

Bungay Neighbourhood Development Plan 2020-2036



Submission Version

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Contents

1	Introduction	3
1.1	Background	3
1.2	The Neighbourhood Planning process	4
1.3	Community Consultation	5
1.4	National Policy and neighbourhood planning	6
2	Local Context of Bungay	8
3	Vision and objectives	11
3.1	Vision	11
3.2	Objectives	11
4	Policies	13
5	Housing policies	14
5.1	Design – appearance and functionality	15
5.2	Housing mix	18
5.3	Affordable housing	21
5.4	Housing allocation	23
6	Community matters policies	29
6.1	Network of community facilities	29
6.2	Health care	30
6.3	Sport	31
6.4	Education	31
6.5	Community Infrastructure Levy	32
7	Cultural heritage and the built environment policies	34
7.1	Bungay Conservation Area	34
7.2	Cultural heritage	36
8	Bungay Town Centre Vitality and Economic Development	38
8.1	Town centre	38
8.2	Tourism	40
8.3	Economic Development	41
9	Environment	43
9.1	Access to the countryside	43
9.2	Green Corridor	43
9.3	Open spaces	46
9.4	Allotments	46
9.5	Playgrounds and parks	46
9.6	Landscape	48

9.7	Biodiversity	49
9.8	Flooding	50
10	Traffic and Transport	52
10.1	Vehicle Parking	52
10.1.1	Residential parking	52
10.1.2	Public parking	54
10.2	Traffic management	55
10.3	Sustainable transport and safety	56
Appendix A. Supporting information for Policy TC&E1		60
Appendix B. Key constraints and key policies from the Waveney Local Plan		61

1 Introduction

1.1 Background

1. This document is the Bungay Neighbourhood Development Plan for the period 2020 to 2036. Waveney District Council¹ and the Broads Authority designated a Neighbourhood Area for Bungay in March 2016 (**Figure 1**) to enable Bungay Town Council to prepare a NDP. The Plan has been prepared by the Bungay Neighbourhood Development Plan (BNDP) Steering Group composed of volunteers from the community. The policy proposals presented in the document are derived from the views expressed by the wider community through an extensive consultation process undertaken between December 2016 and January 2018, and further consultations on potential sites to allocate for housing in February 2020
2. The document builds on and is informed by the National Planning Policy Framework (NPPF), the Waveney Local Plan, and the Local Plan for the Broads, and combined with these it sets out the criteria and conditions for development for the above period, and how projected growth in our town will be delivered. When the plan has been completed and examined, there will be a referendum within Bungay, and the BNDP will come into force and following which assume a statutory role in planning decisions.
3. The purpose of the BNDP is, along with both the Waveney and Broads Local Plans, to guide sustainable development within the town and provide guidance to those wishing to submit proposals for development.

¹ Waveney DC is now part of East Suffolk Council

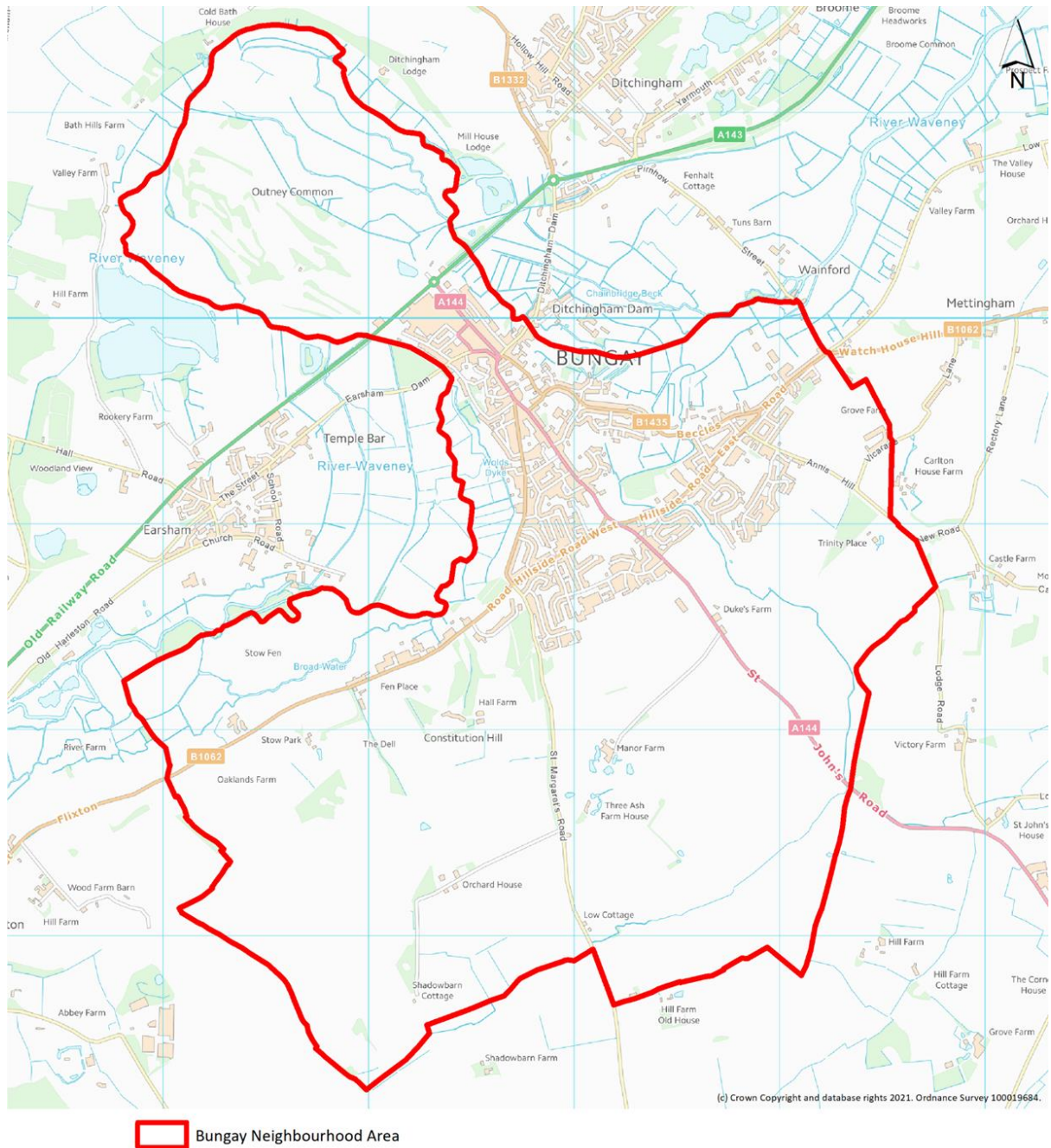


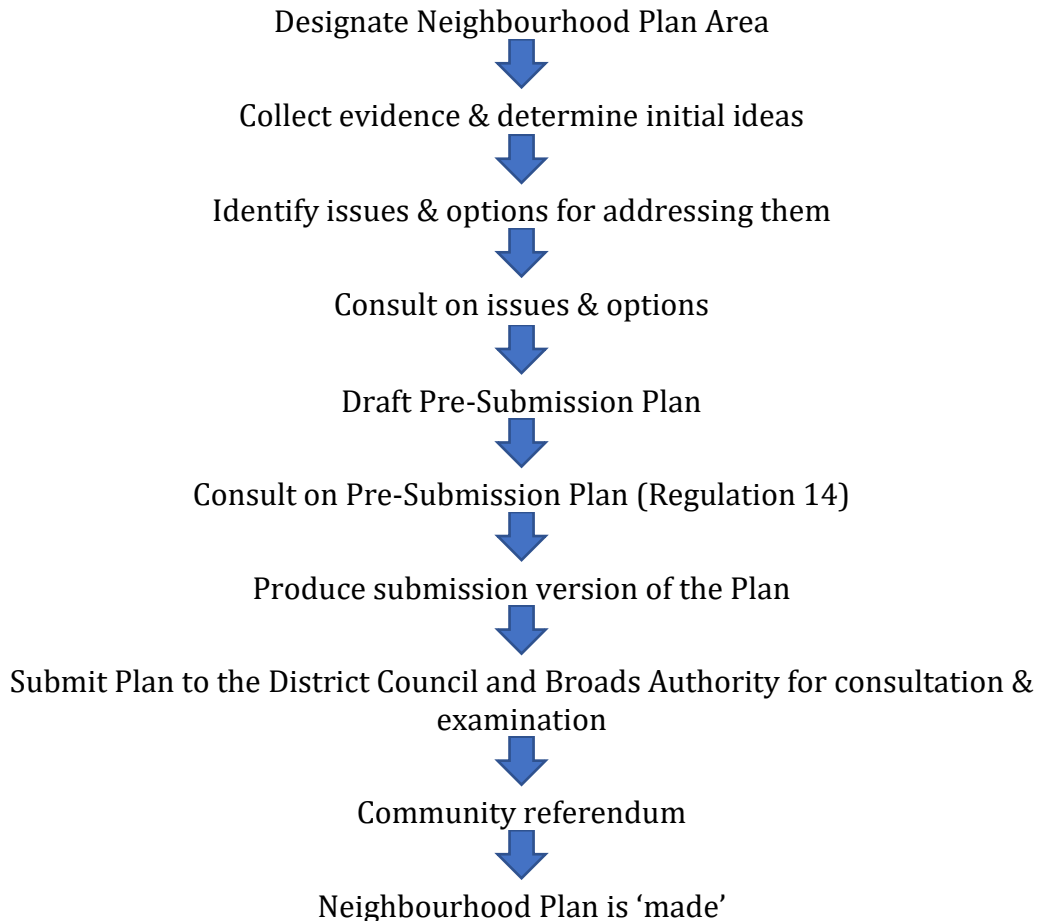
Figure 1: Bungay Neighbourhood Development Plan Area

1.2 The Neighbourhood Planning process

4. The BNDP Steering Group has prepared the current plan to establish a vision for the future of the town and its hinterland, and set objectives for how this vision will be realised through planning, land use management and development change over the period of the plan up to 2036.
5. The Localism Act (2011) was the principal driver for greater decision making on planning issues at local and community levels. The subsequent Neighbourhood Planning Regulations (2012) (as amended) set out the provisions for preparation of Neighbourhood Plans and the participation of residents in the planning and development of their own communities.

6. Developing a neighbourhood plan is a process, involving collecting evidence, developing ideas, and consulting local people. **Figure 2** sets out the process we have been on to develop this plan (Regulation 14).

Figure 2: Neighbourhood Plan process



7. Draft policy proposals in each section of this draft BNDP are derived from the community views, what the evidence is telling us, and what is required by legislation, and statutory or non-statutory guidelines. The rationale and justification for the proposed development policies are presented in each section of the Plan, although in order for the reader to familiarise themselves with the full context, it is suggested that this document should be read in conjunction with separate supporting documents, such as the *Bungay Neighbourhood Plan. Evidence base and key issues 2018*.

1.3 Community Consultation

8. Community engagement is central to Plan preparation of NPS, and the following sections and policy proposals reflect issues of importance to Bungay, its residents, businesses and community groups, as determined through extensive engagement. The process has been undertaken through both paper and on-line surveys, in addition to formal consultations, presentations and

focus group discussions. Specific measures to determine community views and aspirations for the future growth and development of the town have included:

- Formal public consultations at the Bungay Christmas street fair in December 2016 and St Mary's Church in February 2017.
 - Public consultation at the Co-op supermarket in September 2017.
 - Consultation exercises at the Bungay Town Library in October and November 2017.
 - Consultation at the Bungay Primary School in December 2017.
 - The distribution of on-line questionnaires from October 2017 to January 2018.
 - Consultation with a survey and events at the Co-op and Library on whether to allocate and potential sites for housing took place in February 2020. This was undertaken following adoption of the Waveney Local Plan (which confirmed Local Plan site allocations for Bungay) and further work had been undertaken in relation to potential sites.
 - Regulation 14 on the draft plan from September to November 2021.
9. Issues arising from the consultations are discussed in the context of the different policies in each section of this draft BNDP.

1.4 National Policy and neighbourhood planning

10. At a National level, the NPPF introduced substantial changes to planning policy and established the core principles under which neighbourhood planning could be undertaken. The NPPF recognised the need for local communities to be granted the legal authority for the preparation of policies that would enable towns and parishes to deliver sustainable development consistent with the strategic policies in the Plans but also the needs and aspirations of their residents and businesses.

11. The NPPF sets out a number of important matters for neighbourhood planning including the following:

- Neighbourhood plans must be in general conformity with the strategic policies, such as the scale of housing growth, of the Waveney Local Plan and Broads Local Plan;
- Neighbourhood plans should reflect these policies and should plan positively to support them;
- Neighbourhood plans should not promote less development than set out in any relevant Local Plan or undermine its strategic policies;
- Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area, such as housing mix and design principles;
- A neighbourhood plan needs to have due regard to the policies in the National Planning Policy Framework;
- Once a neighbourhood plan has passed the referendum and is 'made', the policies it contains take precedence over existing non-strategic policies in any relevant Local Plans where they are in conflict; until

they are superseded by strategic or non-strategic policies that are adopted subsequently in any relevant local plan.

12. So the BNDP needs to be positive about housing growth. It can also allocate land for housing over and above that in the Waveney Local Plan², so that it can have more local control over where growth happens, and indeed this is part of BNDP. It can also have planning policies on housing mix and design, environmental protection and enhancement, and many other policy areas, so that it can have more local control over the detail of future planning proposals. This needs to happen in a way that avoids having significant adverse environmental impacts, and this is why the BNDP is accompanied by a Strategic Environmental Assessment and a Habitats Regulations Assessment. The SEA suggested some rewording of policies and additional policy areas to mitigate potential impacts, which have been incorporated whereas the HRA found that there would be no significant impacts on internationally protected sites.

