

# Bungay Neighbourhood Development Plan 2020-2036



**Consultation Statement**

**March 2022**

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## Introduction

### Overview of Bungay Neighbourhood Development Plan

1. Bungay Neighbourhood Development Plan has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011, the Neighbourhood Development Planning (General) Regulations 2012 and Directive 2001/42/EC on Strategic Environmental Assessment.
2. It establishes a vision and objectives for the future of the parish and sets out how this will be realised through non-strategic planning policies.

### About this consultation statement

3. This consultation statement has been prepared by [Collective Community Planning](#) on behalf of Bungay Town Council to fulfil the legal obligation of the Neighbourhood Development Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should contain:
  - a) Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b) Explains how they were consulted;
  - c) Summarises the main issues and concerns raised by the persons consulted; and
  - d) Describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.
4. It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood Development Planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:
  - a) Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the Neighbourhood Development Plan area:
    - i. Details of the proposals for a neighbourhood development plan;
    - ii. Details of where and when the proposals for a neighbourhood development plan may be inspected;
    - iii. Details of how to make representations; and
    - iv. The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
  - b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
  - c) Send a copy of the proposals for a neighbourhood development plan to the local planning authority.
5. Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Development Plan, and ensure that the wider community:
  - Is kept fully informed of what is being proposed;
  - Is able to make their views known throughout the process;

- Has opportunities to be actively involved in shaping the emerging Neighbourhood Development Plan; and
  - Is made aware of how their views have informed the draft Neighbourhood Development Plan.
6. This statement provides an overview and description of the consultation that was undertaken by Bungay Town Council in developing their Neighbourhood Development Plan, in particular the Regulation 14 Consultation on the pre-submission draft. The working group have endeavoured to ensure that the Neighbourhood Development Plan reflects the views and wishes of the local community and the key stakeholders which were engaged with from the very start of its development.

## Summary of consultation and engagement activity

7. This section sets out in chronological order the consultation and engagement events that led to the production of the draft Bungay Neighbourhood Development Plan that was consulted upon as part of the Regulation 14 Consultation.
8. A significant amount of work went locally into engaging with the community early in development of the plan, so that it could be informed by the views of local people. Consultation events took place at key points in the development process, and where decisions needed to be taken, for example on local green spaces. A range of events and methods were used and at every opportunity the results were analysed and shared with local people.

## Summary of Early Engagement

Activity	Date	Who was consulted	Summary
Area designation	April 2016	Statutory consultees	Area designation approved through the District Council and Broads Authority
Engagement with the community	December 2016	Local residents	Early engagement with residents with a stall at the annual Christmas Street Fair
Engagement with the community	February 2016	Local residents	Consultation event at St Mary's Church seeking feedback on issues for the plan
Consultation with the community	September 2017 – January 2018	Local residents	Survey with a range of questions related to issues and options for the plan, the results can be viewed <a href="#">here</a> . Events were held at the Co-Op supermarket, Bungay Town Library and the primary school.
Consultation with the community	February 2020	Local Residents	Consultation to determine people's support for allocating housing growth within the BNDP and potential sites. This ran for 3 weeks and was accompanied by a survey. There were

Activity	Date	Who was consulted	Summary
			also stands at the Co-Op supermarket and Library. 109 people responded to the survey.
SEA Screening Opinion	May 2020	Statutory Environmental Bodies Broads Authority ESC	Statutory Environmental Bodies consulted on the draft plan as part of a Strategic Environmental Assessment screening exercise
SEA Scoping Report	May 2021	Statutory Environmental Bodies ESC	Statutory Environmental Bodies consulted as part of a scoping exercise for the SEA
Informal review of the draft plan	June / August 2021	ESC, Broads Authority	Review draft plan and provide feedback prior to Regulation 14 Consultation

### Early engagement - summary of the main issues raised

9. These included:

- There is support locally for the NDP allocation additional housing growth and there is general support for more affordable housing locally.
- In relation to housing mix, smaller homes, of two or three bedrooms, were supported by most people. Flats / apartments were not well supported.
- There is strong support for encouraging visitors to the town centre and regenerating the town.
- Bungay's heritage is important and very visible within the town centre and it is an important part of the character of the place. This should be retained and enhanced where possible.
- Some people felt that recent housing growth has failed to meet the needs of the community, and that this should be a stronger focus going forward.
- There is concern around how infrastructure and services will cope with additional housing. Residents already feel that services are under pressure and did not believe that additional capacity would be created.
- There is strong support for protecting the environment and the impact of growth on this is a concern. Flooding is an increasing concern.
- The level of traffic and HGV movement through the town centre, and also parking constraints is a concern.

## Early engagement - how this was considered in development of the pre-submission plan

10. Two sites are allocated for development in East Suffolk Council's Waveney Local Plan, but to ensure greatest influence over future development, it's design and mix BNDP allocates a small site for 75 within the plan. This was the preferred site at public consultation.
11. Feedback from residents on local housing need has influenced policies in relation to housing mix and type. Design has also been a key focus of the plan. There is a feeling that recent development has been rather generic and significant effort has been put into developing design codes, policy and a checklist that reflects how the community would like future housing to look.
12. Bungay is a very special place environmentally due to the presence of the River Waveney and the impact this has on the landscape. The importance of the environment and preserving this was reinforced through feedback received during consultation activities. Following this, the steering group developed a green corridor for Bungay which is a central part of the plan. Other policies have been developed to protect habitat and wildlife within the plan area.
13. The town's heritage is important to residents, and feedback helped shape two policies focused on encouraging the sensitive repair of Bungay Castle as well as regeneration of the King's Head Hotel.
14. Feedback from residents in relation to accessing the town centre and parking has led to policies around walking and cycling network improvements, parking policies – including one supporting further off-street public car parking, parking standards for new development, and also a policy around HGVs in the town centre.
15. Further to this summary, issues arising from the various consultations are discussed in the context of the different policies in each section of BNDP.

## Informal Consultation with East Suffolk Council and Broads Authority

16. Prior to Regulation 14 the draft neighbourhood plan was shared with East Suffolk Council and the Broads Authority for informal comments in June 2021 – a healthcheck. Many of the comments from East Suffolk Council were used to amend the draft plan prior to Regulation 14 and this is shown below. The highlighted text indicates action taken by the BNDP Steering Group prior to formal Regulation 14. Due to an issue with versions of the plan, the Broads Authority comments were not used to amend the plan at this stage and so many were provided again at the formal Regulation 14 stage. However, the main issues raised by the Broads Authority during the healthcheck were largely the same as raised by East Suffolk Council.

### *General*

*The policy boxes and community action boxes change colour through the document. This makes it harder to distinguish between planning policies and community actions.*

**Amended**

- *I would recommend having the policy positioned after all of the supporting text, rather than in the middle. People may stop reading the section once they have got to the policy. It is better to have all the supporting text for a section in one place.*

**Moved.**

### 1.3 Community Consultation

- *The process for the different consultation phases is described for each one except for the one in February 2020. This should be included for consistency.* **Added**
- *Para. 11, bullet 7 – NP policies take precedence where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently. (NPPF para. 30)* **amended**
- *Para.1 Waveney District Council should be “former Waveney District Council”.* **All amended**
- *Para.8 I note the consultation on potential site for housing took place relatively late in the process. The plan would benefit from an explanation.* **added**
- *Para.11 An amended version of the NPPF has recently been published. I recommend you check the items in para.11 against the latest NPPF.* **Reviewed.**
- *Para. 23 - 557 is not the minimum housing growth. It is the number of homes built in 2014-17, existing housing commitments (at the time the Local Plan was drafted) and the homes allocated in the Local Plan.* **amended**
- *3.1 Vision mentions Bungay being a place that people want to visit. Don't you also want it to be a place people want to live? The second half the vision moves away from the vision of Bungay in 2036 to plan aims. It would be best if the vision remains focused in the vision of Bungay in 2036.* **Leave as is for now and see what other comments are received at Regulation 14.**

### Climate Change Statement

- *1. – is it correct to say that electric vehicles use less energy? Use of EVs will reduce vehicular emissions.* **Amended.**

### 4. Policies

- *Para. 30 – The Waveney Local Plan contains policies for the former Waveney part of East Suffolk not the whole district.* **amended**
- *Para.31 Site allocations in the Local Plan provide approximate housing numbers, not minimum housing numbers.* **amended**

### 5. Housing Policies

- *Para.36 “to host a minimum of 6%” should be replaced with “provide approximately 6%”. WLP1.1 sets out residential growth across the District approximately.* **amended**
- *5.1 design – this section could also reference the National Design Guide.* **added**
- *Para. 41*
  - *An amended version of the NPPF has recently been published. This para. needs to be checked against the amended NPPF. There is now an emphasis on sustainability and beautiful design.* **amended**

- *Help people walk or cycle to the town centre – I would suggest deleting these last four words to broaden this topic* **amended**
- **Policy H1**

*Need to define excessive density, sufficient private outdoor amenity space and ample internal space. These are all subjective terms and I'm not sure how a planning officer should apply this to a planning application. Reference to particular standards would be helpful. Leave as is for now and see what other comments are received at Regulation 14*

*Suffolk County Council is developing a Suffolk Design Streets Guide and you may wish to refer to this in the policy or supporting text.* **Added**

  - *Planning Policy cannot require developments to achieve net zero carbon emissions. It is therefore unclear what additional benefit the policy offers over and above the requirements of policy WLP8.28 in the Waveney Local Plan. The policy does not require zero carbon but requires that applications explain how design has maximised the potential for energy efficiency with a view to achieving zero carbon emissions. Wait to see what other stakeholders comment at Reg 14.*
  - *Suffolk County Council provides electric vehicle charging information here: Electric vehicle charging | Suffolk County Council* **Noted**
    - criteria f – why are perimeter blocks not supported? What evidence is there to support this requirement? Large parts of historic Bungay display characteristics of perimeter blocks such as buildings close to the street with rear gardens or courtyards.* **Deleted reference to perimeter blocks**
    - *Criterion n – is energy efficiency expected to*
    - *Last sentence - what are the 2019 Guidelines.* **Ref para 46.**

*This policy is long and addresses many different matters. It seems to be mostly aimed at major residential development, despite being written to be applied to all development (except the first para.). Given the breadth of the design topics it tackles I think it will be difficult, or impossible in some instances, to apply to developments such as domestic extensions or advertisements. You may want to consider altering the wording to reflect this, or perhaps have a separate policy for major residential developments (ie. 10+ dwellings) to make it clearer how the parts of the policy should be applied. Added reference in supporting text to the effect that not all elements will apply to small development.*
    - *Many of the criteria are general good design practice which is covered well now with the Local Plan policies, NPPF, National Design Guide, Building for a Healthy Life etc. Is there something more unique and distinctive to Bungay that this policy could draw out? Policy reflects the design guide produced for Bungay but there are similarities with other local and national design policy. Consider further after Reg 14*
- **Policy H2**



Making 4+ bedroom dwellings an exception on all residential development is likely to impact the viability of developments. I note 4+ bedroom dwellings can be provided as an exception on viability grounds – this type of approach will be important in delivering sites in Bungay and not impeding provision of Affordable Housing on the larger sites. **Policy already refers to exceptions such as on viability grounds**

Criterion b – is this policy referring to part M4(2) of the building regulations? If so it should say so. If this is the case this policy appears to repeat local plan policy which is not necessary and will be removed by an Examiner. If the policy is referring to something other than M4(2) then it should be clear about this. **Deleted from the policy**

- Significant weight to be given to eco-homes – this doesn't feel right in a housing mix policy. The design policy might be a better place for this. Significant weight is very strong – this may allow homes to pop up in the surrounding countryside as long as they are eco-homes. I suggest this needs tightening up and perhaps wording included to address their location. You could add reference to the settlement boundary, for example. **Within or adjacent the settlement boundary added.**

Where is the evidence to support the requirement for additional custom/self build plots? Nothing in the supporting text refers to the need for additional custom or self-build in Bungay. How would a lack of local need be demonstrated? See our website for information on demand in the district: [Key statistics from the self build and custom build register » East Suffolk Council](#).

