Improvements to walking and cycling, so encouraging</u></i> people to not travel by car, particularly for short journeys. Access to the range of new community infrastructure</p>	<p>The Highway Authority is the statutory body and the Neighbourhood Plan cannot impose requirements on it. However, the supporting text does contain locally important information which the Town Council could use in the future.</p>	<p>Agree. Paragraph amended as recommended.</p>



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
proposed at the Beccles and Worlingham Garden Neighbourhood is important in this regard."		
<u>Para 5.8</u> Delete reference to the two junctions outside of the Neighbourhood Area " Norwich Road/Loddon Road and Norwich Road/Yarmouth Road "	This part appears to seek to control development outside of the Neighbourhood Area and in so doing, goes beyond the powers of the Neighbourhood Plan.	Agree. References deleted as recommended.
<u>Para 5.8</u> Add a new Paragraph 5.9 to follow on from Para 5.8 " <u><i>The Town Council will seek to encourage actions to address any impacts from increased traffic levels on the above road junctions.</i></u> "	The Highway Authority is the statutory body and the Neighbourhood Plan cannot impose requirements on it. However, the supporting text does contain locally important information which the Town Council could use in the future.	Agree. Paragraph added as recommended.
<u>Figure 5.1</u> Delete any reference from plan/key to anything outside the Neighbourhood Area.	This part appears to seek to control development outside of the Neighbourhood Area and in so doing, goes beyond the powers of the Neighbourhood Plan.	Agree. Changes made as recommended.
<u>Policy BECC6</u> Delete Policy BECC6 " POLICY BECC6: LOCAL ROAD JUNCTIONS "	The Highway Authority is the statutory body and the	Agree. Policy deleted as recommended.



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>A. 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:</p> <ul style="list-style-type: none"> 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 <p>B. B. In particular, such transport impacts include the impact on the safety of cyclists and pedestrians at the respective local road junction."</p>	<p>Neighbourhood Plan cannot impose requirements on it.</p>	
<p><u>Para 5.15</u> Change to "<u><i>Where improvements are needed, the Town Council will seek to encourage contributions, including where possible, through Section 106 agreements, the Community Infrastructure Levy and match-funding.</i></u>"</p>	<p>No evidence is provided to demonstrate that there are any mechanisms in place for the Neighbourhood Plan to deliver on this statement.</p>	<p>Agree. Paragraph added as recommended.</p>



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><u>Policy BECC7</u> Delete the wording</p> <p>A.—Development which proposes to improve cycling and walking will be supported. In particular, provision of segregated cycle and pedestrian routes will be strongly supported. Such routes should also ensure that access by disabled users, the blind and deaf and users of mobility scooters is secured.</p> <p>B.—B. To ensure that residents can access public transport facilities, schools, leisure and other important facilities serving Beccles, all new developments should ensure safe and continuous pedestrian routes that connect to the Key Movement Routes shown on the Policies Map.</p> <p>C.—C. Proposals to enhance the identified Key Movement Routes are strongly encouraged.</p> <p>D.—D. Development will be expected to not have an unacceptable impact on the safety and accessibility of Key Movement Routes and to provide a strategy to mitigate the impact of additional traffic movements on the safety and flow of pedestrian and cycle access.</p> <p>Replace with "<u><i>Improvements to cycling and walking routes, including segregated cycle and pedestrian routes accessible by people with mobility, sight and/or hearing impairments, will be supported. The delivery or improvement of routes that connect to the Key Movement</i></u></p>	<p>Opening sentence could give rise to inappropriate development that happens to include improvements to walking and cycling. Also, it may not be appropriate or possible for all forms of development to deliver these.</p>	<p>Agree. Policy amended as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><u><i>Routes and/or the enhancement of the Key Movement Routes (shown on the Policies Map) will be supported. Development should not harm the safety and/or accessibility of the Key Movement Routes.</i></u></p>		
<p>Para 6.5 Delete last sentence “Such uses include all retail and service uses, offices, hotels and leisure use. However, the Neighbourhood Plan wishes to broaden this to other uses that will maintain footfall in the town centre. Such uses must demonstrate that the unit in question has no demand for other town centre uses.”</p>	<p>This does not provide a decision maker with clarity in respect of how to react to a development proposal.</p>	<p>Agree. Sentence deleted as recommended.</p>
<p>Para 6.6 Change to “In addition, <u><i>the Town Council will seek to encourage the</i></u> use of vacant premises on a temporary basis, either for retail or leisure activities, or for community activities more <u><i>generally, is encouraged.</i></u>”</p>	<p>It is not clear why temporary uses would be supported due to lack of information and could give rise to range of inappropriate uses.</p>	<p>Agree. Paragraph amended as recommended.</p>
<p>Policy BECC8 Change part A to “In the Primary and Secondary Shopping Frontages of Beccles Town Centre, as shown on the Policies Map, the change of <u><i>use, where planning permission is required, of</i></u> premises from main town centre uses to other uses will be supported, provided it can be demonstrated that: The premises in question have not been in active use for at least 12 months and a minimum 12-month active marketing campaign can be demonstrated which meets the marketing requirements in Appendix 4 of the Waveney Local Plan.”</p>	<p>Recent changes to Planning Use Classes have resulted in a new Use Class E, which enables changes from retail to other commercial uses without the need for planning permission. Also, changes to the General Permitted Development Order (GPDO) provide scope for retail uses to change to other uses,</p>	<p>Agree. Policy amended as recommended.</p>



