



# Bungay Neighbourhood Plan Decision Statement

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

**Date of Publication: 27th September 2022**

## **1. Summary**

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

## **2. Background**

2.1 Bungay Town Council, as the Qualifying Body, successfully applied for Bungay Parish to be designated as a Neighbourhood Area under The Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Area was designated by (former) Waveney District Council and the Broads Authority and on 13<sup>th</sup> April 2016.

2.2 The Bungay Neighbourhood Plan was published by Bungay Town Council for pre-submission consultation (Regulation 14) between 10<sup>th</sup> September to 5<sup>th</sup> November 2021.

2.3 Following the submission of the Bungay Neighbourhood Plan (submission version) to East Suffolk Council and the Broads Authority the Plan was publicised and comments invited over an eight week period commencing on 11<sup>th</sup> April, closing on 6<sup>th</sup> June 2022.

2.4 East Suffolk Council and the Broads Authority, with the agreement of Bungay Town Council, appointed an independent examiner, Christopher Collison, to examine the Plan and to consider whether it met the Basic Conditions required by legislation and whether it should proceed to Referendum.

2.5 The Examiner's Report received 4<sup>th</sup> August 2022 concluded that subject to modifications identified in the Report, the Bungay Neighbourhood Plan meets the basic conditions.

2.6 The Examiner recommends that subject to the modifications listed in the Report, the Bungay Neighbourhood Plan should proceed to referendum. He further recommends

that the referendum area should be the same as the designated neighbourhood area, with there being no substantive evidence to demonstrate otherwise.

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

### 3. Decision and Reasons

3.1 East Suffolk Council, under powers delegated to the Head of Planning and Coastal Management, and the Broads Authority (at their 21<sup>st</sup> September 2022 Committee Meeting) have considered each of the modifications recommended and concur with the reasoning provided by the Examiner in his Report dated 4<sup>th</sup> August 2022. With the Examiner's recommended modifications, East Suffolk Council and the Broads Authority have decided that the Bungay Neighbourhood Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, is compatible with the Convention rights and complies with provision made by or under Sections 38A and 38B of the Planning and Compulsory Purchase Act 2004.

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

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

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



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Head of Planning and Coastal Management  
East Suffolk Council

Dated: 21/09/2022



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Director of Strategic Services  
Broads Authority

Dated: 21/09/2022

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<b>Recommended modification 1:</b>		
<p>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 <b>Figure 5</b>. <del>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 <b>Figure 5</b>. 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.</del></p> <p><u>71. 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 <b>Figure 5</b>. 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.</u></p> <p><u>72. As indicated above, the consultation on the sites that had been assessed included a 'Call for Sites' to check whether there were any alternative potential sites available that people could suggest. This was advertised on the BNDP</u></p>	<p>To include further details of the call for housing sites, and outcome, in paragraph 70 of the Neighbourhood Plan, and in the SEA Report. To have sufficient regard for national policy and satisfy Strategic Environmental Assessment requirements.</p>	<p>Agree. Supporting text and Strategic Environmental Assessment report amended as recommended.</p>

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<p><a href="#">website and on the town council website. Notices were put up at locations in the town, and word of mouth helped to spread the news. Stands that were manned were erected at the co-op and library on specific dates which were advertised across the parish.</a></p> <p><del>71. This consultation included a request for alternative sites to come forward.</del> <a href="#">This 73.</a> The 'call for sites' element took a modest approach, simply asking people to suggest potential sites and identify the location of them, ideally with a supporting map. This was felt to be a sufficient and proportionate method bearing in mind that:</p> <ul style="list-style-type: none"> <li>• Some sites had already been assessed by an independent consultant for the Neighbourhood Plan group, and this process had identified a suitable site;</li> <li>• The Neighbourhood Plan group could think of no other suitable parcel of land;</li> <li>• The group did not want to deter people from suggesting sites by virtue of requiring onerous amounts of information; and</li> <li>• Bungay is very constrained, especially by flood risk, which limits suitable sites.</li> </ul> <p><a href="#">74. A small number of sites were suggested. Two were not specific sites or locations. The others were within the development boundary and so benefit from a presumption in favour of development anyway. Most were brownfield sites and so again should potentially secure permission given the strength of support in the NPPF, which is to give substantial weight to proposals for housing on brownfield land within settlements. Sites, or at least the developable area of them, were also generally too small for allocation, being below 0.5ha, which is a common lower threshold used in local plans, chosen</a></p>		

