Bungay Neighbourhood Development Plan 2020-2036



Consultation Statement

February 2022

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Introduction

Overview of Bungay Neighbourhood Development Plan

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

About this consultation statement

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

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

Summary of consultation and engagement activity

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

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

Summary of Early Engagement

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

Early engagement - summary of the main issues raised

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

Early engagement - how this was considered in development of the presubmission plan

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

Regulation 14 Consultation

Details of who was consulted

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

Who	Method	Response Received
All residents of the parish	 A summary leaflet was sent to all households in the neighbourhood area. Three consultation events were held at which people could drop in and read the plan and supporting 	145 responses

Who	Method	Response Received
Neighbouring parishes – Ditchingham, Broome, Mettingham, St. John	 documents, ask questions of the steering group and fill in the survey. Hard copies of the plan available from the Town Council office or at Bungay Library, or by contacting the town clerk. All documents, including supporting evidence, <u>available online</u> Online survey and hardcopy survey available from the town hall or town clerk. Banners and posters in key locations around the town. Article in the Beccles and Bungay Journey advertising the consultation and making people aware how they could make representations. Emailed stakeholder letter (see Appendix A) 	No
Mettingham, St John Illketshall, St Margaret Illketshall, Flixton, Earsham.		
Local landowners and agents	Emailed stakeholder letter	Response from Bidwells on behalf of Slater Family
Anglian Water	Emailed stakeholder letter	No
Broads Authority	Emailed stakeholder letter	Yes
East Suffolk Council	Emailed stakeholder letter	Yes
Environment Agency	Emailed stakeholder letter	No
Essex and Suffolk Water	Emailed stakeholder letter	No
Historic England	Emailed stakeholder letter	Yes
Homes England	Emailed stakeholder letter	No
Labour Party	Emailed stakeholder letter	Yes
Mobile UK	Emailed stakeholder letter	No
Natural England	Emailed stakeholder letter	Yes
Norfolk and Waveney CCG	Emailed stakeholder letter	No
Norfolk County Council	Emailed stakeholder letter	Yes
River Waveney Trust	Emailed stakeholder letter	Yes
Suffolk County Council	Emailed stakeholder letter	Yes
Suffolk Preservation Society	Emailed stakeholder letter	No

Who	Method	Response Received
Suffolk Wildlife Trust	Emailed stakeholder letter	Yes

Consultation Methods

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

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



20. A poster was displayed in various locations around the town, a copy of this is provided in **Appendix D**. This provided details on where and when the Neighbourhood Development Plan could be inspected, including electronic and hard copies. Posters were put up at the beginning of the consultation period.

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

Responses

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

Summary of the issues raised and how these were considered

28. For ease of review, the table below is organised by section of the plan. It contains a summary of feedback from both stakeholders, including statutory consultees, and residents. For clarity, the name of the stakeholder providing the feedback is indicated, the unnamed comments are those from residents.

Summarise the main issues and concerns raised	How these have been considered
General	
Broads Authority and ESC	Amended
Clarity on terminology regarding local planning authorities and what the	
respective local plans are called	
Broads Authority and ESC	Amended as suggested
Other matters of clarity and typographical errors, and a few other	
corrections, and improved references to policies in the two local plans,	
putting all supporting text before a policy, references to the NPPF may	
need updating as the NPPF itself has been updated etc	
Avoid use of the word 'settlement'	Changed to town, but nearly all uses of the word settlement are
	in relation to the settlement boundary
Broads Authority	Changes made to the Vision and objectives
The vision starts off talking about a place people will choose to visit.	
What about the place as somewhere to live, work and play? Linked to a	
previous comment, there is limited reference to protecting what is	
important to the area – the landscape and water are mentioned many	
times in section 2 as being important, yet these are not included in the	
vision. Also suggested minor change to objectives to mention The	
Broads	
Broads Authority	Explanation and distinction improved
Clarity needed on the difference between Community Actions and	
Planning Policies	
Broads Authority and ESC	Changes made where relevant