² The Broads Local Plan does not allocate any sites for housing in Bungay parish in the Broads Authority Area

2 Local Context of Bungay

13. Bungay is a market town situated at the northern boundary of Suffolk. It is located 15 miles to the south of Norwich and 15 miles to the south-west of Lowestoft, at the neck of a meander of the River Waveney. The town developed at the southern bank of River Waveney around the historic castle and bloomed through river trade in the 17th century. It continued growing in the 19th century with its industries, and expanded south with further housing in the 20th century.
14. Bungay is well connected to the surrounding cities, towns and villages via the A143 and A144. It has bus services to Beccles, Halesworth, Diss and Norwich where the nearest access to the railway services are. As a market town, Bungay serves a number of surrounding villages and rural communities. The town serves as a hub for the surrounding area, providing the daily shops and services needed for villages such as Earsham and Ditchingham, but also provides facilities such as secondary education for other towns like Halesworth.
15. Situated on rising land at the base of a meander in the River Waveney, Bungay's long history of settlement, going back to Neolithic times, has been shaped by the geographical position. The river, which also forms the county boundary, encompasses the 400-acre Outney Common leaving the town surrounded by Norfolk on three sides, with its old historical centre situated on a spit of land barely a ½ mile wide.
16. Its politics, trade, industry and agriculture have always depended, in one way or another, on the river, and while rail, and then road, links have long taken over from the river as its main trade route to the wider world, it is Bungay's peculiar geography that still provides one of the greatest challenges in determining successful outcomes in shaping the course of the town's development as it moves into 21st century.
17. By the 12th century one of most powerful Norman war-lords, Baron Hugh Bigod, following conflicts with the Crown, commenced construction of Bungay castle. A key element in his control of the town and the river trade, the Castle provided a natural moat above the rising land and thus complete control of the river which, given the poor state of medieval roads, this meant all trade in and around the town. The Thursday market, established by Hugh Bigod, continues to this day, while the much-diminished remains of the castle now forms the basis of an ambitious new tourist/heritage scheme.
18. By Tudor times the river, then fully navigable right up to Bungay, became the means by which the region's agricultural products reached major ports like Lowestoft and Great Yarmouth, and via them, London. By harnessing the power of the river to drive mills, industry prospered and the merchant wealth this engendered meant that, in the wake of the disastrous Great Fire of 1688, the town steadily rebuilt itself with the elegant Georgian architecture that continues to characterise much of the old town.

19. By the 1930s Bungay's improved roads and the silting up of the Waveney led to the closure of the important wherry shipping centre at the Staithe, effectively removing what remained of Bungay's former economic advantages. This was further compounded by the closure of the railway in 1952, and economically Bungay fell further behind its great rival Beccles, 9 miles to the east, where the railway was retained permanently, as was navigation access to the Broads and the East Coast ports.
20. Today, the River Waveney and the associated flood plain and marshes of the Waveney Valley continue to exert an important influence on planning and land-use management to the north of the old town. Economically they contribute to agriculture through their important role in marsh grazing, in addition to tourism, sports, and the provision of amenity space. Perhaps most importantly, the River Waveney between Bungay and Shipmeadow is the primary source of drinking water supply to the district through surface water and groundwater abstraction from the river and flood plain, with the towns of Bungay, Beccles, Reydon, and Southwold all largely dependent on this water resource. Catchment management of the Waveney Valley has been highly effective through a combination of automated sluices and retention of the traditional flood plain system that minimises flood risk to the town while providing important environmental and natural resource benefits.
21. Conservation measures to protect these resources, such as through the status of Outney Common as a County Wildlife Site, contribute to the environmental quality and landscape character that define Bungay. This character inevitably restricts development and growth to the rising land to the south of the town. The perception of the amenity and environmental value of the river and marshes by the community is reflected in the importance attached to these qualities in the community consultation process undertaken in the course of Plan preparation.
22. There is a risk that new development will erode the quality of the valued natural environment and landscape, as well as the town's heritage assets, unless it is carefully planned and sensitive to maintaining and enhancing the existing character of the town and its setting.
23. As alluded to above, the town is surrounded by the River Waveney to the north, east and west and the landscape rises quite steeply to the south out of the valley. The River Waveney and marshland to the east of the town is part of the Broads area, which has equivalent status to a National Park, and many of the environmental assets of the area are in the Broads. As a result of its geography, Bungay has been forced to grow in a southward direction. The town now has a population of 5,127. The housing growth in the town between 2014-2036 is expected to be 557 new dwellings, according to the Waveney Local Plan. This includes 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. The town will continue to change and grow, as it always has. The main new housing areas are to the south of the town.

24. The main employer of the town is Clays Printers just to the north of the town centre, and this is reflected in the high numbers of people in the town employed in manufacturing. In addition, there are some smaller employment premises within the town, and retail and education are also key employment sectors.
25. Bungay is currently fairly self-contained, with the majority of services and facilities in the town centre itself³. There are high levels of walking and cycling. Traffic levels have reduced in recent years, though there is concern from residents about traffic, and parking is constrained in the town centre. There is a risk that significant levels of development on the outskirts of the town will encourage more people to travel by car, and potentially to travel to nearby settlements such as Beccles. However, flood risk constrains where development can go.
26. Some regeneration or revitalisation in the town is needed, as indicated by work already underway, the level of shop vacancy rates, and the residents survey. This has been exacerbated by the coronavirus pandemic and restrictions. Attracting tourists is very important.
27. Bungay has an ageing population and a higher than usual proportion of single occupancy homes. Housing development in Bungay in recent years has predominantly been for 2 and 3-bed houses, whilst the population analysis, a Housing Needs Assessment report, and residents' consultation all indicate a need for small housing units. There is also evidence of demand for further social housing in Bungay and this will not be met by existing housing stock.
28. **Appendix B** includes a map showing the key constraints, such as the Conservation Area and areas at risk of flooding, as well as key policies from the Waveney local plan such as the housing allocations.

³ Recent developments have reduced the cohesiveness of the town centre by splitting it

3 Vision and objectives

29. The vision for the neighbourhood plan depicts how the town will be in 2036, once the plan has been delivered.

3.1 Vision

Bungay will be known as an historic and distinctive market town with a vibrant town centre that is set in a unique landscape and which has a strong local identity. Bungay will be a place that people choose to visit, as well as live and work. In the next 15 to 20 years the town will host a mix of new housing built to a high green standard and community facilities that meet the needs of residents and the surrounding rural communities. Bungay will be a sustainable place with increased local employment and leisure facilities. People will choose to walking and cycle and have a greener approach to local transport generally. Access to open spaces and the surrounding countryside will be excellent and there will be a focus on the health and well-being of residents, whilst at the same time Bungay will enjoy on-going protection of the valued ecology and landscape. Furthermore, tourists will enjoy a range of facilities and places to stay.

30. To help us achieve this vision for 2036, the following objectives have been set.

3.2 Objectives

Objective 1 - Meet the housing and infrastructure needs of Bungay's residents and future population.

Objective 2 – Protect and enhance community and public facilities and services.

Objective 3 - Support the vitality and regeneration of the town centre.

Objective 4 - Enable Bungay to realise its potential as a visitor attraction.

Objective 5 - Improve the attractiveness of walking and cycling.

Objective 6 - Ensure that the built character of Bungay is preserved and is reflected in new developments.

Objective 7 - Promote the quality and enjoyment of the natural environment, especially the surrounding fen, marshes and Broads.

Objective 8 - Ensure that new development manages flood risk in the most sustainable way possible.

Climate change statement

Although the neighbourhood plan does not have a specific policy on climate change, it is seen as a priority in the NPPF as well as the Climate Change Act 2008, and it has been woven into many of the policies. For example:

1. Policies such as Policy TM5 encourage sustainable transport use, such as walking and cycling, which should reduce CO₂ emissions.
2. Other policies, notably ENV4, promote the protection of the natural environment and natural features such as trees, as well as the planting of new trees, hedges and habitats. Increased vegetation should not only have a cooling effect on air temperature, but will absorb CO₂ emissions.
3. BNDP also provides focus on flood risk and drainage, which will need to take account of the increase in severe weather storm events due to climate change. Annis Hill is an example.

4 Policies

31. The East Suffolk Waveney Local Plan was adopted on 20 March 2019, covering the period up to 2036. This contains planning policies for the whole of the Waveney part of East Suffolk District, including Bungay, apart from the Broads Authority area which is covered by the policies in the Broads Local Plan. The Broads Local Plan was adopted in May 2019.
32. The local plans include strategic policies such as the approximate amount of housing growth Bungay will need to accommodate, and the policies in the BNDP need to be in general conformity with these. The two local plans also include non-strategic policies for the district and Broads Authority area, and BNDP also contains non-strategic policies for Bungay specifically.
33. There is already a planning policy framework in place in the form of the two local plans, and there is no need to repeat or copy those policies unnecessarily. However, where there are policy details that are important for Bungay, or where it was felt that a slightly different policy is needed, then policies were developed for the BNDP. Some of the policies in the following sections are not strictly 'planning' related. Nevertheless, it was felt that they were important enough to include in BNDP and be called 'Community Actions', being something that the local community and Town Council will lead on. These will not be used when making planning decisions.

***Planning Policies* look like this, with blue shading and will be used by the local planning authorities when making planning decisions**

***Community Actions* look like this, with green shading, and will be used by the community and Town Council**

34. The planning policies and community actions are intended to meet the vision and objectives set out in the previous section. They are aimed at guiding decision makers and applicants in order to achieve high standards of development, and development in the right places. Development proposals should have regard to all the planning policies in this neighbourhood plan, and of course those in the Waveney Local Plan and Broads Local Plan.
35. To have more local control over the planning process and particularly where new development should take place, BNDP has allocated a site for housing development (**Policy H4**).

5 Housing policies

36. The NPPF aims to boost significantly the supply of housing.
37. The strategy in the Waveney Local Plan allows for reasonable levels of development in market towns, although over half will be in Lowestoft. As a market town in the Waveney Local Plan, Bungay will need to host approximately 6% of the housing need for the district over the plan period to 2036⁴.
38. The Waveney Local Plan allows for a modest level of growth, aiming to protect the sensitive landscape around the town which is mostly in the Broads area.
39. The Waveney Local Plan allocates land for 485 new homes (of which 150 now have planning permission in addition to the 72 on unallocated sites which already have permission or been completed since the beginning of the Waveney Local Plan period).
40. To help to deliver this, the Waveney Local Plan has made two large allocations off St John's Road to the south-east of the town (WLP 5.1 and WLP 5.2). The BNDP also proposes making a housing allocation, adjacent to WLP 5.2, as shown on the Policies Map, and as set out in **Policy H4**. This is adjacent to St Margaret's Road, and will ensure that all future housing needs of the town are met up to 2036. It will give BNDP more control over where future housing goes and how it is developed.
41. There are, however, likely to be other housing proposals over the life of the two Local Plans, such as windfall or speculative applications, and BNDP will influence these, such as how they are designed and what the mix of housing will be.
42. New housing can create the need for new or improved infrastructure. East Suffolk Council addresses strategic infrastructure in relation to growth through the Waveney Local Plan. The need for infrastructure such as a surgery is addressed at a more strategic level than BNDP and would involve the Clinical Commissioning Group. BNDP does support expansion of the surgery at Policy CM2, as well as other infrastructure in other policies, particularly green and community infrastructure. Moreover, the proposed allocation at H4 will deliver site specific infrastructure such as open space. Also, infrastructure providers, including Anglian Water, have a statutory responsibility to provide the required capacity, such as for foul water. The local water recycling centre has capacity for development as outlined in the Waveney Water Cycle Study which supports the Waveney Local Plan. New housing development would also be expected to make financial contributions to key infrastructure, such as increased capacity for Bungay High School.

⁴ The Broads Local Plan contains no allocations for housing growth for the Bungay parish area

43. The housing being provided at **Policy H4** is based on an indicative housing figure provided by East Suffolk Council, which took into account strategic infrastructure constraints, such as school capacity etc.

5.1 Design – appearance and functionality

44. The NPPF places considerable weight on good design. and the National Design Guide illustrates how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. Good design of buildings and places can (and the following list is not exhaustive):

- Improve health and well-being;
- Help people walk or cycle, especially to the town centre but elsewhere too;
- Create habitat or green spaces for people and wildlife;
- Reduce crime and anti-social behaviour; and
- Create more sustainable places.

45. Consultations have found that Bungay residents appreciate the high-quality environment, particularly in the town centre, and believe that it should inform any new development. A good proportion of people also indicated during consultations that high standards of sustainability should be designed into development from the outset.

46. As is evident through its designation as a Conservation Area, the more historic parts of the town tend to exhibit a strong character and locally distinctive architecture; many of the more recent developments have incrementally diluted some of the qualities of the historic town identity and ‘sense of place’.

47. Some of the principal characteristics of the historic core include:

- The curvilinear layout of the town centre characterises an unfolding pattern creating enclosed and open views and distinctive spaces.
- Built form defines the streetscape; the historic core achieves this in part through unity of building line, with the built form often accommodating varied architectural styles / typologies.
- A comfortable variation in the size and scale of buildings (two to three storeys) which enhances its character of variety and difference, as opposed to homogeneity.
- The mature landscape within the town centre comprises mainly the churchyards and front gardens contrasting with the enclosed and dense arrangement of the narrow streets.
- Within the conservation area most of the buildings are directly fronting the street without any private space.
- Outside the historic core, development during the 20th century and early 21st century has departed from this traditional pattern towards more peripheral ‘cell’ housing estates.

48. The two Local Plans have a number of policies on design and layout, including with respect to older or disabled people, the character and appearance, the functionality of the development, density, landscaping and related issues. The

District Council and Broads Authority both expect development proposals to demonstrate high quality design which reflects local distinctiveness. Furthermore, Suffolk County Council is developing a Suffolk Design Streets Guide and this will need to form a key consideration.

Figure 3: Distinct Local Character in Bungay



49. To ensure that Bungay's special character is respected and extended, new development must integrate well into the existing townscape, reflecting and complementing the local vernacular. In addition to the design principles, Bungay residents feel it important that new developments function well, meeting the needs of current and future citizens. In March 2019 AECOM were commissioned to develop a design guide for future development in the neighbourhood plan area, advising how it can reflect local character. Further guidance on the design principles set out in **Policy H1** is provided in **Bungay Neighbourhood Plan Design Guidelines, March 2019**. The Guidelines do not cover the Broads Authority Area and so planning applications in that area will need to refer to the Broads Local Plan as neither the guidelines nor **Policy H1** will apply. Applicants should also 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.

50. As heating in buildings and industry create around a third of total UK emissions, the BNDP will seek to ensure new development explores ways in which design can contribute to sustainability, leading to better places in which to live, and a reduced environmental footprint. To achieve the 2050 target as set out in the both the Climate Change Act (2008) and the 2019 amendment that requires the UK to bring all greenhouse gas emissions to net zero by 2050, the BNDP will work to ensure that all new developments aim to achieve good energy efficiency. However neighbourhood plans cannot set higher technical standards for energy efficiency than those set out in the national building regulations. Similarly, neighbourhood plans cannot set technical standards for accessibility, such as for people with mobility problems.

Figure 4: Historic Bungay



Planning Policy H1. Design Principles for New Residential Development

All new residential development will be designed to a high quality, considering local character and enhancing local distinctiveness, creating good quality developments, thriving communities and prosperous places to live.

The following design principles will be applied to all new residential development within the neighbourhood plan area except that within the Broads Authority Area.