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<p><a href="#">so as to trigger the provision of affordable housing, which is desperately needed. There were also more detailed constraints pertaining to some sites. On this basis, it was decided that there would be no benefit in carrying out a detailed assessment and reconsulting or considering allocating any of the sites put forward following the February 2020 consultation.</a></p> <p><del>74- 75.</del> Some respondents were concerned about the impacts of additional growth on community infrastructure such as the primary school. <b>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.</b> Suffolk County Council confirmed that Policy H4 will not cause capacity issues at the primary school.</p>		
<p>Text has been included in the now paragraph 72 and 73 of the SEA using text from paragraph 54 of the Examiner's report.</p>	<p>To include further details of the call for housing sites, and outcome, in paragraph 70 of the Neighbourhood Plan, and in the SEA Report. To have sufficient regard for national policy and satisfy Strategic Environmental Assessment requirements.</p>	
<p><del>65- 69.</del> To explore potential site options for allocation the Neighbourhood Plan group have tested a number of sites around Bungay. Each of these sites were identified through East Suffolk (Waveney) District Council call for sites in 2015. Following work locally to establish that these sites were still being promoted by the landowner, a detailed technical site assessment was conducted by Small Fish Strategy Consultants in June 2019 which appraised four identified site options. The assessment proforma is provided in <b>Appendix C</b> of this report. Of the four sites assessed, two are either suitable or potentially <a href="#">suitable (only part</a></p>	<p>Include additional/altered text in paragraph 69 of the SEA report to clarify that it is a smaller part of the site that was considered potentially suitable for assessment in the SEA. To satisfy requirements that the SEA has been met.</p>	

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<p><a href="#">of site BNDP03</a>) for allocation in BNDP, see <b>Figure 4 and 5</b>. The other two sites were found to be unsuitable for allocation due to the level of constraint affecting each one.</p> <p><del>66.</del> <a href="#">70.</a> With regards to available sites, BNDP04 (<b>South of Mountbatten Road</b>), the entire site would deliver significant growth in the south of the settlement. The site assessment work recommended only partial allocation of the site with a reduced capacity. With this in mind and for the purposes of the SEA, a third of the capacity at the site has been progressed for consideration in the formulation of alternatives.</p> <p><del>67.</del> <a href="#">71.</a> There is a notable constraint to progressing development at site BNDP03 (<b>Pilgrims Way</b>). Much of the site is at risk of flooding, which would require it to pass a sequential test prior to allocation and development. The site assessment work concludes that the risk of flooding leaves only 0.2ha sequentially preferable for development, which could accommodate around 5 dwellings. Safe access/egress would also need to be addressed. The site is within the settlement boundary and was subject to a planning application in 2020 for 40 dwellings. This was refused on flood risk grounds. Considering these factors, the site is progressed for the formulation of alternatives on the basis of a revised capacity of 5.</p> <p><del>68. A further local call for sites was undertaken in 2020, resulting in a number of sites being suggested by residents. Each of these were subsequently discounted on the basis that they did not relate to a specific site or unavailable.</del></p>		

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<p><del>69. Apart from the above, there have not been any recent planning applications submitted for sites within Bungay which should be considered in the context of future growth in the settlement.</del></p> <p><u>72. A further local call for sites was undertaken in 2020. This was advertised on the BNDP and town council website, notices were put up around the town and word of mouth helped to spread the word. There were also a number of events and stands at the Co-op and library. The call for sites took a modest approach, simply asking people to suggest potential sites and identify the location of them, ideally with a supporting map. This was felt to be sufficient and proportionate bearing in mind:</u></p> <ul style="list-style-type: none"> <li>• <u>Some sites had already been assessed by an independent consultant for the group and this process had identified a suitable site;</u></li> <li>• <u>The NP group could think of no other suitable parcel of land;</u></li> <li>• <u>The group did not want to deter people from suggesting sites by virtue of requiring onerous amounts of information; and</u></li> <li>• <u>Bungay is very constrained, especially by flood risk, which limits suitable sites.</u></li> </ul> <p><u>73. A small number of sites were suggested. Two were not specific sites or locations. The others were within the development boundary and so benefit from a presumption in favour of development anyway. Most were brownfield sites and so again should potentially secure permission given the strength of support in the NPPF, which is to give substantial weight to proposals for housing on brownfield land within settlements. Sites, or at least the developable area of them, were also generally too small for allocating, being below 0.5ha, which is a common lower threshold used in local plans, chosen so as to trigger the provision of affordable housing, which is desperately</u></p>		

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<p><u>needed. There were also more detailed constraints pertaining to some sites. On this basis, it was decided that there would be no benefit in carrying out a detailed assessment and reconsulting or considering allocating any of the sites put forward.</u></p> <p><u>74. There have not been any recent planning applications submitted for sites within Bungay (apart from that at Pilgrims Way mentioned above) which should be considered in the context of future growth in the settlement.</u></p> <p><u>75. There are only two sites that can be considered in the formation of alternatives, BNDP03 and BNDP04 for the following reasons:</u></p> <ul style="list-style-type: none"> <li>• <u>Detailed site assessment work identified that 2 of the 4 sites assessed were unsuitable for allocation;</u></li> <li>• <u>A call for sites did not result in other available sites being put forward; and</u></li> <li>• <u>There have been no recent planning applications in Bungay that could be considered in the context of future growth in BNDP.</u></li> </ul> <p><del>70. Considering the above, a</del> <u>76. A</u> red, amber, green (RAG) rating has been applied to the available sites in Bungay, indicating their potential for consideration in the development of alternatives to meet the indicative housing requirement. Red indicates that the site is not suitable to progress through the SEA, whereas green indicates a clear reason for progression. Amber sites are those sites where potential issues have been identified but that are considered further through the SEA in the formulation of alternatives.</p> <p><u>77. Planning Practice Guidance on Strategic Environmental Assessment states that 'reasonable alternatives are different realistic options considered in</u></p>		