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
	including residential, without the need for planning permission.	
<p><u>Policy BECC8</u> Delete parts b. and c.</p> <p>“b. the proposed use will retain and enhance footfall along the frontage; and c. the proposed use will maintain or improve interest in the area.”</p>	<p>Criteria b. is unsupported by detailed information and c. appears to be subjective. As such, they do not provide clarity for decision maker.</p>	<p>Agree. Policy amended as recommended.</p>
<p><u>Policy BECC8</u> Delete parts B. and C.</p> <p>“B. Equally, the use of any premises for temporary uses will be supported along these frontages. Such uses include ‘pop up’ shops and cultural, creative and leisure uses introduced on a temporary basis or for specific events. C. Such uses must demonstrate that they will not have a detrimental impact on the amenity of neighbouring uses, particularly residential through excessive noise and pollution.”</p>	<p>It is not clear why temporary uses would be supported due to lack of information and could give rise to range of inappropriate uses.</p>	<p>Agree. Policy amended as recommended.</p>
<p><u>Policy BECC9</u> Change line 3 to “Proposals to expand and improve medical provision at Beccles Health Campus, including car parking to meet the needs of</p>	<p>Not clear what is meant by ‘strong encouragement’</p>	<p>Agree. Policy amended as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
existing residents and proposed new communities, <i>will be supported</i> , as will the provision of enhanced social care services.”		
<p><u>Para 8.4</u> Change to “<i>It is important for development to</i> respect and enhance the landscape quality of the area in which it lies and provide opportunities, where possible, for improvements in public access to green infrastructure. The Waveney Green Infrastructure Strategy¹⁷ sets out improvements that need to be considered in the Beccles (and Worlingham) area. In particular, there is a need for more parks and gardens to serve Beccles. <i>New development may have the potential</i> to contribute towards the recommendations of the Green Infrastructure Strategy, including delivery of the recommended projects.”</p>	Paragraph read as a policy requirement.	Agree. Paragraph amended as recommended.
<p><u>Para 8.6</u> Add new Para 8.7 below Para 8.6 “<i>The Town Council will seek opportunities to encourage housing developers to apply the Government’s Technical Housing Standards – Nationally Described Space Standards.</i>”</p>	Requirement within the policy was not supported by substantive evidence and justification. Amendment will provide a more robust reference in order to ensure the aims of the Neighbourhood Plan are not lost.	Agree. Paragraph added as recommended.
<p><u>Policy BECC10</u> Change part B. to “<i>The incorporation of sustainable design and construction measures into development including, where feasible,</i></p>	National policy does not require all development to ‘incorporate sustainable design and construction measures’. The amendments enable	Agree. Policy amended as recommended.