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

Summarise the main issues and concerns raised	How these have been considered
	The allocation will need a transport assessment to identify issues and improvements, so add this into the policy H4
Uncertainty as to the actual number of houses to be built under the NP	The text on this has been clarified with confirmation of the number of houses being built on WLP 5.1 and WLP 5.2 and the site allocated in BNDP. We have used figures from Housing Requirement report from ESC to explain.
East Suffolk Council	Should be a matter of planning judgement, but it has been
Policy H1 on design. New development should not have, or have the	rephrased to say it should be an appropriate density taking into
appearance of having, an excessive density, taking into account its context and setting. What does excessive mean?	account its context and setting.
East Suffolk Council	This is true, it has been confirmed that NPs cannot require this.
Policy H1. Planning Policy cannot require developments to achieve net	We have rephrased so the requirement is for development to
zero carbon emissions. It is therefore unclear what additional benefit	demonstrate how they have maximised energy efficiency.
the policy offers over and above the requirements of policy WLP8.28 in	
the Waveney Local Plan.	
East Suffolk Council	Rephrase the bullet point with clear reference to Nationally
Policy H1. Delete phrase 'ample indoor space' as it is not clear how this would be judged	Described Space Standards
East Suffolk Council	Removed reference
Policy H1. Criteria f – why are perimeter blocks not supported?	
East Suffolk Council	This policy sets out the requirements of the Bungay specific
Policy H1. Sort of repeats much of what is in local or national policy. Is it needed?	design guide.
Broads Authority	Agreed, added explanation
Policy H1 Design – Bungay NP Design Guide should not apply to the	
Broads	
Broads Authority	Policy title revised to New 'Residential Development', rather than
Policy H1 Design	just 'new development'.

Summarise the main issues and concerns raised	How these have been considered
Clarity on whether Policy H1 applies to new homes or any development,	There will indeed now be new EV charge point requirements for
such as new windows. ESC made a similar comment	new homes, so this part of the policy has been deleted. Policy
	TM2 on EV charge points -also delete as superseded before the
There will be Government requirements on EV charging points for new	plan will be 'made'
homes. How does TM2 on EV charge points relate to H1 part n, which	
says something similar?	
Historic England	Added to supporting text of H1
Policy H1 or its supporting text should require applicants to have regard	
to and follow the best practice for design set out in the government's	
National Design Guide, as well as Manual for	
Streets 1 and 2. This also applies to policy H4.	
Historic England	Indicative layout is more suited to an out of centre layout. HE
Policy H1.	seems to be more focused on the town centre, which is less
Inclusion of Figure 5 as an example of a 'good residential layout' ought	uniform. However, have removed Figure 5 from the document as
to be removed, as it depicts a very uniform and indistinctive residential	it is in the Design guide anyway.
layout that bears no relation to Bungay's historic character. Instead of	
requiring 'continuous buildings lines, we suggest the plan's general and	
site H4 specific design policies could include a requirement for	
development to adopt a 'spaces first' approach to designing streets,	
based on an analysis of local context, form and character, reflecting the	
town's traditional layout.	
Policy H2 Housing mix.	The HNA shows that the need is actually for modest sized homes.
Some residents thought the plan should encourage larger homes.	
Concerns from LPAs regarding significant weight being given to	Deleted reference to passivhaus development outside boundary.
passivhaus development outside the settlement boundary as contrary to	
basic conditions ¹	