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<p><u>developing the policies in the plan. They need to be sufficiently distinct to highlight the different environmental implications of each so that meaningful comparisons can be made'. In this case, where only two sites have been identified as available and deliverable, and one can only accommodate a small number of dwellings, achieving distinctly different options to meet the housing need is a challenge.</u></p> <p><u>78. Relying on windfall development has also been considered in the formulation of alternatives. A 10% windfall rate would equate to 7 dwellings, which is not too dissimilar to the number that can be delivered on BNDP03, and given the lack of recent permissions in Bungay, there is a lack of confidence in this being achieved. Reliance on windfall is not considered to be a reasonable alternative.</u></p> <p><u>79. Considering the above, the spatial strategy options considered as reasonable alternatives for delivering Bungay's housing need of 70 dwellings to 2036 is as follows (and presented in <b>Figure 7</b>):</u></p> <ul style="list-style-type: none"> <li>• <u>70 dwellings on BNDP04 (Option 1)</u></li> <li>• <u>5 dwellings at site BNDP03 and 65 at BNDP04 (Option 2).</u></li> </ul>		

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<p><u>New appendixes have been added containing the tables and a new paragraph 84. Appendix D Site Options Assessment Against SEA Framework and Appendix E Policy Assessment Against SEA Framework.</u></p> <p>84. A full appraisal of each of the alternatives against the SEA framework is provided in <b>Appendix D</b>, a summary of impact against each theme is given below. The summary shading in the main body of this report, paragraphs 85-114, has been informed by the assessment in Appendix D.</p>	<p>Include in the SEA report a table which shows the detailed assessment of each of the alternatives (as contained in Figure 7 of the SEA report) against the SEA framework. To satisfy requirements that the SEA has been met.</p>	<p>Table added in Appendix D of the SEA Report and a new paragraph 84.</p>																																	

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<p>The Potential site allocations for residential development Assessment proforma (June 2019) has been added to a new Appendix C of the SEA report.</p>	<p>Include the 'Potential Site Allocations for Residential Development -Assessment Proforma (June 2019)' document as an appendix to the SEA report. To satisfy requirements that the SEA has been met.</p>	<p>Assessment proforma added to Appendix C of the SEA Report.</p>
<p><b>Recommended modification 2:</b></p>		
<p><b>Planning Policy H1. Design Principles for New Residential Development</b></p> <p>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.</p> <p>The following design principles will be applied to all new residential development within the neighbourhood plan area <del>accept that within the Broads Authority Area.</del></p> <p>a. New residential development should have an appropriate density, taking into account its context and setting, whilst making good use of the land.</p> <p>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.</p> <p>c. <del>Provide internal space in excess of the Nationally Described Space Standards.</del> Proposals that are significantly above the minimum nationally described space standards will be positively supported.</p> <p>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.</p>	<p>The second paragraph is modified as the Broads Authority has confirmed the policy can apply to the Broads.</p> <p>Part 'c' is modified so the policy has sufficient regard for national policy.</p> <p>Part 'e' is modified as the term navigation has the potential to confuse as the water near Bungay is not navigable.</p> <p>Part 'n' is modified so the policy has sufficient regard for national policy.</p> <p>The policy should use the correct title for the "<b>Bungay</b></p>	<p>Agree. Policy amended as recommended.</p>

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<p>e. Places will be legible and well signposted, ensuring they function well and <del>support navigation-</del> <a href="#">help people find their way around</a>.</p> <p>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.</p> <p>g. The edges of development will create a positive interface and reflect the character of its surroundings.</p> <p>h. Development will create coherent enclosure with buildings and/or large trees defining and enclosing spaces that lie between them.</p> <p>i. Buildings on corners should be designed to emphasize the importance of their corner position.</p> <p>j. Continuous building lines and setbacks will be used to support creation of enclosure and definition of the public realm.</p> <p>k. Streets will have active frontages to create well-used and attractive streetscapes.</p> <p>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.</p> <p>m. Building materials and architectural design features will complement those of the local distinctive character of Bungay, although innovative contemporary design will be encouraged.</p> <p>n. <del>Applications will need to explain how the design has maximised the potential for energy efficiency.</del> <a href="#">Proposals that maximise the potential for energy efficiency will be supported.</a></p>	<p><b>Neighbourhood Plan Design Guidelines 2019 or later version”.</b></p> <p>The ‘Note’ is of such importance in the implementation of the policy that it should within the policy text.</p>	

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<p>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 <del>2019 Design Guidelines</del> <a href="#">Bungay Neighbourhood Plan Design Guidelines 2019 or later version</a>.</p> <p><a href="#">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.</a></p>		
<b>Recommended modification 3:</b>		
<p><b>Planning Policy H2: Housing Mix</b></p> <p>New housing developments should provide a mix of housing to meet the needs of the community.</p> <p>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.</p> <p>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. <del>Significant weight</del> <a href="#">Support</a> will be given to proposals within the settlement boundary that provide eco-homes such as Passivhaus or other similarly high energy efficiency standards.</p>	<p>The terms “significant weight will be given” and “encouraged” do not provide a basis for the determination of development proposals.</p>	<p>Agree. Policy amended as recommended.</p>