Would self-builders be limited to 3 bed dwellings too? You could reference the marketing guidance in the appendix of the Waveney local plan to provide clarity over how this should take place. **Deleted from policy as covered in local plan, replaced with a statement offering general support**

- **Policy H3**

- The government has introduced First Homes which is considered to meet the definition of 'affordable housing'. 25% of affordable homes will be required to be First Homes. Neighbourhood Plans can support the provision of First Homes through planning policies. The policy should be updated to reflect the latest government policy. **updated**

The tenure split is very vague. This will be very difficult to apply. The Bungay Housing Needs Assessment provides recommendations on tenure splits – what about using these? **Add tenure split from HNA**

You could borrow some of the wording from the local plan on exception sites. This could help provide extra clarity and information for readers regarding the housing need, for example. **Consider further once further comments are received after Regulation 14**

What is the justification for the 50m distance? **Consider further after Regulation 14, but support from local representatives so as to support such development**

- Criterion c should also reference cycling. **added**

Para. 64 – the neighbourhood plan should carry out its own clear and effective call for sites to underpin a robust site selection process. **Some text added about this in para 65 of the Regulation 14 version of the plan, which now covers the consultation on potential sites and the effort to be aware of other potential sites.**

Para. 66 – infrastructure capacity issues will not be managed by the district Council. BNDP team should engage with infrastructure providers as part of the plan development process to ascertain their specific views. **Noted and some text added re District Council at Para 66 of Regulation 14 version, and providers will be consulted at Regulation 14**

- Policy H4

*the site requires access over third party land – has this been factored in to the site assessment? Has it been explored with the interested landowners? **This has been considered and supporting text refers to the need for joint masterplanning between the sites (H4 and WLP5.2). There is the option of alternative access arrangements***

*You could have a site-specific requirement for custom/self build plots on this site, provided it is supported and justified. This may be easier to justify than the approach taken in policy H2. **Included a requirement in H4 but with the caveat of the developer being given the option of demonstrating that the local demand does not warrant it***

- Policy CM1

*Is it necessary to speculate about space becoming available in the policy? That probably adds unneeded complication. You could word the start as follows: ~~'Should some physical space become available to accommodate a Community Hub, its use as a community hub will be supported provided the following criteria are met:...~~' **amended accordingly***

- *What is meant by 'green space'? eg. Allocated open space, agricultural land?*

**Clarity provided**

- *Why must it be on a brownfield site? **To make efficient use of land but consider further after Regulation 14***

- Policy CM2

- *The Suffolk Guidance for Parking specifies the requirements for parking at Medical Centres. It is unclear how the requirements of the policy CM2 differ from the Suffolk Guidance for Parking or are justified.*

Use	Vehicle	Cycle	PTW	Disabled
	Requirement	Minimum	Minimum	Minimum
Medical centres*	1 space per full time equivalent staff, + 4 per consulting room	2 spaces per 4 staff + 2 spaces for every two consulting rooms	1 space + 1 per 20 car spaces (for 1 <sup>st</sup> 100 car spaces), then 1 space per 30 car spaces (over 100 car spaces).	Dependent on actual development, on individual merit, although expected to be significantly higher than business or recreational development requirements

- Policy CM3

*What is meant by reasonably accessible? Is this in terms of location? Or how it a facility is managed? Location would be a planning matter - management arguably not. Amended to refer to accessible by sustainable modes of transport*

*what is meant by positive planning? This is not clear from the plan. Amended by deleting reference to positive planning*

- Section 6.5 CIL – there are a lot of projects in this section – are they all of equal priority? *Steering group to consider – no order preferred though.*
- Policy CH1 – Conservation Area – some neighbourhood plans specify key views on a map in their neighbourhood plan (eg. Kesgrave). You could consider doing this for your plan. *No action*

*Policy CH2, The Kings Head – what type of community benefits are envisaged here? Keeping the building maintained and in use is a community benefit, or should it go further than this? A judgement will need to be made depending on any proposal for change of use coming forward – consider further after Reg 14*

- Policy TC&E1

*The first part of policy wording is not policy and can be removed. Eg: ~~It is important to maintain a thriving and vibrant town centre in Bungay, which attracts people to visit. Therefore, in those circumstances where proposals to change from a town centre use (Class E) require planning permission, consideration must be given...~~ amended as suggested*

*Policy TC&E2 – this is quite a flexible policy. Is it intended to treat a hotel proposal the same as a single chalet, for example? Hotels are town centre uses which the NPPF says should be located in the town centre (para. 87). Allowing hotels on the edge of settlement or south of the A143 would be inconsistent with national policy. This policy therefore needs revising. Beccles NP has a specific policy for new hotels. National policy is clear on this and so policy has been amended to clarify that the policy does not include hotels*

Policy ENV1 **amended to reflect comments from ESC**

Much of the text in the box is descriptive text and not policy and should be removed. **Policy made more succinct**

The objective is good but the policy is vague - how should new development contribute to or deliver the green corridor? **Amended to clarify**

Also the area on fig. 7 covers a large area. How will a decision-maker know when this requirement has been met? The NPPF says at para. 16 that policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. **Some policy wording to help clarify**

It is unlikely to be achievable that all major development can ensure residents can have traffic-free access to local services. This is a very high bar. They can show how they support biodiversity and walking and cycling instead, for example. **Consider this more once feedback from others after Regulation 14**

- Policy ENV2

- delivering significant biodiversity net gain is not consistent with national policy.
- It might be better to say something like: proposals which involve creating new open space should demonstrate how biodiversity net-gain will be provided. **amended**

- Policy ENV3

What type of impacts is the policy concerned with? Visual? Ecological? Other? **Made minor changes to the wording to clarify, referring to landscape character, biodiversity etc**

What would be an unacceptable impact on the landscape character versus an acceptable impact? **This is a common matter of planning judgement**

- Policy ENV4

- How is the threshold of 5 dwellings justified? **Deleted**
- Criterion 4 – up to this point the policy is concerned with biodiversity, but here it introduces climate regulation. They are not quite the same, this bit may be better off in a different policy. **See what further feedback received at Reg 14**

- Policy ENV5

- 'Flood prevention or mitigation measures will need to demonstrate a biodiversity net gain...' - I don't think this is something you can require, it doesn't appear to be consistent with national policy. **Amend this to focus more on the SuDS aspect, which also provide benefits such as enhancing public open space, providing habitat for wildlife, contributing to the character of the area.**

- Policy TM1

Criterion b (on unplanned on-street parking) – I don't know how you could demonstrate this. Would meeting the minimum parking standards be sufficient? If not – what else? Meeting the minimum would be sufficient. A planning statement or transport statement submitted with the application would demonstrate the number of spaces. Consider more after Reg 14

- Policy TM3

This policy feels at odds with a number of the other elements of the plan. Eg: the vision; climate change statement; environment chapter; sustainable transport; and so on. Leave as policies within plans are rarely always perfectly aligned and judgements have to be made as to which carry greater weight for any given application

The first two bullet points look difficult to apply. Bullet 1 is complicated. What is the existing demand and forecast demand? If this information is not easily available then this policy will be difficult to implement. This will require the application to include evidence on existing and forecast demand, though the evidence should be proportionate

Bullet two - What is a material increase in traffic in the Conservation Area likely to be? If traffic increases as a result but this is mainly low emission vehicles, would this be ok? Why just the Conservation Area? Highway professionals often deal with judgements as to a material increase in traffic and indeed some (such as Norfolk CC) publish specific guidance as to what should be considered as a material increase. Think about the air quality aspect after Reg 14

- Bullet 3 – can this be informed by SCC Highways Authority standards to add some clarity? added
- Secure, covered cycle parking would be good here. added

- Community Action 7

- This does not read like a community action as there is no role for the community. It could say something like: 'The community will work with the Highways Authority to carry out a review of...' amended

## Formal Regulation 14 Consultation

### Details of who was consulted

17. The consultation ran for eight weeks from **10 September to 5 November 2021**. Everyone who was consulted is listed in the table below. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14.

