Broads Authority
Planning Committee
15 August 2014
Agenda Item 11
APPENDIX 3

### **Beccles Conservation Area Re-Appraisal**

Beccles Conservation Area Appraisal and Management Plan Consultation responses with actions in red text Updated 14<sup>th</sup> May 2014

Note that all comments received are paraphrased below, except those of Planning Policy, which are given in full.

# **CIIr Keith Jenkins (Beccles South)**

In favour of extending conservation area. Pleased that certain changes will be limited. No action required.

# **Suffolk County Council**

Supportive. Not clear why some addresses are in bold and not others.

For consistency, these will be removed.

Description for north Blyburgate (character area 1) is given in character area 5. This will be corrected.

Define important walls and green spaces on plans.

This is a huge undertaking in terms of manpower; hence the text included in the management plan to cover these issues.

Add 'special' on page 4 of management plan before 'architectural and historic interest'.

This will be done.

#### **Georgian Group**

Recommend including a more in-depth analysis of the major churchyard monuments. Whilst being a valuable suggestion, this is not feasible at this time.

#### **Suffolk Preservation Society**

Supportive and congratulatory. Wonder if p.15 DM20 should read DM30. This should indeed be DM30 and will be corrected.

## **Beccles Town Council**

Supportive of the proposed extensions. Would like assurance that owners of properties within extensions will be advised that conservation area protection will permit 'reasonable and reasoned' development.

Yes, within the parameters of the controls that will be in place. Not sure though how we can advise owners on this, except individually, when applications are submitted.

There are some areas and individual properties that could be included in the conservation area or locally listed in the future – Denmark and Caxton Roads, Alexandra Road, Rigbourne Moor, Homefield Paddock and Avenue, etc. Some of these roads – such as Denmark, Caxton and Alexandra Roads - were considered as part of this appraisal and rejected as having been too much modified. The remaining roads will need to be looked at as part of a future appraisal, as it is not possible to add anything at this stage.

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Would like to see underground features – tunnels, undercrofts, cellars and crypts locally listed.

Agreed. This will need to be ongoing, as very little information is known at present.

Further clarification for owners regarding protection afforded by local listing. This is already available, both in the Beccles Conservation Area Management Plan and in the WDC Built Heritage & Design Supplementary Planning Document.

Suggest that the proposed extension of the Norfolk bank of the River Waveney should be extended to the 'cut' just upstream from the Rowing Club. (This would involve a further public consultation process). The current proposal is based on the quality of the view on the Suffolk side of the river, in conservation area terms. Although a pleasant view thereafter, the 'special interest' begins to degrade after this point; hence the current position of the proposed boundary was arrived at in discussion with the Broads Authority, and no appropriate justification exists to modify it. No action required.

# **Beccles Society**

The Society welcomes, and strongly supports, the proposed updates and revisions to the Beccles Conservation Area Management Plan. No action required.

## **Planning Policy**

#### **General Comments**

Overall this document takes a highly textual approach, which contains salient details about buildings within the conservation area. At some points within the conservation area this includes a brief description of nearly every building, making this a very comprehensive document.

There are some areas where the format of the document could be improved if there is time, but it is quite usable. Large amounts of text makes the document difficult to use as a quick point of reference and, while it reads well, it could make finding out about specific buildings difficult. Scrolling backwards and forwards to access the map of character areas at the start of the document can also be time consuming in the electronic version. The format of these documents follows previous appraisals, therefore a change of layout would not be appropriate at this stage. No hard copy documents are to be produced; therefore carrying out a 'find' for particular buildings is feasible. If a page number is noted, the maps can more quickly be accessed. No changes proposed to address the above concerns.

Rather than large amounts of text it might be better to have a table for each street. This table could have entries for each building with its name or number together with a photograph followed by a brief description of the building and any conservation issues that may have arisen. Most readers will only be interested in a specific building and will probably want a format that enables to identify information about that building quickly and easily. This would not be appropriate. The layout follows a format laid down in English Heritage guidance. It is not a building gazetteer. No action proposed.