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Build-to-rent proposals will also be <del>encouraged</del> <u>supported</u> , as will self-build.		
<b>Recommended modification 4:</b>		
<p><b>Planning Policy H3: Affordable housing</b></p> <p>The inclusion of affordable housing provision as part of proposals for fewer than 10 dwellings within the settlement boundary will be <del>strongly</del> supported, but will not be a requirement.</p> <p>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:</p> <ul style="list-style-type: none"> <li>a. 10% of affordable homes offering routes to home ownership; and</li> <li>b. 90% being affordable homes to rent.</li> </ul> <p>First Homes exception site proposals that are suitable for first time buyers which are outside of the settlement boundary <u>and not within the Broads Authority area</u> will be <del>permitted</del> <u>supported</u> where:</p> <ul style="list-style-type: none"> <li>a. The proposal would help to meet a demonstrable local housing need;</li> <li>b. <del>It is situated within 50m of the settlement boundary; and</del> <u>It is situated adjacent to the existing settlement</u></li> <li>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 <u>and</u></li> </ul>	<p>The term “strongly” does not provide a basis for the determination of development proposals.</p> <p>The modifications should be made so that the policy has sufficient regard for national policy and “is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” as required by paragraph 16d) of the Framework.</p>	<p>Agree. Policy amended as recommended.</p>

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<p><a href="#">d. If it is situated within the setting of the Broads Authority area it must be located and designed to avoid or minimise impact on the designated area.</a></p>		
<b>Recommended modification 5:</b>		
<p><b>Planning Policy H4: Land to the east of St Margaret's Road</b></p> <p>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.</p> <p>The site should be developed in accordance with the following site-specific criteria:</p> <p>a. A detailed masterplan, informed by ongoing engagement with the community, and <del>part of an overall masterplan that includes</del> <a href="#">identifying the relationship with</a> 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.</p> <p>b. The site will be developed at a density of approximately 20-25 dwellings per hectare.</p> <p>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.</p> <p><del>d. Dwellings of three bedrooms or fewer. Exceptions to this will need to be fully justified.</del></p> <p>e. <a href="#">d.</a> Vehicular access should be from St Johns <del>Hill</del> <a href="#">Road</a> <del>if possible</del>, via the site allocated in the Waveney Local Plan as Policy WLP5.2.</p> <p>f. <a href="#">e.</a> One hectare of open space should be provided on site for informal recreation and habitat enhancement.</p>	<p>Modifications so that the policy "is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" as required by paragraph 16d) of the Framework.</p>	<p>Agree. Policy amended as recommended.</p>

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<p><b>g. f.</b> Natural features on the site such as trees and hedgerows should be retained where possible and incorporated into the layout of the development.</p> <p><b>h. g.</b> A landscape belt should be provided along the southern edge of the site.</p> <p><b>i. h.</b> 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).</p> <p><b>j. i.</b> The existing informal dog-walking route on the site should be incorporated if possible into the design and layout.</p> <p><b>k. j.</b> 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.</p> <p><b>l. k.</b> 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.</p> <p><b>m. l.</b> 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, <del>as well as a transport statement or assessment.</del></p> <p><b>n. m.</b> 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.</p>		



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>e. n. The layout and design will need to promote self-enforcing traffic speeds that do not exceed 20mph on the site.</p> <p>p. o. 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.</p> <p>q. p. Any proposal will need to demonstrate that it does not prevent future expansion of the High School.</p>		
<p>43. The housing being provided at <b>Policy H4</b> is based on an indicative housing figure provided by East Suffolk Council, which took into account strategic infrastructure constraints, such as school capacity etc. <u>It should be noted that as the housing requirement for the Broads Authority Area is zero, the housing figure provided applies only to that part of the Neighbourhood Plan area that is not within the Broads.</u></p> <p><del>79.</del> <u>83.</u> 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. <u>This applies entirely to that part of the Neighbourhood Plan outside of the Broads Authority Area as the housing requirement within the Broads Authority Area is zero. The figures are <del>This is</del> shown below, along with the overall housing numbers for Bungay from 2014. <u>These are from the 'Bungay indicative Housing Requirement' document, which addresses the housing requirement calculation in full detail.</u></u></p>	<p>Modifications so that the policy "is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" as required by paragraph 16d) of the Framework.</p>	<p>Agree. Paragraphs 43 and 79 amended as recommended with text supplied by the Neighbourhood Plan Group.</p>
<b>Recommended modification 6:</b>		
<b>Planning Policy CM1: Community Hub</b>	To clarify it relates to development proposals, and to	Agree. Policy amended as recommended.

