

# Help plan the future of the District

Consultation - 18<sup>th</sup> August to 30<sup>th</sup> October 2017

Issues & Options for the Suffolk Coastal Local Plan Review



## Kelsale-cum-Carlton Parish Council Response

October 2017 – Version 1.0

Approved by the Parish Council on 25<sup>th</sup> October 2017

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### **Issues & Options for the Suffolk Coastal Local Plan Review**

#### **Introduction**

In developing its response to this consultation, Kelsale-cum-Carlton Parish Council [KcCPC] suspects it is like many other villages in Suffolk Coastal in feeling a deep sense of foreboding.

Apprehension that inappropriate and/or overdevelopment, the lack of infrastructural delivery, the absence of longer term sustainable village or local jobs and a continuing deficit of additional amenities will leave Kelsale-Cum-Carlton [KcC] as just another dormitory feeder village to the A12 commute and hence to Ipswich.

Moreover, there is a grave concern that during the plan period not only will the A12-B1122 route be bearing an inordinately high level of vehicular movements for Sizewell C, but that these and other smaller roads will simultaneously be subject to increased traffic movements for the various house building programmes and subsequently, the additional commuter traffic into and back from the Ipswich area.

Whilst recognising the complexity of a consultation of this type, KcCPC are further troubled by the degree of opacity of the document, alongside a seemingly inconsistent presentation and analysis of some data elements, in some cases making them irreconcilable or unfathomable to the reader.

Additionally, KcCPC are surprised and perturbed at the lack of vision, ideas, innovation and developed thinking being put forward in the consultation document to; sustain, develop and grow communities both existing and new.

For example, there is no promotion of concepts akin to '21st Century Villages', or architectural treatments to provide mixed residential and work environments in rural locations - the so called 'working community' or even closer to home appropriate reference to or inclusion of elements of exciting UK developments like Poundbury.

KcCPC holds the view that the Suffolk Coastal area is a valuable and diverse district where a very fine balance has to be struck in the development of new housing and considered decisions to be taken if Ipswich is to avoid becoming another Basingstoke and all the surrounding towns and villages for a twenty mile radius from becoming much the same as those in the North East corner of Hampshire.

#### **What is Kelsale-cum-Carlton?**

KcC comprises a combined Parish of two village entities (Kelsale & Carlton) and three historic Greens (Curlew, North & East). It is bisected by the A12, with the bulk of residents living to the east of this busy 'A road'. Additionally the Parish has a northern tail that runs to the A12 providing many Saxmundham residents and mixed commercial traffic with a primary route to and from the A12.

KcC comprises; circa 500+ households, many listed buildings, a small light industrial estate, a primary school, a number of places of worship, a listed Village Hall & Centre, Social Club, Public House, several formal and informal nature reserves, 0.5 day a week Post Office facility, visiting library service, several large farms and a number of smaller farms and agricultural business, all based on a substantially agricultural swathe of land surrounding the main residential centres.

Local employment opportunities are low with jobs at industrial estate companies and agricultural businesses polling staff from Saxmundham, Leiston and villages within a 5-10 mile radius.

The village does however have a significant number of self employed and micro businesses (builders, plumbers, electricians, etc.) providing a range of services to the whole Suffolk Coastal area. It also has a small number of tourist oriented businesses (holiday rental, glamping, camping & caravanning, sport & recreation, etc.) offering further part-time employment opportunities.

### **KcCPC's Response**

With limited time to respond to this proposal and resources already committed to a Conservation Area Proposal, the Sizewell C development proposal and a Neighbour Plan initiative, KcCPC has had little time to undertake a full consultation of residents before compiling this response.

However, pulling together strands from these other activities and taking soundings from a small but representative sample of residents, employers and interested parties, KcCPC believes it has made every effort to make a qualified and substantive response.

## Part 1

### Strategic/Cross Boundary Issues for Ipswich BC & SCDC

#### Key Issues

##### **Q01 Are there any other issues that the Local Plan should consider?**

This consultation attempts to consider long term needs and possible solutions over a 15 to 20 year period.

There are multiple challenges with this type of analysis – as it combines regional macro-economics with demographics over a long period. In addition the authors have taken account of the Suffolk Coastal District Council's aspirations in terms of employment/business growth rather than taking the trend and making an assumption about how that might continue.

It could be argued that the consultation is trying to limit its scope to the scale of growth and where it should be located (See Page 1).

However, KcCPC do not believe they should limit themselves and will phrase their responses with regard to the priority considerations A to E also set out on Page 1 of the Consultation Document.

#### What is the vision for Ipswich HMA & FEA?

##### **Q02 What are the advantages of your area that should be protected through local plans?**

KcC has its own distinct identity and sense of community which it wishes to keep. Moreover, it sees considerable risk to that sense of community arising from any merging of boundaries with Saxmundham. These impacts can be typified as similar to those felt by the likes of Basing, Chineham, Kempshott and other villages during the expansion of Basingstoke over the preceding 40 years or so.

##### **Q03 What are the disadvantages of your area that the local plans could try to address through the way land is used or developed?**

KcC has little in the way of local employment and the more rural areas do not have access to reliable and sensible speed broadband services.

The value of tourism is increasing as farmers and households look to this to bolster income whilst others are moving to the area for its heritage, architecture, peace, lack of light pollution, beautiful hedgerows, green spaces and natural beauty.

The increase in tourism and second home ownership is a double edged sword as it does not necessarily further engender community or social cohesion. It also removes previously affordable housing stock from the local population and their children. To avoid resentment in the future as local youngsters cannot afford to get on the inflated price housing ladder, if nothing can be done to protect existing properties, consideration must be given to new ones being built on the basis they are for permanent residential purposes only. KcCPC understands that there are established

precedents for this type of action in areas where second home ownership threatens community cohesion.