Who	Method	Response Received at Reg 14
All residents of the parish	<ul style="list-style-type: none"> <li>• A summary leaflet was sent to all households in the neighbourhood area.</li> <li>• Three consultation events were held at which people could drop in and read the plan and supporting documents, ask questions of the steering group and fill in the survey.</li> <li>• Hard copies of the plan available from the Town Council office or at Bungay Library, or by contacting the town clerk.</li> <li>• All documents, including supporting evidence, <a href="#">available online</a></li> <li>• Online survey and hardcopy survey available from the town hall or town clerk.</li> <li>• Banners and posters in key locations around the town.</li> <li>• Article in the Beccles and Bungay Journey advertising the consultation and making people aware how they could make representations.</li> </ul>	145 responses
Neighbouring parishes – Ditchingham, Broome, Mettingham, St John Illketshall, St Margaret Illketshall, Flixton, Earsham.	Emailed stakeholder letter (see <b>Appendix A</b> )	No
Agent for allocated site	Emailed stakeholder letter	Response from Bidwells on behalf of Slater Family
Anglian Water	Emailed stakeholder letter	No
Broads Authority	Emailed stakeholder letter	Yes
East Suffolk Council	Emailed stakeholder letter	Yes
Environment Agency	Emailed stakeholder letter	No
Essex and Suffolk Water	Emailed stakeholder letter	No
South Norfolk Council	Emailed stakeholder letter	
Historic England	Emailed stakeholder letter	Yes
Homes England	Emailed stakeholder letter	No
Labour Party	Emailed stakeholder letter	Yes

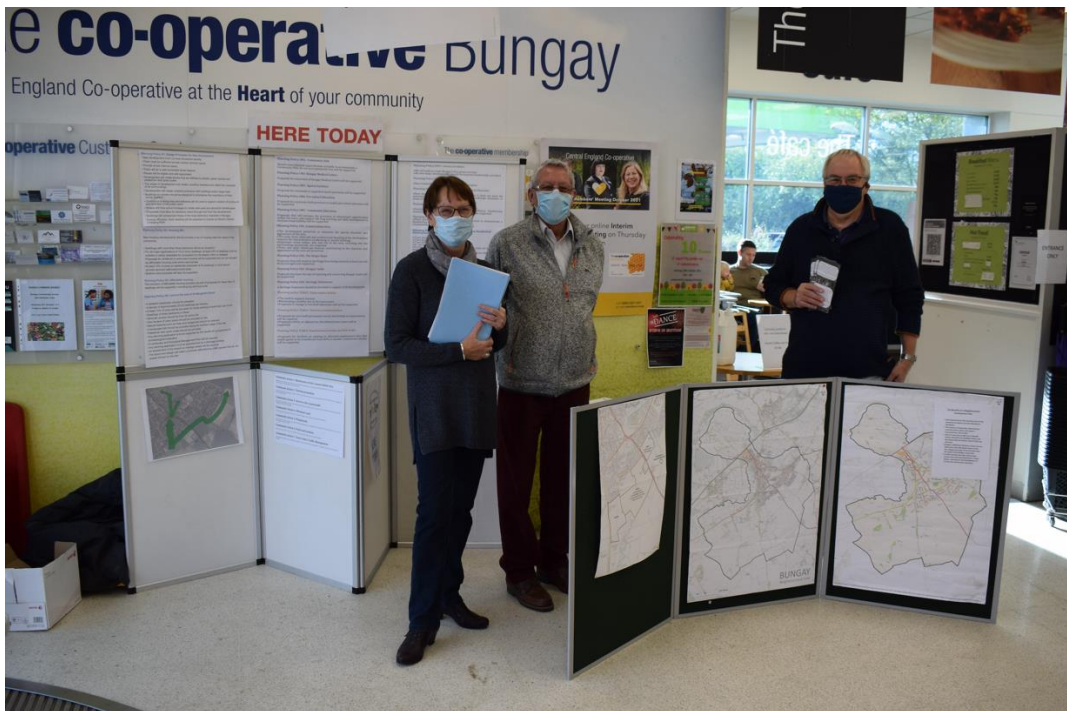
Who	Method	Response Received at Reg 14
Mobile UK	Emailed stakeholder letter	No
Natural England	Emailed stakeholder letter	Yes
Norfolk and Waveney CCG	Emailed stakeholder letter	No
Norfolk County Council	Emailed stakeholder letter	Yes
River Waveney Trust	Emailed stakeholder letter	Yes
Suffolk County Council	Emailed stakeholder letter	Yes
Suffolk Preservation Society	Emailed stakeholder letter	No
Suffolk Wildlife Trust	Emailed stakeholder letter	Yes
BEBA (Bungay Events & Business Association)	Emailed stakeholder letter	No
Bungay Medical Practice	Emailed stakeholder letter	No
Trinity Church	Emailed stakeholder letter	No
Emanuel Church	Emailed stakeholder letter	No
St Edmund's Church	Emailed stakeholder letter	No
Bungay Primary School	Emailed stakeholder letter	No
Bungay High School	Emailed stakeholder letter	No
Castle East School	Emailed stakeholder letter	No

## Consultation Methods

18. Several methods were adopted to ensure that all relevant bodies and parties were informed of the consultation, as well as ensuring that local residents were made aware of the consultation and provided with opportunities to provide their views and comments. The approach aligns with updated Planning Practice Guidance with respect to Neighbourhood Development Plans and the Coronavirus (Covid-19) pandemic.
19. A leaflet advertising the consultation, in accordance with the Regulations, was distributed to all households in the neighbourhood area. This included a summary of key policy areas, see **Appendix B**.
20. Three consultation events were held over the 8 weeks, including:
  - Saturday 25 September at Bungay Community Library
  - Saturday 9 October at Fisher Theatre
  - Saturday 23 October at the Co-Op Supermarket

These provided an opportunity for residents to drop in and view the plan and its proposals, talk to members of the steering group and fill out a hard copy survey. Banners were used to advertise the consultation and events, see **Appendix C**.





21. A poster was displayed in various locations around the town, a copy of this is provided in **Appendix D**. This provided details on where and when the Neighbourhood Development Plan could be inspected, including electronic and hard copies. Posters were put up at the beginning of the consultation period.
22. During the consultation period the Neighbourhood Development Plan was advertised and available for download along with all the supporting documents on the [website](#). The supporting documents available included the Environmental Report, Habitats Regulations Assessment, Evidence Base, Housing Needs Assessment and Housing Design Guide. The website included the dates of the consultation and the various methods of commenting on the draft plan to encourage as many responses as possible.
23. Hard copies of the draft plan were available to view in the Town Council offices and Bungay Library. In addition, it was possible for people to request a hard copy of the plan by contacting the town council clerk.
24. An email was sent directly to each of the stakeholders, including statutory consultees, supplied by East Suffolk Council, in addition to local stakeholders, as listed above. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14. This was sent on 9 September 2021. A copy of this is provided in **Appendix A**. The email informed the stakeholders of the commencement of the consultation period. These contacts involved numerous bodies and individuals that the Neighbourhood Development Plan steering group and the District Council believed will be affected by the Neighbourhood Development Plan for Bungay, such as neighbouring parishes, key bodies such as Historic England and Natural England. The email notified consultees of the Neighbourhood Development Plan's availability on the website, alongside supporting materials, and highlighted several methods to submit comments.
25. Throughout the consultation it was possible for people to make representations by:
  - Completing an online survey;



- Filling in a hard copy of the survey or electronic version of the survey and sending this to the working group (see **Appendix E**);
- Providing feedback via letter or electronically to the working group.

## Responses

26. At the end of the consultation period there were 145 completed forms from local residents, either filled in electronically, by hand or online.
27. Ten stakeholders wrote to the working group with their comments on the draft plan, either in letter or email form.
28. The next section summarises the main issues and concerns raised and describes how these were considered in finalising the Neighbourhood Development Plan.

## Summary of the main issues and concerns raised at Regulation 14 and how these were considered

29. For ease of review, the table below is organised by section of the plan and by policies. It is intended to contain, as a minimum, a summary of feedback regarding the main issues and concerns raised from stakeholders, including statutory consultees, and residents. For clarity, the name of the stakeholder providing the feedback is indicated, the unattributed comments are those from residents.
30. At Regulation 14 East Suffolk Council repeated many of the comments it made during the informal healthcheck consultation in June 2021 because of a misunderstanding as to whether its suggested changes had been made to the draft plan following the healthcheck. Where these had in fact already been used to make amendments to the plan for Regulation 14, the ESC comments (and resultant amendments) are not set-out in the table below. They are however reflected in the earlier section of this Consultation Statement.
31. Both East Suffolk Council and the Broads Authority required, following Regulation 15 submission, a significant number of changes to the Consultation Statement and this has required the following disclaimer.

### **Disclaimer**

Collective Community Planning and the BNDP Steering Group produced a Consultation Statement that was submitted as part of Regulation 15 and which it was believed met the requirements for a Consultation Statement. In particular, that it summarised the main issues and concerns raised. During the checking process carried out by the Local Planning Authorities before moving to Regulation 16, they insisted the Consultation Statement be revised to include a large number of additional issues and concerns that were raised by themselves at Regulation 14.

The BNDP Steering Group and Collective Community Planning felt that the vast majority of the additional entries were either:

- Already addressed in the Consultation Statement but just summarised, as required by Regulation 15, rather than set out verbatim;
- Minor and so not appropriate to include, as per the Regulation 15 requirement only to include *main* issues and concerns; or
- Not relevant as the comments concerned earlier versions of the BNDP and so the Regulation 14 version had already been amended accordingly.

However, as the Local Planning Authorities have the authority not to progress the BNDP to Regulation 16, the changes required were made. This disclaimer is to explain why the following table is believed to include matters not strictly required by Regulation 15.

Summary of the main issues and concerns raised	How these have been considered
<b>General</b>	
<u>Broads Authority and ESC</u> Clarity on terminology regarding local planning authorities and what the respective local plans are called	Amended
<u>Broads Authority and ESC</u> Other matters of clarity and typographical errors, and a few other corrections, and improved references to policies in the two local plans, putting all supporting text before a policy, references to the NPPF may need updating as the NPPF itself has been updated etc	Amended as suggested
<u>Broads Authority</u> Section 2 is good, but I would have thought it would be prudent to refer to the Broads and the Broads having a status equivalent to a National Park. Section 2 talks about many assets of the area that are effectively the Broads; so, suggest link them together	Now refers to equivalent national park status
<u>Broads Authority</u> I find footnote 3 a bit confusing. I am not sure what the message is here that cannot be made in the main text. What are you trying to say?	Deleted footnote
Avoid use of the word 'settlement'	Changed to town, but nearly all uses of the word settlement are in relation to the settlement boundary
<u>Broads Authority</u> The vision starts off talking about a place people will choose to visit. What about the place as somewhere to live, work and play? Linked to a previous comment, there is limited reference to protecting what is important to the area – the landscape and water are mentioned many times in section 2 as being important, yet these are not included in the vision. Also suggested minor change to objectives to mention The Broads (objective 7)	Changes made to the Vision and objectives
<u>Broads Authority</u>	Explanation and distinction improved

Summary of the main issues and concerns raised	How these have been considered
Clarity needed on the difference between Community Actions and Planning Policies	
<u>Suffolk CC</u> Include a map showing the development boundary for the town	Included at Appendix B
<u>Suffolk CC</u> Include an overall Policies Map. This map should include: the parish boundary, settlement/development boundary, housing site allocations, conservation area, the proposed green corridor, key community facilities, heritage assets/listed buildings.	Included a map of key constraints and WLP policies at Appendix B
<u>Norfolk County Council</u> No specific comments to make	Noted.
<b>Housing</b>	
Infrastructure inadequate for growth, such as GP surgery and school. Traffic also raised as an issue	Added text to explain that ESC will address strategic infrastructure in relation to growth through the strategic plan making process. In relation to the surgery, the need for such infrastructure is addressed at a more strategic level and involve the Clinical Commissioning Group. The allocation will deliver site-specific infrastructure, such as open space. Primary School capacity was not raised as an issue by SCC or ESC. Providers, such as Anglian Water, have a statutory responsibility to provide the required capacity, such as for foul water drainage and treatment capacity. The plan does support the expansion of the surgery at Policy CM2, and spare land should not be an issue. BNDP also supports other infrastructure such as green infrastructure, community facilities etc