- a. New residential development should have an appropriate density, taking into account its context and setting, whilst making good use of the land.
- b. There must be sufficient private outdoor amenity space, unless in exceptional circumstances it can be shown that it is not necessary in light of the proximity of off-site public open space.
- c. Provide internal space in excess of the Nationally Described Space Standards. Proposals that are significantly above the minimum nationally described space standards will be positively supported.
- d. There will be a well-connected street network, providing people, especially those walking and cycling, with a choice of different routes and allowing traffic to be distributed evenly across the network.
- e. Places will be legible and well signposted, ensuring they function well and support navigation.
- f. Development will create blocks that are defined by streets, green spaces and pedestrian and cycle routes, providing clarity between the fronts and backs of buildings, public and private spaces and enabling continuous overlooking of the street.

- g. The edges of development will create a positive interface and reflect the character of its surroundings.
- h. Development will create coherent enclosure with buildings and/or large trees defining and enclosing spaces that lie between them.
- i. Buildings on corners should be designed to emphasize the importance of their corner position.
- j. Continuous building lines and setbacks will be used to support creation of enclosure and definition of the public realm.
- k. Streets will have active frontages to create well-used and attractive streetscapes.
- l. Proposals must allow for attractive views through and from the development, especially out into the surrounding countryside, to be retained and not obscured, and these views should be identified as part of any application. Landmarks, vistas and focal points will be used to create places that are easy to read and allow users to easily orientate themselves.
- m. Building materials and architectural design features will complement those of the local distinctive character of Bungay, although innovative contemporary design will be encouraged.
- n. Applications will need to explain how the design has maximised the potential for energy efficiency.

These principles will apply equally to open market and affordable housing with the expectation that the two are indistinguishable in terms of general appearance. Development will be expected to meet these criteria unless evidence is presented showing that by doing so it would fail to preserve, complement or enhance the character of the immediate area and the historic context of Bungay. Proposals, except those in the Broads Authority Area, will need to take into account the 2019 Design Guidelines.

Note: Not all criteria of Planning Policy H1, nor those in the Design Code, will apply to all residential developments. Only some will apply to minor development and even then the relevant criteria should be applied proportionately.

5.2 Housing mix

51. The Waveney Local Plan sets out that, *“The mix of sizes and types of units on any particular site should be based on evidence of local needs including the Strategic Housing Market Assessment and in consultation with the authority. Proposals for new residential developments will be permitted where at least 35% of new dwellings on the site are 1 or 2 bedroom properties.”* It goes on to say that neighbourhood plans can have their own mix based on local evidence. Other policies support the provision of housing specifically suitable for older or disabled people.
52. The current population of Bungay is older than the district average, and it is an ageing population. Age group estimates for Bungay in comparison with national statistics overall show significantly lower proportions of younger

people in the town for those aged between 0-44 years, and conversely a much higher proportion of older people aged 60 or more, with those aged over 80 years being roughly twice the percentage found in England overall. Policies in both local plans provide support for more housing that is suitable for an ageing population.

53. Although this plan aims to support new employment and help younger people onto the housing ladder, it is still likely that this would indicate the need for development to focus on smaller housing units and perhaps single storey. In 2011, over a third of homes were single-occupancy, which is an increase from 2001. Although around half of these were with occupants over 65 years of age, the increase in one-person households was driven not by older age groups over 65 years, but younger ones. This could also indicate the need for development to focus on smaller homes.
54. According to the 2011 Census a third of Bungay's 2,265 dwellings are detached houses or bungalows, and another third semi-detached houses or bungalows. The proportion of detached dwellings has reduced since the 2001 Census, with housing development almost exclusively being semi-detached houses or bungalows (an increase of 100 in a 10-year period).
55. In 2011 three-bedroom properties were most dominant, 42%, followed by 2-bedroom homes, 29%. The proportion of three-bedroom homes is less than the district as a whole, but larger homes are more common.
56. In a local survey, support for new housing development was high. In particular, local people demonstrated an awareness of a current shortfall of smaller houses (1-2 bedrooms), with 59% identifying this to be either vital or an important part of the development of Bungay's future housing stock. Also, there was recognition that both affordable and social housing must be part of any new development mix with respondents supporting this in over 80% of responses.
57. In tune with the needs of older residents, respondents overwhelmingly supported warden controlled and sheltered housing (88%) to be part of the mix in any new developments.
58. As part of the development of the neighbourhood plan, AECOM were commissioned to prepare a housing needs assessment, which is available as a separate report. This found the following:
 - With a limited number of smaller dwellings, demographic trends point to not enough supply of smaller dwellings;
 - In order to avoid misalignment between supply and demand, the report recommended that 19% of houses in new developments be one-bedroom homes, 42% two-bedroom, and 39% three-bedroom.
 - Most of the community's need will be for two and three-bedroom homes and there will be no need to build further large properties with four or five or more bedrooms.

- Population increases justify building more homes of many types, particularly smaller family housing and housing for the elderly.
 - Analysis of the specialist housing needs of older people suggests a need of between 110 to 218 homes.
 - Analysis identified that the private rented sector has provided a common route through which young people have been able to set up an independent household and, for this reason, 'build to rent' development should be supported.
59. For Bungay to be sustainable there needs to be policy that encourages and supports a more balanced community within the new development housing mix. Residential development will need to provide a variety of housing types and encourage affordable, lower cost and accessible homes appropriate for younger and older people. Smaller dwellings (1 – 2 bedrooms) are especially needed. This should be considered in the context of ensuring that schemes remain viable, and the need to avoid being too onerous for smaller developments.
60. Bungalows, which have the ability to provide housing for older people as well as those with disabilities, will be encouraged given the growing need for housing suitable for older people.
61. The Waveney Local Plan Policy WLP 8.31 requires all new housing developments on sites of 10 or more dwellings to make provision for 40% of all dwellings to meet Requirement M4(2) of Part M of the Building Regulations for accessible and adaptable dwellings. Homes suitable for older residents will allow people to live independently in their own homes for longer, thereby helping to take the strain off social care services.
62. Passivhaus is a rigorous, standard for energy efficiency in a building, which reduces the building's ecological footprint, helping to mitigate climate change. It results in ultra-low energy buildings that require little energy for space heating or cooling. The NPPF encourages self-build development, as does the Waveney Local Plan, and build-to-rent, and BNDP would also like to do so.
63. The settlement boundary from the Waveney local plan is shown at **Appendix B**.

Planning Policy H2: Housing Mix

New housing developments should provide a mix of housing to meet the needs of the community.

For all new housing applications, including the conversion of existing buildings, the inclusion of dwellings with more than three bedrooms will be an exception that will need to be justified by clear evidence that this is meeting a local need or is necessary for viability.

Proposals for sheltered or extra-care housing will be supported and can be included as affordable housing units where appropriate. Proposals for bungalows will be supported.

Significant weight will be given to proposals within the settlement boundary that provide eco-homes such as Passivhaus or other similarly high energy efficiency standards.

Build-to-rent proposals will also be encouraged, as will self-build.

5.3 Affordable housing

64. The Waveney Local Plan and Broads Local Plan have policies on affordable housing. Policy DM34 of the Broads Local Plan seeks offsite contributions for schemes of 6-9 dwellings inclusive. Policy WLP8.2 of the Waveney Local Plan requires 20% of new homes for major planning applications to be affordable housing. Smaller sites do not need to provide affordable homes. Of the affordable dwellings, 50% should be for affordable rent. Affordable housing should be indistinguishable from market housing in terms of the external appearance/design. The NPPF sets out a policy approach to affordable housing, including the need to ensure at least 10% of new houses are affordable homes to buy. It also requires that at least 25% of affordable homes are First Homes, which are discounted by at least 30% and made available only to first-time buyers. The NPPF and the Waveney Local Plan also cover Rural Exception Sites for affordable housing. These higher order policies generally cover most affordable housing requirements.
65. The proportion of the community that currently needs affordable housing is not small (200-300), and so it is a significant factor that must be addressed in the housing mix. Especially, too, from the aspect of having a more balanced community as it will help to attract younger people to stay in the town close to their family or move to the town. This would fit with the idea of a First Homes exception site. According to East Suffolk Council, the lower quartile (cheapest 25% of homes) to income ratio for Bungay is 10 (income X 10) (Hometrack July 2021). The lower quartile (cheapest 25%) property value in July 2021 was £180,000. This makes home ownership unaffordable for many and so requires some kind of discounting.
66. The greatest need regarding affordable housing is for one-bedroom properties (Waveney Housing Register 2018). House prices in the former Waveney area are lower than neighbouring areas but still not affordable. Local Estate Agents and Letting Agents confirm that there is an insufficient quantity of homes that are affordable for first-time buyers or younger people who want to rent. The AECOM Housing Needs Assessment for Bungay identified that:
- For households on lower incomes, the options as regards housing in Bungay are very limited. For example, in order to cover the average rent on the least expensive form of Affordable Housing, these households may

need to reduce spending on other basic goods and services. This makes the provision of housing for Social Rent a priority in the neighbourhood.

- Those on middling incomes would be able to afford social housing priced at this income group, but also have the option of Shared Ownership if they are seeking to buy a home.
- Households with above average incomes have more options including affordable routes to home ownership (such as First Homes) and homes for sale at the entry level price point.
- The report recommended a tenure split of: 10% offering 'routes to home ownership' of which 50% should be Starter⁵ Homes and 50% Shared Ownership; and 90% Affordable Housing for rent, of which 60% should be Social Rent and 40% Affordable Rent⁶. This however does not meet prevailing national policy, which requires that at least 10% of all dwellings on major developments to be available for affordable home ownership. The Waveney Local Plan requires 30% of homes to be affordable. Putting these two requirements together means that a third of affordable homes would need to provide routes to home ownership, the others being rent. For example, a development of 100 would have 30 affordable homes of which 10 would provide for home ownership, meaning that a third of the affordable homes would be affordable home ownership, far more than the 10% suggested by the Housing Needs Assessment. This risks not meeting the local housing need.

67. First Homes exception sites are defined in national policy and guidance. Essentially, they are sites outside of the settlement boundary that would not normally be given planning permission for housing, but which can be acceptable for First Homes, a type of affordable housing. National guidance is that such exception sites should be adjacent to settlements, which the BNDP defines as within 50m at its nearest point to the settlement boundary to encourage such sites to come forward. Local Bungay representatives feels that 50m is a reasonable definition of 'adjacent' bearing in mind the desire to support such development. As per the National Planning Policy Framework, such exception sites should not compromise the protection given to areas or assets of particular importance, such as the Broads.

Planning Policy H3: Affordable housing

The inclusion of affordable housing provision as part of proposals for fewer than 10 dwellings within the settlement boundary will be strongly supported, but will not be a requirement.

Affordable housing provision required through major residential schemes should aim to have a tenure split as close as possible, given the requirements of national policy, to that which meets the local housing need as reflected in the split set out in the Housing Needs Assessment, which is:

⁵ No longer a type of affordable housing

⁶ This has been superseded by national policy which has a greater focus on encouraging home ownership

- a. 10% of affordable homes offering routes to home ownership; and
- b. 90% being affordable homes to rent.

First Homes exception site proposals that are suitable for first time buyers which are outside of the settlement boundary will be permitted where:

- a. The proposal would help to meet a demonstrable local housing need;
- b. It is situated within 50m of the settlement boundary; and
- c. The proposal will enable future occupants to access local services and facilities using sustainable means of transport, such as walking, that is safe and convenient.