**Q04 What are the key priorities you would like to be addressed by 2036 – in the places across Ipswich and Suffolk Coastal where you live work or study?**

1. Reliable high-speed broadband in all rural locations,
2. Enhanced infrastructure to sustain the population we currently have, particularly schools, further education and health services.
3. All new housing to be affordable, built in styles sympathetic to the village vernacular and having integral water and energy efficiency features together with adequate parking arrangements, commensurate with the number of occupants and their style of occupation.
4. Access to local employment without having to travel down the A12 and drive miles (assuming roads are clear) to go to work.

**Q05 What is your vision for the Ipswich HMA (Housing Market Assessment) and Ipswich FEA (Functional Economic Area) by 2036?**

As identified in the introduction, there is no promotion of concepts akin to ‘21st Century Villages’, or architectural treatments to provide mixed residential and work environments in rural locations - the so called ‘working community’ or even closer to home appropriate reference to or inclusion of elements of exciting UK developments like Poundbury.

This sort of omission, coupled with the profound lack of vision and thought leadership from the authors of this consultation document has led to a degree concern within KcCPC that the consultation is an expedient rather than one designed to find innovative treatments of a known UK wide problem, whilst retaining Costal Suffolks’ community and character.

Equally, to ask a small village Parish Council to express a view on the potential vision for Ipswich HMA & FEA nearly 20 years hence seems an unlikely ask.

There was a time when a ‘20 year window’ would seem a relatively easy period to make sense of an achievable vision.

Today however, it seems a challenge to envision the next 20 years with any degree of certainty that could not rapidly become derailed by national and international decisions in the very short term. For example;

BREXIT – in or out, soft or hard, import & export impacts, European Nationals, farming subsidies, etc.

SIZEWELL C – on or off, single campus or multiple, road traffic & routing, etc.

CLIMATE & ENVIRONMENTAL– East Coast rainfall deficit, water abstraction, pollution, etc.

TRAFFIC – social trends, employment proximity, public service transport, diesel debate, etc.

GEO POLITICAL – Syria, Middle East, post Brexit Europe, US, N Korea, etc.

LOCAL – demographics, employment, skills, infrastructure, health, schools, social care, etc.

That said, KcCPC views its future and those of its residents in a fundamentally different way to the overall feel a reader is left with after reading the consultation document.

20 years hence KcCPC expects to see Parish agriculture having to have changed significantly.

Amongst the things driving this change are likely to be;

- removal or at least significant reductions in farming subsidies as a result of BREXIT
- increased water abstraction rates as a result of the continuing East Coast rainfall deficit
- large scale arable operations becoming unprofitable
- land prices may slide although the further collapse of the £ after Brexit and a possible Socialist government may make it more attractive to foreign buyers unless legislation comes in to prevent this

New desalinated water extraction techniques could be implemented to exploit the huge resources of the North Sea in order to offset local rainfall deficit and abstraction rates. However, currently the cost of them would be prohibitive and although the value of water in the East is sometimes high it is not currently high enough to justify the technology. But in twenty years time?

Consequently 20 years hence there is an agricultural revolution looming but it probably won't benefit the deepest countryside very much. A new generation of landowners with more market led views may however create more jobs and value-added products as technologies like hydroponics will challenge rural agriculture, taking place closer to the markets and potentially in cities themselves.

The countryside will likely become even more of a leisure asset which attracts people from the overcrowded urban areas. However, housing pressures both locally and nationally may lead to further national and local legislation seeking to reduce levels of second and holiday home ownership, particularly if a Socialist government is returned. It may also provide more ecosystem services which are generally regarded as a good thing, but do not necessarily generate new jobs unless something is done to attract new job creators to rural areas.

One way we can change things is to build houses which young, working age people can afford to live in. Redundant farm buildings and other outbuildings could be converted into combined residential and workspace environments for a wide range of creative, technology, craft and knowledge based micro, mini and collaborative businesses.

In addition we need to rebase our planning environment so that it encourages rural employment, not just micro, mini and small, but also businesses which can employ larger numbers of people with lower levels of training and experience, perhaps working towards apprenticeships and further development and education in employment.

KcC at least has reasonable access to Saxmundham and less easily Leiston, but it still needs more local jobs for people who don't have cars and struggle even to find the work and stick at it.

KcC believes a more flexible treatment of planning at traditional farms might help as they are up and running and managed by people looking for diversification opportunities and who are likely to be accepting of new enterprises to take root.

In summary, a KcC vision would be pivotal on the building of affordable homes for the less well off of what is a predominantly rural and agricultural parish, especially those who are members of multi-generational resident families and therefore already have resilience to the problems of rural life in their wider family support systems.

These new homes are also needed to enable people to feed into newly created jobs in the local community, supported by more sympathetic planning and better infrastructure, particularly connectivity, schools & education, health resources and social care.

**Q06 Which growth scenario should we plan for across the Ipswich Housing Market Area?**

As far as KcCPC can see there is no meaningful analysis of the impact of each option. So they have tried to focus responses on the impact of each option on our KcC.

**How much growth in jobs & homes should be planned for?**

**Q07 Do you have evidence to suggest that the housing and/or jobs targets should be different from the forecasts or scenarios outline above – either higher or lower?**

As modelling is difficult (and subject to sensitivity analysis) a degree of flexibility will be required to adapt the plan as the differences between expected and actual experience start to emerge.