Summary of the main issues and concerns raised	How these have been considered
	The allocation will need a transport assessment to identify issues and improvements, so add this into the policy H4
Uncertainty as to the actual number of houses to be built under the NP	The text on this has been clarified with confirmation of the number of houses being built on WLP 5.1 and WLP 5.2 and the site allocated in BNDP. We have used figures from Housing Requirement report from ESC to explain.
<b><u>Policy H1</u></b>	
<p><u>East Suffolk Council</u> This policy is long and addresses many different matters. It seems to be mostly aimed at major residential development, despite being written to be applied to all development (except the first para.). Given the breadth of the design topics it tackles I think it will be difficult, or impossible in some instances, to apply to developments such as domestic extensions or advertisements. You may want to consider altering the wording to reflect this, or perhaps have a separate policy for major residential developments (ie. 10+ dwellings) to make it clearer how the parts of the policy should be applied. Similar point raised during the Informal consultation with ESC in June 2021, but further changes made to policy in response to formal Reg 14 comment</p> <p><u>Broads Authority</u> The title of H1 is 'new development'. The first para refers specifically to 'all new residential development'. The intro to the bullets says 'all new development'. So, what does this policy apply to and what scale? Where you say 'all new development' that could include windows for example; does it apply to that?</p>	<p>Further amended to make clear that the policy applies to new residential development (so not advertisements or new windows for example).</p> <p>Supporting text makes clear that not all the criteria will apply to <i>minor</i> development, and even where they do apply they should be applied proportionately.</p>
Broads Authority	Amended "...Bungay will..." to "...BNDP will..."

Summary of the main issues and concerns raised	How these have been considered
. Also, Para 47 (and maybe throughout) says ‘Bungay will’ on a couple of occasions – may be best to say ‘BNDP will’.	
<u>East Suffolk Council</u> Policy H1 on design. New development should not have, or have the appearance of having, an excessive density, taking into account its context and setting. What does excessive mean?	Should be a matter of planning judgement, but it has been rephrased to say it should be an appropriate density taking into account its context and setting.
<u>East Suffolk Council</u> Policy H1. Planning Policy cannot require developments to achieve net zero carbon emissions. It is therefore unclear what additional benefit the policy offers over and above the requirements of policy WLP8.28 in the Waveney Local Plan.	This is true, it has been confirmed that NPs cannot require this. We have rephrased so the requirement is for development to demonstrate how they have maximised energy efficiency.
<u>East Suffolk Council</u> Policy H1. Delete phrase ‘ample indoor space’ as it is not clear how this would be judged	Rephrase the bullet point with clear reference to Nationally Described Space Standards
<u>East Suffolk Council</u> Policy H1. Sort of repeats much of what is in local or national policy. Is it needed?	This policy sets out the requirements of the Bungay specific design guide, though it is accepted that there is an overlap with national and local policy.
<u>Broads Authority</u> Policy H1 Design – Bungay NP Design Guide should not apply to the Broads	Agreed, added explanation
<u>Broads Authority</u> There will be Government requirements on EV charging points for new homes. How does TM2 on EV charge points relate to H1 part n, which says something similar?	There will indeed now be new EV charge point requirements for new homes, so this part of the policy has been deleted. Policy TM2 on EV charge points -also delete as superseded before the plan will be ‘made’
<u>Broads Authority</u> How will applicants respond to this policy? Using a DAS?	Just as they would respond to any design policy, whether in the local plan. NPPF or in the BNDP
<u>Broads Authority</u>	There is further detail in the Design Guides 2019. The policy is unable to capture every detail and so refers to the 2019 Guides.

Summary of the main issues and concerns raised	How these have been considered
There doesn't appear to be anything about the scale of new developments relating to the context (e.g. 2/ 3 storeys) or what materials might be considered acceptable	
<u>Broads Authority</u> I – I am a little wary of such policies as developers can use it as a means of justifying 'landmark corner buildings' completely out of scale with their surroundings.	Noted but no change. This is explained further in the 2019 Design Guidelines where it explains that taller or more architecturally distinct buildings could be acceptable, and the acceptability will be a planning judgement
<u>Broads Authority</u> Consider having each paragraph in each policy numbered	From a review of other NPs and local plans, the approach is mixed. No change.
<u>Historic England</u> Policy H1 or its supporting text should require applicants to have regard to and follow the best practice for design set out in the government's National Design Guide, as well as Manual for Streets 1 and 2. This also applies to policy H4.	Added to supporting text of H1
<u>Historic England</u> Policy H1. Inclusion of Figure 5 as an example of a 'good residential layout' ought to be removed, as it depicts a very uniform and indistinctive residential layout that bears no relation to Bungay's historic character. Instead of requiring 'continuous buildings lines, we suggest the plan's general and site H4 specific design policies could include a requirement for development to adopt a 'spaces first' approach to designing streets, based on an analysis of local context, form and character, reflecting the town's traditional layout.	Indicative layout is more suited to an out of centre layout. HE seems to be more focused on the town centre, which is less uniform. However, have removed Figure 5 from the document as it is in the Design guide anyway.
<b>Policy H2: Housing Mix</b>	
East Suffolk Council comments already addressed following the June 2021 informal feedback	
Policy H2 Housing mix. Some residents thought the plan should encourage larger homes.	The HNA shows that the need is actually for modest sized homes.

Summary of the main issues and concerns raised	How these have been considered
Concerns from LPAs regarding significant weight being given to passivhaus development outside the settlement boundary as contrary to basic conditions <sup>1</sup>	Deleted reference to passivhaus development outside boundary.
<u>Broads Authority</u> Policy H2 Housing Mix Suggested changes to Policy H2 on housing mix, including for clarity and to avoid repeating existing policy  What is meant by <i>significant</i> weight	Made some minor changes to improve clarity  Re significant weight, this is also used in local plans and the NPPF and so a similar planning judgement will be needed.
<u>Broads Authority</u> Para 58 – I don't think lifetimes homes standard is a thing anymore. I think it is no more. Do you mean building for a healthy life?	Not relevant as no such reference in the policy. Could be referring to an earlier version of the policy.
<b><u>Policy H3: Affordable Housing</u></b>	
<u>East Suffolk Council</u> Policy H3. Provided some useful data on incomes and housing affordability.	Added to the evidence base and summarised in the plan itself
<u>Broads Authority</u> Policy H3 on affordable housing. Include explanation of affordable housing requirements in the local plans. Clarify what exception sites are for. <u>ESC and Broads Authority</u> Suggested specifying First Homes (a type of affordable housing) How does the policy relate to Policy WLP8.6 in the local plan? Why within 50m of the development boundary? This is not adjacent, which means adjoining. ESC asked about the justification for 50m.	Included an explanation on local plans for context  Exception sites amended to be for First Homes as the direction seems to be this this type is replacing Entry-level (in national guidance but not in the NPPF as yet) Adjacent can mean 'near to', and the policy defines this as 50m to provide clarity and certainty. The justification is that the steering group decided this to be reasonable for their community. Case law has found that even abutting does not need to mean touching. So using terms such as adjacent or abutting leaves considerable uncertainty

<sup>1</sup> This was raised shortly after Regulation 15 and acted upon accordingly



Summary of the main issues and concerns raised	How these have been considered
<p>You could borrow some of the wording from the local plan on exception sites. This could help provide extra clarity and information for readers regarding the housing need, for example.</p>	<p>Policy WLP8.6 seems to be for rural exception sites, which are different, and which are covered by national policy and the local plan, and which specifically excludes Bungay anyway. No change needed on this specific point.</p>
<p><u>The Labour Party</u> Would like to see more social housing on new developments, whether provided by the local authority or a Housing Association.</p>	<p>This is a strategic policy for the local plan rather than for the neighbourhood plan</p>
<p><b>Policy H4: Land to the east of St Margaret’s Road</b></p>	
<p><u>East Suffolk Council</u> Comments from ESC were made during the informal consultation in June 2021 and addressed prior to Regulation 14</p>	
<p>Policy H4 – the allocation Allocation needs to address piping/instability on perimeter and associated historic landslips into St Margaret’s Road and north of the site. Allocation drains towards north-west and so could increase flood risk to housing on the north.</p> <p><u>Suffolk CC</u> Policy H4. Water management on this site may be challenging. The ground conditions of Local Plan site allocation to the east is WLP5.2 don’t support SuDS infiltration systems (soakaway etc) requiring the provision of an attenuated piped system which has a positive outfall into the river to the east of St John’s Road. It is likely that site H4 has the same constraints and requirements. It needs to be demonstrated that there is a feasible water management and drainage solution for site H4.</p>	<p>There are historic landslips and so this has been referred to in supporting text. Extra requirement to be aware of this included in the policy. This could be related to an old pit (Gower’s pit in the north west corner of the site) and the drainage matter too. This site could be the location for the informal recreation open-space area, which has been explained in the supporting text.</p> <p>Made it clear that any proposal will need to be supported by a site specific Flood Risk Assessment, but the policy draws attention to the issue. It might be that the north of the site becomes the open space area for ecological enhancement, informal recreation, and some flood risk management. This also allows for a buffer between new development and existing dwellings to the north. Explain in supporting text.</p>

Summary of the main issues and concerns raised	How these have been considered
	Included SCC comments in supporting text and make minor changes to the policy
<p><u>Bidwells</u> Strongly support the allocation. A number of alterations requested to Policy H4 including:</p> <ul style="list-style-type: none"> <li>• Policy should be clear tha the land could come forward independently of Policy WL5.2, albeit having regard to the requirements of the adjacent site. Failure to incorporate this flexibility may result in delays.</li> <li>• Criteria e) whilst preferred access to the site is from St John’s Hill, alternative options will be considered where feasible and practical, policy should be amended to reflect this</li> <li>• Criteria k) clarity should be provided as to what is considered a significant BNG, a figure of 10% is suggested</li> </ul>	<p>The supporting text has been amended to clarify that although masterplanned with the adjacent site, this should not prevent H4 gaining permission and being built-out at a different time to WLP5.2.</p> <p>Policy and supporting text amended to say that access should be via WLP5.2/ St John’s Hill, <i>if possible</i>.</p> <p>BNG policy text amended to say that it should be at least 10%</p>
<p><u>Bidwells</u> Query as to why the % of plots required to be custom/self-build has been significantly increased from WLP8.3 which sets out 5% to 10% in BNDP on schemes of 20 or more. No justification is provided for this change and further information is requested.</p>	<p>It is felt that there is strong national policy and legislative support for self-build opportunities, and there is strong community support for the approach as it might enable local people to get on the housing ladder, which is a key issue locally. Flexibility is included in H4 in the event of proven lower local demand for such plots.</p>
<p>Policy H4 Allocation policy should not have cycle access onto St Margaret’s Road as it’s dangerous. Need to maintain existing public access to the site, such as dog walking.</p>	<p>Rely on the pedestrian access being provided by WLP5.2, linking to the swimming pool etc, so the key would be to link with the Public Right of Way and WLP5.2, and this would fit in with the Green Corridor.</p>