Sections of the document discuss improvements to the Conservation Area. It would be useful to also identify the risks to each character area and recent issues encountered. These are discussed in the Management Plan to a larger degree but would be useful if cited here. It is appropriate that these issues have been addressed BH/Pcrpt150814/Beccles Conservation Area- Appendix 3/Consultation Responses/Page 2 of 8/140814

#### in the management plan. No action proposed.

As a guidance document there is some merit to following a standardised format such as that used in the LDF documents. Weblinks to Local Plan documents would be extremely useful, although these can be removed from the hardcopy version. The use of paragraph numbers might also make the document easier to use. WDC conservation area documents do follow a standardised format, although not the same as the LDF documents, which some of them predate. Paragraph numbers have not been used on previous conservation area documents, and would give a formality to the documents which would be out of place in my view. Weblinks will be added where appropriate.

On the planning front the document fails to mention site specific allocation BEC2 (Land off Gresham Road) for housing and a customer access centre. This site is directly to the north of Station Road and borders the conservation area to the rear of housing on Station Road. Development here has the potential to impact upon the setting of the conservation area and this issue should be flagged up in the document. A paragraph about this will be added under 'Future Development' within the management plan.

How would development in the Gosford Road area affect the conservation areas? Would traffic (volume and junctions), design, density, type of use etc have any impact? The site in the vicinity of Roys has had planning permission in the past for mixed use development and there are ongoing going discussions about it. This becomes more important to consider within the proposed extension of the conservation area adjacent to the site. A paragraph about this will be added under 'Future Development' within the management plan.

The Broads is not a national park but it does carry an equivalent status. This appears to be incorrect, therefore no action will be taken.

The Beccles Southern Relief Road is expected to be granted planning permission in 2014. What effect will this have on the conservation areas in the town in terms of traffic? A paragraph about this will be added under 'Traffic domination' within the management plan.

#### Specific Issues

The citation on the front of the Conservation Area Appraisal refers to this as a new document but there is some uncertainty as to whether the document is actually new or an update of the previous Conservation Area Appraisal. It is a new appraisal.

**Page 4:** Is the photograph of Beccles the most recent one available? This has been updated.

**Page 21.** Special note refers to the 2001 as a recent review. Is 'recent' appropriate given that 13 years have passed? The word 'recent' has been removed.

'Recent' has also been used in other parts of the document with reference to developments in the town. Is this always appropriate as many of these works were completed some time ago (eg. the pedestrianisation of Sheepgate)? One instance of this is to be deleted; elsewhere its use was considered appropriate.

Page 27. Capital 'c' required 'Beccles Borough Council' This has been corrected.

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Page 30. 'Tower house' - capitalise the H? This has been corrected.

**Page 51** provides a comment about the undertaking of a survey - when was this? A date would be useful to reflect how current this text is. A date has been added.

**Pages 65-66.** Poor's Pightel or Poor's Pightle? Inconsistent spelling. This has been corrected.

Page 71. There is an extant development brief for the train station area of Beccles. The development that has taken place in the area to date since the removal of the maltings could be used as an example of how new development can complement or impact on a conservation area. This could also be used to discuss what further improvements could be made to enhance the existing area should the development brief be progressed in the future. Some text is to be added under 'Enhancement Potential' in the management plan..

**Page 73.** The change of topic/discussion for the next chapter seems to merge with the preceding text. As a change of section/focus this should be more obvious. Change of topic now occurs on following page therefore no further action required.

**Appendix E:** Information about legislation and policy guidance could be usefully separated as one is negotiable and the other is not. This appendix will be modified..

### **Conservation Area Management Plan**

## **General Comments**

The Conservation Area Management Plan Proposal is a far more concise document, which provides prescriptive solutions for the issues confronting properties and land within the Beccles Conservation area. Brief summaries of each character area and a series of sections about each issue surrounding the conservation area, together with possible solutions, are easy to read and refer to. Taken together they get to grips with the problems surrounding the conservation area.

The simple explanation of article 4 directions on page 8 sidesteps some of the changes in regulations that have made this issue needlessly complicated. It might be worth providing a link or reference to the Built Heritage and Design SPD, where more information can be found. More generally weblinks to other planning documents, especially those contained in the Waveney Local Plan, would be of use. These can be removed from the hardcopy version. Add weblinks as necessary.