**Q08 Would communities be prepared to accept more growth if that growth meant that significant new or enhanced infrastructure could be provided?**

No, infrastructure is currently inadequate and needs to improve before further development should be considered.

**Q09 What key pieces of transport infrastructure should be sought? Would it be roads such as an Ipswich northern route, or a sustainable transport infrastructure (public transport, park and ride, cycling), or both?**

A sustainable planned and integrated transport infrastructure strategy (public transport, park and ride, cycling, etc.) should be developed, reflecting the longer term needs and evidenced gains to Suffolk Coastal's residential and business communities.

**Q10 Should the Local Plan Review seek to address the issue of temporary closure of the Orwell Bridge by planning for a scale of development that can help to deliver infrastructure?**

This 'micro' issue should rightly be considered within the 'macro' strategic planning sought in Q09 above.

**Q11 Do you agree that providing a high growth scenario would help deliver the affordable housing required?**

No, that is akin to presenting inflated customer numbers in a business plan in order to secure Bank finance. Unless there is evidence that high growth scenarios are likely, then they should not be presented – unless they are accompanied by low growth scenarios. This then enables a full range of potential outcomes to be considered.

The numbers presented relate to the complex interactions between the demographics and the economics. There clearly is a model but it is difficult to reconcile the numbers given. The outputs from the model are presented in a deterministic fashion without the normal set of qualifications one might expect around the assumptions and how they might change the outputs.

The presentation of the numbers could have been enhanced either by producing a fan chart or by presenting plausible alternative scenarios by a tweaking of the assumptions. In any case this has not been done, and for interested respondents it is difficult to identify what the model is most sensitive to. For example even if the aspirations for future job growth are met, does it matter what types of industries grow and where they locate?

Without a better understanding of the key features of the model it is very difficult to give any meaningful view on the amount of growth that will need to be accommodated.

**Q12 Are there alternative scenarios which could be considered?**

See response to Q11 above.

Once an understanding of the model and the relative sensitivities of different variables are understood, KcCPC may be in a position to provide a considered answer to this question. Otherwise any answer is likely to be pure speculation and potentially create ‘flights of fancy’ – KcCPC is sure that this is not what is wanted of respondents

## **Where should the growth go?**

**Q13 Which distribution options do you think would be most appropriate to take forward?**

The favoured approach which KcC could support would be Option 4, the continuation of the existing approach.

We could support this as KcCPC believes that the sensible growth of the existing settlement hierarchy, cognisant of the employment, retail and housing opportunities and their constraints, seems to offer a balanced accommodation of aspirations for the Ipswich HMA & FEA, ahead of any game changing infrastructural or commerce based strategies that have yet to be surfaced, consulted on and agreed.

However, KcCPC wish it to be known that even this support may be tested if wide ranging issues pertaining to the development of Sizewell C induce further and/or unnecessary strain on existing infrastructure and services. As consultation on Sizewell C is yet to be completed and the National and multiple Local Authority positions clarified, KcCPC believes it would be disingenuous to make unqualified support for any option whilst this remains the case.



KcCPC are not in favour of Option 5 because it believes a disproportionate focus on Saxmundham without commensurate, agreed, well understood longer term strategies for Health & Dentistry, Roads, Housing, Traffic Management, Social Care, Education, Public Services (Police, Fire, Ambulance) etc. being in place would lead to an untenable decline in the living and working conditions of Saxmundham and the surrounding villages who rely heavily on the existing and heavily overloaded capabilities.

For the same reasons as above KcCPC are not in favour of Option 6.

In addition, without all settlements being identified specifically, KcCPC assume that a significant proportion of the 'A12 Corridor Settlements' referred to, will similarly to Kelsale cum Carlton, be directly impacted by the Sizewell C construction project and associated traffic movements on the A12 & B1122 proposed route.

Moreover, KcCPC believe these impacts will be further exacerbated by other increased traffic movements on local roads, where, as yet, there are no reassurances in regard to disallowing 'rat run self routing' to unnecessary on-site parking at the Sizewell C site(s).

In summary, for a significant portion of the period covered by this Consultation it is KcCPC's contention that the so called 'A12 Corridor Settlements' will effectively become hostage to the vaguest of planning assumptions currently being outlined during the Sizewell C Consultation process.

All evidence, via Freedom of Information Requests [Fol] made on behalf of KcCPC seem to indicate that neither EDF, SCDC, SCC or the Government Departments concerned have a single view, let alone a joint agreement on what approach(es) are appropriate for Sizewell C.

Consequently, without joint agreement, concluded consultation on Sizewell C ameliorations, allocated and secured funding for aforesaid ameliorations and an implementation timetable, KcCPC could not possibly consider, let alone commit to Option 6.

**Q14 Are there any other distribution options that the Councils should consider, including across the whole of the Ipswich Housing Market Area?**

The remit of KcCPC extends to the interests of KcC residents and businesses. Therefore, KcCPC believe it would be wholly inappropriate to propose or promote unsponsored distribution options that potentially have a widespread impact on individuals, communities and other Parish Councils with the correct remit.

Nevertheless, a baseline model using an equal distribution algorithm for all communities above a certain threshold might put a different complexion on the size of the issue as it pertains to all communities in Suffolk Coastal.

**Q15 Should the spatial distribution of jobs growth align with housing growth or should we take a different approach which focuses on improving accessibility between homes and work places?**

KcCPC takes the view that on a macro level sustainability of the planet is a major consideration in deriving the 'correct' spatial distribution. That is to say, the optimum 'micro' position might be considered to be that employment and housing strategies are aligned, reducing unnecessary travel between home and work, all the time being cognisant that the 'materials in' & 'products out'

considerations may also have a significant and disproportionate bearing on the pursuit of such a strategy.