Summary of the main issues and concerns raised	How these have been considered
Needs to integrate with the rest of Bungay.	There is an existing Public Right of Way along eastern boundary of the site Refer to it in the policy. There is also an informal dog walking root via the old pit and looping around the boundary of the site, so include in the policy.
<p>The Labour Party</p> <p>We are pleased to see that BNDP provides more land for housing than previously allocated, though we feel more consideration is needed in relation to how the site links to the road network.</p>	The preferred access is to St John's Hill via allocation WLP5.2 and this will be implemented if possible. However, to provide flexibility and to avoid sterilising the site, other access options might need to be considered if the preferred option is not possible.
<p><u>Suffolk CC</u></p> <p>Part I of this policy should be amended, with wording suggested below.</p> <p>i. Pedestrian and cycle routes should be provided that link with the allocated site to the east (WLP 5.2 of the Local Plan), and the Green Corridor going north (see Policy ENV1 and Figure 7). A cycle route could also be provided onto St Margaret's Road. A transport assessment should identify the measures necessary to ensure that St Margaret's Road is safe for cycling. Safety measures may involve reductions of traffic volumes and/or speed.</p>	Policy revised such that the cycle route no longer deploys St Margaret's Road
<p><u>Suffolk CC</u></p> <p>Policy H4. The allocation land-locks the High School, which will need to expand in the future. Policy H4 should be amended to reflect that the school will have need to expand, to ensure that development on this land does not prevent delivery of the school expansion invertedly</p>	Amended H4 as suggested
<p><u>Historic England</u></p> <p>Policy H4 should require a Design code from the developer</p> <p>Policy H4 – archaeological excavations should incorporate community engagement</p>	Updated the policy to include this as part of the masterplanning Include a requirement for community engagement during any archaeological investigations
Policy H4 – ensure homes are fully accessible and suitable for elderly, and build to very high environmental standards	Neighbourhood Development Plans cannot set technical standards for building regulation. Local plans can, if viable, and

Summary of the main issues and concerns raised	How these have been considered
	indeed the local plan has done this. Included an explanation in supporting text of Policy H1.
Policy H4 Allocation – needs access for buses, and for disabled people	Allocation WLP5.2 includes a parking and turning area for buses near the High School. National policy requires access to be for all people. This has been referred to in the supporting text. Also, the allocation policy could require a transport assessment and so this should identify specific improvements – added this into the policy
<u>Suffolk CC</u> Confirmed that the allocation will not cause capacity issues at the primary school	Noted and mentioned in supporting text of H4
<b>Community policies</b>	
Need larger play area for ball games like football	This is included in Allocation Policy WLP5.2. Reference added to the supporting text
<b>Policy CM1: Community Hub</b>	
<u>East Suffolk Council</u> Policy CM1 <ul style="list-style-type: none"> <li>• What is meant by ‘green space’? eg. Allocated open space, agricultural land?</li> <li>• Why must it be on a brownfield site?</li> </ul>	Further clarity added on the definition of green open space within the town using NPPF definition of providing accessible public amenity etc Limiting it to brownfield might severely restrict the likelihood of anything happening. Amended to say that brownfield would be preferred. The intention was to make efficient use of land, which it was felt the brownfield requirement achieved.
<b>Policy CM2: Bungay Medical Centre</b>	
<u>East Suffolk Council</u> Policy CM2 <ul style="list-style-type: none"> <li>• The Suffolk Guidance for Parking specifies the requirements for parking at Medical Centres. It is unclear how the requirements of the policy CM2 differ from the Suffolk Guidance for Parking.</li> </ul>	Reference added to the Suffolk Guidance for Parking
<b>Policy CM3: Sports facilities</b>	

Summary of the main issues and concerns raised	How these have been considered
East Suffolk Council comments already addressed following the June 2021 informal feedback	
<b>Policy CM4: Pre-School Education</b>	
<p><u>Suffolk CC</u>  Policy CM4 suggest the following amendments:  “This will need to have:</p> <ul style="list-style-type: none"> <li>• Safe access by walking, cycling and public transport; and</li> <li>• Sufficient parking provision, including temporary parking at drop-off and collection times, and secure cycle parking for staff and visitors.</li> </ul>	Changes made
<p><u>Broads Authority</u>  Para 95 – have you spoken to the Broads Authority about these aspirations? Of making the river near Bungay navigable and more walking routes?</p>	Broads Authority is a consultee and has seen the draft BNDP
<b>Cultural heritage and the built environment policies</b>	
<p><u>Broads Authority</u>  Add to the end of the sentence about the grade II listed Manor Farmhouse ‘the setting of which will need to be considered.</p> <p>Page 31 – Conservation Areas aren’t specifically designated as Heritage Assets in the Planning (Listed Buildings and Conservation Areas) Act 1990. They are defined as designated heritage assets through the NPPF. However, the above this 1990 Act is the planning legislation that governs how they are identified, designated and dealt with.</p>	<p>Suggested wording added to supporting text of H4</p> <p>Noted re status of conservation areas. The wording specifically uses the term heritage assets in a generic sense without upper case first letter (so not Heritage Assets). It can not be argued that conservation area are not heritage assets. Leave wording as it is.</p>
<b>Policy CH1: Conservation Area</b>	
<p><u>Historic England</u>  Policy CH1 could include a requirement to retain shopfront</p>	Added to policy
<p><u>East Suffolk Council</u>  Policy CH1 -It is recommended that this policy acknowledges that in some instances harm to a heritage asset or conservation area may be</p>	Added wording to the effect that the requirements should not undermine the need to balance any harm against the benefits, as required by national policy.

Summary of the main issues and concerns raised	How these have been considered
<p>necessary but this should be balanced against other factors, such as the benefits of development or the condition of a heritage asset. This policy seems to try to allow development but without acknowledging that this could lead to harm or change to a heritage asset or conservation area.</p>	
<p><u>East Suffolk Council</u>            Planning Policy CH1. Conservation Area – where it states “the Waveney District Council Bungay Conservation Area Character Appraisal” this should be replaced with “East Suffolk Council’s Bungay Conservation Area Appraisal and Management Plan”.</p>	<p>Change made</p>
<p><b>Community Action 1</b></p>	
<p><u>Broads Authority</u>            Page 33 – there is a community action box. That is a lighter shade. This is the first time community actions are talked about – did they need talking about at like para 32?</p>	<p>Not relevant as Regulation 14 version of the BNDP has a full explanation of this matter in Section 4, although this was expanded for the Submission version for further clarity. Comment could be referring to an earlier version of the BNDP.</p>
<p><b><u>Policy CH2: King’s Head</u></b></p>	
<p><u>East Suffolk Council</u>            Policy CH2. Requiring demonstrable and over-riding community benefits is a high bar and could result in it becoming derelict. Also, what community benefits are being envisaged? You could consider setting criteria that any re-use should achieve. Eg.</p> <ul style="list-style-type: none"> <li>O Retaining an active frontage at first floor level</li> <li>o Offices or residential uses only at first floor and above</li> <li>o Retail/public exhibition space/community use /pub/ café /restaurant uses will be supported provided the building has been adequately and appropriately marketed for hotel use for not less than 12 months. (you can refer to local plan appendix 4 here if you wish)</li> </ul>	<p>Revised the policy, around hotel or other visitor accommodation and any change of use will require 12 months of marketing. Any other use should require retaining active frontage on ground floor</p>
<p><u>Historic England</u>            Policy CH2 (King’s Head) - re-word to strengthen it.</p>	<p>The suggestions could make it harder to achieve an ongoing viable use for the hotel.            See earlier for proposed changes to policy.</p>

Summary of the main issues and concerns raised	How these have been considered
<p>“Proposals that will result in the change of use of the King’s Head from a hotel to other use will not be supported, unless it can be demonstrated that a) hotel use is not economically viable, b) the long-term use of the building will be secured, and c) that there are demonstrable and overriding community benefits from the new use.”</p>	
<b><u>Policy CH3: Bungay Castle</u></b>	
<p><u>East Suffolk Council</u> Policy CH3 Suggest changing it to a Community Action rather than a policy. Could be expanded to say whether enabling development would be acceptable.</p>	<p>Left as policy and with no reference to enabling development due to concerns as to what this might mean in practice, but other amendments made (see below)</p>
<p><u>Broads Authority</u> Policy CH3 – would you want to say ‘proposals that will appropriately/sensitively repair and conserve Bungay Castle will be supported’? Aim is one thing, to do is another.</p>	<p>Change made</p>
<b><u>Community Action 1: Maintenance of the Conservation Area</u></b>	
<p><u>Broads Authority</u> Community Action 1. Maintenance of the Conservation Area – perhaps the wording of the final sentence should be changed to: ‘informed by the management and enhancement proposals within the Bungay Conservation Area Appraisal’</p>	<p>Change made</p>
<b><u>Policy CH4: Heritage Statements</u></b>	
<p><u>Broads Authority</u> CH4 – uses the word ‘should’. That is a weak and flexible word. If you want these statements to be provided, suggest you say ‘will’ or ‘must be’.  Could require Heritage Impact Assessment</p>	<p>Change made  Re impact assessment, NPs cannot set out what a LPA will require from applicants. This will be included in their local list. Policy specifically sets out Heritage Statement to be flexible such that, for reasons of proportionality, it could be just a section in a planning statement or DAS.</p>