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><a href="#">Development proposals for</a> a community hub will be supported provided the following criteria are met:</p> <ul style="list-style-type: none"> <li>a. The site enjoys good access by walking, cycling and public transport for all members of the community.</li> <li>b. The site does not result in the loss of green space that provides accessible public amenity.</li> <li>c. The proposal provides for a number of community uses, including leisure and sporting activities.</li> <li>d. The site has sufficient parking space so that there is no adverse pressure on neighbouring residents; and</li> <li>e. The development includes environmentally friendly facilities, especially electric vehicle plug-in points.</li> </ul> <p>Proposals on land that was previously developed, or brownfield, will be <del>especially welcome</del> <a href="#">supported</a>.</p>	<p>provide a basis for the determination of development proposals.</p>	
<p><b>Planning Policy CM2: Bungay Medical Centre</b></p> <p>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. <del>Good access by sustainable transport modes will be required.</del> <a href="#">Proposals must be designed, and incorporate facilities, to encourage access by sustainable transport modes.</a></p>	<p>To improve clarity so the policy is “clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” as required by paragraph 16d) of the Framework.</p>	<p>Agree. Policy amended as recommended.</p>
<p><b>Recommended modification 7:</b></p>		

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><b>Planning Policy CH1. Conservation Area</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>a. The development preserves or enhances the special character and appearance of the area;</li> <li>b. The development is in sympathy with, and integrates into, the characteristic built form of the area;</li> <li>c. The appearance of shopfronts are retained where applicable;</li> <li>d. The scale, form, materials and architectural detailing of the development respects the characteristics of adjoining or nearby buildings;</li> <li>e. <del>Important views within, into and out of the area, including into the surrounding countryside, are respected;</del> <u>Key views specifically identified in Section 5 of the Bungay Conservation Area Appraisal and Management Plan (January 2022), or later revision, are not significantly adversely affected;</u></li> <li>f. Trees and other landscape features contributing to the character and appearance of the area are preserved; and</li> <li>g. The development in other ways conforms with the character as set out in Conservation Area Character Appraisal.</li> </ul> <p>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. <del>Where possible, consideration will be given to the cumulative impacts of separate development proposals on the character.</del></p>	<p>To improve clarity so the policy is "clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" as required by paragraph 16d) of the Framework.</p>	<p>Agree. Policy amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>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 <del>considered favourably supported</del>, 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.</p> <p><del>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.</del></p>		
<b>Recommended modification 8:</b>		
<p><b>Planning Policy CH2. The King's Head</b></p> <p>Proposals that will result in the Kings Head being retained in hotel use will be <del>encouraged and</del> supported.</p> <p>Proposals that will result in the change of use of the King's Head from a hotel will be supported provided that <del>it</del> the following criteria are met:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b. Any proposed offices or residential uses are at first floor and above only; and</li> <li>c. It has been adequately and appropriately marketed for hotel use for not less than 12 months</li> </ul>	<p>The term "encouraged" does not provide a basis for the determination of development proposals.</p>	<p>Agree. Policy amended as recommended.</p>
<b>Recommended modification 9:</b>		

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><b>Planning policy TC&amp;E1: Town centre vitality</b></p> <p><del>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:</del></p> <p><u>Within the town centre proposals to change from a town centre use (Class E of the Use Classes Order) must demonstrate consideration has been given to:</u></p> <ul style="list-style-type: none"> <li>a. The need to support tourism uses;</li> <li>b. Maintaining a healthy mix of uses in the town centre, reflecting the needs of residents and visitors; and</li> <li>c. The extent to which the proposal will add vibrancy.</li> </ul> <p><del>Proposals to change to hot food takeaways will not be supported unless there is an over riding need demonstrated.</del></p>	<p>The first part of the policy is not policy and should be removed.</p> <p>The final sentence of the policy is deleted so that the policy has sufficient regard for national policy</p>	<p>Agree. Policy amended as recommended.</p>
<b>Recommended modification 10:</b>		
<p><b>Planning Policy TC&amp;E2: Tourism accommodation in Bungay town</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>1. Both adjacent to the development boundary and south of the A143; and</li> <li>2. Of a scale appropriate to Bungay</li> </ul> <p>Proposals within, or adjacent to, the defined town centre will be supported.</p>	<p>The current wording of TC&amp;E2 could be interpreted as meaning that the requirements in the policy do not apply to hotels, and therefore that a more permissive approach is taken for hotels.</p>	<p>Agree. Policy amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><del>This policy does not apply to hotels.</del> <u>Proposals for new hotel development will only be supported in the town centre.</u></p>		
<p><b>Recommended modification 11:</b></p>		
<p><b>Planning Policy ENV1: Green Corridor</b></p> <p>New developments within the Green Corridor shown at <b>Figure 6</b> 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. <del>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.</del> <u>Proposals that would enhance the active travel network to or in the Green Corridor will be supported.</u></p>	<p>The final sentence of policy ENV1 is very aspirational and lacks clarity and precision; therefore works better as a community action rather than planning policy. To provide clarity around how active travel will be considered in the green corridor.</p>	<p>Agree. Policy amended as recommended.</p>
<p><b>New Community Action -</b></p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p><u>Community Action 4: Green Corridor.</u></p> <p><u>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.</u></p> </div>	<p>The final sentence of policy ENV1 is very aspirational and lacks clarity and precision; therefore works better as a community action rather than planning policy.</p>	<p>Agree. Community Action added.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
Figure 6: <del>Illustrative proposed</del> Green Corridor	The policy wording applies to all developments within the corridor defined in fig. 6. However, fig. 6 is titled 'Illustrative proposed Green Corridor', indicating that this is only an <i>illustrative</i> area for the green corridor.	Agree. Title of map amended as recommended.
<b>Recommended modification 12:</b>		
Planning Policy ENV2: Open Space  <del>Proposals which involve creating new open space will need to demonstrate how biodiversity net gain will be achieved.</del> <a href="#">Proposals for the creation of new open space will be supported.</a>	To clarify relationship with policy ENV4 and to meet the Basic Conditions.	Agree. Policy amended as recommended.
<b>Recommended modification 13:</b>		
<b>Planning Policy ENV3: Landscape and Ecological Character</b>  New development will only be <del>permitted</del> <a href="#">supported</a> 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	It is inappropriate for the policy to include the term "permitted" as material considerations will not be known until the point of determination of a proposal.	Agree. Policy amended as recommended.