Consequently, potential employment style preferences where this might be more readily achieved could be; telephone and web based customer service, knowledge based workers, craft industries, web and app development activity, professional and support services, etc.

**Q16 Do you have evidence which indicates that building at higher densities in Ipswich and Suffolk Coastal would be viable financially?**

KcCPC takes the view that housing density should not solely be seen as a financial performance issue (“viable financially”).

It believes there is sufficient weight of well documented evidence suggesting that high density housing in the 1950’s and 1960’s demonstrate housing density ‘tipping points’ in terms of both social tolerance and cohesion, and were considerably lower than those forecast when undertaking the building of local authority ‘tower blocks’, ‘unified living spaces’ and ‘high density Local Authority estates’.

It is difficult to see why 21<sup>st</sup> Century outcomes would or should differ materially from those of the 50’s and 60’s.

Consequently, KcCPC takes the view that it is the responsibility of the planning authorities to take suitable advice on the social, holistic and whole life costs of permitting high density developments, prior to giving approval for them.

**Q17 Should the policy approach of maintaining the physical separation of villages from Ipswich be continued or should infill in gaps between settlements be considered a source of housing land?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to propose or promote the ‘infill in gaps between settlements’ for “villages from Ipswich’ given that such a policy might potentially have such widespread impacts on individuals, communities and other Parish Councils with the correct remit.

In respect to the question were it to be applied to KcC and Saxmundham or Theberton, or Yoxford or Leiston – KcCPC would fight any proposal so to do.

KcCPC believes that as a community, KcC has a distinct and different character to those of the neighbouring communities and whilst KcC happily collaborates with one another for the betterment of all (e.g. joint Remembrance with Saxmundham, separate and non-conflicting 5<sup>th</sup> November arrangements, etc.), physical separation plays an important part in maintaining respect for the differences that distinguish one from another.

**Q18 If development cannot be accommodated within Ipswich, should it be focused within the communities close to Ipswich or distributed within the larger Ipswich Housing Market Area? What criteria should guide its location?**

See answer to question 15.

KcCPC suggest that where residence and working could be combined as described in Q15 than spatial distribution outside of Ipswich might be viable subject to the telecoms and other infrastructure (health, education, etc.) being available.

**Q19 Should Ipswich switch employment use to housing use, even though the Borough has a high jobs target? Where should the Council prioritise protecting employment land?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to propose or promote ‘...Ipswich switch employment use to housing use...’ given that such a policy might potentially have such widespread impacts on individuals, communities and other Parish Councils with the correct remit.

In respect to the question were it to be applied to KcC, each case would have to be judged on its merits.

However, broadly anything that removes viable commercial property and hence employment from the Parish would have to be shown as unsustainable as a viable commercial site prior to getting any form agreement.

Overall a mix of housing and employment is essential, extending to potentially building purpose specific residential accommodation combined with employment use (e.g. a smithy, a farriers yard, a craft workshop, a micro brewery, etc.). Irrespective of purpose, KcCPC is seeking well designed innovative & sustainable buildings which fit in with the village vernacular and/or their landscape (e.g. converted farm outbuildings, water towers, etc.).

**Q20 Is there any other land within Ipswich Borough which should be considered for residential development? Is the approach to protecting open space the right one?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to propose or promote the ‘other land within Ipswich Borough’ given that such a policy might potentially have impacts on individuals, communities and other interests within Ipswich Borough.

**Q21 Where do you think the most appropriate locations are to meet this need (Gypsy, Traveller, Travelling Showpeople & Boat Dwellers)?**

KcCPC are not familiar with the specific requirements to meet the needs of Short Stay Sites, Residential Pitches or Residential Moorings. It assumes that with no coastal access KcC sites will have no suitable sites for permanent residential moorings.

In respect to Short Stay Sites and Residential Pitches, lack of understanding of the specific and/or any mandatory requirements mean KcCPC is unable to put forward any site suggestions at this time.

## **Provision of Retail & Leisure Development**

### **Q22 Which town centres should we plan to expand?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward 'town centres' which should be expanded given that such a suggestion might potentially have impacts on individuals, communities, businesses and other interests within Suffolk Coastal towns.

However, KcCPC believes that Suffolk Coastal should actively be encouraging businesses to populate high streets rather than migrate to out of town centres, leaving the centre desolate and lifeless.

### **Q23 Are there town centres that should be reduced in size?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward 'town centres' which should be reduced in size given that such a suggestion might potentially have impacts on individuals, communities, businesses and other interests within Suffolk Coastal towns.

However, KcCPC believes that Suffolk Coastal should actively be encouraging businesses to populate high streets rather than migrate to out of town centres, leaving the centre desolate and lifeless.

### **Q24 Which sites should be identified through the Local Plan reviews for future retail growth?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward 'sites' which could be earmarked for 'future retail growth' given that such a suggestion might potentially have impacts on individuals, communities, businesses and other interests within the Suffolk Coastal area.

However, KcCPC believes that Suffolk Coastal should actively be encouraging businesses to populate high streets rather than migrate to out of town centres. Moreover, KcCPC believes that a vibrant high street is further assisted by the provision of easy to use and affordable public transport to and from them. In order to facilitate this KcCPC believe that the previously mentioned (Q09) 'sustainable transport infrastructure' should incorporate specific requirements to re-link villages and rural communities with the high streets of towns in the Suffolk Coastal area via easy to use and affordable public transport.