¹ This was raised shortly after Regulation 15 and acted upon accordingly

Summarise the main issues and concerns raised	How these have been considered
Bidwells	It is felt that there is strong national policy and legislative support
Query as to why the % of plots required to be custom/self-build has	for self-build opportunities, and there is strong community
been significantly increased from WLP8.3 which sets out 5% to 10% in	support for the approach as it might enable local people to get on
BNDP on schemes of 20 or more. No justification is provided for this	the housing ladder, which is a key issue locally. Flexibility is
change and further information is requested.	included in H4 in the event of proven lower local demand for
	such plots.
East Suffolk Council	Added to the evidence base and summarised in the plan itself
Policy H3. Provided some useful data on incomes and housing	
affordability.	
Broads Authority	Included an explanation on local plans for context
Policy H3 on affordable housing.	Exception sites amended to be for First Homes as this has
Include explanation of affordable housing requirements in the local	replaced Entry-level in national guidance
plans. Clarify what exception sites are for.	Adjacent can mean 'near to', and the policy defines this as 50m
ESC	to provide clarity and certainty
Suggested specifying First Homes (a type of affordable housing)	Policy WLP8.6 seems to be for rural exception sites, which are
How does the policy relate to Policy WLP8.6 in the local plan?	different, and which are covered by national policy and the local
Why within 50m of the development boundary? This is not adjacent,	plan, and which specifically excludes Bungay anyway. No change
which means adjoining. ESC asked about the justification for 50m	needed.
The Labour Party	This is a strategic policy for the local plan rather than for the
Would like to see more social housing on new developments, whether	neighbourhood plan
provided by the local authority or a Housing Association.	
Broads Authority	Made some changes to improve clarity
Policy H2 Housing Mix	
Suggested changes to Policy H2 on housing mix, including for clarity and	
to avoid repeating existing policy	

Summarise the main issues and concerns raised	How these have been considered
Policy H4 – the allocation	There are historic landslips and so this has been referred to in
Allocation needs to address piping/instability on perimeter and	supporting text. Extra requirement to be aware of this included in
associated historic landslips into St Margaret's Road and north of the	the policy. This could be related to an old pit (Gower's pit in the
site.	north west corner of the site) and the drainage matter too. This
Allocation drains towards north-west and so could increase flood risk to	site could be the location for the informal recreation open-space
housing on the north.	area, which has been explained in the supporting text.
Suffolk CC	Made it clear that any proposal will need to be supported by a
Policy H4. Water management on this site may be challenging. The	site specific Flood Risk Assessment, but the policy draws
ground conditions of Local Plan site allocation to the east is WLP5.2	attention to the issue. It might be that the north of the site
don't support SuDS infiltration systems (soakaway etc) requiring the	becomes the open space area for ecological enhancement,
provision of an attenuated piped system which has a positive outfall into	informal recreation, and some flood risk management. This also
the river to the east of St John's Road. It is likely that site H4 has the	allows for a buffer between new development and existing
same constraints and requirements. It needs to be	dwellings to the north. Explain in supporting text.
demonstrated that there is a feasible water management and drainage	
solution for site H4.	Included SCC comments in supporting text and make minor
	changes to the policy
Bidwells	The supporting text has been amended to clarify that although
Strongly support the allocation. A number of alterations requested to	masterplanned with the adjacent site, this should not prevent H4
 Policy H4 including: Policy should be clear that he land could come forward 	gaining permission and being built-out at a different time to WLP5.2.
independently of Policy WL5.2, albeit having regard to the	Policy and supporting text amended to say that access should be
requirements of the adjacent site. Failure to incorporate this	via WLP5.2/ St John's Hill, <i>if possible</i> .
flexibility may result in delays.	BNG policy text amended to say that it should be at least 10%
 Criteria e) whilst preferred access to the site is from St John's Hill, 	
alternative options will be considered where feasible and practical,	
policy should be amended to reflect this	
Criteria k) clarity should be provided as to what is considered a	
significant BNG, a figure of 10% is suggested	