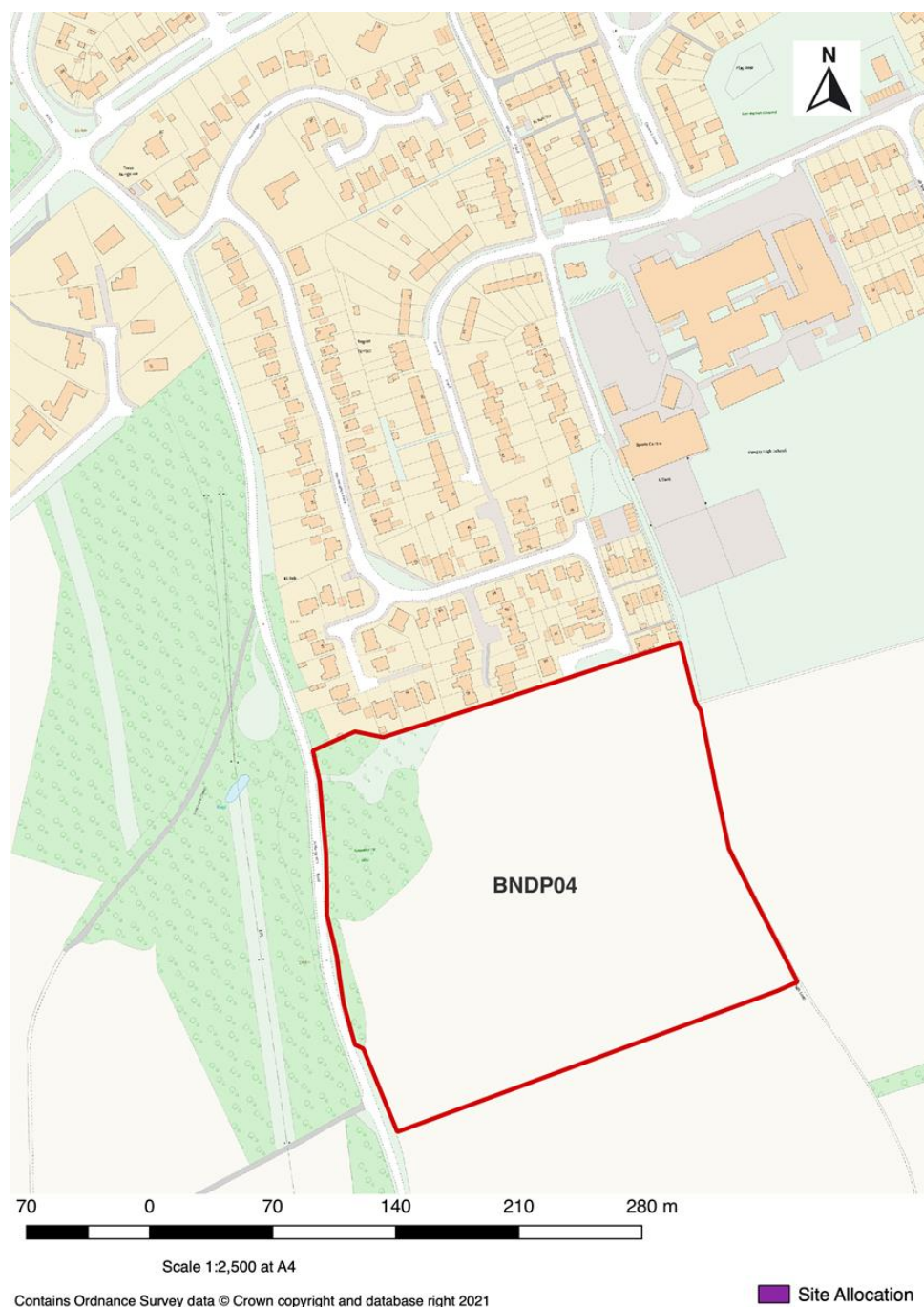
5.4 Housing allocation

68. As referred to earlier, the Waveney Local Plan allocates two sites for housing (and other uses) to the south-east of the town off St John's Road. The BNDP group has taken the positive step of deciding to allocate additional land for housing to ensure the needs of the community are met, including in the event that the sites allocated in the Waveney Local Plan do not get built-out as expected. It will also help support the vitality and viability of the town centre retail sector, and will provide more control over where growth happens with the preferred lower density and smaller dwellings. It will also help give the town some time-limited protection from speculative development in line with the NPPF. The approach has been supported by East Suffolk Council which has provided a method for calculating the indicative housing requirement that could be met by an allocation.
69. A planning consultant was appointed to carry out an independent site appraisal for the BNDP on behalf of Bungay Town Council to help determine which of the known sites are suitable, available and achievable, as required by the NPPF. The Waveney Local Plan invited a call for sites and a number of sites were put forward by landowners or developers. The East Suffolk Council assessed these, two of which were subsequently allocated in the Waveney Local Plan. The remaining four sites have been assessed for the BNDP.
70. The assessment considered each of the sites against a range of criteria such as flood risk, impact on the natural environment, and access. As part of the assessment, a recommendation was made for each site. Only one of the sites was recommended to be taken forward for potential allocation, and a modified version of this is shown in **Figure 5**. Following the assessment, a public consultation exercise was carried out in February 2020 to check that local people supported making a site allocation, to find out which site would be preferred, what they wanted from the allocation, and whether there were any other sites that should be considered. The results were that 56% of respondents supported making a site allocation and a majority preferred the site set out in Policy H4 below and shown at **Figure 5**. Other results, such as the concern for the natural environment, support for around 75 dwellings, and the preference for smaller homes, are reflected in Policy H4. This consultation

included a request for alternative sites to come forward. No sites were put forward by landowners and of those suggested by the public none were available or appropriate for development.

71. Some respondents were concerned about the impacts of additional growth on community infrastructure. This has been highlighted in the Waveney Local Plan and addressing these capacity issues will be managed by the district council, including using contributions from the housing development. Suffolk County Council confirmed that Policy H4 will not cause capacity issues at the primary school.

Figure 5: Strategic housing allocation east of St Margaret's Road



72. The site of 4.5 hectares lies to the south of the built-up area of Bungay, south of Mountbatten Road and east of St Margaret's Road. Bungay High School adjoins the site at the north-east corner. The site is currently in agricultural use. Open countryside currently lies to the east and south, although the land to the east will be developed as allocated site WLP5.2 in the Waveney Local Plan. To the west is a road, beyond which is more agricultural land. There are some farm buildings to the south, including a Grade II listed building, Manor Farmhouse, the setting of which will need to be considered.
73. The site forms an extension to the built-up area of Bungay and will integrate well with WLP 5.2. There is good access to local services, facilities and employment land, although access by cycle could be improved. Pedestrian and cycle links should be included across the site to link with the existing residential development to the north and the Public Right of Way on the eastern boundary, the allocated site WLP 5.2 of the Waveney Local Plan, the proposed Green Corridor (Policy ENV1), the swimming pool, High School and new industrial units. Existing residents use the site for dog-walking and this will need to be retained.
74. St Margaret's Road to the west is narrow and generally unsuitable for any significant increase in traffic. Access via neighbouring estate roads to the north is possible but not ideal and was not supported in the consultations. The best solution will be vehicle access from allocated site WLP5.2 from the Waveney local plan, if this is possible. This would require some degree of joint master-planning for the wider site as it would require third party land on WLP5.2, though this should not prevent the separate allocations gaining permission and being built-out at different times. Allocation WLP5.2 includes a parking and turning area for buses near the High School. National policy requires access to be for all people, and this public transport provision will benefit allocation H4.
75. The site lacks distinctive landscape features and its landscape sensitivity and value is not high. However, existing boundary hedges, such as along St Margaret's Road, provide biodiversity and landscape value and should be retained where possible. The site does intrude into the open countryside and so a landscape strategy will be needed, including a landscape buffer to the south of the site. The site has a high potential for archaeology and this will need to be investigated as part of an application. The site potentially land-locks the High School, which will need to expand in the future. This will need to be taken into account.
76. One hectare of open space should be provided on the allocation. This can be for informal recreation and habitat as a playground is being provided as part of WLP5.2.
77. There are small strips of high, medium and low surface water flood risk around the edge of the site, and a sustainable drainage strategy will need to consider these. A priority has been the need to keep an allocation away from the Broads,

the sensitive landscape of the Broads and out of flood risk areas. However, the site probably drains towards the north-west corner and there have been historic incidents of land-slip into St Margaret's Road. Surface water flood risk is evident in this north-west part of the site. This would suggest that this part of the site could usefully be deployed as part of the open space referred to in the previous paragraph. The open space could potentially be used for flood management too, depending on the outcome of a Flood Risk Assessment and drainage investigations. Locating the open space to the north and north-west of the allocation would also enable it to act as a buffer between dwellings north of the site and the development on the site, as well as providing an amenity benefit for the residents of those dwellings. It should be noted that the ground conditions of the adjacent Waveney Local Plan allocation could not support surface water infiltration, meaning that the water will be piped into the river to the east of St John's Road. It is likely that site H4 has the same constraints and requirements. A drainage strategy will be essential.

78. The site is within a Minerals Consultation Area and Minerals Safeguarding Area as defined by Suffolk County Council as the Minerals Planning Authority. As such the County Council will need to be consulted on the planning application. Therefore, any planning application should be supported by evidence which assesses the quality and quantity of sand and gravel resources on site in order to help judge whether on-site resources should be used on-site during development. This may help reduce the amount of material transported on and off the site.

79. The number of homes proposed for the allocation H4 is approximately 70. This is based on an indicative housing requirement provided by East Suffolk Council of 67. This is shown below, along with the overall housing numbers for Bungay from 2014.

Growth identified in Local Plan:	The figures below are taken from page 122 of the Waveney Local Plan and set out the quantum of growth planned for in Bungay in the Local Plan.
<i>Completions (within plan period, as set out in Local Plan)</i>	30 dwellings (2014 – 2017)
<i>Permissions as at start of plan period</i>	42 dwellings (excludes 150 homes with permission within site WLP5.2)
<i>Allocations in Local plan</i>	Approximately 485 dwellings (WLP5.1 Land east of St. Johns Road, Bungay – approximately 85 dwellings) (WLP5.2 Land west of St. Johns Road, Bungay – approximately 400 dwellings)
<i>Total</i>	557 dwellings (see page 122 of Waveney Local Plan) There is no specific housing growth planned for Bungay in the Broads Local Plan.

Percentage of total growth above based on Local Plan contingency	Waveney Local Plan contingency is 12% $557 \times 0.12 = 67$ dwellings
Indicative housing requirement for BNDP	67 dwellings

Planning Policy H4: Land to the east of St Margaret's Road

Land east of St Margaret's Road, Bungay (4.5 hectares) as shown at **Figure 5** is allocated for the development of approximately 70 dwellings, open space, landscaping and biodiversity enhancement.

The site should be developed in accordance with the following site-specific criteria:

- a. A detailed masterplan, informed by ongoing engagement with the community, and part of an overall masterplan that includes allocated site WLP 5.2 of the Waveney Local Plan, should be prepared and submitted as part of any full or outline planning application. Design codes will be required for the whole site.
- b. The site will be developed at a density of approximately 20-25 dwellings per hectare.
- c. At least 10% of plots will be set aside for those wishing to build their own home unless a lower local demand can be shown.
- d. Dwellings of three bedrooms or fewer. Exceptions to this will need to be fully justified.
- e. Vehicular access should be from St Johns Hill if possible, via the site allocated in the Waveney Local Plan as Policy WLP5.2.
- f. One hectare of open space should be provided on site for informal recreation and habitat enhancement.
- g. Natural features on the site such as trees and hedgerows should be retained where possible and incorporated into the layout of the development.
- h. A landscape belt should be provided along the southern edge of the site.
- i. Pedestrian and cycle routes should be provided that link with the existing residential development to the north if possible and Public Right of Way on the eastern boundary, the allocated site to the east (WLP 5.2 of the Waveney Local Plan), and the Green Corridor going north (see Policy ENV1 and **Figure 6**).
- j. The existing informal dog-walking route on the site should be incorporated if possible into the design and layout.
- k. Any planning application is to be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork if necessary that should consider community engagement, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.
- l. A Landscape and Ecological Management Plan will be required as part of any planning application. This will need to demonstrate a significant net gain in biodiversity of at least 10%. It will also need to demonstrate how

the development is integrated into the wider landscape through the design of the buildings, the layout, and use of landscaping/ vegetation. The strategy will need to identify and preserve any important key views.

- m. Any planning application is to be accompanied by a Site-Specific Flood Risk Assessment and drainage strategy, incorporating sustainable drainage principles if shown to be possible, as well as a transport statement or assessment.
- n. An assessment of the impact on heritage assets will be required as part of any planning application in view of the proximity of the listed Manor Farmhouse.
- o. The layout and design will need to promote self-enforcing traffic speeds that do not exceed 20mph on the site.
- p. Any planning application should be supported by evidence which assesses the quantity and quality of sand and gravel resources within the site in order to determine whether it is practical to make use of resources on site, in accordance with the Suffolk Minerals and Waste Local Plan.
- q. Any proposal will need to demonstrate that it does not prevent future expansion of the High School.

6 Community matters policies

6.1 Network of community facilities

80. Bungay will have a network of facilities that will provide educational, health and care, recreational and social opportunities for the whole community.
81. The separate document 'Bungay Community Facilities' shows the locations of this network of facilities. These include meeting places such as the Library and the Riverside Centre, Day Care & Residential Care Homes, medical and health care providers, educational facilities, places of worship, sports facilities, and allotments and green spaces. It can be seen that these are scattered across the town. It is recognised that a number of venues offer different opportunities such as the Fisher Theatre and the Community Centre. The library currently offers a focus for community services and facilities, although it has limited space for additional services. The Honeypot Centre has been replaced by the building of a new community centre on the Old Grammer School playing field; but this will not offer sufficient capacity or breadth of facilities for the needs of the community. It is felt that the town would benefit from an additional centralised physical community hub. This physical community hub would not only act as a signpost to all of the other facilities, it would also provide its own spaces and services such as a community café, further life-long learning opportunities, intergenerational activities, more affordable and accessible leisure and sporting activities, and storage facilities and spaces for existing and new groups
82. Should space become available to create a physical community hub, this will be viewed favourably. In the immediate future, it is proposed that Bungay library or Town Hall should be considered the centre of the Hub as a signposting and co-ordinating facility to connect existing and future community provision.
83. The evidence indicates a particular need for leisure and sporting activities for younger and older people within the town. There is an under-provision for younger age groups, which came through strongly as part of the consultation, and with an ageing population, it is essential that the town creates opportunities for this group to meet and engage in activities that promote their health and well-being, and reduce the risk of social isolation.
84. We consider that CIL money should be made available to support these developments, specifically Bungay Library in the short term and to support other proposals to develop a physical Community Hub.

Planning Policy CM1: Community Hub

A community hub will be supported provided the following criteria are met:

- a. The site enjoys good access by walking, cycling and public transport for all members of the community.

- b. The site does not result in the loss of green space that provides accessible public amenity.
- c. The proposal provides for a number of community uses, including leisure and sporting activities.
- d. The site has sufficient parking space so that there is no adverse pressure on neighbouring residents; and
- e. The development includes environmentally friendly facilities, especially electric vehicle plug-in points.

Proposals on land that was previously developed, or brownfield, will be especially welcome.

6.2 Health care

85. The close proximity of several large village communities including Ditchingham and Earsham, in South Norfolk but dependent on Bungay for most of their economic and community needs, impose pressures on health services. Bungay's population in 2016 was 5,100, yet the Bungay Medical Centre has a register of more than 11,000 patients due to this external demand for the service.

86. With the level of planned growth in the town, pressure on primary and community-based health services, including General Practice, is likely to increase. The Waveney Local Plan has identified the need for an extension or improvements to the Bungay Medical Centre.. Should additional capacity in these services be required there may be a need for an enhancement to physical infrastructure and development of Bungay Medical Practice to accommodate it. Any development will need to be mindful of existing parking pressures within the town and ensure adequate provision is made available to support the growth in patient visitors to the centre.

87. Just over 10% of Bungay residents provide unpaid care to their loved ones, with almost 3% of people providing over 50 hours a week. Consultation with the community indicates a need for more local services to support carers – including facilities and activities for people with disabilities. A new community facility could provide much needed facilities centre and other opportunities to create greater capacity in this area would be supported.

Planning Policy CM2: Bungay Medical Centre

To support planned growth in the town and the needs of the ageing population, proposals for expansion of Bungay Medical Centre will be supported in principle. Proposals will need to demonstrate that sufficient parking is, or can be made, in accordance with the Suffolk Guidance for Parking. Good access by sustainable transport modes will be required.

6.3 Sport

88. There is a particular need for more leisure and sporting activities for younger and older people within the town. Although there is a sports centre to the south-east of the town, there is under-provision for younger age groups, which came through strongly as part of the consultation in 2017, and with an ageing population, it is essential that the town creates opportunities for this group to meet and engage in activities that promote their health and wellbeing, and reduce the risk of social isolation. It should be noted that although the former middle school playing field has been secured for community use, this piece of land cannot be used for sporting activities due to the change in use of the land. The land will, however, benefit the community in access to activities that promote mental health and well-being.
89. For a town the size of Bungay with a population of over 5,000, sporting opportunities and facilities within the town are limited. There is current provision for swimming, a gym, a running club, golf, dancing, fishing, canoeing, cycling, bowls and in the adjoining village of Ditchingham⁷ there are football and tennis facilities. The Waveney Local Plan housing allocation WLP 5.2 will include recreational open space provision such as for football. In addition, some facilities are available albeit for restricted use, such as the High School cricket pitch, and not available for wider community use. A third of respondents to the community consultation in 2017 indicated that there were not enough sports facilities in the town. Evidence also indicates that the proportion of people with good or very good health is lower than the national average, with a lack of appropriate and accessible sporting activities potentially a contributory factor.
90. Increased and improved sports facilities in Bungay, which are accessible and affordable to all people in the town, will support a stronger, more vibrant and healthy community.