### **Q25 How do we increase the range of uses or activities in Ipswich town centre, given its role as a regional centre, and what should they be?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward or promote ideas for activities in Ipswich Town Centre given that such suggestions might potentially have detrimental impacts on individuals, communities, businesses and other interests within the greater Suffolk Coastal area.

However, KcCPC is interested in the implication that Ipswich is in some way undercooking its "...role as a regional centre..." and in that context is interested to understand what steps have or are planned to remedy these apparent shortcomings.

KcCPC is also interested to understand which UK regional centres Ipswich aspires to emulate, before considering what and whether it can contribute anything to aid that ambition.

**Q26 What range of uses or activities would you like to see in the smaller town centres?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward or promote ideas for uses or activities in 'smaller town centres' given that such suggestions might potentially have detrimental impacts on individuals, communities, businesses and other interests within the greater Suffolk Coastal area.

In general terms KcCPC perceive that Ipswich and the other towns in the Suffolk Coastal Area need to be attractive to two broad audiences if they are to be viable and sustainable commercial centres.

Firstly, attractive to the residents and businesses of Suffolk and secondly to the visitors to Suffolk who may holiday, stopover or just visit for the day.

These potential audiences, beyond the basic offerings that seemingly should be available in all towns (food, drink, Post Office, access to money, etc.), need the Suffolk Coastal area to offer a diverse range of interesting, varied and affordable facilities, experiences and entertainments.

However, because the Suffolk Coastal area is not that large it may not be necessary for each individual town to offer the full range. Indeed it might be counter productive if the Suffolk Coastal towns don't collaborate to provide a broad range of complimentary attractions, facilities, activities, experiences and entertainments.

The more pertinent question would seem to be whether the optimum outcome is best delivered through public sector pre-planning & design or by experiential development generated by private sector innovation & experimentation, with the strongest prevailing?

It may be that Suffolk Coastal wide agreement could be effective (including pre-agreed planning conventions) if, for example several smaller towns were to jointly agree a plan for the exclusion of traffic from their individual town centres and an increased car parking provision at the periphery of the exclusion area (e.g. Halesworth), for a better and wider range of uses of the created pedestrian thoroughfares.

**Q27 What approach should be taken to further out of centre shopping? Does out of centre shopping complement or compete with the existing town centres?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward or promote ideas for more or less out of centre shopping given that such suggestions might potentially have detrimental

impacts on traffic levels, individuals, communities, existing businesses and other interests within the greater Suffolk Coastal area.

KcCPC suspects that the thinking of KcC residents on out of centre shopping is as divided as in any other community and that there is equally contradictory evidence both for and against out of centre shopping.

That said, a considerable number of Suffolk Coastal small town centres seem to reflect a growing national phenomenon with only Charity Shops, Newsagents, Hairdressers, Coffee Outlets, National Micro Supermarkets, Small Local Chains and a considerably depleted number of specialist shops remaining.

Most recently of course this trend has also seen further retrenchment by banks to the larger towns, presumably not as a result of out of centre shopping but because of a trend to cashless payment and the increasing cost of maintaining a high street presence for fewer products and services.

However, a major consideration in respect to out of centre shopping has to be the additional mid-distance traffic movements generated by out of town centres and the resilience of Suffolk Coastal roads in dealing with further increases.

On a recent business trip to Martlesham, a KcC village resident identified peak time southbound A12 traffic in excess of 80% (by volume) leaving the A12 at the so called Tesco roundabout, with further traffic taking the same exit from the Northbound flow.

Granted some of this traffic may have been seeking quicker access to Adastral Park to avoid the solid queue between the roundabouts, but nevertheless the overall impact of this particular out of centre shopping facility on the primary coastal route is considerable.

**Q28 Should the existing retail parks be considered as centres in their own right, or should town centres continue to be the first choice location for new shops and leisure uses?**

Please see the answer to Q27 above.

## **Infrastructure**

**Q29 What infrastructure is currently required in your area and what additional infrastructure do you think would be needed, and where, to support the future distribution and levels of growth outlined?**

KcC currently relies on Saxmundham to a greater extent and Leiston to a lesser extent for the access to everyday infrastructural and frontline services. Most notably these are; bus & rail access, GP health & dentistry, land based telephony & broadband services and is working with Saxmundham and Benhall on a cycle scheme linking the three communities.

KcC is divided by the A12, with the smaller portion lying to the west of the A12.

KcC has direct access to the A12 at three points on the southbound side; via Carlton Road, Main Road and North Green and also an exit on the northbound side more or less opposite the Carlton Road junction.

KcC also has indirect access via exits at Saxmundham and through Saxmundham and onto the Benhall junction.

Access to the B1122 can be made indirectly from KcC via several points along its length at; Middleton Moor, Fordley Moor, Hawthorn Road, Pretty Road, Moat Road, Harrow Lane onto Abbey Lane and Theberton Airfield onto Abbey Lane.

KcC has limited direct access to any scheduled daily bus service with the nearest access point for regular services being in Saxmundham.

KcC has a local school which takes children aged 4-11 from Kelsale, Saxmundham and a range of other villages in the Saxmundham area.

KcC has no healthcare provision relying on GP services in Saxmundham and dental services in Saxmundham and Leiston as well as further afield.

Like most villages in Suffolk, KcC relies on remotely stationed; ambulance, fire and police services centrally controlled by their respective headquarters.

The central parts of Kelsale & Carlton are fed from Saxmundham telephone exchange to one of two fibre cabinets potentially enabling these areas to obtain good quality telephone services and high speed broadband.

The areas west of the A12, North Green, East Green and the properties at the northern extreme of the Parish boundary are not able to receive good quality telephone or broadband services.

