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11th May 2018.

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Dear Sir,

Response from Beccles Society to Final Draft Local Plan

We acknowledge the amount of work carried out by the independent consultants David Lock Associates in designing the Masterplan for the Garden Neighbourhood Village for Beccles and Worlingham and support the general principles of the scheme.

However the highway and traffic situation is of concern. The two housing sites put a significant amount of traffic down London Road causing increased problems at many junctions, including several in the centre of Beccles. This negates many of the benefits accruing from the Southern Relief Road.

In paragraph 3.7 of the Final Draft Plan Strategy for Beccles and Worlingham it indicates that new and improved infrastructure will be required for Transport as follows:-

- * Beccles Southern Relief Road (currently under construction)
- * Access improvements and servicing to the Enterprise Zone at Ellough.
- * Cycle link to the Ellough industrial estates over land allocated as the Beccles and Worlingham Garden Neighbourhood (PolicyWLP3.1).
- * Improvements to the cycle network as identified in the Waveney . Cycle Strategy.

No mention is made of any other off site highway improvements.

WSP produced a technical note in 2016 based on 1100 dwellings from the Beccles and Worlingham Garden Village area exiting onto the Southern Relief Road in 2036. It did not include the additional vehicles which would be generated by the proposed 250 houses which would be accessing onto London Road (WLP3.2). Nor as a worst case scenario did it allow for the extra 150 houses proposed for the Garden Village site (1250 houses).

Nevertheless, the study at that time highlighted that the following junctions were either at or near capacity at all or at certain peak times:-

- 1) A145 Blyburgate/ A145 Peddars Lane.
- 2) A146 Norwich Road/ Lodden Road.
- 3) A145 Ashmans Road/ Frederick Road.
- 4) Gosford Road/ Grove Road.
- 5) A146 Norwich Road/A143 Yarmouth Road.
- 6) A143 Yarmouth Road/ George Westwood Way.

If you include the traffic from the housing development on London Road then the junction of London Road/St Mary's Road also becomes critical (as was highlighted in in the previous assessment carried out by Larkfleet in considering a slightly smaller development on the site of the Garden Village). Other junctions in the town centre area may also now become critical.

In Planning Policy Guidance - Preparing a Local Plan Paragraph 018 it states:-

“The Local Plan should make clear for at least the first five years what infrastructure is required, who is going to fund and provide it and how it relates to anticipated rate and phasing of development”

This is clearly not the case in relation to the highway infrastructure requirements outside the sites WLP3.1 and WLP3.2. Although it can be argued that the need for major junction improvements will not be necessary in the first five years of the Local Plan, we at Beccles Society, believe that the scale of the problems of traffic congestion within the historic conservation area are such as to justify you highlighting the specific junctions needing to be improved. The number of houses are known for both WLP3.1 and WLP3.2, traffic analysis work has recently been undertaken this year by WSP, and there seems no reason why the critical junctions cannot be identified.

At present within the Plan it is left vague with prospective developers required to carry out a Traffic Assessment and Traffic Plan when submitting planning applications with any off site infrastructure generally funded by the Community Infrastructure Levy (CIL). The general public are therefore unaware of the scale of the junction improvements necessary and we believe that this is unreasonable.

In WLP1.4 it clearly states that all development will be expected to contribute toward infrastructure provision to meet the needs generated. As indicted above, the cost of improving these junctions is to be from the CIL. This is already being allocated within the Local Plan for the Beccles Area for contributions as follows:-

- 1) £546,000 for 274 sq. m. of extra floor space for Beccles Health Centre
- 2) Funding of £1.18 million split throughout Waveney for extra Police staff, vehicles and floor space.
- 3) £324,000 for extra floor space at Beccles Library.
- 4) £1.88 million for Beccles Sports Centre.

In addition any prospective developers have to fund highway and drainage facilities within WLP3.1 together with £500,000 towards the primary school, £460,000 for the sports facilities and £152,000 for the country park all via Section 106 or 278 agreements.

It is appreciated that the CIL is a pooled resource but presumably other areas of Waveney have a need to use it.

Taking the demand for funding in the Beccles area for CIL, we at Beccles Society, cannot see how any prospective developers of site WLP3.1 could possibly fund all their in site commitments together with their currently itemised off site ones, plus any highway junction improvements not yet specified.

When we met the Larkfleet developer he advised us that he could not afford to build a primary school until he had built 1000 houses. This was taken with a pinch of salt as it errs somewhat on the conservative side, but it nevertheless puts the scale of the proposed funding demands into perspective.

Existing car parks at Tesco, New Market and Hungate Lane are already full on many occasions. What provision is to be made for additional car parking to deal with the influx of new shoppers from the two main housing sites?

In conclusion, we have serious doubts about the ability of any developers to be able to fund all the currently identified CIL and Section106 commitments and would argue that you would be unable to demonstrate satisfactorily how any highway infrastructure improvements would be funded (without grant or Govt aid). Furthermore, we believe that for the avoidance of doubt, all necessary off site highway improvements should be indicated within the Plan so that developers are aware of any likely expenditure before putting options on sites.

Finally, we would like to give notice of our intention to be represented at the Examination in Public.

Yours faithfully

Paul Fletcher
Chairman, Beccles Society.