Planning Policy CM3: Sports Facilities

Proposals for increased or expanded sports provision will be supported, provided they are in an accessible location, especially by walking, cycling and public transport.

Applications that enable existing facilities to be made accessible for wider community use will be supported.

6.4 Education

91. There is a recognised need for additional pre-school provision in Bungay, with this identified in the Waveney Local Plan which provides for a new purpose-built setting as part of Allocation WLP 5.2. An important aspect of any new provision is strong links with the existing primary schools, which will provide

⁷ This is where Bungay FC play

smoother transitioning for early years children and further encourage local provision to be the place of choice for local families, thereby enabling greater sustainability.

92. In addition, there is strong community support for additional childcare opportunities, including in school holidays, to support working families. This was a key theme identified during consultation with residents in 2017.

Planning Policy CM4: Pre-school Education

Proposals for a purpose-built provision to enable pre-school education will be supported. This will need to have:

- a. Safe access by walking, cycling and public transport; and
- b. Sufficient parking provision, including temporary parking at drop-off and collection times; and
- c. Secure cycle parking for staff and visitors.

93. There is strong support for additional Adult Education classes to be provided in the town, with almost 80% of respondents indicating a need during consultation in 2017. At present there are no classes available within Bungay. Creative opportunities for providing this, such as making use of existing facilities like the High School, would be welcomed, and provision of a new community facility could provide the necessary space.

Planning Policy CM5: Community Education

Proposals that will increase the provision of educational opportunities within the town, and support life-long learning and skills development to increase employability will be supported.

6.5 Community Infrastructure Levy

94. Since April 2010, local planning authorities have been able to charge a 'Community Infrastructure Levy' (CIL) on new development. East Suffolk Council is one of the local authorities that operates CIL. A percentage of CIL money collected is given to the parish or town council in which the development takes place, and this amount increases to 25% when a neighbourhood plan is in place.
95. CIL income provided to local communities can be used for the provision, improvement, replacement, operation or maintenance of infrastructure; or indeed anything else that is concerned with addressing the demands that new development places on an area. The neighbourhood plan portion of CIL can be used for a wider range of planning issues than infrastructure.
96. Below are projects which are suggested as priorities for the use of the neighbourhood plan portion of CIL money, based on current needs as

identified during consultations with the people of Bungay. Use of CIL money will be a decision for the Town Council, informed by the priorities as identified below:

- a. Improved community transport provision, including use of electric vehicles and provision of a shuttle service from the out of town housing developments and outlying villages into the town centre. The aim of this service would be to increase visitors to the town and alleviate parking difficulties which are of major concern. Bungay has fewer parking spaces per head of population than most Suffolk towns and has been identified as a limiting factor in the town's economy.
- b. To encourage greener and more sustainable transport for both residents and visitors there will be a programme to provide on-street electric vehicle charging points as well as in public areas, such as car parks.
- c. Upgrading council owned play parks with new equipment, including for adults, and seating which will be suitable for children aged 5 to 12.
- d. Install outdoor gymnasium equipment for adults and young people in green/play areas. This could be as stand-alone units or integrated into a fitness trail with the aim of supporting health and well-being across the community.
- e. In line with increasing facilities for 'play' and health, the River Waveney needs to be made more accessible to not only encourage leisure but also tourism. Also required are improvement and development of walking and cycling routes beside the River Waveney.
- f. To link the planned new developments with the town centre, development of the Green Corridor should be implemented. Access along this corridor will be by foot and bicycle but with enough width to allow use by people in wheelchairs. Green spaces need to be enhanced e.g. seating.
- g. Acquire land for the development of additional allotments and open spaces for community use and as additional green space. To sponsor the use of indoor farms.
- h. Support development of the current site or identify a new site for a/the market, allowing for an extension of the current weekly market as part of the development of the town centre. This would also enhance and develop attractions for residents and visitors to support the wider economy of Bungay, including tourism.
- i. Development of a community hub complementary to the new community centre, as outlined in Section 6. This could include development of the library, allowing it to extend its offer to the community in relation to leisure, education and information services.

7 Cultural heritage and the built environment policies

97. Bungay has a long history. The town benefits from a rich historic environment with a Norman era castle and many fine examples of Georgian buildings in the town centre. Many of its historic features are still in evidence, especially in the conservation area. However, our historic buildings, areas and townscape need to be protected and also maintained to a good standard of repair and enhanced wherever possible, and there is evidence that this is not the case with a number of town centre sites.
98. It is important to maintain an appropriate balance between new development, sustainability and the historic environment. The main BNDP survey indicates concern about the outward appearance of the town centre. For example, several buildings are in need of a considerable amount of maintenance and funding sources may be difficult to find for all requirements.
99. There are few sites in the old town that could be developed with any modern housing. The key is to conserve and improve what is already there. The historic streetscapes such as Earsham Street, Broad Street and Trinity Street need to be maintained as they are. Conversely, several old buildings on St Mary's Street have had their frontage spoiled by modern shop fitting being inserted, such as at the old Guild Hall.

7.1 Bungay Conservation Area

100. The Conservation Area of Bungay was established initially in 1970 and was amended and enlarged in 1981 and 1997. Conservation Areas are designated heritage assets under the Planning (Listed Buildings and Conservation Areas) Act 1990 and are defined by the Government as areas of special interest, the character and appearance of which it is desirable to preserve or enhance. The former Waveney District Council published the *Bungay Conservation Area Character Appraisal* in 2007, which describes the character of the area and identifies its special character.
101. Bungay's Conservation Area benefits from an Article 4 Direction, over some permitted development rights. This means that planning permission will be required to make any change of design or material to any part of the property facing a public thoroughfare in the Bungay Conservation Area.
102. A summary of key points from the Bungay Conservation Area Character Appraisal, March 2007 include:
- A proportion of the town is designated a Conservation Area, meaning that a high degree of attention is needed to the design of any new development to preserve and enhance the Conservation Area.
 - Principal areas within the town include the Market Place, St Mary's and Trinity Church yards, the Castle Bailey and Castle Hills, car parks in Priory Lane and Wharton Street.

- The Castle area includes the mounds and ditches of the Norman motte and bailey castle, the Norman keep and remains of the medieval curtain walls and the inner and outer baileys of the Edwardian castle.
- There are three Scheduled Ancient Monuments – Bungay Castle, Castle Hills and The Butter Cross.
- St Mary's Church tower, though redundant, is a major landmark of the town centre and visible from surrounding areas.
- The town connects visually with the open countryside, with views out between buildings and via the roads that lead to them
- Substantial rebuilding of the town following fires in late 17th Century has determined much of its architectural character.
- Particular architectural styles and materials dominate in different areas. Georgian style, red or yellow brick and colour washed timber-frame with red or black pantile roofs in the central area, 19th Century brick terrace houses with pantile or slate roofs in the Ollands area, small scale 19th century artisan red brick terraces in Southend Road and a 19th Century industrial character in the Staithe area.

103. A recent survey of residents in preparation for BNDP asked about housing development in relation to Bungay's historic nature. Forty four percent of respondents strongly agreed that no new development should be allowed unless it fits with the character of the town.

Planning Policy CH1. Conservation Area

Development proposals for new buildings, alterations, and extensions within the Bungay Conservation Area or which are outside of it but which may impact on the setting or significance of the Bungay Conservation Area, will be supported where all the following criteria are met:

- a. The development preserves or enhances the special character and appearance of the area;
- b. The development is in sympathy with, and integrates into, the characteristic built form of the area;
- c. The appearance of shopfronts are retained where applicable;
- d. The scale, form, materials and architectural detailing of the development respects the characteristics of adjoining or nearby buildings;
- e. Important views within, into and out of the area, including into the surrounding countryside, are respected;
- f. Trees and other landscape features contributing to the character and appearance of the area are preserved; and
- g. The development in other ways conforms with the character as set out in Conservation Area Character Appraisal.

Development proposals will be assessed against these criteria in the context of the particular character area, as set out in East Suffolk Council's Bungay Conservation Area Appraisal and Management Plan, in which the proposal sits, as well as any impact on the Conservation Area as a whole. Where possible, consideration will be given to the cumulative impacts of separate development proposals on the character.

Proposals that help restore the character, setting or significance of the area will be supported. Similarly, proposals that will bring buildings back into use or which will ensure their long-term use will also be considered favourably, even if this requires a change of use, particularly if the proposal is likely to make a positive contribution to the vitality of the town centre.

It is recognized that in some instances there could be harm to a heritage asset or the conservation area and that this should be balanced against other factors, such as the benefits of development or the condition of a heritage asset.

Community Action 1. Maintenance of the Conservation Area

Maintenance or restoration work will be encouraged and undertaken on buildings and other features that are important components of the character of the Bungay Conservation Area. An Action Plan will therefore be developed by the Town Council or volunteers to guide resources and effort, informed by the management and enhancement proposals within the Bungay Conservation Area Appraisal

7.2 Cultural heritage

104. The National Heritage List for England (Historic England) contains 191 entries for Bungay, including three scheduled monuments. Most are Grade II listed buildings. Buildings of Bungay Archive (BOBA) have detailed reports on many of the old buildings in the town, including some that are not listed or designated (non-designated heritage assets). Even if not designated, these are important heritage assets. The cultural heritage of the town should be viewed as an asset for tourism and preserved.
105. There is a risk that historic buildings will fall into disrepair if they are not in use, and the King's Head (grade II listed) is an example of this. The King's Head is within the town centre and identified as primary shopping frontage in the Waveney Local Plan policies map. Waveney Local Plan policies WLP8.18 and WLP8.19 set out what uses are supported in these locations, and this should be a starting point for determining change of use applications for the King's Head. The hotel will be a particular asset for tourism.

Planning Policy CH2. The King's Head

Proposals that will result in the Kings Head being retained in hotel use will be encouraged and supported.

Proposals that will result in the change of use of the King's Head from a hotel will be supported provided that it the following criteria are met:

- a. It retains an active frontage at ground floor level for community use or visitor attractions such as a café, restaurant, shop, or public exhibition;
- b. Any proposed offices or residential uses are at first floor and above only; and
- c. It has been adequately and appropriately marketed for hotel use for not less than 12 months.

106. A number of heritage assets are in need of repair and preservation. Bungay Castle in particular is on the at-risk register. The conservation of Bungay Castle is important not only for its own sake in terms of preserving our history, but because it is an iconic building and is one of the reasons people will visit the town.

Planning Policy CH3. Bungay Castle

Proposals that appropriately and sensitively repair and secure enhancement to Bungay Castle will be supported.

107. Given the number of heritage assets in the town, and the importance of the town's historic fabric in attracting visitors, BNDP aims to reduce the risk of further erosion of this through insensitive development. This can be achieved through the requirement for heritage statements with planning applications.

Planning Policy CH4. Heritage Statements

A Heritage Statement will be provided in support of all development proposals affecting any designated or non-designated heritage asset or its setting, as well as for all proposals which may affect the significance of such heritage assets. Such statements will be proportionate to the scale and significance of the likely impact and outline the significance of any heritage assets affected and any adverse impacts that the development may have on those heritage assets. It must also include any proposed mitigation measures, as well as how the proposed development will contribute positively to the character and setting of the relevant heritage asset.

8 Bungay Town Centre Vitality and Economic Development

8.1 Town centre

108. The town centre is slightly larger than Halesworth and Southwold in terms of retail floorspace, and is described as a '*small Town Centre*' in the adopted Waveney local plan. Most of Bungay's retail, office and leisure units are in the town centre. The growth allocated in the Waveney Local Plan and BNDP are seen as needed not only to provide homes, but to help support the town centre.
109. The town centre is a shopping and services destination for surrounding villages such as Ditchingham. It also attracts tourists and visitors from further afield. There are an estimated 109 retail, service and leisure units in the town centre (Retail & Leisure Needs assessment 2016), and there was a 12.4% increase in retail units between 2006 and 2015, mainly in café and restaurant use. These figures are now almost certainly out-of-date following the coronavirus pandemic and the changes it has wrought.
110. The town centre comprises St Mary's Street, which joins into Market Place and Earsham Street. Policy WLP8.18 in the Waveney Local Plan designates town centres and primary shopping areas. The policy map for Bungay has defined a primary shopping area, and primary and secondary shopping frontages are defined on the policies map through Policy WLP8.19. The defined town centre comprises most of the town's retail, office and leisure uses.
111. Earsham Street comprises a range of specialist and independent retailers. There are also independent convenience occupiers such as a greengrocer, fishmonger and delicatessen. The shops are high in quality, with attractive historic shopping frontages. However, the former large post office unit with prominent frontage is now vacant.
112. Market Place has successfully retained its Victorian townscape and has a diverse offer. Prominent buildings including the Three Tuns public house and the King's Head Hotel, are both 'tired' in terms of appearance and in need of investment. The family run H. Wightman & Son Ltd selling home furnishings occupies a large unit which fronts on to the market place. A weekly market is held each Thursday around the central Buttercross in market place. All the banks have closed and there was no 24-hour ATM facility in the centre of the town until the Town Council installed one at the Town Hall.
113. High street vitality in town and village centres is under considerable pressure, including from growth in internet trading, exacerbated by the coronavirus pandemic. The NPPF places great emphasis on maintaining and improving the viability and vitality of town centres and states that local plans should be positive in promoting competitive town centres and should contain policies for managing centres over the plan period. In particular, the NPPF requires that town centres should be the preferred location for town centre

uses, such as retail, offices and leisure. Such uses of a significant size should not be permitted outside of the centre unless no land is available. Policy WLP8.18 in the Waveney Local Plan complements the NPPF. It supports new town centre uses (such as leisure and retail) being within the town centre or close by if there are no suitable town centre sites, and it is felt that BNDP does not need its own policy in this respect.