Summary of the main issues and concerns raised	How these have been considered
<p><u>East Suffolk Council</u> The policy states that heritage statements should be ‘proportionate’, but it does not say to what. It’s worth noting that Local Plan policy WLP8.37 ‘Historic Environment’ already includes text about heritage statements and so it is not totally clear what this policy aims to add. Further guidance about heritage statements can be found in the Historic Environment SPD. See page 133, paragraph 18.4.</p>	<p>Amended policy to set out that it will be proportionate to the scale and significance of the likely impact</p>
<b>Other comments</b>	
<p><u>Historic England</u> Could identify not-listed buildings that have heritage importance and use this evidence to encourage East Suffolk Council to ensure that Bungay’s Article 4 Direction removes the Permitted Development Right to change the use of these buildings</p>	<p>The Neighbourhood Development Plan can’t be used as a way of making ESC do something outside of the determination of applications</p>
<p><u>Historic England</u> Section 6.5 on CIL. Could include some wording on using CIL for conservation of heritage assets, such as the castle</p>	<p>Any link to growth seems tenuous. No changes</p>
<p><u>East Suffolk Council</u> Need to be careful when referring to the use of CIL monies. CIL monies are the responsibility of the district council and it should be used to address the impacts of growth rather than addressing existing issues.</p>	<p>Amended the wording to reflect this. Although CIL is the responsibility of ESC, the text in the plan talks about the portion that goes to the town council.</p>
<b>Town Centre Vitality and Economic Development</b>	
<b>Policy TC&amp;E1: Town Centre Vitality</b>	
<p>East Suffolk Council comments already addressed following the June 2021 informal feedback</p>	
<p>Some questioning of policy stance on hot food takeaways</p>	<p>This was supported by the steering group and also at consultation.</p>
<p>Not enough on increasing job opportunities and employment growth (including from the Labour Party)</p>	<p>The plan supports the building of new homes which will create work, as well as supporting tourism and town centre vitality. The</p>



Summary of the main issues and concerns raised	How these have been considered
	local plan has an allocation for employment use already at site WLP5.2. Don't think there is anything more the plan could reasonably add.
<p><u>Labour Party</u> Disappointed that the draft plan says little about employment or industry. The town is extremely vulnerable to the fortunes of its largest employer. The more small flexible employment sites with good road access the better.</p>	The Neighbourhood Plan had no real evidence that there would be a need for additional allocations for commercial development. The allocation for commercial development is part of the East Suffolk Waveney Local Plan. What the Neighbourhood Plan has done, however, is be very supportive of tourism and tourist accommodation.
<p><b>Policy TC&amp;E2: Tourism accommodation in Bungay town</b></p>	
East Suffolk Council comments already addressed following the June 2021 informal feedback	
<p><u>Broads Authority</u> Para 125 – both local plans have these policies.</p>	Amended
<p><b>Environment Policies</b></p>	
<p><u>Natural England</u> The neighbourhood plan has a range of positive environmental policies which Natural England commends. These include (but are not limited to) ENV1: Green Corridors, ENV2: Open Space, ENV3: Landscape and Ecological Character, ENV4: Biodiversity and ENV5: Flooding.</p>	Noted, thank you.
<p><u>Historic England</u> Neighbourhood Development Plan could designate Local Green Spaces</p>	Decision not to do this early in the plan's development and doing so now would require a lot of work and cause a delay of 6 months at least. Also landowners have to be informed early in the process, which would now be impossible.
<p><u>Suffolk CC</u> Section 9 Environment which makes statements about the local public rights of way network could also highlight the strengths of the network including reference to the Angles Way, a long distance promoted trail between Great Yarmouth and Thetford that offers a well-used and well-</p>	Suggested change made

Summary of the main issues and concerns raised	How these have been considered
signed walking link between Bungay and Beccles in the east and Diss in the west	
<b>Policy ENV1: Green Corridor</b>	
Policy ENV1. Green Corridor Add Annis Hill to the Green Corridor	Too far away unfortunately
River Waveney Trust We are particularly interested in your proposal for a green corridor. We have been looking at opportunities for natural flood management solutions on the Tin River, as well as thinking about river restoration further downstream and how the floodplain could be enhanced.	Noted. Thank you.
<u>East Suffolk Council</u> The objective is good but the policy is vague - how should new development contribute to or deliver the green corridor?	Further policy wording amendments made, clarifying that this is through habitat improvements that help t create a corridor of links or stepping stones
<u>East Suffolk Council</u> Also the area on fig. 7 covers a large area. How will a decision-maker know when this requirement has been met? The NPPF says at para. 16 that policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.	Further policy wording amendments made
<u>East Suffolk Council</u> Policy ENV1 How would developments contribute to the Green Corridor. It is unlikely to be achievable that all major development can ensure residents can have traffic-free access to local services. This is a very high bar. They can show how they support biodiversity and walking and cycling instead, for example.	The Corridor is a way of focusing biodiversity enhancements that cannot be delivered on-site by developments. Make this clear and in policy ENV4. Deleted wording on traffic free access - walking and cycling is covered elsewhere at TM5 (added wording in that policy on the Green Corridor), and general biodiversity requirements are also covered by other policy such as ENV4 and ENV5
<b>Policy ENV2: Open Space</b>	
East Suffolk Council comments already addressed following the June 2021 informal feedback	

Summary of the main issues and concerns raised	How these have been considered
<p><u>Broads Authority</u> Para 144 and 145 – should cross refer to the open space standards of the Waveney Local Plan (as the Broads Local Plan defers to those).</p>	<p>Leave as no need to cross-refer to every policy in the ESC Waveney local plan as they are, combined, part of the same development plan</p>
<b>Policy ENV3: Landscape and Ecological Character</b>	
<p>East Suffolk Council comments already addressed following the June 2021 informal feedback</p>	
<p>Policy ENV3 on Landscape and Ecology character Some questioning of Skinners Meadow being listed in ENV3 as some see it as ideal for a community facility</p>	<p>Flood risk would prevent this. Included some wording on community use, but not a community facility that comprises a building. Policy amended to say that development proposals will not be supported unless it avoids unacceptable harm to ecology or landscape character.</p>
<p>Broads Authority Para 152 – this should refer to and reflect the Broads Landscape Character Assessment. Also, this para needs to cross refer to policy SP7 Landscape Character, in the Broads Local Plan.</p>	<p>Leave as no need to cross-refer to every policy in the Local Plan for the Broads as they are, combined, part of the same development plan</p>
<b>Policy ENV4: Biodiversity</b>	
<p><u>East Suffolk Council</u> Criterion 4 – up to this point the policy is concerned with biodiversity, but here it introduces climate regulation. They are not quite the same, this bit may be better off in a different policy</p>	<p>Removed reference to climate change to focus more on biodiversity</p>
<p><u>Suffolk CC</u> the following amendments are suggested to Policy ENV4: “1. development proposals should include a detailed assessment of the existing biodiversity and the <i>strategy</i> to provide a net gain; 2. The Biodiversity provided by the development should <i>enhance those features</i> that the site already contains, <i>such as hedgerows, trees and other important or connective habitat</i>. Planning proposals should explain the extent of each benefit; and</p>	<p>Suggested changes made, except ref to climate change now deleted</p>

Summary of the main issues and concerns raised	How these have been considered
3. Support will be given to proposals that demonstrate a significant biodiversity net gain; and 4. New developments must avoid harming priority habitats, <i>and</i> actively seek to conserve and enhance these habitats to strengthen their capacity to regulate climate.”	
<u>Broads Authority</u> ENV4 - as worded, it is not setting requirements. It is saying that if you do this, then we will support you. It is not saying, you need to do this.	Made wording stronger on biodiversity enhancements
<u>Suffolk Wildlife Trust</u> Include reference to having due regard to Priority Habitats in ENV4. Include safeguarding and supporting protected species.	Suitable wording included. The NP can't offer greater protection than that already in legislation. Legislation already covers protected species. Could have wording to say that proposals will need to set out how protected species are being supported, such as swift and bat boxes and allowing hedgehogs wider movement (type of fencing used)
<u>Suffolk Wildlife Trust.</u> Bungay Neighbourhood Development Plan should require developments to seek a minimum of 10% biodiversity net gain	Already covered by ENV4 and allocation
<b>Policy ENV5: Flooding</b>	
East Suffolk Council comments already addressed following the June 2021 informal feedback	
Policy ENV5. Mention recent floods	Added reference to flooding in Winter 2020/21 and included some photos
<u>Suffolk CC</u> Policy ENV5 should be amended as follows to better align with national policy: “Sustainable Drainage Systems are required unless it can be clearly demonstrated that it would be inappropriate. The Neighbourhood Development Plan encourages the use of materials on new developments that are permeable and which therefore reduce the risk of surface water flooding.”	Change made
<u>Suffolk Wildlife Trust</u>	Suitable wording included

Summary of the main issues and concerns raised	How these have been considered
Community Action 3: Access to the Countryside, should include wording about also protecting wildlife	
<b>Transport Policies</b>	
Need to manage traffic, esp lorries, concerns about general road safety, speed limits, and parking (including charges)	These matters would be traffic management and parking management which unfortunately is beyond the remit of a NP
<b>Policy TM1: Parking Standards for New Residential Development</b>	
<u>East Suffolk Council</u> Criterion b (concerning unplanned on-street parking) – I don't know how you could demonstrate this. Would meeting the minimum parking standards be sufficient? If not – what else?	Policy amended with this deleted
<u>Broads Authority</u> How does TM1 relate to the Suffolk Parking standards – do you need to explain that? There is a lot of talk about walking and cycling in the Plan, but you don't talk about cycle parking	Leave as no need to cross-refer to everything  Cycle parking is covered at Policy TM4
<b>Policy TM3: Public car parking (now policy TM2 following deletion of Policy TM2 on EV charge points)</b>	
<u>East Suffolk Council</u> Re criterion b, If traffic increases as a result but this is mainly low emission vehicles, would this be ok? Why just the Conservation Area?	Deleted air quality aspect from policy as not clear
<u>Historic England and others</u> Policy TM3, Off-Street Car parking. Could be unattractive and encourage more car-use. Suffolk CC also concerned about encouraging car use and conflict with climate change, but has not actually objected	Landscaping and design of the car park will be important and this is in the policy. It could induce some traffic, but this needs to be balanced against wanting people to visit the town centre. Furthermore, there is anecdotal evidence that cars are driven around the centre looking for somewhere to park, which increase traffic movements
<u>Broads Authority</u> TM3 – what about cycle parking?	Now mentioned in policy

