Matter 7 – Strategies for Beccles and Worlingham, Halesworth and Holton, Bungay and Southwold and Reydon

Further Statement on behalf of Chenery's Landowners & Beccles Townlands Trust (Beccles Feoffees)

Policy WLP3.1 – Beccles and Worlingham Garden Neighbourhood

1. The Inspector has asked of various allocations in the market towns of the District:

   "Are the following allocations for development soundly-based, are the criteria set out in the relevant policies justified and effective; and is there evidence that the development of the allocations is viable and deliverable in the timescales indicated in Appendix 3 of the plan?"

   Is the criteria set-out in the policy is justified and effective?

2. We wish to confirm the continuing support for the inclusion of the two parcels of land in the ownership of our clients i.e. Chenerys Land and the adjoining land to the west in the ownership of Beccles Townlands Trust (Beccles Feoffees) that make up a significant part of the allocation WLP3.1 Beccles and Worlingham Neighbourhood.

3. In our opinion the Garden Neighbourhood is justified, effective and consistent with national policy. It will help ensure that the Local Plan (LP) meets identified development needs.

4. The site represents a highly sustainable location for the provision of new homes and represents a new logical extension to the settlement boundary. Development in accordance with the LP Policy would ensure deliver of a sustainable mixed use development, linked into the existing settlement.

5. None of the site is subject to any physical constraints or land designations that would prohibit its development for homes or any of the other uses identified within WLP Policy 3.1 and the accompanying Masterplan.

6. The Sustainability Appraisal published alongside the Final Draft LP has confirmed the suitability of the site for development.

7. The mix of development, housing, business, school and community uses

8. Achieving the delivery of the site in a comprehensive manner is key to ensuring provision of the identified mixed uses within the allocation and thus meeting the objectives of the allocation. Equally important is the delivery of housing as part of the LP and helping it to achieve a 5 year Housing Land Supply.

Areas for Clarification

9. In respect of the delivery of the allocation, there are various matters on which clarification is required to ensure delivery as planned.

   The status of the Masterplan (MP) and the weight that can be afforded to it

10. The Masterplan report emerged during the preparation of the Final Draft LP and elements of the report have been written into the text accompanying WLP3.1 and the policy itself.

11. The indicative layout of the overall allocation prepared within the Masterplan is included within the LP. (Figure 13) and replaces the previous illustrative layout included within the first draft LP ( Figure 14).
The Beccles & Worlingham Proposed Garden Neighbourhood Masterplan Report (March 2018) is included in the Examination Document Library within Section C Evidence (Document C12). In para 1.2 the Masterplan report states; 

"... The Working Group agreed the appointment of consultants to provide urban design and masterplanning expertise and progress the initial spatial design accompanying the draft local plan into an outline masterplan. The intention is that it will then form part of the next round of statutory consultation on the draft local plan."

Para 4.3 of the report goes on to state; 

"... The outline masterplan is very much an evolution of figure 14 that accompanied the first draft local plan policy shaped to take account of the review, engagement and analysis process."

There has therefore been a good degree of public consultation on the principles of development for the allocation as embodied within the masterplan. A good deal of weight can therefore be afforded to the Masterplan in preparing and determining planning applications. Additionally, Policy WLP3.1 includes some key elements of the proposal. It is part of our earlier representation that more detail should be included in the policy. Equally it is considered important to retain flexibility for the deliverability of the various residential areas of the site. Flexibility and the need to significantly boost housing land supply are key thread running through the first version of the NPPF and its recent replacement version as well as the Government White paper “Fixing our broken housing market”.

Comprehensive Development and Delivery of Infrastructure and Services

Key to enabling development of the whole site, and hence the delivery of the required housing numbers within the timeframe, is the availability of services and infrastructure across the individual landownership. Our clients are prepared to work in a co-operative manner to ensure there are no impediments. However, the LPA should include within Policy WLP3.1 the requirement to provide infrastructure, roads and services to the boundary of the relevant individual landownership. Additionally, the LPA should ensure that planned facilities within the proposed development be delivered at the relevant stages so as not to impede or delay later phases of development; be this the requirement for a land for the country park, sports facilities, or a serviced site for the school.

Trigger points for the delivery of essential infrastructure & facilities

As discussed above, the delivery of the allocation in a comprehensive manner is dependent on the timely provision of infrastructure and facilities. Further clarification is therefore required on infrastructure requirements, including utility routes and connections, across the development given the likelihood that individual planning applications are submitted by the various landowners rather than a single comprehensive application coming forward for the entire allocation. It is important that close collaboration is undertaken between the various landowners to ensure a co-ordinated approach is taken across the allocation to realise the Masterplan.

Delivery of essential community facilities such as the primary school, community hub including local shops & community centre, indoor/ outdoor play facilities, country park etc. requires greater guidance than is currently provided within the written text of either the LP or the Masterplan report. Essentially, the various trigger points should be identified, beyond which development cannot continue, until these essential services and vital components of the development, are delivered.

If it has not already been obtained, the advice of the Education Authority should be sought on the current capacity of existing school and likely demand for places arising from the development. This should be written into the policy in terms of timing of provision of the new pre-school and primary school sites being made available.

Greater clarity should also be provided on the nature of the financial contributions required by the accompanying S106 agreement and the associated trigger points for the provision of land and serviced sites for facilities such as the school and the timing for the attendant financial contributions.
Access

20 Policy WLP3.1 states that all vehicular access to the Garden Neighbourhood will be taken from two points along the Southern Relief Road. It is pleasing to note this road scheme is on target, and reassuring that this road is nearing completion and should be open during the latter part of this month. This will ensure that achieving vehicular access to all parts of the proposed allocation will not be held up by access constraints.

21 Support the policy objectives of:

- encouraging traffic to travel into Beccles westwards along the Southern Relief Road
- Provision of pedestrian and cycle links to existing built up areas of Beccles and Worlingham in order to provide easy access to integrate the new neighbourhood with the existing town, linking the services and facilities in both existing and new communities.

Masterplan Layout Principles

22 Support the policy principles of locating the primary school & community hub centrally within the site in order to ensure good accessibility to these facilities for both the existing and all areas of the new community.

23 Support the location of the Country Park adjacent the Ellough Road and the Sports and Leisure facilities adjacent the boundary of the southern relief road in terms of ease of access and screening value, both visual and noise reduction, afforded by these facilities to other parts of the site that would be vulnerable to these issues.

24 Natural England did not object to the allocation in their response to the Final Draft LP but requested the design and landscaping of the scheme should take account of its location 1.6km from the Broads National Park and 2.5 km from the Suffolk Coast and Heath AONB. The provision of the above facilities as ‘green infrastructure’ and in the location shown on the Masterplan making them easily accessible to the wider community should help to relieve visitor pressure on the designated areas of sensitive landscapes, that could otherwise result from residents if there are no alternatives.

Available

25 Both of the landowners are committed to delivering the land for development.

Deliverability

26 The site is predominantly a greenfield site on the edge of the town. Our clients, and also Larkfleet Homes in their representations, have all confirmed the site is not unduly constrained in terms of access, landscape, flood risk or ecology. Our clients support the allocation of the land for development as part of policy WLP3.1 Beccles and Worlingham Garden Neighbourhood.

27 Both parcel of land within the ownership of our clients are achievable and deliverable without delays, with the right approach and co-operation towards a comprehensive build-out of the site. The landowners are committed to early delivery and will contribute to development within the first five years of the plan period.