114. It is essential for Bungay's economy that the town centre displays vibrancy and vitality. According to the latest evidence, the proportion of retail units vacant is the highest in the district. The prevalence of vacant units and charity shops indicates a need for revitalisation. East Suffolk Council supports this through its People and Places initiative.
115. Although efforts should support bringing vacant units back into retail use, consideration might need to be given to other uses to help maintain vibrancy. The best way to support Bungay's shops is to focus retail development within the defined town centre, and especially the primary shopping area. Economic growth of the town centre is contingent upon it being accessible for people visiting the town both during the day and in the evening.
116. With the loss of banks in the town centre it is possible Bungay will lose visitors to nearby towns which have these facilities. This risk will need to be countered by a proactive approach, although the move toward a cashless society is perhaps inevitable, especially following the coronavirus pandemic. The community is exploring options for a post office and has installed an ATM at the Town Hall. The three street markets have shown to be very popular with 95% of survey respondents requesting an increase in these markets.
117. The attractiveness and vitality of Bungay town centre depends in large measure on the mix of uses within it. Recent changes in national policy will make it easier for premises to be put to different town centre uses. Nearly all town centre uses (such as shops, gyms, clinics and other medical/care centres, cafes, restaurants, offices etc – but not pubs and hot food takeaways) are now in a new use class – Class E. Any of these uses can switch to other uses within Class E without needing planning permission. For example, a shop can become a restaurant.
118. The second recent change is permitted development-right Class MA. This allows for any Class E use to change to residential (Class C3) without needing planning permission. This does require prior approval and so is subject to checks against material considerations such as highways, flood risk, amenity and so on – but it is not assessed against the local plans or BNDP. There are certain conditions or limitations, such as size, needing to be vacant for at least 3 months, and being in Class E use for at least 2 years. Also, if in the Conservation Area and the proposal is to change the ground floor use, this requires an assessment of the impact on the Conservation Area. The new Class MA will not apply to listed buildings but will, otherwise, apply in Conservation Areas.

119. Of course, there will be uses within the town centre that are not in the new Class E (such as hotels), so not everything is covered by the change, but most commercial uses will be. Whilst this could help to maintain the vibrancy and vitality of the town centre by ensuring that premises avoid being vacant for too long, it also reduces the control BNDP can exercise over the changes.
120. **Appendix A** provides the results of a survey into town centre uses and tourism accommodation. It can be seen that the people of the town generally support changes of use, except where this is to hot food takeaways.

Planning policy TC&E1: Town centre vitality

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 to:

- a. The need to support tourism uses;
- b. Maintaining a healthy mix of uses in the town centre, reflecting the needs of residents and visitors; and
- c. The extent to which the proposal will add vibrancy.

Proposals to change to hot-food takeaways will not be supported unless there is an over-riding need demonstrated.

8.2 Tourism

121. A good mix of tourist and visitor accommodation is essential to supporting visits and tourism in Bungay. This includes accommodation in serviced hotels, inns, public houses and guesthouses, a whole variety of self-catering accommodation and sites for touring caravans and camping.
122. The NPPF is generally supportive of tourism and states that local plans should support sustainable rural tourism which benefits the rural economy whilst respecting the character of the countryside. This would benefit from a Waveney Valley-wide approach to tourism.
123. The East Suffolk Waveney Local Plan and the Broads Local Plan have policies that protect and seek to improve existing tourism accommodation across the parish. In the Waveney Local Plan there is support for new hotels or guest houses in the town centre, and support for new self-catering tourist accommodation. The latter includes the need for large campsites to be in or close to the town and new permanent buildings needing to be within the town's development boundary. The Broads Local Plan also supports new tourism accommodation near to existing tourism facilities. These policies will guide decision making on many proposals.
124. To support the vitality of the town, BNDP would prefer to see such development in or close to the town, offering visitors the opportunity to use

local services on foot, but in an effort to support this sector the plan will also support appropriate tourism accommodation proposals that are outside of, but well-connected to the town.

125. In the consultations, there was strong support for all types of tourism accommodation (see **Appendix A**), and so BNDP strongly supports good proposals for such development.
126. Where new accommodation is permitted outside of the development boundary, appropriate planning conditions will be applied to ensure the facility is genuinely available for holiday lettings, and to help manage any adverse impacts on the environment and the character and appearance of the countryside. Typically, these will take the form of holiday occupancy conditions placed on un-serviced holiday accommodation. The NPPF classes hotels as being a main town centre use and so discourages new hotels outside of town centres. There are strict planning requirements limiting the opportunities for new hotels that are outside of the town centre. Policy TC&E2 does not cover hotels for this reason.
127. Although short of 'green space' (see **Chapter 9**), Bungay has, within its boundary, a water system which is suitable for fishing and canoeing and a large common which is passable on foot. There are excellent opportunities for observing wild birds and animals.

Planning Policy TC&E2: Tourism accommodation in Bungay town

Proposals for new built permanent tourist and holiday accommodation will be required, unless overriding material considerations indicate otherwise, to be located within the development boundary or on sites that are:

1. Both adjacent to the development boundary and south of the A143; and
2. Of a scale appropriate to Bungay

Proposals within, or adjacent to, the defined town centre will be supported.

This policy does not apply to hotels.

Community Action 2: Tourism promotion

An action plan will be developed, in liaison with the Broads Authority and others, and maintained to promote tourism in Bungay and leisure opportunities. There will be particular focus on water-based leisure activities such as canoeing, as well as walking and cycling, and themes around enjoyment of and engagement with the natural and historic environments.

8.3 Economic Development

128. Clays, printers of books, are the main manufacturing employer in Bungay. The other main employment types in the town are health care (surgeries, residential homes, vet) and schools, as well as retail.

129. The self-employment rate in Bungay is higher than district and national averages, perhaps in part reflecting the artistic culture of the town. Also, although a relatively high proportion of residents walk or cycle to work, many residents commute out of the town. Opportunities not to commute out to jobs elsewhere need to be encouraged.
130. The existing main employment area to the north of the town centre is protected to a large degree by Policy WLP8.12 in the Waveney Local Plan.
131. However, Bungay will need to support the new housing development by *increasing* its employment base to avoid new residents having to commute elsewhere. Opportunities to bring in new employment must be actively pursued.
132. New employment land has already been permitted to the south-east of the town off St John's Road as part of a mixed-use development which will help improve the self-containment of the town. The Waveney Local Plan has included this as part of the allocated site WLP5.2, to ensure that the permitted site is planned in a way consistent with the newly allocated housing land. Policy WLP8.13 – New Employment Development sets out where new employment development will be acceptable and the circumstances which will make it acceptable. The Broads Local Plan has similar supporting policies such as SP10 and SP11.
133. However, a key area of concern for the town is the HGV traffic associated with economic development, especially given the narrow roads towards and in the town centre.

Planning Policy TC&E3: Employment Growth and HGV traffic

Proposals for facilities on existing or allocated employment sites that enable goods to be transferred from HGVs to smaller commercial vehicles will be supported.

9 Environment

9.1 Access to the countryside

134. Due to the special nature of Bungay's relationship with the Broads Area and surrounding wetlands, including the Waveney River, grazing meadows and marshes, there needs to be a concerted effort to improve sustainable access without environmental harm. Many of the public rights of way in the nearby countryside are disconnected, poorly signed and often badly maintained. This reduces access for those residents or visitors that want to walk and enjoy the surrounding countryside.
135. The network does also have its strengths, including the Angles Way. This is a long distance promoted trail between Great Yarmouth and Thetford that offers a well-used and well-signed walking link between Bungay and Beccles in the east and Diss in the west.
136. The south of the town has no easy access to the surrounding countryside, and this should be remedied to ensure that residents of Bungay are able to enjoy the lifestyle benefits that the outdoors provide, and become stewards of the local environment.

Community Action 3: Access to the Countryside

The Town Council will, in liaison with the Broads Authority and Suffolk County Council, aim to promote and improve public access, footpaths and associated signage to Outney Common, Stow Fen and Waveney Marshes, and associated linkages through town and to walking networks outside the plan area. These efforts must not, however, harm wildlife and habitats.

9.2 Green Corridor

137. BNDP aspires to develop a network of green infrastructure, including off-road corridors and greenways, to connect people and their homes, through green open spaces, to services in the town centre. This will also ensure a connected landscape of joined-up habitats for wildlife.
138. A green or ecological corridor should become an important part of the green infrastructure in Bungay. It will ensure that people and wildlife can travel between existing open spaces in town, and when new developments are built on the edge of town, will ensure that new residents have pleasant routes to services and amenities.
139. The corridor is especially important due to the fact that as an older market town there is limited space for new green areas. Bungay currently has no green corridors or greenways.
140. It is a long-standing aspiration of the community to have access to Skinner's Meadow, and by opening up this area, as well as other currently

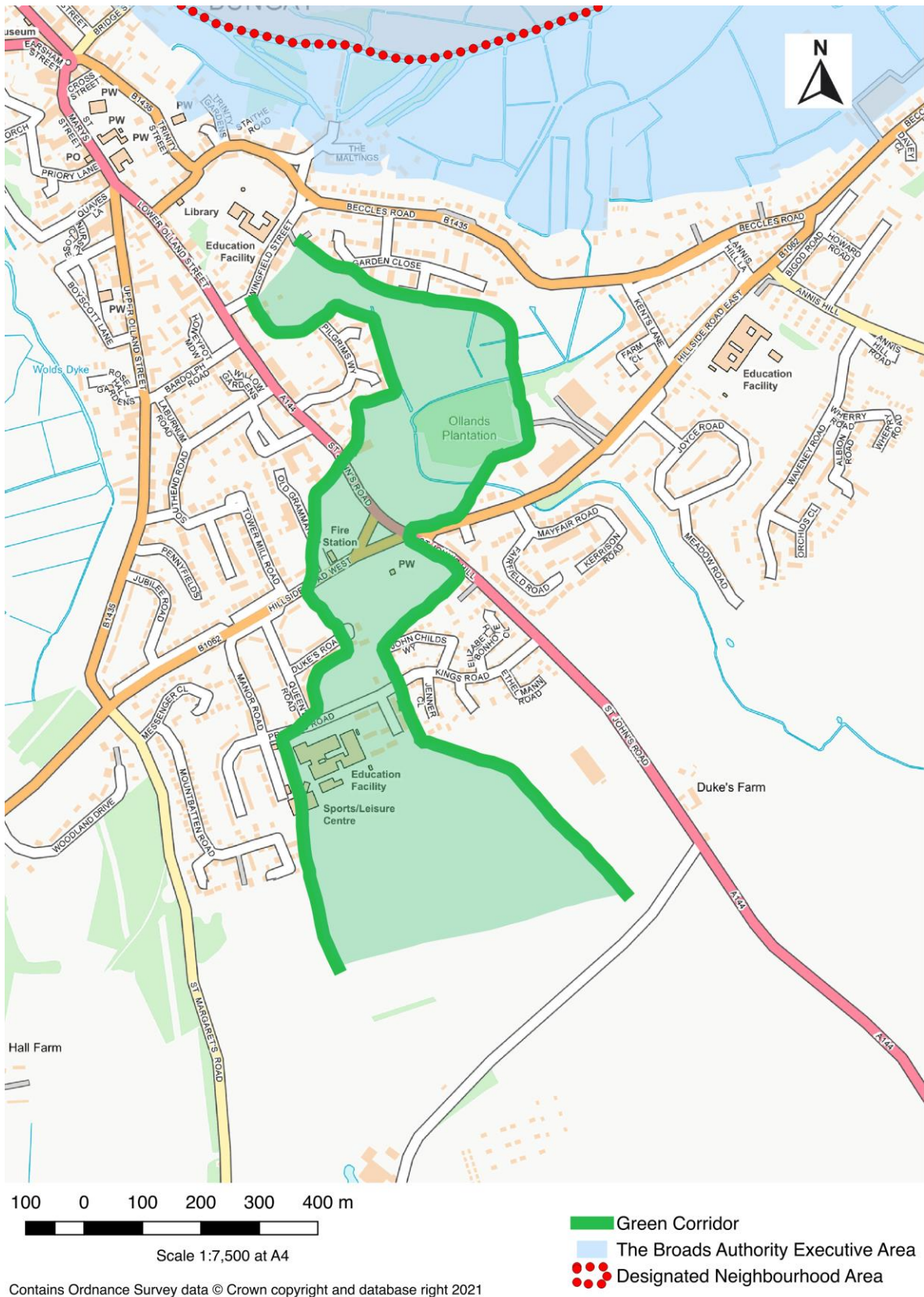
inaccessible green areas to the public, it will successfully integrate Bungay's limited green space into its urban environment.

141. BNDP proposes Bungay's first green corridor linking the south-east of town to the centre of town, which would incorporate many underutilised or currently inaccessible areas of green spaces, to create a focus for walking and cycle improvements. The green corridor would link the new development sites of WLP5.2 (of the Waveney Local Plan) and Policy H4 (from this neighbourhood plan – the land off St Margaret's Road) to the centre of the town. It would also link:
- Prince's Road play area;
 - Wooded area to west of cemetery;
 - Site of the former Old Grammar School play space;
 - Skinners Meadow; and
 - Grazing fields leading to Garden Close play space and old allotment site.
142. The Waveney Green Infrastructure Strategy supports this approach and provides supporting evidence, as does the Waveney Cycle Strategy. Further relationships between the Green Corridor and walking/cycling links are set out later in Planning Policy TM4.

Planning Policy ENV1: Green Corridor

New developments within the Green Corridor shown at **Figure 6** will help to contribute towards the implementation of it through appropriate habitat improvements that take into account the need to develop links or stepping stones for wildlife. For those developments elsewhere where the required biodiversity improvements and biodiversity net-gain cannot be delivered on site, the expectation is that the improvements and net-gain will take place within the Green Corridor.

Figure 6: Illustrative proposed Green Corridor



9.3 Open spaces

143. Bungay is fortunate to be surrounded by many scenic and biodiverse areas such as Outney Common, Stow Fen and other grazing marshes. At present these spaces are not well integrated into the town and are therefore not easily accessible. Bungay is the only town within the ex-Waveney area that fails to meet current guidelines for open space.
144. To compensate for this the town will prioritise future development that provides for open space incorporating conservation and habitat enhancement to improve biodiversity. The Local Plans contained open space standards which set out the requirements for new housing development.

Planning Policy ENV2: Open Space

Proposals which involve creating new open space will need to demonstrate how biodiversity net gain will be achieved.

9.4 Allotments

145. Current research into the benefits of allotment gardening shows that this activity provides a wealth of benefits to a community, including: access to fresh vegetables, encouraging social connection, promoting mental well-being, and use as a health measure.
146. Bungay currently has the lowest amount of allotment land available per person in the former Waveney District. The recommended standard is 0.3ha of allotments per 1000 people, which works out to 1.5ha of allotment space for the current population. Bungay has only 0.46ha. Policy WLP5.2 in the Waveney Local Plan requires 0.25 hectares of allotment land to be provided on site, which will help with the shortfall, and provide for the south-east of the town. There will remain though a significant shortfall of allotments in Bungay, and the absence of any easily accessible allotment is especially pressing in the north and central.