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><u><i>ground/air heat pumps, solar panels and grey/rainwater harvesting solutions, will be supported.</i></u></p>	<p>this to be achieved in a manner which meets the basic conditions.</p>	
<p><u>Policy BECC10</u> Delete parts C. and D.</p> <p>“C. Proposals should take mitigation measures so as to not adversely affect any historic architectural or archaeological assets on the development site or in its surroundings.</p> <p>D. All new dwellings or replacement dwellings should, as a minimum, comply with the Technical Housing Standards—Nationally Described Space Standards.”</p>	<p>Part C. sets out a very brief interpretation of part of national and local heritage policy and results in an approach which does not provide for a carefully balanced approach. Part D. was not supported by substantive evidence and justification.</p>	<p>Agree. Policy amended as recommended.</p>
<p><u>Policy BECC10</u> Change part E. to <u>“Major new housing development (retain footnote) must respect local topographical, natural, built and historic features and demonstrate that consideration has been given to its landscape impacts.”</u></p>	<p>Part E. sets out onerous requirements without providing sufficient information to demonstrate that such requirements are deliverable. Further, the requirements set out, such as views and ‘features of the locality’, appear vague and wide-ranging.</p>	<p>Agree. Policy amended as recommended.</p>
<p><u>Policy BECC10</u></p>	<p>Part F. imposes an onerous requirement on all forms of development, without evidence of</p>	<p>Agree. Policy amended as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>Change part F. to “<i>Major new housing development should incorporate high quality green infrastructure. This could include open spaces, parks, woodlands, allotments, play areas, green corridors and street trees.</i>”</p>	<p>deliverability. However, the Qualifying Body has clarified that this part of the Policy is intended to apply to larger-scale developments only.</p>	
<p><u>Para 8.7</u> Add new Para 8.8 below new Para 8.7, “<i>Effective community engagement can perform an essential role in the development process. The Town Council will seek to encourage consultation on development proposals. In respect of proposals for shared spaces, the Town Council will encourage developers to engage at an early stage in the design process with all and will pay particular attention to encouraging early engagement with disabled people.</i>”</p>	<p>The Policy sets out consultation requirements that are unsupported by evidence in respect of deliverability.</p>	<p>Agree. Paragraph added as recommended.</p>
<p><u>Policy BECC11</u> Delete the wording A. New development or major regeneration of public streets and spaces is expected to demonstrate, through its design and layout, how it will enhance the health and wellbeing of residents or users, including those with a disability. In particular, it should seek to incorporate the following into its design: c. Street infrastructure which allows all residents and users to enjoy their surroundings whatever the season, such as provision of sensitively designed shade and shelter features, benches,</p>	<p>The policy would seek to impose criteria on any form of development, as well as in circumstances where ‘major regeneration of public streets’ takes place. However, the criteria set out could not be delivered by all forms of development and there is no evidence in the Neighbourhood Plan of any likely ‘major regeneration of</p>	<p>Agree. Policy amended as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>tree planting and practical landscaping features such as planters. This should be supported by sensitively located, low energy lighting.</p> <p>d. Along main ‘desire lines’, ensure that pavements are wide enough to allow multiple users.</p> <p>e. Where possible, install segregated cycle lanes to support active transport.</p> <p>f. Provision of an adequate number of safe highway crossing points which prioritise pedestrians and cyclists.</p> <p>g. Take mitigation measures so as to not adversely affect any historic architectural or archaeological assets on the development site or in its surroundings.</p> <p>B. B. Any proposals for shared spaces should ensure that the disabled, blind and deaf are consulted at an early stage of the design process. It must be demonstrated that the impact of the design of shared space design on all members of the community has been assessed.</p> <p>Replace with “<u><i>The design and layout of development should consider the health and wellbeing of residents and/or users, including those with a disability. The development of segregated cycle lanes and safe highway crossing points will be supported, as will the provision of</i></u></p>	<p>public streets’ in the Neighbourhood Area.</p>	