Summary of the main issues and concerns raised	How these have been considered
<p><b>Policy TM4: HGVs in the town centre (now policy TM3)</b></p> <p><u>Labour party</u> The level of HGVs through the town centre needs to be reduced and policy TC&amp;E3 doesn't look to be feasible or credible in relation to this.</p>	<p>This is a key issue for the town, but one which is largely outside of the scope of planning and the Neighbourhood Plan, being a matter of traffic management in the main. However, in addition to the policy referred to, the plan also has Policy TM4 and Community Action 7.</p>
<p><b>Policy TM5: Sustainable transport and highway safety (now policy TM4)</b></p> <p><u>Suffolk CC</u> Planning Policy TM5: Sustainable transport and highway safety is very welcome although reference under Green Corridors to the 'footpath network' would better refer to the 'public rights of way network', as footpaths alone limit the scope of this policy.</p>	<p>Change made to the supporting text</p>
<p><u>Broads Authority</u> Wondered whether the conversion of the railway from Ditchingham to Beccles for walking and cycling may be something you wish to mention or promote</p>	<p>This falls outside of the Neighbourhood Development Plan area.</p>
<p><b>Environmental Report (SEA)</b></p>	
<p><b><u>East Suffolk Council</u></b> <b><i>Various comments provided at Regulation 14 (and following Regulation 15) as set out below.</i></b></p>	<p><b><i>Some outstanding matters were also picked up during the LPA checks at Regulation 15 and these were taken on board and included below.</i></b></p>
<p>Paragraph 3 – should be updated to reflect the evolution of the report. You should also explain within the SEA report how / whether any changes to the Neighbourhood Plan since the Regulation 14 consultation have been assessed.</p>	<p>Updated.</p>
<p>Paragraph 6 – The wording of the vision doesn't reflect the Submission plan. The overall gist of the Vision seems similar but if this report is accompanying the Submission Plan it should be updated.</p>	<p>Updated in the plan</p>

Summary of the main issues and concerns raised	How these have been considered
Paragraph 8 – ‘Section xx’ needs a number	Amended
Paragraph 11 – Additional wording has been added to explain the rationale for the reasonable alternatives, however the differences between the options are nevertheless still considered marginal (i.e. 65 or 70 dwellings on site BNDP04). Reference to the indicative housing requirement would assist here to a degree, to demonstrate that reasonable alternatives were being considered in the context of this. Otherwise, it could be asked why not 20 dwellings or 40 dwellings or some other number? An explanation that the indicative housing requirement is 67 dwellings, that there are only two reasonably alternative sites and that one of these is considered to only reasonably accommodate 5 dwellings will assist.	Added this explanation.
Paragraph 13 – should ‘settlement’ be ‘option’?	Updated
Paragraph 22/23 – Reference to the refusal has been removed, but a ‘concern’ that there is only appetite (from who?) to develop the site for more than 5 dwellings doesn’t seem a valid reason to discount the site.	Changed the wording to reflect known interest from the landowner in developing the site for more than 5 dwellings, and lack of appetite from them for developing it for just 5.
Paragraph 27 – it isn’t clear whether the mitigation for TC&E2 has been applied. The addition of wording in the policy stating ‘This policy does not apply to hotels’ is confusing in this respect – does this mean that the requirement for accommodation to be in the Settlement Boundary doesn’t apply to hotels? I think it could be interpreted that way.	Text included in the policy was recommended by ESC as hotels are covered by national policy and are a town centre use. We have clarified this in the supporting text.

Summary of the main issues and concerns raised	How these have been considered
Paragraph 27 – the mitigation for climate change is very broad and it isn't clear therefore whether this has been addressed in the Plan. Could you include reference to policies where this would be relevant.	Added specific reference to H1 and TM4.
Paragraph 27 – Historic Environment. Was Policy CH3 amended as a result of this? It doesn't refer to enhancement.	CH3 was added as a result of this. Wording of the policy as recommended by Historic England.
Paragraph 29 – Should be updated to reflect Submission stage.	Amended.
Paragraph 40 – Should be updated to reflect Submission stage	Amended
Paragraph 47 - I note the Housing Requirement note forms part of the Submission documents - this was a Draft so I recommend we provide it to the Neighbourhood Plan group in final version form.	Yes please
Paragraph 51 – Surplus 'this' in the last sentence.	Amended
Paragraph 54 - Copy of previous comment – At the draft Scoping Report stage air quality was scoped out. We commented that this didn't reflect the discussion that new development could give rise to increased levels of NO <sub>2</sub> . It is noted from the summaries in Appendix B Scoping Information that the statutory consultees did not raise this, however it is noted that it remains scoped out contrary to our earlier advice.	Yes, as per findings of the scoping and as none of the statutory consultees raised this, the decision was made for this to remain scoped out.
SEA Framework Historic Environment - Copy of previous comment – as per previous comments, does Bungay currently have Non Designated Heritage Assets that have been formally identified as such? It is noted that the Plan does not propose any, but have they been identified through the Buildings of Bungay Archive? If there are not any already	Removed reference to NDHAs.



Summary of the main issues and concerns raised	How these have been considered
the role for the SEA would be to assess the impacts of proposing NDHAs rather than assessing the impacts of the Plan on NDHAs.	
Paragraph 68 – It isn't necessary to re-quote the text from the methodology here as it is quoted above. My earlier comment was referring to including the number of 67.	Removed repeated text and reference added to the paragraph instead.
Paragraph 79 - 112 Assessing reasonable alternatives – My previous comments stated that each alternative should be assessed specifically against each of the SEA objectives and questions. Whilst detailed assessments of the policies have been included in Appendix C there doesn't appear to be any equivalent detailed assessments of the sites individually and the reasonable alternatives – these need to be included so that it is clear how they perform against the SEA framework and therefore what has informed the description of the effects.	We feel the approach taken, to assess each of the reasonable alternatives against the relevant SEA themes, meets the legal requirements without including detailed assessments against each of the SEA objectives and questions. No feedback was received from the statutory consultees in relation to the approach not meeting the requirements.
Paragraph 97 – Copy of previous comment - Given that the difference on BNDP04 is only five dwellings between the 2 options and the site area is assumed to remain the same, would option 2 really mean less agricultural land is lost?	Para 97 states that 'This option could be considered to be marginally preferable, were it to result in a reduction in the size of the allocation at BNDP04. At this stage, however this detail is also uncertain.'
Paragraph 127 – You could add here that it has been updated to reflect the Submission version. Have revisions to policies been checked against the SEA to check the assessments remain valid? This should be explained here.	Updated and assessments checked.
Paragraph 132 / 133 – These paragraphs seem to contradict each other as to whether large scale accommodation could result in recreational pressure on important sites. If paragraph 132 is only referring to non-	Clarity provided, para 132 explicitly related to non-EU designations.

Summary of the main issues and concerns raised	How these have been considered
European sites it should say so. For European sites the SEA shouldn't come to a different conclusion to the Appropriate Assessment.	
Paragraph 136 –TM3 doesn't contain reference to a car park, should this be TM2?	Updated.
Paragraph 180 – The conclusions table would benefit from being updated in places where revised / additional effects have been described in the sections above e.g. climate change and landscape.	Table updated.
Paragraph 181 – See comments on paragraph 27 above	see update from above
Paragraph 182 – update to reflect Submission stage	updated
Paragraph 184 – update to reflect Submission stage	Updated
Paragraph 187 – The requirement is to monitor the significant effects of the Plan. As you have concluded there are no significant negative effects I would say so for clarity.	Updated.
Pg 39 - Typo in right hand column of middle row - 'East' should be 'Each'.	updated
It is noted that air quality was scoped out at the scoping stage. Our advice remains that it would have been more robust to have included air quality (as per our comments on the Scoping Report).	Noted.
The Scoping Report doesn't appear to have been submitted with the submission documents, can this be provided? Also the SEA Screening Opinion should be submitted for completeness.	The scoping report is in Appendix B of the report, but we can also submit this separately and with the screening opinion.

Summary of the main issues and concerns raised	How these have been considered
<p><u>Broads Authority</u> The sites need to be assessed individually rather than a combination – the resulting combination of growth at two sites or one site can be a conclusion, but the actual assessment needs to assess the sites individually as what is for one site might not be for the other. As such, this does not tell the whole story accurately as presented. There is an objection to the Environment Report on these grounds.</p>	<p>The assessment is of reasonable alternatives to deliver the indicative housing growth – for 69 homes. The site assessment work is used for a basis of identifying reasonable alternative sites, this concludes there are only two potential sites for growth. One of these sites is small and not capable of delivering the required housing numbers. It therefore must be combined with another site to reflect a true reasonable alternative. This approach to assessing reasonable alternatives is common in neighbourhood plan SEAs.</p>
<p><u>Natural England</u> Natural England does not have any specific comments to make on this SEA.</p>	<p>Noted</p>
<p><u>Historic England</u> No comments</p>	
<p><b>Habitats Regulation Assessment</b></p>	
<p><u>Natural England</u> Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process. Your appropriate assessment concludes that your authority is able to ascertain that the plan will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the plan, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any associated planning permissions given. Further general</p>	<p>Noted</p>

Summary of the main issues and concerns raised	How these have been considered
<p>advice on neighbourhood planning and the natural environment, including natural environment information sources is provided in Annex I.</p>	
<p><u>Broads Authority</u> The Broads SAC and SPA near Barnby seems to be within 15km – may need to check what the HRA says about this</p>	<p>Part of Barnby Broads &amp; Marshes (North Cove Nature Reserve) is accessible to the public and lies 13.5km from the proposed allocation at its closest, so it is within 15km. Discussion of that part of the SAC/SPA will therefore be added to the HRA. However, as discussed in the HRA report already, we consider it unlikely Bungay residents, or tourists staying in Bungay in any new accommodation, would regularly travel such a large distance for recreation when many other areas of publicly accessible land and water are closer, and no need for a strategic recreational pressure mitigation strategy has been identified for The Broads in Suffolk as part of the Waveney Local Plan or Local Plan for The Broads HRA processes.</p>
<p><u>Broads Authority</u> Page 32 and 33 – why does this focus on the Broads Plan and not the Local Plan for the Broads? This needs rectifying.</p>	<p>HRA does refer to both, but the author (Dr James Riley of AECOM) has taken the view that, for this HRA, the Broads Plan is the most important</p>

## Appendix A: Stakeholder Email

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**From:** Edwin Rosier  
**Sent:** 09 September 2021 17:05  
**To:**  
**Subject:** Bungay Town Neighbourhood Plan Regulation 14 Pre-submission Consultation

TO WHOM IT MAY CONCERN

### **Bungay Town Neighbourhood Plan Regulation 14 Pre-submission Consultation**

In accordance with the requirements of Regulation 14 you are invited to comment on the Draft Neighbourhood Plan for Bungay. Please find attached the draft (pre-submission version) Neighbourhood Plan, the Strategic Environmental Assessment (SEA) and the Habitats Regulation Assessment (HRA). It is the product of a considerable amount of work by the local community, which aims to have greater influence over development that comes forward within the town. The consultation period is from 10<sup>th</sup> September 2021 to 5<sup>th</sup> November 2021, and so the consultation closes on 5<sup>th</sup> November 2021; please therefore let us have any comments by then. You can provide comments by email to [admin@bungaytowncouncil.gov.uk](mailto:admin@bungaytowncouncil.gov.uk), or by post to Edwin Rosier, 1A Broad Street, Bungay NR35 1EE. If you would like a hard copy, please email or call Edwin Rosier on 01986 894236. Alternatively, a number of hard copies will be available during the consultation period at Bungay Town Hall and Bungay Library.