Summarise the main issues and concerns raised	How these have been considered
Policy H4	Rely on the pedestrian access being provided by WLP5.2, linking
Allocation policy should not have cycle access onto St Margaret's Road	to the swimming pool etc, so the key would be to link with the
as it's dangerous. Need to maintain existing public access to the site,	Public Right of Way and WLP5.2, and this would fit in with the
such as dog walking.	Green Corridor.
Needs to integrate with the rest of Bungay.	There is an existing Public Right of Way along eastern boundary
	of the site Refer to it in the policy. There is also an informal dog
	walking root via the old pit and looping around the boundary of
	the site, so include in the policy.
The Labour Party	The preferred access is to St John's Hill via allocation WLP5.2 and
We are pleased to see that BNDP provides more land for housing than	this will be implemented if possible. However, to provide
previously allocated, though we feel more consideration is needed in	flexibility and to avoid sterilising the site, other access options
relation to how the site links to the road network.	might need to be considered if the preferred option is not
	possible.
Suffolk CC	Policy revised such that the cycle route no longer deploys St
Part I of this policy should be amended, with wording suggested below.	Margaret's Road
i. Pedestrian and cycle routes should be provided that link with the	
allocated site to the east (WLP 5.2 of the Local Plan), and the Green	
Corridor going north (see Policy ENV1 and Figure 7). A cycle route could	
also be provided onto St Margaret's Road. A transport assessment	
should identify the measures necessary to ensure that St Margaret's	
Road is safe for cycling. Safety measures may involve reductions of	
traffic volumes and/or speed.	
Suffolk CC	Amended H4 as suggested
Policy H4. The allocation land-locks the High School, which will need to	
expand in the future. Policy H4 should be amended to reflect that the	
school will have need to expand, to ensure that development on this	
land does not prevent delivery of the school expansion invertedly	
Historic England	Updated the policy to include this as part of the masterplanning

Summarise the main issues and concerns raised	How these have been considered
Policy H4 should require a Design code from the developer	Include a requirement for community engagement during any
Policy H4 – archaeological excavations should incorporate community	archaeological investigations
engagement	
Policy H4 – ensure homes are fully accessible and suitable for elderly,	Neighbourhood Development Plans cannot set technical
and build to very high environmental standards	standards for building regulation. Local plans can, if viable, and
	indeed the local plan has done this. Included an explanation in
	supporting text of Policy H1.
Policy H4 Allocation – needs access for buses, and for disabled people	Allocation WLP5.2 includes a parking and turning area for buses
	near the High School. National policy requires access to be for all
	people. This has been referred to in the supporting text. Also, the
	allocation policy could require a transport assessment and so this
	should identify specific improvements – added this into the policy
Suffolk CC Confirmed that the allocation will not cause capacity issues at the	Noted and mentioned in supporting text of H4
primary school	
Community policies	This is included in Allocation Deligy MUDE 2. Deference added to
Need larger play area for ball games like football	This is included in Allocation Policy WLP5.2. Reference added to the supporting text
East Suffolk Council	Clarity added on the definition of green open space within the
Policy CM1	town using NPPF definition of providing accessible public amenity
• What is meant by 'green space'? eg. Allocated open space,	etc
agricultural land?	Limiting it to brownfield might severely restrict the likelihood of
Why must it be on a brownfield site?	anything happening. Amended to say that brownfield would be preferred.
East Suffolk Council	Reference added to the Suffolk Guidance for Parking
Policy CM2	
• The Suffolk Guidance for Parking specifies the requirements for	
parking at Medical Centres. It is unclear how the requirements of the	
policy CM2 differ from the Suffolk Guidance for Parking.	

Summarise the main issues and concerns raised	How these have been considered
Suffolk CC	Changes made
Policy CM4 suggest the following amendments:	
"This will need to have:	
 Safe access by walking, cycling and public transport; and 	
• Sufficient parking provision, including temporary parking at drop-off	
and collection times, and secure cycle parking for staff and visitors.	
Cultural heritage and the built environment policies	
Broads Authority	Suggested wording added to supporting text of H4
Add to the end of the sentence about the grade II listed Manor	
Farmhouse 'the setting of which will need to be considered.	
Historic England	Added to policy
Policy CH1 could include a requirement to retain shopfront	
East Suffolk Council	Added wording to the effect that the requirements should not
Policy CH1 -It is recommended that this policy acknowledges that in	undermine the need to balance any harm against the benefits, as
some instances harm to a heritage asset or conservation area may be	required by national policy.
necessary but this should be balanced against other factors, such as the	
benefits of development or the condition of a heritage asset. This policy	
seems to try to allow development but without acknowledging that this	
could lead to harm or change to a heritage asset or conservation area.	
East Suffolk Council	Revised the policy, around hotel or other visitor accommodation
Policy CH2. Requiring demonstrable and over-riding community benefits	and any change of use will require 12 months of marketing. Any
is a high bar and could result in it becoming derelict. Also, what	other use – retaining active frontage on ground floor
community benefits are being envisaged? You could consider setting	
criteria that any re-use should achieve. Eg.	
O Retaining an active frontage at first floor level	
o Offices or residential uses only at first floor and above	
o Retail/public exhibition space/community use /pub/ café	
/restaurant uses will be supported provided the building has been	