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><i><u>sensitively designed and located shade and shelter features, benches, tree planting and planters.”</u></i></p>		
<p>Policy BECC12 Change part A. to “<i><u>Development generating water run-off should provide Sustainable Drainage Systems (SuDS) unless there is clear evidence that it would be inappropriate to do so. The use of a wide range of creative SuDS solutions, for example through the provision of SuDS as part of green spaces, green roofs, permeable surfaces and/or rain gardens, will be supported.</u></i>”</p>	<p>There are examples of development where SuDS will not be relevant. The Qualifying Body have made a suggestion to address this.</p>	<p>Agree. Policy amended as recommended.</p>
<p>Policy BECC12 Change part B. of Policy BECC12 to “<i><u>The use of SuDS to enhance wildlife, biodiversity and water quality will be supported. SuDS should capture diffuse pollution from hard surfaces to ensure that there is no deterioration in the Water Framework Direction status of the River Waveney as a result of pollution.</u></i>”</p>	<p>There is no substantive evidence to demonstrate that SuDS can, in all cases, enhance wildlife, biodiversity and water quality. Also, there is no substantive evidence to demonstrate that it will be appropriate in all circumstances for SuDS provision to include a wide range of creative solutions.</p>	<p>Agree. Policy amended as recommended.</p>
<p>Policy BECC12 Change part C. to “Proposals that improve the water quality, biodiversity and landscape value of the River Waveney will be <i><u>supported</u></i>, in order to protect wetland habitats within Beccles where the River Waveney passes through the area. This includes controlling</p>	<p>Not clear what is meant by ‘strong encouragement’</p>	<p>Agree. Policy amended as recommended.</p>



Examiner’s recommended modification	Reason for change (summarised)	Action by ESC and BA
invasive non-native species and ensuring that new development proposals do not damage or destroy riparian habitats or water quality in the river.”		
<p><u>Policy BECC12</u> Delete parts D. and E.</p> <p>“D. Development should be directed to the part of any site which is least prone to flooding.</p> <p>E. Applicants should take into account the Environment Agency’s guidance on Flood Risk Assessments: Climate Change.”</p>	Parts D. and E. over-simplify the sequential test set out in Chapter 14 of the Framework and refer to guidance which is beyond the control of the Neighbourhood Plan.	Agree. Policy amended as recommended.
<p><u>Para 8.12</u> Delete last sentence “All development will be expected to comply with any uplift in Building Regulation standards that may be introduced during the plan period.”</p>	Building Regulations are not controlled by planning policies.	Agree. Paragraph amended as recommended.
<p><u>Policy BECC13</u> Change wording from “New residential properties (including replacement properties) on sites of less than 10 dwellings, as well as significant renovation and extension of existing properties (where a planning application is required) are expected to demonstrate that they have incorporated measures which actively improve the energy efficiency of the buildings. This relates to the heating, cooling, lighting</p>	The requirements in respect of energy efficiency measures go beyond the requirements of national and local planning policy and no detailed evidence has been presented in justification of this. However, improvements in energy efficiency can make a significant	Agree. Policy amended as recommended.



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>and waste management of the buildings as well as the opportunity for renewable energy generation on the property."</p> <p>Change to "<u><i>The incorporation of measures to actively improve the energy efficiency of buildings will be supported. This relates to the heating, cooling lighting and waste management of the buildings, as well as the opportunity for renewable energy generation on the property.</i></u>"</p>	<p>contribution to the transition to a low carbon future.</p>	
<p><u>Contents, Policy, Paragraph and Page Numbering</u> Update the Contents, Policy, paragraph and page numbering to take into account the recommendations.</p>	<p>The recommendations made will have a subsequent impact on Contents, including Policy, paragraph and page numbering.</p>	<p>Agreed. Amendments made.</p>
<p><u>Policies Map</u> Remove Local Road Junctions and related Key references; Remove any annotation/Key references to anything outside the Neighbourhood Area.</p>	<p>The recommendations made will also have an impact on the Policies Map.</p>	<p>Agreed. Amendments made.</p>
<p><u>Inset Map</u> Remove Local Road Junctions and related Key references.</p>	<p>The recommendations made will also have an impact on the Inset Map.</p>	<p>Agreed. Amendments made.</p>

Council's further modifications

Under section 12(6)(a) of Schedule 4B of the Town and Country Planning Act 1990, the Council considers that the following modifications are also needed in order that the Plan meets the basic conditions or for the correction of errors.



Policy/Supporting text	Reason for change	Action by ESC
<p><u>Paragraph 4.20</u> Change to “It should be noted that Beccles Quay is within the Broads Authority area and therefore any proposals must also take account of the policies in its Local Plan, including Policies DM31, DM33 and Policy BEC2 on residential moorings.</p>	<p>Correction to highlight the policies in the Broads Local Plan that will be applicable when determining applications that relate to Beccles Quay.</p>	<p>Agree. Amendments made.</p>