Significant portions of KcC are not served by mains drainage nor have gas supplies available to them other than privately sourced bottled gases.

The Ipswich to Lowestoft railway line goes through the village in a cutting to the east of Kelsale village centre.

KcC has a large recreational space adjacent to the Kelsale village centre and a smaller green area provision integral to the former centre of Carlton. These are supplemented with a network of paths crossing the Parish and adjacent to the surrounding farmland.

The Kelsale Village Hall is a two storey building in the centre of Kelsale and is managed by an independent Trust. It is used by KcCPC and various other groups for meetings and events. It also has a free to residents' high speed broadband capability, jointly provided by KcCPC and the Trustees of the Village Hall.

The Village Hall also provides a home to the Kelsale Social Club a long standing membership club housed on the ground floor.

There is one other licensed premises, the public house in Carlton 'The Poachers Pocket' in Rosemary Lane.

KcC has three churches, two Church of England (one in Kelsale and the other in Carlton Park) and one Methodist Chapel in Kelsale. Plans have been submitted for the development of a Plymouth Brethren Meeting Hall in Carlton.

KcC has a small industrial estate adjacent to its border with Saxmundham containing a mixture of offices, manufacturing businesses, warehousing, the UK Power Networks area depot as well as a childrens play centre.

KcC hosts one formally recognised Nature Reserve (Simpsons Fromus immediately adjacent to the A12), a Roadside Nature Reserve (at North Green Crossing) and a private informally designated nature reserve.

In addition KcC hosts important natural habitats that support populations of; various deer, bats, newts, frogs, toads, orchids, sulphur clover, Dyer's greenweed, various birds including; Turtle Doves, Buzzards, various birds of prey, songbirds and significant annual flights of migrant species.

As would be expected there are also considerable 'set aside' field boundaries which play host to a wide range of species.

Currently, KcCPC believes that there are infrastructure deficits in five key areas:

**Health provision** – KcCPC recognises the pressure on Saxmundham GP services and believes that the physical facility (the Saxmundham Health Lambsale Meadow) needs augmentation as well as an increase in the number of General Practitioners and people providing complimentary services, prior to any further increment required as a result of development proposals.

Dependent on the development outcome of this and subsequent consultations, KcCPC recognises that additional health facilities might more sensibly be built into any planning requirements and looks forward to being consulted on the proposed approach for health service delivery across Suffolk Coastal coming out of this and future consultations.

**Telecommunications** – KcCPC is very aware of the lack of reliable and good quality terrestrial & mobile whole market telephone services outside of the central areas of KcC.

Moreover it is acutely aware of the gulf in reliable, good quality broadband services between the village centre and those experienced by residents no more than a mile distant.

This has led to KcCPC & Kelsale Village Hall & Centre Charitable Trust making available a free to residents' high speed broadband capability in the village hall. However this can only be regarded as emergency access for any KcC resident, as it does nothing to deliver outlying residents with these facilities in their own homes and businesses.

Over the past three years KcC has lost rural jobs to towns further afield (e.g. Woodbridge) and existing and emerging tourist businesses are struggling to maintain growth against a backcloth of low speed, unreliable broadband service.

KcCPC believe that as well as delivering, high speed rural (in the true sense) broadband, better quality and reliability telephone services (mobile and terrestrial) to existing homes and businesses



across the KcCPC area, these must be a pre-requisite of any development options coming out of this and any further consultations.

**Education** – At present there is one school in KcC, a Church of England VC Primary School. Currently Kelsale School has vacant places for pupils in 4 of the 7 year groups (3 year groups being full). This means that they are having to turn families away with more than one child, if one child needs a place in a full year group.

Kelsale School has 14 places vacant out of approximately 170 (i.e. 8%), Saxmundham School is full and Benhall has a few vacant places.

Additional houses recently occupied in Saxmundham have provided some new pupils but not as many as expected as yet. It is assumed some unrealised demand is that of young families (possibly having pre-school children) and of course older people, **BUT** the expectation is that demand for places will continue to rise in the short to medium term.

There is no preschool in KcC and the Headteacher indicates that this is a deficiency in provision and an essential facility needed as many current pupils travel to Benhall, Sibton or Middleton for preschool education.

Clearly, if some of the new residents of any future planned development are younger, then this need will rise further.

The school has pupils who live in Kelsale that have not attended preschool as they have not been able to get to those nurseries and/or the Saxmundham Nursery (Meadowbrook) has not had vacant places.

Any further development in KcC would require further extension to the current school and demand that KcC has its own pre-school facility to work with or be a part of the existing school.

Moreover, any further expansion would potentially exacerbate the morning and afternoon traffic issues that remain unresolved.

There is no public transport to or from the school and parking is in the main limited to on street parking on Carlton Road, a through route to and from the A12.

Currently, this is of grave concern to parents, teachers, Governors and local residents.

It not only cause bottlenecks twice a day but also means young children have to cross a busy road without the benefit of either a crossing or a 'safe' car parking facility capable of dealing with increased children numbers.

**Green Infrastructure & Habitats** – KcC already plays host to the Simpsons Fromus Nature Reserve, designated Roadside Nature Reserves at North Green Crossing and at least one privately owned and informally designated nature reserve.

KcCPC is extremely concerned that the increased HGV (and other vehicle types) traffic movements on the A12 postulated by the Sizewell C Consultation will severely and detrimentally impact Simpsons Fromus as well as other habitats in close proximity to the A12.