Summarise the main issues and concerns raised	How these have been considered
adequately and appropriately marketed for hotel use for not less than	
12 months. (you can refer to local plan appendix 4 here if you wish)	
East Suffolk Council	Left as is
Policy CH3	
Suggest changing it to a Community Action rather than a policy. Could	
be expanded to say whether enabling development would be	
acceptable.	
Broads Authority	Change made
Community Action 1. Maintenance of the Conservation Area – perhaps	
the wording of the final sentence should be changed to: 'informed by	
the management and enhancement proposals within the Bungay	
Conservation Area Appraisal'	
Broads Authority	Change made
Policy CH3 – would you want to say 'proposals that will	
appropriately/sensitively repair and conserve Bungay Castle will be	
supported'? Aim is one thing, to do is another.	
Broads Authority	Change made
CH4 – uses the word 'should'. That is a weak and flexible word. If you	
want these statements to be provided, suggest you say 'will' or 'must	
be'.	
Historic England	The suggestions could make it harder to achieve an ongoing
Policy CH2 (King's Head) - re-word to strengthen it.	viable use for the hotel.
"Proposals that will result in the change of use of the King's Head from a	See earlier for proposed changes to policy.
hotel to other use will not be supported, unless it can be demonstrated	
that a) hotel use is not economically viable, b) the long-term use of the	
building will be secured, and c) that there are demonstrable and	
overriding community benefits from the new use."	
East Suffolk Council	Change made

Summarise the main issues and concerns raised	How these have been considered
Planning Policy CH1. Conservation Area – where it states "the Waveney	
District Council Bungay Conservation Area Character Appraisal" this	
should be replaced with "East Suffolk Council's Bungay Conservation	
Area Appraisal and Management Plan".	
Historic England	The Neighbourhood Development Plan can't be used as a way of
Could identify not-listed buildings that have heritage importance and	making ESC do something outside of the determination of
use this evidence to encourage East Suffolk Council to ensure that	applications
Bungay's Article 4 Direction removes the Permitted Development Right	
to change the use of these buildings	
Historic England	Any link to growth seems tenuous. No changes
Section 6.5 on CIL. Could include some wording on using CIL for	
conservation of heritage assets, such as the castle	
East Suffolk Council	Amended the wording to reflect this. Although CIL is the
Need to be careful when referring to the use of CIL monies. CIL monies	responsibility of ESC, the text in the plan talks about the portion
are the responsibility of the district council and it should be used to	that goes to the town council.
address the impacts of growth rather than addressing existing issues.	
Town Centre Vitality and Economic Development	
Policy TC&E1	This was supported by the steering group and also at
Some questioning of policy stance on hot food takeaways	consultation.
Not enough on increasing job opportunities and employment growth	The plan supports the building of new homes which will create
(including from the Labour Party)	work, as well as supporting tourism and town centre vitality. The
	local plan has an allocation for employment use already at site
	WLP5.2. Don't think there is anything more the plan could
	reasonably add.
Labour Party	The Neighbourhood Plan had no real evidence that there would
Disappointed that the draft plan says little about employment or	be a need for additional allocations for commercial development.
industry. The town is extremely vulnerable to the fortunes of its largest	The allocation for commercial development is part of the East
	Suffolk Waveney Local Plan. What the Neighbourhood Plan has