Community Action 4: Allotment Land

The Town Council will work to ensure that Bungay is aligned with the Open Space Needs Assessment by providing 0.3ha of allotments per 1,000 people. Incorporating the old allotment site behind Wingfield Street (0.8ha) would go a long way in reaching that target for the current population. If this is not achievable in the short term, other sites will be investigated by the Town Council.

9.5 Playgrounds and parks

147. Play is an important part of every child's life. It is not just for fun, but is essential to development as it contributes to the physical, social, and emotional

well-being of children and young people. Children's play areas can contribute to this by providing safe, outdoor areas for kids to meet up, play, socialise and burn off some energy. Play areas should be conveniently located within easy walking distance of homes, safe, and attractive and integrated into the residential area they are intended to serve. In other words, they should be in locations where children can 'see and be seen' by a trusted adult.

148. Bungay has just one playground that is consistent with at least a Local Equipped Area for Play, and a few neighbourhood playgrounds that are small, built on the edge of developments and often in a state of disrepair. The need for more, better, and bigger play areas is an important for improving the health and wellbeing of young people. As the town grows in the near future, there will be an even greater need for new and improved equipped play spaces to be provided.

Community Action 5: Playgrounds

We will seek to build a play area at Castle Hills of a quality consistent with at least a Local Equipped Area for Play. This will provide play equipment for young children in the centre of town, that would increase its value to residents, complement the town centre, and act as an attraction to those that live outside town but wish to visit Bungay and enjoy its amenities.

All playgrounds in Bungay will be improved to encourage better use, to increase the range of activities offered, and increase the access to the site through better links to the wider neighbourhoods to ensure natural surveillance of the playgrounds. A state-of-the-art Skate Park is a key aspiration.

149. Bungay is the only market town within the District that has no town park or garden. The existing shortfall of park space in Bungay is 2.05ha. The open space within the town that does exist offers some of the lowest quality and value for the community in the District, and is not sufficient to compensate for the deficiency of park space. In general, open spaces in the town are small and have limited opportunity to be enhanced to a standard that is equivalent to a satellite park.
150. Under **Policy ENV2** residential development will provide or contribute towards open green amenity space. This alone will not result in meeting the current guidelines for open space requirements within the town. Existing private green spaces within the town need to be improved, enlarged and made available to the public as green amenity space to ensure all the inhabitants of Bungay have access to these important spaces. These parks and gardens would act as vital green spaces in town, ensuring a place for residents to unwind, relax, and socialise. It would also provide a landscape that would improve their mental and physical health and wellbeing. The presence of green spaces that include trees and grass can promote community connections through the above activities, and can help to build social capital.

Community Action 6: Parks and Gardens

In the next ten years the Town Council will plan and build a new park and/or garden to bring the town in line with the district average. This would be designed to support physical and mental wellbeing, diverse social activities, community cohesion and neighbourhood identity. Possible locations include opposite Bungay High School, Annis Hill Green, and the Old Allotments.

9.6 Landscape

151. The residents of Bungay wish to protect, promote and enhance the natural environment of Bungay town, and its surrounding countryside, with the landscape being described by the Broads Landscape Character Assessment. The Local Plans also aim to provide protection, such as policy SP7 (Landscape Character) in the Broads Local Plan. We wish to ensure that the biological and aesthetic value of these areas are not adversely affected by new development. Bungay town and the surrounding meadow, marshes and Waveney River are all within the Broads National Character Area (NCA). This NCA provides important nectar sources for insects that pollinate commercial arable crops that grow in the Waveney Valley, provide flood-plain grazing for livestock, and improve the landscape, biodiversity and recreation opportunities for those that live in Bungay. These areas are also UK Priority Habitats, meaning that they have been identified as being the most threatened and most requiring of conservation action under the UK Biodiversity Action Plan.
152. There are many areas of biological interest within the neighbourhood area such as Outney Common, Castle Hills, Waveney Marshes, Stow Fen, and the Tin river catchment. Apart from these Priority Habitats, there is also Skinner's Meadow, Olland's Plantation and the churchyards and cemetery that also add to the biodiversity of town, and also need protection.
153. Bungay Town council and a designated working party are in discussion with Suffolk County Council to secure the former middle school playing field off Annis Hill as a community green space. Public consultation in 2021 showed an overwhelming support for the area becoming natural woodland and open meadow, combined with community led garden space and play area. This will help address the need for more, accessible open space, particularly to the south of the town as well as extending the proposed green corridor through the town. The bid for this land has been successful.

Planning Policy ENV3: Landscape and Ecological Character

New development will only be permitted where it would not result in unacceptable impact on landscape character, biodiversity or geodiversity, with particular regard to the following sites:

- a. Outney Common
- b. Stow Fen
- c. The Waveney Marshes

- d. Skinners Meadow
- e. Ollands Plantation
- f. Annis Hill Green

9.7 Biodiversity

154. We must ensure that any new developments in Bungay do not negatively affect the biodiversity of our local flora and fauna, and actually enhance these by sustainable practices and improving green infrastructure.
155. Degradation of Priority Habitats in Bungay (floodplain grazing marsh, deciduous woodland, acid grassland and high quality semi-improved grassland) is an issue and can lead to a reduction in trees and vegetation and their capacity for carbon storage.
156. Tree planting supports biodiversity, landscape interest and public amenity and can be an effective measure for carbon storage. Where appropriate, we will investigate the planting of trees on land owned by the Bungay Town Council, Bungay Town Trust, on private land with landowner support, and on the least productive agricultural ground surrounding Bungay.
157. Biodiversity net gain (BNG) is now a requirement of the Environment Act 2021. Development proposals from 2023 will be required to deliver a 10% BNG preferable on-site. BNDP brings in the requirement for BNG earlier.
158. Poorly designed developments can inadvertently harm protected species. This can include preventing hedgehogs moving around because fences prevent them going from garden to garden. In this example, having post and rail fencing or hedgerows would be better. Similarly, through modest design changes, proposals can support other protected species, such as by including bat and swift boxes.

Planning Policy ENV4: Biodiversity

Where reasonable, development proposals will be expected to protect and enhance biodiversity and connectivity and deliver a biodiversity net gain, taking into account the following:

- a. Development proposals must include a detailed assessment of the existing biodiversity and the strategy to provide a net gain;
- b. The biodiversity provided by the development must enhance those features that the site already contains, such as hedgerows, trees and other important or connective habitat. Planning proposals will need to explain the extent of each benefit;
- c. Support will be given to proposals that demonstrate a significant biodiversity net gain;
- d. Proposals should explain how they will support protected species; and

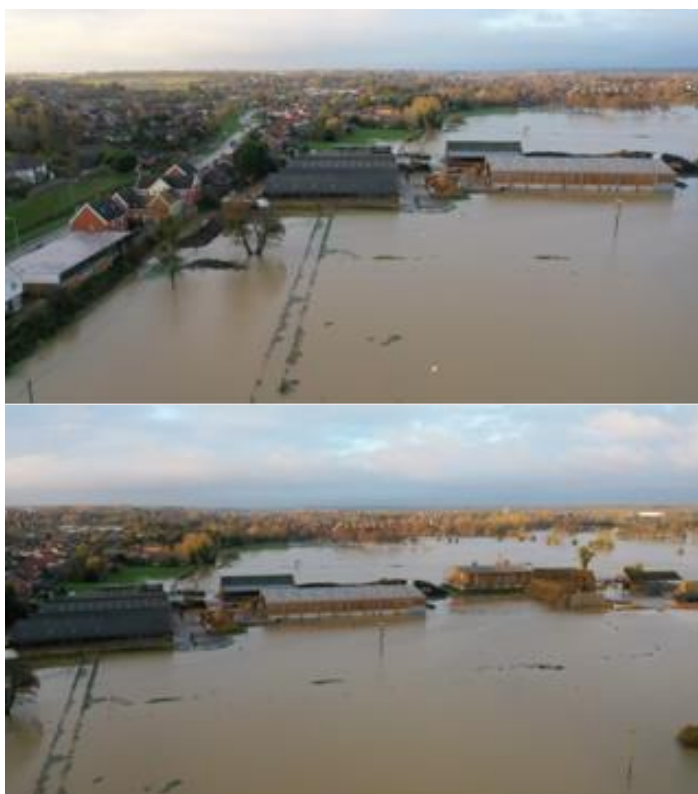
- e. New developments must have due regard where relevant to Priority Habitats and actively seek to conserve and enhance these habitats to promote biodiversity.

The significant net gain will need to be at least 10%, at least until this is superseded by national legislation or policy. Within the Broads Authority Area, enhancements will need to refer to the Broads Authority biodiversity enhancements guide.

Where the net-gain cannot be delivered on site, the focus should be on delivering the net-gain in the Green Corridor as shown in Figure 6.

9.8 Flooding

159. The flood meadows, wet grassland and marshes that surround Bungay are important not just for their biodiversity value and significance to the local farming community, but they also provide important flood protection. These semi-natural 'softer' solutions for flood control increase the natural upstream storage of water, while simultaneously protecting riverside and flood plain property from flood damage.



160. Flood events are increasing in frequency and severity. The winter of 2020/21 resulted in widespread flooding, including of many homes (see photographs). Sustainable Drainage Systems (SuDS) can help communities adapt to climate change. Changes in weather patterns caused by climate change generate more frequent extreme rain events as well as droughts. SuDS

can help in the detention of floodwaters from developments, and can also treat and reuse such waters during times of drought. They also provide benefits such as enhancing public open space, providing habitat for wildlife, contributing to the character of the area.

Planning Policy ENV5: Flooding

All proposals must incorporate natural Sustainable Drainage Systems that are appropriate to the scale and nature of the development and designed to be an integral part of the green infrastructure. These may include:

- a. Attenuation ponds;
- b. Planting;
- c. Introduction of permeable driveways or parking areas;
- d. Rainwater harvesting and storage features; or
- e. Green roofs.

Sustainable Drainage Systems are required unless it can be clearly demonstrated that it would be inappropriate. The neighbourhood plan encourages the use of materials on new developments that are permeable and which therefore reduce the risk of surface water flooding.

10 Traffic and Transport

161. The principles of directing new development to sustainable locations and of promoting the use of sustainable modes of transport are now well established in national and local planning policies. The need to travel by car should be reduced by planning for a good mixture of homes, employment, shops and essential services, and designed to facilitate walking, cycling and access by public transport, especially for those travelling from further afield. This will contribute to reducing use of energy, carbon emissions and pollution, and promote healthy life styles.
162. Access and transport considerations are an important matter in development management decisions. Proposals that will generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Such proposals will need to be supported where appropriate by a Transport Assessment or Transport Statement and a Travel Plan to help encourage sustainable modes of travel and reduce the cumulative impacts of development. Further guidance on these matters will be provided by the highway authority at Suffolk County Council.
163. The use and design of development should facilitate sustainable modes of travel such as walking, cycling and public transport. Whilst BNDP aims to reduce the need to travel and encourage use of sustainable transport modes, the private car will remain an important means of travel, not least because Bungay serves a wide rural area.

10.1 Vehicle Parking

164. Being a small market town, albeit a very walkable one, means that the use of the car for day to day purposes is inevitable. This means that levels of car ownership tend to be on the high side, with fewer than 18% of households with no car or van compared with 26% for England (Census 2011). Sufficient parking availability in the town is important. However, car parking should be carefully considered so that it does not dominate the street scene. Furthermore, there is a critical difference between car use and car ownership. BNDP supports the need to reduce car usage, particularly for journeys entirely within Bungay, such as by switching to alternative modes, and by retaining employment and retail opportunities within the plan area to ensure good access to them.

10.1.1 Residential parking

165. It is now widely recognised that restricting the off-road space to park vehicles at home through the use of *maximum* parking standards does not restrict car ownership, but instead leads to indiscriminate on-street parking. Similarly, parking areas that are isolated from people's houses are under-used with people preferring to park their vehicles outside their homes. Indeed, the NPPF now requires maximum parking standards to be fully justified.

166. Recent housing developments in Bungay have provided insufficient or inappropriate off-street parking for the number of cars owned by those occupying the dwellings. As a result, there are high levels of unplanned on-street parking. This leads to traffic issues such as congestion, an increase in road danger, including for pedestrians crossing between parked vehicles, and problems with access for larger vehicles such as waste collection vehicles or emergency vehicles.
167. Planning Policy TM1 uses *minimum* parking standards, rather than maximum. The policy recognises that community parking areas such as parking courts may sometimes be the best solution to avoid a street-scene dominated by parked vehicles. However, it is imperative that such provision does not result in the existing issue of indiscriminate on-street parking, and so will only be acceptable where this will not happen, such as where there are on-street parking restrictions.
168. The policy also recognises that some on-street parking is inevitable, such as to accommodate visitors, but that this needs to be an integral part of the road's design to avoid indiscriminate on-street parking. On-street car parking can often act as an informal traffic calming measure, such as by acting as a pinch-point, and so where on-street parking is built into street designs, the opportunity can be taken to promote road safety by reducing traffic speeds.
169. The use of open parking or car ports is encouraged as opposed to garages. Commonly garages are not used for parking and instead are used for storage, thereby failing to address the parking issue. Carports provide an easily accessible off-road parking space whilst still providing the opportunity for storage space to be provided in the roof space.
170. In the neighbourhood plan consultation, electric vehicle charging points were considered as important for new homes to facilitate the transition to electric vehicles. This was also recommended in the Design Guidelines. From 2022, this requirement has become part of the national building regulations.

Planning Policy TM1: Parking Standards for New Residential Development

For all new residential developments, where practicable and feasible, the following *minimum* standards shall apply for the provision of off-road parking:

- 1 bed dwelling, 1 off-road car parking space
- 2 bed dwelling, 2 off-road car parking spaces
- 3 bed dwelling, 2 off-road car parking spaces
- 4+ bed dwelling, 3 off-road car parking spaces

These standards will be applied within the curtilage of each dwelling or on-street in dedicated bays. The use of open parking spaces and car ports instead of garages will weigh in favour of a proposal. Parking areas such as parking

courts or undercroft parking will be considered as an acceptable alternative where:

- a. The impact on the street scene and its function of providing car parking at each dwelling would otherwise be unacceptable;
- b. It is well related to the homes they serve with safe and convenient access for residents;
- c. It is not located on a main through route with open access to the public;
- d. It avoids provision of overly-large communal parking areas that are used by many residents, thereby making it more difficult to recognise legitimate users of the parking court; and
- e. A majority of dwellings have a clear view of the parking court from habitable rooms (not applicable to undercroft parking) or benefits from other informal surveillance.

Additionally, in recognition that on-street parking could occur because of the needs of visitors, streets should be designed to safely accommodate some on-street parking. The level of provision should be such that indiscriminate parking and the obstruction of footways and carriageways is avoided.