We will aim to take on board your feedback and make any necessary changes as and when we produce our submission version of the plan. That version will then be submitted to East Suffolk Council, who will consult again on that more advanced version before it goes to Examination and ultimately to referendum. If passed by a majority of our residents at the referendum, the plan will be formally adopted and will become a part of the statutory development plan, which means it will be used to determine planning applications in Bungay.

We hold onto some of your personal information to enable the town council to perform its official functions in the interest of the public or for contractual reasons. We will retain your information until your contract expires or for as long as is necessary. Your information will only be passed between members of the town council and will not be shared with any third parties without prior consent. The Clerk to the Council can be contacted by email, [admin@bungaytowncouncil.gov.uk](mailto:admin@bungaytowncouncil.gov.uk), by post to Edwin Rosier, 1A Broad Street, Bungay NR35 1EE or on 01986 894236.

Yours sincerely

**Eddie Rosier**


Edwin Rosier  
Assistant Town Clerk  
Bungay Town Council  
1a Broad Street  
Bungay, NR35 1EE  
Tel: 01986 894236



## Appendix B: Regulation 14 Summary Leaflet


A Neighbourhood Plan is a community led plan to guide future development. It has been drafted by the Town Council with local residents, and local people have been consulted. The Plan is nearing completion and during this final stage you are invited to comment on the proposals.

A full printed copy of the draft of our Bungay Neighbourhood Development Plan can be see at the Town Council Office and in the Library. It is available to read online at [www.bungaytowncouncil.gov.uk](http://www.bungaytowncouncil.gov.uk)



Please let us know what you think. If you wish to comment you can:

- complete a survey online [smartsurvey.co.uk/s/BungayNDP/](https://smartsurvey.co.uk/s/BungayNDP/)
- complete the survey form - available at the Town Council Office and in the Library – and return to the Town Council Office
- email [admin@bungaytowncouncil.gov.uk](mailto:admin@bungaytowncouncil.gov.uk)



**HAVE YOUR SAY**  
**10<sup>TH</sup> September**  
to  
**5<sup>TH</sup> November**

The aim is to make Bungay a historic and distinctive market town, with a vibrant town centre, and sustainable housing developments. Bungay will have mix of new housing built to a high green standard and community facilities to meet the needs of its residents. There will be increased local employment and leisure facilities. The town will promote green policies, including greener approaches to transport, enhance access to open spaces and focus on health and well being. The Plan will run until 2036.

### Key Policy Areas

#### Housing

In the period of the Plan Bungay will need to provide at least 557 new dwellings. The Waveney Local Plan has allocated two areas for homes off St Johns Road (WLP 5.1 & WLP 5.2). The Neighbourhood Plan also identifies another site for proposed development to the east of St Margaret's Road (BNDP)



The Plan makes recommendations for the design of new developments, the mix of housing and the need for affordable housing. Bungay will work to ensure that all new developments aim to achieve net zero emissions.

#### COMMUNITY MATTERS

The Plan promotes a community hub to enhance sporting and leisure facilities in the town, to provide amenities to support carers and venues for education courses. It supports the Library in its role connecting community provision. The Plan supports proposals for

- the expansion of Bungay Medical Centre to meet the growing population in the town and surrounding area
- purpose-built provision for pre-school education facilities for additional childcare opportunities
- opportunities for life-long learning and skills development
- community use of the Annis Hill green site



#### TOWN CENTRE

The Plan addresses the need to develop the vibrancy of the town centre as well as maintaining the cultural heritage.

Facilities for tourists will be encouraged

#### ENVIRONMENT

The neighbourhood plan aspires to develop a network of green infrastructure, with a green corridor linking the south-east to the centre of town, creation of open spaces in new residential development, identification of sites for new allotments. Bungay is the only town in Suffolk without a park. The Plan proposes a town park as well as improved and extended play areas for children.

New development will only be permitted if it does not have an unacceptable impact on the landscape character, or areas of biodiversity or geological significance. Developments which protect and enhance biodiversity connectivity and deliver a biodiversity net gain will be supported. Flood prevention measures will need to demonstrate a biodiversity net gain.

#### TRAFFIC, TRANSPORT and PARKING

The Plan identifies minimum standards for off road parking in new residential areas and promotes electrical vehicle charging points.

An off-street public car park in or adjacent to the town centre would be supported subject to certain provisions

The Plan urges a review of current traffic management measures in Bungay, with a view to reducing HGV through traffic and traffic speeds in the town centre.

Sustainable transport and highway safety are priorities.

## Appendix C: BNDP Regulation 14 Banners







The BNDP will guide future development for Bungay  
over the next 15 years

## **HAVE YOUR SAY**

**Public Consultation**

**10th September 2021 – 5th November 2021**

Copies of the Plan can be seen at  
the Council Office Broad St

or

The Library Wharton St

or

Viewed online and the survey completed at

**[www.bungaytowncouncil.gov.uk](http://www.bungaytowncouncil.gov.uk)**

Response forms are available at the Council Office or Library

**Responses must be in by 5th November 2021**



## Appendix E: Hard copy version of the survey



### **Bungay Neighbourhood Development Plan Regulation 14 Consultation on the Pre-Submission Draft Plan**

Thank you for supporting development of a Neighbourhood Plan for Bungay, which will help to influence future development of our town.

We would like your views on the pre-submission draft of our Neighbourhood Development Plan, the Regulation 14 Version. The full document is available to view on the Bungay Town Council website [www.bungaytowncouncil.gov.uk](http://www.bungaytowncouncil.gov.uk), in hard copy from Bungay Council Offices or Bungay Library or by contacting Edwin Rosier [admin@bungaytowncouncil.gov.uk](mailto:admin@bungaytowncouncil.gov.uk) and contains more detail and context to the policies.

Any comments you provide will be used to help prepare the final Bungay Neighbourhood Development Plan for examination.

You can submit your comments in the following ways:

- Completing a survey online at <https://www.smartsurvey.co.uk/s/BungayNDP/>
- Completing this form and posting or emailing copies to the Town Council at [admin@bungaytowncouncil.gov.uk](mailto:admin@bungaytowncouncil.gov.uk) or Bungay Town Council, 1a Broad Street, Bungay, NR35 1EE
- By emailing your comments to [admin@bungaytowncouncil.gov.uk](mailto:admin@bungaytowncouncil.gov.uk)

**Please complete your response online if possible, the online survey includes all the policy text and related maps.**

After the closing date, we will consider all of the comments and the extent to which concerns can be addressed. The draft plan, amended as necessary will then be submitted to East Suffolk Council and the Broads Authority who will publicise the plan again. This provides further opportunity for people to make representations about the plan's proposals. The next stages following this will be:

- Submission of the draft plan for independent examination;
- Publication of the independent examiner's report and decisions;
- A referendum of residents on the draft plan; and
- If the referendum result supports the draft plan it will 'made' and become part of the development plan.

**The closing date for comments is 5<sup>th</sup> November 2021**

### Your Details and Consent

You must complete this section, failure to do so may result in your response not being considered.

Questions with a \* require a response.

Your details:

Name*:	
Organisation:	
Address 1:	
Address 2:	
Post Code*:	
Email or phone number*:	

Please tick all that apply:

- |   |  |
|---|--|
| <input type="checkbox"/> I live in Bungay           | <input type="checkbox"/> I am an agent     |
| <input type="checkbox"/> I work in Bungay           | <input type="checkbox"/> I am a landowner  |
| <input type="checkbox"/> I am a statutory consultee | <input type="checkbox"/> None of the above |

A summary of all comments made will be publicly available. Please note that any other personal information provided will be confidential and processed in line with the Data Protection Act 1998 and General Data Protection regulations. Bungay Town Council will process your details in relation to the preparation of this document only. The Privacy Statement can be found on Bungay Town Council's website. As part of the consultation and in line with the new General Data Protection Regulations (GDPR) please confirm that you are happy for Bungay Town Council to pass on your contact details (name, address/email address) onto East Suffolk Council (as the Local Planning Authority) so that they can contact you at Regulation 16 Consultation.

- I consent to Bungay Town Council processing your details in relation to this preparation of this Neighbourhood Development Plan\*
- I consent to Bungay Town Council passing my contact details to East Suffolk Council\*

The tick boxes below are optional and relate to us being able to contact you in future with regard to the Neighbourhood Development Plan. Please indicate whether you consent to the following:

- I consent to being contacted with regard to my response by the Bungay Neighbourhood Development Plan Steering Group
- I consent to being kept up to date on the status of the Bungay Neighbourhood Development Plan

### Housing Policies

To what extent do you agree with the housing policies?

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
H1: Design principles for new development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
H2: Housing Mix	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
H3: Affordable Housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
H4: Land to the east of St Margaret's Road	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you have in relation to these policies:

### Community Matters

To what extent do you agree with the planning policies related to community matters?

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
CM1: Community Hub	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM2: Bungay Medical Centre	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM3: Sports Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM4: Pre-School Education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM5: Community Education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you have in relation to these policies:

### Cultural Heritage and the Built Environment

To what extent do you agree with the planning policies related to cultural heritage and the built environment?

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
CH1: Conservation Area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CH2: The King's Head	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CH3: Bungay Castle	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CH4: Heritage Statements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you have in relation to these policies:

### Bungay Town Centre Viability and Economic Development

To what extent do you agree with the planning policies related to the town centre and economic development?

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
TC&E1: Town Centre Vitality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TC&E2: Tourism Accommodation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TC&E3: Employment Growth and HGV Traffic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you have in relation to these policies:

## Environment

To what extent do you agree with the environmental planning policies?

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
ENV1: Green Corridors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENV2: Open Space	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENV3: Landscape and Ecological Character	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENV4: Biodiversity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENV5: Flooding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you have in relation to these policies:

## Traffic and Transport

To what extent do you agree with the planning policies related to traffic and transport?

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
TM1: Parking Standards for Residential Development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TM2: Electric Vehicle Charging Points	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TM3: Off-Street Public Car Parking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TM4: HGVs in the Town Centre	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TM5: Sustainable Transport and Highway Safety	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you have in relation to these policies:

I am generally in favour of the Bungay Neighbourhood Development Plan

Yes

No

Please provide any comments which explain your answer:

**Thank you for completing this survey and supporting development of the Bungay  
Neighbourhood Development Plan**