Summarise the main issues and concerns raised	How these have been considered
employer. The more small flexible employment sites with good road	done, however, is be very supportive of tourism and tourist
access the better.	accommodation.
Environment Policies	
Policy ENV5.	Added reference to flooding in Winter 2020/21 and included
Mention recent floods	some photos
Natural England	Noted, thank you.
The neighbourhood plan has a range of positive environmental policies	
which Natural England commends. These include (but are not limited to)	
ENV1: Green Corridors, ENV2: Open Space, ENV3: Landscape and	
Ecological Character, ENV4: Biodiversity and ENV5: Flooding.	
Suffolk CC	Change made
Policy ENV5 should be amended as follows to better align with national	
policy: "Sustainable Drainage Systems are required unless it can be	
clearly demonstrated that it would be inappropriate. The	
Neighbourhood Development Plan encourages the use of materials on	
new developments that are permeable and which therefore reduce the	
risk of surface water flooding."	
Policy ENV1. Green Corridor	Too far away unfortunately
Add Annis Hill to the Green Corridor	
River Waveney Trust	Noted. Thank you.
We are particularly interested in your proposal for a green corridor. We	
have been looking at opportunities for natural flood management	
solutions on the Tin River, as well as thinking about river restoration	
further downstream and how the floodplain could be enhanced.	
Suffolk CC	Change made
We welcome the mention in paragraph 149, however it is suggested	
that this could include reference to the "physical and mental" health	
and wellbeing benefits that can be gained from	
access to pleasant outdoor areas.	

Summarise the main issues and concerns raised	How these have been considered
East Suffolk Council	The Corridor is a way of focusing biodiversity enhancements that
Policy ENV1 How would developments contribute to the Green	cannot be delivered on-site by developments. Make this clear
Corridor. It is unlikely to be achievable that all major development can	and in policy ENV4.
ensure residents can have traffic-free access to local services. This is a	Deleted wording on traffic free access - walking and cycling is
very high bar. They can show how they support biodiversity and walking	covered elsewhere at TM5 (added wording in that policy on the
and cycling instead, for example.	Green Corridor), and general biodiversity requirements are also
	covered by other policy such as ENV4 and ENV5
Historic England	Decision not to do this early in the plan's development and doing
Neighbourhood Development Plan could designate Local Green Spaces	so now would require a lot of work and cause a delay of 6
	months at least
Policy ENV3 on Landscape and Ecology character	Flood risk would prevent this. Included some wording on
Some questioning of Skinners Meadow being listed in ENV3 as some see	community use, but not a community facility that comprises a
it as ideal for a community facility	building. Policy amended to say that development proposals will
	not be supported unless it avoids unacceptable harm to ecology
	or landscape character.
Suffolk Wildlife Trust	Suitable wording included
Community Action 3: Access to the Countryside, should include wording	
about also protecting wildlife	
Suffolk Wildlife Trust.	Already covered by ENV4 and allocation
Bungay Neighbourhood Development Plan should require developments	
to seek a minimum of 10% biodiversity net gain	
Suffolk CC	Suggested changes made
the following amendments are suggested to Policy ENV4: "1.	
development proposals should include a detailed assessment of the	
existing biodiversity and the <i>strategy</i> to provide a net gain;	
2. The Biodiversity provided by the development should <i>enhance those</i>	
features that the site already contains, such as hedgerows, trees and	
other important or connective habitat. Planning proposals should explain	
the extent of each benefit; and	