Landscaping shall be used to avoid car parking being too obtrusive in the street scene.

10.1.2 Public parking

171. Consultations for the plan found that residents feel that there is insufficient public car parking during the daytime. This was also highlighted in the *Retail & Leisure Needs assessment 2016*. There are currently five council run car parks providing 172 spaces, but there is evidence to suggest that existing public car parks are often full, resulting in people driving around looking for available car parking spaces.

172. The plan aims to encourage more residents of the town to leave their cars at home and use alternatives such as public transport, walking and cycling, especially as the distances into the town centre are generally modest at under a mile for most. However, residents will still need to use their cars at times and evidence suggests almost half of residents will at least sometimes use their cars to drive to the centre. Most importantly, BNDP aims to promote the town centre as a retail and visitor destination. Realistically, visitors from outside of the town will drive into Bungay and will need somewhere convenient to park their vehicles. Furthermore, a lack of parking provision could be further exacerbated by development on the outskirts of the town if the longer travel distance makes people more likely to drive.

Planning Policy TM2: Off-street public car parking

A proposal for an off-street car park in or adjacent to the town centre will be supported in principle provided it can be demonstrated that:

- a. It will have a capacity that does not exceed that which is required to meet existing demand and forecast future demand over the plan period;
- b. It does not materially increase traffic in the Conservation Area;
- c. It provides sufficient electric vehicle charging points as identified in Suffolk Guidance for Parking;
- d. It is designed and landscaped to minimise the impact of parked vehicles on the street-scene whilst still affording informal surveillance; and
- e. It includes covered cycle parking provision.

10.2 Traffic management

173. There remains a strong feeling in Bungay that the number of HGVs passing through the town centre is unacceptably high. HGVs and the pollution associated with them are a major problem and 84% of respondents favoured a complete ban on lorries in the town centre. In addition, many people report a problem with vehicle speeds in the town centre, as well as in other parts of the town. With the plan aiming to promote Bungay town centre as a retail and visitor attraction, it will be important that it is made as attractive and welcoming as possible and that visitors can feel safe and enjoy their visit.
174. Suffolk County Council's Local Transport Plan focusses mainly on minimising the impact of heavy goods vehicles in Bungay, particularly through the historic centre. However, this historic built pattern restricts options within the town itself. The A143 forms part of the Strategic Lorry Route identified by the County Council, which by-passes the town. The A144 brings many large lorries onto the A143 from the south. These run through the narrow streets of Bungay, often close to homes, narrow footways and along single width sections where there is street parking. The HGV traffic adds to general congestion and results in adverse impacts on public health and well-being. This also detracts from the attractiveness of the main shopping streets, reducing the chances for any improvement in economic vibrancy.
175. Both the A144 and the B1062, which links Bungay to the A143 via Flixton, are defined as secondary distributor routes in the County Council's hierarchy. The A144 has a significant role in how Bungay is experienced and functions as a place. Multiple homes and businesses front closely onto this road, which passes through the historic marketplace. Running through the heart of the town, the A144 is particularly unsuitable in providing the role of distributor road or through-route, and could make pollution worse.
176. An alternative is the B1062. This is already signed from the A143 as the HGV route for lorries travelling towards Harleston, avoiding the southbound weight restriction on the A144 through Bungay. The B1062 is of reasonable two-way width throughout, and mainly of a straight alignment. Running through generally much less populated countryside, this road is much better suited as a link route. Traffic is generally more free flowing along the B1062

and it is without the same high level of traffic congestion that narrow historic roads through a sizeable town create in Bungay. Greater use of the B1062 as a relief route offers the most obvious means to reduce the unacceptable effects of HGV through-traffic in Bungay.

177. As there is increasing evidence over the high degree of harm to human health caused by road traffic pollution and noise, exacerbated by the greater degree of congestion in more built-up and populated areas, the status quo in respect of traffic management in Bungay is highly undesirable.

Community Action 7: Town Centre Traffic Management

The community will work with the Highways Authority carry out a review of current traffic management or highway infrastructure measures in Bungay, focusing on historic built environment, public health and economic regeneration impacts, with a view to reducing HGV through traffic and traffic speeds in the town centre.

Planning Policy TM3: HGVs in the town centre

Any Construction Management Plan or HGV routing agreement required as part of a planning application will need to demonstrate that routes for HGVs avoid the Conservation Area and town centre as much as reasonably possible.

10.3 Sustainable transport and safety

178. The NPPF encourages new development to facilitate the use of sustainable transport modes, especially development generating significant travel demand, and to ensure that safe and suitable access can be provided for all people. It aims to promote walking as a way of improving health and social interaction. Walking is known to promote neighbourliness and community spirit. National policy sets out that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. This means promoting opportunities for people to meet in the street, and actively use public spaces.
179. Bungay prides itself on its high levels of walking and access to the surrounding countryside. Almost 50% of Bungay residents work in the town and given that the majority of its retail and leisure offering is centrally based, the town is reasonably self-contained. The town is also fairly flat and virtually all residential areas are within a mile of the town centre. These factors should present good opportunities for walking and cycling and indeed there are higher rates of walking or cycling to work than for the district as a whole according to the Census. A recent survey of residents indicates that walking is the most popular means of travel into the town centre with 79% of respondents indicating that they walked at least sometimes and 15% sometimes used a bike (excluding those who already live in the centre).

180. However, a traffic count survey through the centre of Bungay, repeated annually between 2000-2014 shows a year on year reduction in the number of cyclists – by over 50% in 10 years. The reduction in cycling suggests the attractiveness of cycling needs improving.
181. Furthermore, not everybody has ready use of a car, which is especially true for older and younger residents. Almost 1 in 5 households in Bungay has no car or van. These households are therefore dependent on non-car means of access.
182. National Cycle Route 1 and Regional Cycle Route 30 link Bungay to Beccles and Harleston. Sections of these routes utilise narrow roads with high speed traffic. Cycle provision in Bungay town itself is limited. Cycle routes connecting the town centre, residential areas and community facilities consist of indirect routes that are fragmented and difficult to navigate. The built-up area follows a north-south axis with existing cycle routes following corridors that have poor surfaces and are not well overlooked.
183. The shortage of continuous, good quality and convenient cycle routes is likely to encourage people to cycle along busy roads such as St John's Hill and Hillside Road to access local services and facilities. With no alternatives available this creates conflict between people and vehicles, including HGVs. There is little provision for cycling in the town centre which reinforces the perception that cyclists are not well catered for in the town. Current provision for cyclists is unlikely to be of a quality that would encourage the less confident rider to cycle through the built-up area.
184. In the southern part of Bungay, community facilities such as schools are likely to be accessed by cycling along busy vehicular routes. Greater provision of clear and easy to follow cycle routes is required linking residential areas to community facilities and the town centre.
185. A key aim is to encourage new development to intergrate with existing local services and layouts that encourage walking and cycling for local trips and avoid the generation of significant additional traffic in the town. Everyone within the town should enjoy good access to local facilities, services, amenities – all important for maintaining the existing strong community feel.
186. References in the policy to pedestrian routes or networks will include footways, shared facilities, and Public Rights of Way.
187. Suffolk Parking Guidance includes cycle parking standards for new development.

Planning Policy TM4: Sustainable transport and highway safety

New development should take every reasonable opportunity to provide safe and convenient pedestrian and cycling access. This includes connections to the existing pedestrian and cycling network and creating new safe networks, especially in the Green Corridor as shown in Figure 6. To help deliver the Green Corridor, the provision of off-road cycle routes and the pedestrian network should be integrated with opportunities for enhancing wildlife networks and habitats.

Even outside of the Green Corridor, provision for an expanded cycling and footpath network should be integrated with opportunities for enhancing wildlife networks by utilising and enhancing habitats along cycle and walking routes. These should be a composite element consistent with the Green Infrastructure Strategy (2015) and Cycling Strategy linking new and existing development with services and amenity space.

Supporting cycling will include making appropriate provision for secure cycle parking in line with the Waveney Cycle Strategy 2016 or any update and the Suffolk Parking Guidance, especially in the town centre. Major planning applications will be expected to show how they can take advantage of opportunities to help deliver the Waveney Cycle Strategy 2016 or any update, including relevant route improvements where feasible, particularly to improve sustainable access to the town centre, the High School, and other community facilities.

Layouts for major developments will be supported where they prioritise walking and cycling and create permeable, connected, safe communities with links to amenities in the community and to other residential areas and which improve connectivity within the community for both pedestrians and cyclists.

Development that is well located and can provide safe and convenient walking access to the town centre, countryside, and local services and facilities and to bus stops will be supported. Walking and cycling networks should be supported by good signing to key destinations.

As part of the promotion of sustainable transport, major developments should be laid out to incorporate natural surveillance of pedestrian routes and public open spaces.

Major development schemes should be designed to facilitate traffic speeds of 20mph or lower on residential streets or lanes where appropriate, and satisfactory arrangements for car parking must be provided in a well-designed and convenient way in accordance with the applicable car parking standards (see **Planning Policy TM1**) with a view to reducing any adverse impact on pedestrian or cyclist safety.

All new developments will need to provide evidence that highway safety, especially in relation to pedestrians and cyclists, has been considered and that the proposal includes measures that will make any potential impact on highway safety acceptable in planning terms.

In particular, the Town Council will seek the implementation of a new cycleway and pedestrian route connecting any major development to the west of St John's Road to Flixton Road in order to increase access to Stow Fen.

Appendix A. Supporting information for Policy TC&E1

The results from the town questionnaire are shown below in **Figure 7**, and from the tourism accommodation survey in **Figure 8**.

Figure 7: Local preference for new town centre uses

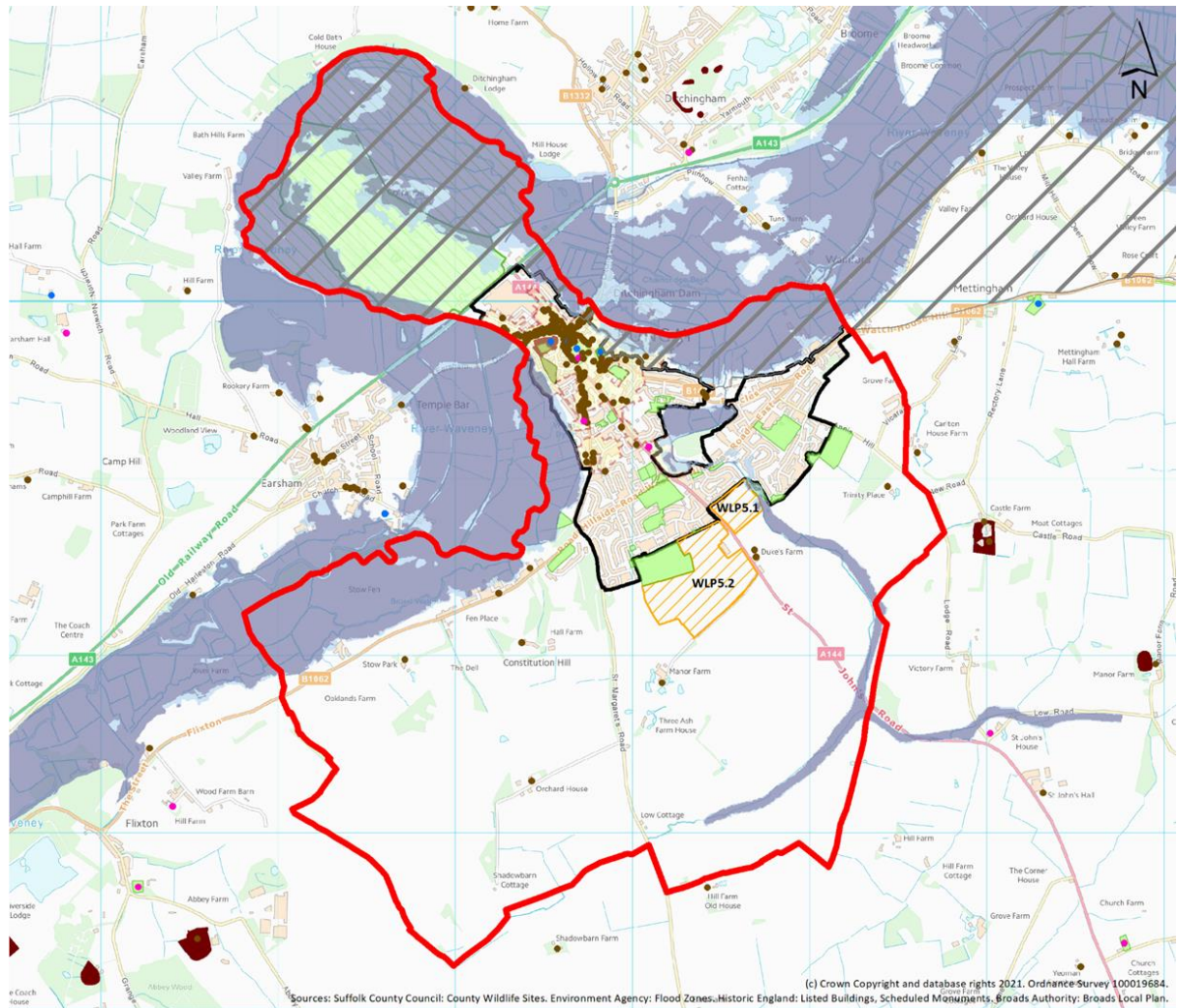
Which of the following should be encouraged	Yes (%)	No (%)	Don't know (%)
Pubs	55	36	9
Restaurants	70	21	9
Cafes	54	35	11
Hot-food takeaways	39	48	13
Professional businesses	87	10	3
Craft workshops	79	6	15
Bank	69	25	6
Dentist	86	6	8

Figure 8: Local support for types of tourism accommodation

Place to stay	Yes (%)	No (%)
Hotel	81	8
Camp site	70	14
Touring caravan site	60	22
Youth Hostel	57	24
B&B	93	2
Guest House	88	3
Holiday let	68	17

These consultation results should be used to guide decision making on proposed changes of use as per **Policy TC&E1**.

Appendix B. Key constraints and key policies from the Waveney Local Plan



- | | |
|---|---|
| Bungay Neighbourhood Area | Flood Zone 3 |
| Broads Authority Area within East Suffolk | Flood Zone 2 |
| Housing Allocation | Open space on land, play space, sports fields and allotments (DM7) |
| Settlement Boundary | Conservation Area |
| • Grade I Listed Building | County Wildlife Site |
| • Grade II Listed Building | Open Space |
| • Grade II* Listed Buildings | Scheduled Monument |