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
Include in the Neighbourhood Plan a map that identifies sites a. to f.	It is not clear to what area the policy applies.	Agree. Map added as recommended.
<b>Recommended modification 14:</b>		
<p><b>Planning Policy ENV4: Biodiversity</b></p> <p><del>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:</del></p> <p><del>a. Development proposals must include a detailed assessment of the existing biodiversity and the strategy to provide a net gain;</del></p> <p><del>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;</del></p> <p><del>c. Support will be given to proposals that demonstrate a significant biodiversity net gain;</del></p> <p><del>d. Proposals should explain how they will support protected species; and</del></p> <p><del>e. New developments must have due regard where relevant to Priority Habitats and actively seek to conserve and enhance these habitats to promote biodiversity.</del></p> <p><del>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.</del></p>	<p>Paragraph 180c of the Framework provides protection for irreplaceable habitats including ancient woodland, and ancient or veteran trees, this does not extend to all hedgerows and trees of other important or connective habitat. Loss of existing habitat may be necessary, for example, to create safe access to a site. A policy may not anticipate future national policy.</p>	<p>Agree. Policy amended as recommended.</p>



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><del>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.</del></p> <p><u>To be supported proposals for built new development, and proposals for the creation of new open space, must include a detailed assessment of existing biodiversity and achieve at least a 10% net gain in biodiversity, and enhance biodiversity connectivity. Biodiversity net gain should be measured using the most recently available Biodiversity Metric at the time of the submission of the planning application. Within the Broads Authority area reference should be made to the Broads Authority enhancements guide.</u></p> <p><u>Development proposals must explain how they have considered the need to support protected species and habitats, and must demonstrate that, wherever possible, they protect and enhance any existing hedgerows, trees or other important or connective habitat.</u></p>		
<b>Recommended modification 15:</b>		
<p><b>Planning Policy ENV5: Flooding</b></p> <p>All proposals must incorporate <del>natural</del> 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:</p> <ul style="list-style-type: none"> <li>a. Attenuation ponds;</li> <li>b. Planting;</li> <li>c. Introduction of permeable driveways or parking areas;</li> <li>d. Rainwater harvesting and storage features; or</li> </ul>	<p>Add the words "hard-surfacing" for clarity.</p>	<p>Agree. Policy amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>e. Green roofs.</p> <p>Sustainable Drainage Systems are required unless it can be clearly demonstrated that it would be inappropriate. The neighbourhood plan encourages the use of <a href="#">hard-surfacing</a> materials on new developments that are permeable and which therefore reduce the risk of surface water flooding.</p>		
<b>Recommended modification 16:</b>		
<p><del>167. 173.</del> <a href="#">173.</a> Planning Policy TM1 uses minimum parking standards, rather than maximum. <del>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.</del> <a href="#">These are the same as those set out in the adopted Suffolk Guidance for Parking Technical Guidance. Third Edition, May 2019. (Suffolk County Council). The justification for the standards is explained in that document. 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.</a> 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 onstreet parking restrictions.</p>	<p>To explain the justification of the adopted parking standards is set out in the Suffolk Guidance for Parking Technical Guidance. Third Edition, May 2019. (Suffolk County Council)</p>	<p>Agree. Supporting text amended as recommended.</p>
<b>Recommended modification 17:</b>		
<p><b>Planning Policy TM2: Off-street public car parking</b></p> <p>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:</p>	<p>Criterion a and b as written are unclear and it would be very difficult for applicants, agents and decision-makers to effectively apply.</p>	<p>Agree. Policy amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><del>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;</del>  <del>b. It does not materially increase traffic in the Conservation Area;</del>  <del>e. a.</del> It provides sufficient electric vehicle charging points as identified in Suffolk Guidance for Parking;  <del>d. b.</del> It is designed and landscaped to minimise the impact of parked vehicles on the street-scene whilst still affording informal surveillance; and  <del>e. c.</del> It includes covered cycle parking provision.</p>		
<b>Recommended modification 18:</b>		
<p><b>Planning Policy TM4: Sustainable transport and highway safety</b></p> <p>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.</p> <p>Even outside of the Green Corridor, provision for an expanded <del>cycling and footpath network</del> <b>public rights of way network</b> should be integrated with opportunities for enhancing wildlife networks by utilising and enhancing <del>and</del> 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.</p>	<p>It is better refer to the “<i>public rights of way network</i>”, as footpaths alone limit the scope of this policy.</p> <p>In the seventh paragraph the term “where appropriate” is imprecise and the selection of a particular vehicle speed limit has not been sufficiently evidenced. Vehicle speed limits are in any case determined through statutory procedures separate from Neighbourhood Plan preparation.</p> <p>It is confusing and unnecessary for one policy to refer to another policy of the Neighbourhood Plan</p>	<p>Agree. Policy amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><del>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 <b>Planning Policy TM1</b>) with a view to reducing any adverse impact on pedestrian or cyclist safety.</del></p>	<p>as the plan should be read as a whole.</p> <p>Final paragraph reads more like a community action than a planning policy, so alternative wording for the policy is recommended.</p>	