Moreover, with (as yet) no robust agreed alternative routing in the event of the A12-B1122 route becoming temporarily closed or lost for a longer period, KcCPC is concerned that other vulnerable roadside habitats and sensitive areas will be damaged by uncontrolled and unmonitored use of local roads as short cuts, unofficial diversions, rat runs and 'sat nav' routings.

Consequently, prior to any agreement on developments giving rise to increased traffic movements on the A12, KcCPC wish to ensure that all existing KcC Nature Reserves and wildlife habitats are identified and safeguarded against detrimental impacts directly and indirectly caused by those traffic movements – including the assessment of local roads and verges for the implementation of a traffic control measures plan, enforceable in law.

To maintain the green space balance and the environmentally rich landscapes of KcC in the future, KcCPC is currently in the second consultation cycle for a Conservation Area, Neighbourhood Plan and is also formulating a Bio-diversity Plan.

Consequently, KcCPC's Planning Committee will also be looking to maintain a sensible balance against these provisions when asked to comment on planning applications prior to consideration by SCDC.

**Transport** – KcC has a varied socio-economic and age demographic, not all of which has ready access to private transport, relying instead on a mix of friends & neighbours, communal services, public hire and public transport services for the conduct of everyday life.

Currently the only scheduled public transport (a Border Bus) service passing through KcC is the 512 Halesworth-Aldeburgh-Halesworth. A service that operates once to Saxmundham, Leiston & Aldeburgh at 07:59 and four times a day to Yoxford, Darsham, Bramfield & Halesworth at 09:39, 12:39, 15:39, & 18:05.

With these restricted bus services, the only other option for some KcC villagers is walking into Saxmundham to access public service transport.

Consequently, it is essential further consideration be given to the substantial work and investment required to deliver the integrated transport services mentioned in the consultation. To not do so will invariably lead to further rural isolation and the social and economic privation that it brings.

KcC residents with private transport wishing to travel beyond the immediacy and the towns of Saxmundham and Leiston inevitably access the A12 North or South.

Access is gained at the northern end of the old A12 passing through KcC, via Carlton Road passing Kelsale School or via Saxmundham and out to the A12 via Brook Farm Road or Rendham Road (B1119) or onward to Benhall and out on the B1121.

Each of these routes onto the A12 is hazardous at peak times if attempting to cross the southbound traffic stream to go north and pose the same problems if returning from the south and again crossing the southbound flow to enter KcC.

With increased HGV and mixed traffic flows arising from Sizewell C for 10+ years and the increased traffic movements from south and/or north, generated by the outcome of the SCDC Local Plan

Review (whatever it be), it is essential that a traffic study be undertaken to establish which of these routes (possibly all of them) would benefit from roundabout access to the A12.

Special attention should be paid to the Rendham Road (B1119) and Carlton Road junctions where the same issues arise for people entering the A12 from the western side.

**Q30 How can the strategic transport connections be enhanced and improved?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward or promote ideas for the improvement or enhancement of strategic transport connections when it has no body of knowledge and/or expertise in the planning of transport systems.

KcCPC wish it to be noted that it does not have an understanding of the modelling or tools to understand the potential impacts on individuals and communities of making changes to strategic transport connections. Moreover, it is disappointed at the paucity of opportunities or ideas put forward at this time for consideration and comment.

**Q31 In which areas should “super surgeries” be considered?**

Having spoken with Saxmundham Health Lamsale Meadow, KcCPC are advised that so called “super surgeries” are not being considered at this stage, but that it will be kept under review.

Saxmundham Health Lamsale Meadow view that it might be more useful in urban areas where there is a higher population density (i.e. Ipswich).

**Q32 Is there a need for additional education provision in certain areas of the Housing Market Area, including early years and special educational facilities, and if so what is the need and where?**

There is one school in KcC at present, a Church of England VC Primary School. Kelsale School has vacant places for pupils in 4 of their 7 year groups (3 year groups are full). This means that currently families are being turned away with more than one child, if one child needs a place in a full year group.

Kelsale School has a total of 17 vacant places, Saxmundham School is full and Benhall has a few vacant places.

The additional houses recently completed in Saxmundham have provided some new pupils, but not as many as forecast at this point. It is assumed some are young families (possibly having pre-school children) and of course older people with no Kelsale School age range children.

BUT, the expectation is that the demand for places will continue to rise.

KcC has no pre-school provision and the Kelsale School Headteacher has indicated that this is already an essential facility with many of her potential pupils travelling to Benhall, Sibton or Middleton for pre-school education.

Clearly, if the new residents of Saxmundham developments are younger, then this need will continue to rise.

The Kelsale School currently has pupils who live in Kelsale and have not attended pre-school as they have not been able to get to the previously mentioned nurseries and the Saxmundham Nursery (Meadowbrook) has not had vacant places. It is the contention of the Kelsale School Headteacher that it would be pragmatic for KcC to have its own nursery/pre-school facility to work with or be integrated as part of the existing school.

What is clear is that any housing development in the area surrounding Saxmundham would definitely need further extension of Kelsale School and provision of a complimentary pre-school capability.

**Q33 What kind of outdoor recreational spaces would you like and where should we locate them to reduce pressure on the more sensitive coastal areas? What other measures could be put in place to protect sensitive environments?**

Earlier this year KcCPC embarked on the process of engaging residents in drawing up a Neighbourhood Plan. Consequently it is a little early to set out an agreed, clear and detailed provision.

However, what we know so far is that residents are welcoming the opportunity to increase outdoor facilities for children and adults in the village. Nevertheless until ideas have been developed and put out for consultation with the village, we are no position to give a more detailed response.

That said it is clear that a significant proportion of KcC residents currently exercise peaceful enjoyment of surrounding agricultural land, utilising the full range of public paths and lanes whether on foot, cycle or horse.