Where proposed areas for extensions to the Conservation Area are proposed, there should be some discussion as to what this means for the owners and occupiers of buildings in terms of planning related issues. This will be addressed. Reference to the Built Heritage SPD would be useful to provide further guidance. This reference would also help give the document more of an applied focus to support the discussion provided. This will be addressed.

The pages of photographs on pages 10, 11 and 18 are visually very pleasing, picking out the period detail on many fine buildings to give a strong sense of place. In some ways it is a pity that there are not also photographs of some of the issues surrounding buildings in the conservation area, such as structural damage, together with references to the pictures in the text. However, it has to be recognised that this approach might prove very sensitive to the property owners concerned. There are BH/Pcrpt150814/Beccles Conservation Area- Appendix 3/Consultation Responses/Page 4 of 8/140814

pictures illustrating problem areas on pages 14, 16 and 18 of the management plan. In both documents it would be useful to directly reference each picture in the text, for example, when the Conservation Area Management Plan refers to concerns about poor quality advertisements on page 16 the text does not refer to the example (QD Stores) given at the top of the page. Perhaps numbering photographs and tables would make referencing easier. The photographs have been chosen to illustrate the text and will be readily found on the same page as the text to which they refer. To number them and refer to them within the text is not considered justifiable with the level of manpower currently available within this department.

### Specific Issues

Page 16 makes reference to PPS5 'Planning for the Historic Environment'. This document has now been superseded by the National Planning Policy Framework. The supplementary guidance 'Historic Environment Planning Practice Guide' remains in place until new planning practice guidance has been finalised. This has been addressed.

**Page 20.** The development brief for the Station Square area is still extant and could be referenced. This has been addressed.

# Resident responses from public exhibition and web consultation

29 feedback form responses5 web responses2 letters1 telephone call (visually impaired)

27 (73%) in favour 6 (16%) against Remainder (11%) do not say

Other comments received:

Remove word 'path' on mapping adjacent to river path. This is a request from the landowner, who feels that this is misleading and leads to trespassing on his land. This should be addressed if possible.

Extend river path extension up-stream to Shorts Corner, opposite Waveney Meadow, where river bends away from the town. Already dealt with above.

Remove Peddars Lane extension from proposals, although several buildings on the south side do have architectural or historic interest, albeit in the case of the Ebenezer Chapel inappropriately modified. This is a historic route and as noted by the respondent includes a number of buildings of historic or architectural interest. It would not therefore be appropriate to remove this proposed extension.

Retain disabled parking spaces in the town centre and have more of them. There is no intention to remove disabled parking spaces in the town.

Include the whole of St Benedicts Road in the conservation area. Although it is best to include whole streets, the conservation area boundary has to fall somewhere and the buildings in question are not of sufficient quality to justify inclusion. Their position just outside the conservation area boundary will however bring with it the requirement for planners to consider the impact of applications on the conservation area.

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Include the whole of Beccles in the conservation area. This would be a misuse of conservation area protection, which is intended to be applied to 'areas of special interest, the character of which it is desirable to preserve or enhance'.

Upset by poor quality of development in the area in recent years and feels that the proposed new controls are too late. The imposition of the article 4 direction will enable some insensitive changes to be reversed in the future.

Concerned about damage to properties and toxic emissions from double decker buses in the town. A number of comments have been made about buses, which will be brought to the attention of the SCC Highways Department.

London Road pavements are too narrow when large vehicles attempt to pass one another. This comment will be brought to the attention of the SCC Highways Department.

Pavements in Hungate are in very poor condition. This comment will be brought to the attention of the SCC Highways Department.

Concerned that at quiet times traffic exceeds 30 mph speed limit (London Rd/Hungate Lane). This comment will be brought to the attention of the SCC Highways Department.

School Cottages should not be included in the conservation area, as art 4 would not apply because no elevation fronts public land (footpath along the frontage is privately owned). School Cottages are to be removed from the proposed extension of the conservation area.

Concerned about removal of parking in Market Squares, as Tesco car park is now congested at peak shopping times. With the Equalities Act in place, this does seem an unworkable proposal and has not been universally welcomed; therefore I recommend that no action be taken at present and the management plan modified accordingly.