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><u>Major development schemes that are designed to facilitate traffic speeds of 20 mph or lower on residential streets or lanes will be supported.</u></p> <p><u>In major development schemes car parking provision must be designed to avoid adverse impact on pedestrian or cyclist safety.</u></p> <p><del>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</del></p> <p><u>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 will be supported.</u></p>		
<p><b>Recommended modification 19</b></p>		
<p>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 <u>former</u> 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.</p>	<p>Modify policy explanation sections, general text, figures and images, and supporting documents to achieve consistency with the modified policies, and to achieve updates and correct identified errors.</p>	<p>Agree. Plan amended as recommended.</p>
<p>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</p>	<p>To add clarity to the term 'middling incomes'.</p>	<p>Agree. Plan amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Those on middling <a href="#">(around average)</a> 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.</li> <li>• 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.</li> <li>• The report recommended a tenure split of: 10% offering 'routes to home ownership' of which 50% should be Starter<sup>1</sup> Homes and 50% Shared Ownership; and 90% Affordable Housing for rent, of which 60% should be Social Rent and 40% Affordable Rent<sup>2</sup>. 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</li> </ul>		

<sup>1</sup> No longer a type of affordable housing

<sup>2</sup> This has been superseded by national policy which has a greater focus on encouraging home ownership

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>affordable home ownership, far more than the 10% suggested by the Housing Needs Assessment. This risks not meeting the local housing need.</p>		
<p>Para.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, <del>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.</del> 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. <u>It should be noted that First Homes can also be delivered by open-market housing developments. Where affordable housing is required as part of an open market housing proposal, First Homes are required to account for at least 25% of all affordable housing units delivered by developers through planning obligations, as stated in National Planning Practice Guidance.</u></p>	<p>To achieve consistency with the modified policy, and to add clarity around the delivery or First Homes.</p>	<p>Agree. Plan amended as recommended.</p>
<p>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</p>	<p>Paragraph 68 final sentence - East Suffolk Council has produced a method for calculating an indicative housing requirement, but the plan should reflect that the Council has also produced the indicative housing requirement figure itself (67</p>	<p>Agree. Plan amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p>town some time-limited protection from speculative development in line with the NPPF. <del>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.</del> <u>East Suffolk Council has produced a method for calculating an indicative housing requirement, and has deployed this to produce the indicative housing requirement figure itself (67 dwellings). This can be found in the supporting document: 'Bungay Indicative Housing Requirement'.</u></p>	<p>dwellings). This is one of the submitted documents.</p>	
<p><del>71. 75.</del> Some respondents were concerned about the impacts of additional growth on community infrastructure such as the primary school. <del>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.</del> Suffolk County Council confirmed that Policy H4 will not cause capacity issues at the primary school.</p>	<p>Paragraph 71 second sentence - infrastructure capacity issues will not be managed by the district Council.</p>	<p>Agree. Plan amended as recommended.</p>
<p><del>79. 83</del> 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, <u>as set out in the 'Bungay Indicative Housing Requirement' document, submitted with the BNDP. This applies entirely to that part of the Neighbourhood Plan outside of the Broads Authority Area as the housing requirement within the Broads Authority Area is zero.</u> The figures are shown below, along with the overall housing numbers for Bungay from 2014. <u>These are from the 'Bungay indicative Housing Requirement' document, which addresses the housing requirement calculation in full detail.</u></p>	<p>Paragraph 79 - This part should reference the submitted 'Bungay Indicative Housing Requirement' document as the source for the figures quoted in the table. This document addresses the housing requirement calculation in full detail.</p>	<p>Agree. Plan amended as recommended.</p>
<p><del>84. 88.</del> We <u>would support neighbourhood CIL funds being</u> <del>consider that money should be</del> made available to support these developments, specifically Bungay Library in the short term and to support other proposals to develop a physical Community Hub.</p>	<p>Paragraph 84 should clarify it is the locally determined portion of CIL monies that is referred to.</p>	<p>Agree. Plan amended as recommended.</p>



Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><del>137</del>139. A secondary consideration is the need to support delivery of low carbon infrastructure (eg ground source heat pumps, or solar PV with battery storage) and high standards of sustainable design and construction. <del>This includes achieving net zero or at least CO2 emissions standards that exceed the requirements of Building Regulations.</del> Policy H1 on design principles for new development sets a requirement that applications set out how design has maximised the potential to achieve net zero carbon emissions. This is required to apply to both open market and affordable housing. A development of 70 homes should provide economies of scale to achieve sustainable design and construction principles over and above that set by Building Regulations.</p>	<p>Paragraph 137 (now 139) of the SEA Report updated to delete reference to zero carbon emissions.</p>	<p>Agree. Plan amended as recommended.</p>
<p><del>132</del>134. <b>Policy TC&amp;E12</b> is assessed as having potential long term negative impacts on biodiversity as it is supportive of tourist accommodation, which could include large-scale accommodation such as a hotel, outside of the development boundary. This could result in additional recreational pressure on local non-European designated sites of biodiversity interest, and where it is located outside of the development boundary, will likely reduce green open space and result in the fragmentation of ecological connectivity. The level of impact is uncertain as it depends on the proposals coming forward. It is recommended that further clarity to be provided in the policy in relation to the types of proposals that would be supported, with large scale hotel development not supported outside of the development boundary.</p> <p><del>144</del>146. <b>Policy EC&amp;T12</b> allows for new tourist accommodation, including that which is located adjacent the development boundary. The policy could allow for a large hotel as it is unspecific in relation to the type of accommodation that would be supported. Without mitigation, a development of this nature has the potential to negatively impact on the character of the landscape.</p>	<p>Paragraphs 132 and 144 (now paragraph 134 and 146 in the revised report) of the SEA Report should relate to Policy TC&amp;E2 and not Policy TC&amp;E1.</p>	<p>Agree. Plan amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><del>144.</del> <u>150.</u> To compensate for this the town will prioritise future development that provides for open space <del>incorporating conservation and habitat enhancement to improve biodiversity</del>. The <u>Waveney Local Plan and Broads Local Plan</u> contain<del>ed</del> open space standards which set out the requirements for new housing development.</p>	<p>Paragraph 144 (now 150) replace "contained" with "contain". Delete text to achieve consistency with the modified policy. Amend text to include specific reference to each Local Plan.</p>	<p>Agree. Plan amended as recommended.</p>
<p>Show the Broads on Figure 1 to provide context as per Figure 1 in the Environment Report.</p>	<p>Modify policy explanation sections, general text, figures and images, and supporting documents to achieve consistency with the modified policies, and to achieve updates and correct identified errors.</p>	<p>Agree. Plan amended as recommended.</p>
<p>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 <b>Policy H1</b> is provided in <b>Bungay Neighbourhood Plan Design Guidelines, March 2019</b>. 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 <del>as neither the guidelines nor Policy H1 will apply</del>. Applicants should also have regard to and follow the best practice</p>	<p>In paragraph 49 delete "neither" and "nor Policy H1" from the penultimate sentence.</p>	<p>Agree. Plan amended as recommended.</p>

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
for design set out in the government's National Design Guide, as well as Manual for Streets.		
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. <a href="#">The Broads Authority has an equivalent standard for M4 (2)</a> . 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.	In paragraph 61 add reference to the Broads equivalent standard for M (4)2.	Agree. Plan amended as recommended.
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, <a href="#">the Broads local plan</a> and the Waveney Local Plan also cover Rural Exception Sites for affordable housing. These higher order policies generally cover most affordable housing requirements.	In paragraph 64 clarify the Local Plan for the Broads also covers exception sites.	Agree. Plan amended as recommended.
The legend for Figure 5 is deleted.	To achieve consistency with the map.	Agree. Plan amended as recommended.

Examiner's recommended modification	Reason for change (summarised)	Action by ESC and BA
<p><del>87.</del> <u>91.</u> 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 <del>centre</del> and other opportunities to create greater capacity in this area would be supported.</p>	<p>In paragraph 87 final sentence delete “centre” to correct error in text.</p>	<p>Agree. Plan amended as recommended.</p>
<p><u>113. “Suffolk County Council manages the Historic Environment Record for the county. Non-designated archaeological heritage assets would be managed through the National Planning Policy Framework. Suffolk County Council Archaeological Service advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework, East Suffolk Strategic Priority 3, and Waveney Local Plan (policy WLP8.40) are met. Suffolk County Council Archaeological Service is happy to advise on the level of assessment and appropriate stages to be undertaken.”</u></p>	<p>Text updated to add information relating to the Historic Environment Record.</p>	<p>Agree. Plan amended as recommended.</p>

### Council's further modifications

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

Further Actions	Reason for change	Action by ESC
<p><u>A new community action ‘Community Action 4: Green Corridor’ has been added and the subsequent Community Actions need to be renumbered accordingly.</u></p>	<p>Update the numbering of Community Actions following the examiners recommendation to</p>	<p>Numbering amended as recommended.</p>

	include a new Community Action for Green Corridors.	
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