Summarise the main issues and concerns raised	How these have been considered
3. Support will be given to proposals that demonstrate a significant	
biodiversity net gain; and 4. New developments must avoid harming	
priority habitats, and actively seek to conserve and enhance these	
habitats to strengthen their capacity to regulate climate."	
Broads Authority	Made wording stronger on biodiversity enhancements
ENV4 - as worded, it is not setting requirements. It is saying that if you	
do this, then we will support you. It is not saying, you need to do this.	
Suffolk Wildlife Trust	Suitable wording included. The NP can't offer greater protection
Include reference to having due regard to Priority Habitats in ENV4.	than that already in legislation. Legislation already covers
Include safeguarding and supporting protected species.	protected species. Could have wording to say that proposals will
	need to set out how protected species are being supported, such
	as swift and bat boxes and allowing hedgehogs wider movement
	(type of fencing used)
Suffolk CC	Suggested change made
Section 9 Environment which makes statements about the local public	
rights of way network could also highlight the strengths of the network	
including reference to the Angles Way, a long distance promoted trail	
between Great Yarmouth and Thetford that offers a well-used and well-	
signed walking link between Bungay and Beccles in the east and Diss in	
the west	
Transport Policies	
Need to manage traffic, esp lorries, concerns about general road safety,	These matters would be traffic management and parking
speed limits, and parking (including charges)	management which unfortunately is beyond the remit of a NP
Historic England and others	Landscaping and design of the car park will be important and this
Policy TM3, Off-Street Car parking. Could be unattractive and encourage	is in the policy. It could induce some traffic, but this needs to be
more car-use. Suffolk CC also concerned about encouraging car use and	balanced against wanting people to visit the town centre.
conflict with climate change, but has not actually objected	
Labour party	This is a key issue for the town, but one which is largely outside
	of the scope of planning and the Neighbourhood Plan, being a

Summarise the main issues and concerns raised	How these have been considered		
The level of HGVs through the town centre needs to be reduced and policy TC&E3 doesn't look to be feasible or credible in relation to this.	matter of traffic management in the main. However, in addition to the policy referred to, the plan also has Policy TM4 and Community Action 7.		
East Suffolk Council Policy TM3. Bullet two - If traffic increases as a result but this is mainly low emission vehicles, would this be ok? Why just the Conservation Area?	This is a case of balancing objectives as want to encourage visitors. Also, as car parks get full, cars drive around looking for parking, or park on-street, and both of these have adverse impacts.		
Suffolk CC Planning Policy TM5: Sustainable transport and highway safety is very welcome although reference under Green Corridors to the 'footpath network' would better refer to the 'public rights of way network', as footpaths alone limit the scope of this policy.	Change made to the supporting text		
Broads Authority Wondered whether the conversion of the railway from Ditchingham to Beccles for walking and cycling may be something you wish to mention or promote	This falls outside of the Neighbourhood Development Plan area.		
Environmental Report			
East Suffolk Council Various comments provided	These were all a repeat of comments made prior to Regulation 14, therefore addressed before publishing the Environmental Report for consultation.		
Broads Authority The sites need to be assessed individually rather than a combination – the resulting combination of growth at two sites or one site can be a conclusion, but the actual assessment needs to assess the sites individually as what is for one site might not be for the other. As such, this does not tell the whole story accurately as presented. There is an objection to the Environment Report on these grounds.	The assessment is of reasonable alternatives to deliver the indicative housing growth – for 69 homes. The site assessment work is used for a basis of identifying reasonable alternative sites, this concludes there are only two potential sites for growth. One of these sites is small and not capable of delivering the required housing numbers. It therefore must be combined with another site to reflect a true reasonable alternative. This approach to		

Summarise the main issues and concerns raised	How these have been considered		
	assessing reasonable alternatives is common in neighbourhood		
	plan SEAs.		

Appendix A: Stakeholder Email

From: Edwin Rosier Sent: 09 September 2021 17:05 To:

Subject: Bungay Town Neighbourhood Plan Regulation 14 Pre-submission Consultation

TO WHOM IT MAY CONCERN

Bungay Town Neighbourhood Plan Regulation 14 Pre-submission Consultation

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

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

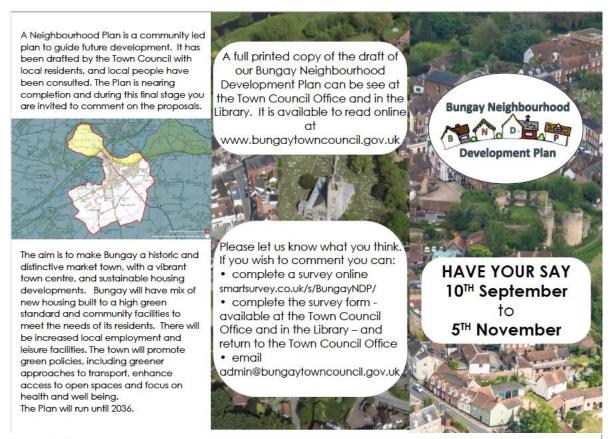
We hold onto some of your personal information to enable the town council to perform its official functions in the interest of the public or for contractual reasons. We will retain your information until your contract expires or for as long as is necessary. Your information will only be passed between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