Is surfacing of Priory Road responsibility of planning, highways or conservation? Planners please advise.

Questions the colour of the fascia lighting on the Jesters public house in New Market. A listed building application is to be sought.

Does inclusion of Priory Road in the conservation area means that it could be improved? Yes, if the road is considered to be a 'highway', as an article 4 direction is/will be in place.

Undergrounding of cables in Upper Grange Road area. Opportunities for undergrounding of all overhead cables in the conservation area will be taken as and when they occur.

Path extension on Norfolk side of river should extend to the point (up-stream) opposite the limit of the existing conservation area. Dealt with above.

Would like to see pathways in Northgate relaid with York stone slabs or granite setts. This comment will be brought to the attention of the Suffolk County Highways Department.

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Suggests that 20 mph speed limit for Northgate would limit damage to buildings. This comment will be brought to the attention of the Suffolk County Highways Department.

12 tonne buses down Northgate affect safety and cause damage to building fabric. This comment will be brought to the attention of the Suffolk County Highways Department.

Supportive of proposal to remove traffic from the two market squares and reduce parking in the town centre. Parking dealt with above. It has been suggested that the traffic congestion in the town centre could be relieved by reversing the flow. This comment will be brought to the attention of the Suffolk County Highways Department.

Have cottages along Gresham Road been considered for inclusion in conservation area, continuing on from Station Road? Yes, but this area is not particularly prominent and so much change has occurred that it was not considered workable to include it.

Resident hopes that conservation area status will prevent the trend for developing garden areas. This is a subject that has already been included in the management plan.

Northgate is suffering serious overuse by heavy traffic. This comment will be brought to the attention of the Suffolk County Highways Department.

George Westwood Way should take more of the bus traffic. This comment will be brought to the attention of the Suffolk County Highways Department.

The present flow of traffic through the town encourages traffic to use Northgate. Reversal of Grove Road one way system might ease this. This comment will be brought to the attention of the Suffolk County Highways Department.

Not supportive of proposals due to additional cost to replace current upvc windows. New controls cannot be backdated. When upvc windows need to be replaced, householders would not be expected to replace with timber.

Old Fybronal factory site behind Fair Close excluded from conservation area which seems unfair. Yes, but conservation area status is about retaining areas of 'special interest, the character of which it is desirable to preserve or enhance'. The factory site is not an area of special interest, and should therefore rightly be excluded.

Need for short term town centre parking in addition to Tesco car park for quick visits and for those unable to walk far. Dealt with above.

The development will negatively impact on residents surrounding the Grove Road area. Road access is main concern. The junction would be very close to the traffic lights and add to the general congestion along Ingate. Concern for pedestrian safety with children using the route to walk to the old middle school site. I do not understand these comments, which do not appear to apply to the proposals that have been made; therefore, no action required.

Natural habitats for wildlife need to be preserved. These will be preserved inasfar as they are protected in law.

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Do not support proposals to include the southern part of Beccles, and particularly Waveney Road, in the conservation area, or to apply an article 4 direction. Waveney Road does not have sufficient houses of architectural or historic merit to warrant inclusion, and feel it would be an unfair burden on residents. The conservation area should be restricted to main thoroughfares. Waveney Road forms an important part of the Grange Estate development that took place during the first half of the twentieth century. Its significance as a 'fine suburban development with many individual houses of architectural interest' is described in the draft Beccles Conservation Area Appraisal and its further inclusion is fully warranted.

Piecemeal expansion in the area around Ravensmere / Ravensmere East / New Road will not increase amenity or the visual landscape, because the area is disconnected from other parts of the conservation area, and the area is surrounded by streets that area clearly not worthy of being in a conservation area. It will only increase costs for residents with no benefit to them. The area of Beccles to the east of Northgate is indeed fragmented and for this reason proposals to include the Caxton / Denmark Road area were eventually dropped as being unworthy of conservation area status and therefore a burden to residents. The two small areas retained for inclusion in this part of Beccles are however considered suitable. This is not just about buildings but about the general character of these areas.