Yours sincerely

Eddie Rosier

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

Appendix B: Regulation 14 Summary Leaflet



Key Policy Areas

Housing

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



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

COMMUNITY MATTERS

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

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



TOWN CENTRE

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

Facilities for tourists will be encouraged

ENVIRONMENT

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

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

TRAFFIC, TRANSPORT and PARKING

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

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

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

Sustainable transport and highway safety are priorities.

Appendix C: BNDP Regulation 14 Banners



Appendix D: BNDP Regulation 14 Poster



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

HAVE YOUR SAY

Public Consultation 10th September 2021 – 5th November 2021

Copies of the Plan can be seen at the Council Office Broad St or The Library Wharton St or Viewed online and the survey completed at

www.bungaytowncouncil.gov.uk

Response forms are available at the Council Office or Library

Responses must be in by 5th November 2021

Appendix E: Hard copy version of the survey



Bungay Neighbourhood Development Plan

Regulation 14 Consultation on the Pre-Submission Draft Plan

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

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

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

You can submit your comments in the following ways:

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

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

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

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

The closing date for comments is 5th November 2021

Your Details and Consent

You must complete this section, failure to do so may result in your response not being considered. Questions with a * require a response.

our details:	
Name*:	
Organisation:	
Address 1:	
Address 2:	
Post Code*:	
Email or phone number*:	
Please tick all that apply:	
	l am an agent
I live in Bungay	l am a landowner
📃 I work in Bunga	
I am a statutory	None of the above
	Consulter
vebsite. As part of the consu please confirm that you are h	t only. The Privacy Statement can be found on Bungay Town Council's Itation and in line with the new General Data Protection Regulations (GDPR) happy for Bungay Town Council to pass on your contact details (name, East Suffolk Council (as the Local Planning Authority) so that they can contact ation.
I consent to Bungay To Neighbourhood Develo	wn Council processing your details in relation to this preparation of the second s
I consent to Bungay To	wn Council passing my contact details to East Suffolk Council*
	ional and relate to us being able to contact you in future with regard to the t Plan. Please indicate whether you consent to the following:
I consent to being cont Development Plan Stee	acted with regard to my response by the Bungay Neighbourhood rring Group
I consent to being kept	up to date on the status of the Bungay Neighbourhood Development Plan

Housing Policies

To what extent do you agree with the housing policies?

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
H1: Design principles for new development					
H2: Housing Mix					
H3: Affordable Housing					
H4: Land to the east of St Margaret's Road					
Please provide any comments you have in relation to these policies:					

Community Matters

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

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
CM1: Community Hub					
CM2: Bungay Medical Centre					
CM3: Sports Facilities					
CM4: Pre-School Education					
CM5: Community Education					
Please provide any comments you have in relat	ion to these p	olicies:			

Cultural Heritage and the Built Environment

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

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
CH1: Conservation Area					
CH2: The King's Head					
CH3: Bungay Castle					
CH4: Heritage Statements					

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

Bungay Town Centre Viability and Economic Development

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

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
TC&E1: Town Centre Vitality					
TC&E2: Tourism Accommodation					
TC&E3: Employment Growth and HGV Traffic					
Please provide any comments you have in relation	on to these p	olicies:			

Environment

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

Policy	Strongly agree	Agree	Not sure	Disagree	Strongly disagree
ENV1: Green Corridors					
ENV2: Open Space					
ENV3: Landscape and Ecological Character					
ENV4: Biodiversity					
ENV5: Flooding					

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

Traffic and Transport

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

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

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

I am generally in favour of the Bungay Neighbourhood Development Plan

Yes
No

Please provide any comments which explain your answer:

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