Consequently KcCPC are committed to maintaining this amenity and safeguarding the safety of residents and visitors on the footpaths and lanes.

As in the previous question (Q29) above - prior to any agreement on developments giving rise to increased traffic movements on the A12, KcCPC would wish to ensure that all existing KcC Nature Reserves and wildlife habitats are identified and safeguarded against detrimental impacts directly and indirectly caused by those traffic movements – including the assessment of local roads and verges for the implementation of a traffic control measures plan, enforceable in law.

## PART 2

### Vision

#### **Q34 What makes a successful community in Suffolk Coastal?**

As in the previous question (Q33) KcCPC are working with the residents of KcC to develop a neighbourhood Plan which will develop to a far greater extent what KcC residents view as a 'successful Kelsale-cum-Carlton community'.

That said, it is often viewed that the qualities of 'successful communities' are as varied as those people that constitute any particular community.

Moreover, most people seem to agree that the definition of 'successful' must emanate from a shared understanding of what 'success' looks & feels like. In turn it is that 'success' that must be experienced by those in the community for it to truly be regarded as 'successful'.

So, whilst any village or town may regard itself as a 'successful community' within the parameters of what it has defined for itself, this may not necessarily be obvious (or experienced) by those outside of that town or village, or indeed make for a model that can be replicated elsewhere.

By the same token, a group of like minded people operating at an individual street level in a village or town (or Tower Block in a city) may regard themselves as a successful community, working with each other for collective betterment.

#### **Q35 What services/facilities/developments are needed to make a community successful?**

Please see Q33 & Q34 above.

KcCPC will have a far better understanding of the specifics necessary to make KcC a more 'successful community' as it develops the Neighbourhood Plan in the coming months.

Irrespective, it is imperative that major strides are made in KcCPC's overriding priority areas of:

1. Reliable high-speed broadband in all rural locations,
2. Enhanced infrastructure to sustain the population we currently have, particularly schools, further education and health services.
3. All new housing to be affordable, built in styles sympathetic to the village vernacular and having integral water and energy efficiency features together with adequate parking arrangements, commensurate with the number of occupants and their style of occupation.
4. Access to local employment without having to travel down the A12 and drive miles (assuming roads are clear) to go to work.

#### **Q36 What is your vision of a local community?**

Earlier this year KcCPC embarked on the process of engaging residents in drawing up a Neighbourhood Plan. Consequently, it is working to develop an agreed, clear and detailed Vision for KcC as a community.

**Q37 How should the Council define housing requirement figures for Neighbourhood Plan groups?**

KcCPC would like to ensure that housing requirement figures be drawn up in consultation with KcCPC, taking into account current infrastructure (or lack of it) and that any future figures take into account the fact that KcC is a small village with its own discrete identity and ensure that future growth is proportionate.

As mentioned at the outset of this response, there is a significant volume of time proven case evidence in areas like Basingstoke & Deane Borough Council that demonstrate and contrast the pro's and con's of different approaches that have been taken to development in villages.

For example compare and contrast the absorption of villages like Chineham and Kempshott with the comparative preservation of a village community in places like Cliddesden & Mapledurwell.

## **Housing**

**Q38 Are the existing policy approaches and planning policies operating appropriately in relation to affordable housing?**

Previously in this response KcCPC have outlined some of the infrastructural deficiencies currently experienced by residents of KcC living a very short distance from the village centre.

For example, no mains gas (except bottled), no mains drainage, no public transport (even in the village centre where it is negligible), poor communications, limited school vacancies and no local pre-school, etc.

This week (W/E 13<sup>th</sup> Oct-17) a study on the inflationary differential between urban and rural living highlighted several big ticket items that have widened the inflationary pressure gap to the detriment of rural living. Specifically, heating oil inflation, transport costs, high speed broadband costs by alternative provision other than terrestrial (due to unavailability of terrestrial),etc.

Against this backcloth, KcCPC believes that pursuit of a policy that that looks to deliver 100% affordable housing "...as part of a rural exceptions site policy. A rural exceptions policy allows for the development of affordable housing schemes on the edge of rural settlements where open market housing development would not usually be acceptable." is a complex proposition that could see residents having to relocate after a very short time because of four primary drivers:

- **affordable housing must also deliver low running costs.** Can this be achieved in a rural setting whilst maintaining the low capital cost?
- **infrastructure costs to relatively small rural locations.** Can private sector suppliers be relied on to deliver low user cost infrastructure to a rural setting as they do not at present (e.g. BT Openreach)?
- **realisation of an integrated transport.** Can a low cost integrated transport network be delivered to relatively small rural locations to avoid isolation and social economic conflict?

- **provision of accessible education & health.** Is existing educational and health infrastructure readily accessible to small rural settlements of affordable housing and/or can it be delivered more effectively for these challenges, at a sensible price?

**Q39 Is the existing affordable housing policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a comprehensive approach to affordable housing?**

The fundamental issue appears to be the shortage of affordable housing which young, working age people can live in without undue difficulty in gaining employment and getting to it relatively economically.

In addition, the consultation document seems to imply we have another anomaly exacerbating the affordable housing issue – namely an increasing incidence of, surviving partners, divorcees and ‘down sizers’.

Furthermore, in an area where tourism so important we have also experienced a long term loss of what was previously affordable housing stock to holiday rentals and second homes. Despite recent legislation on Stamp Duty this trend seems unlikely to change whilst the investment return is so attractive in comparison to a dwindling number of ill performing alternatives.

Against this backcloth, rural Suffolk needs a planning environment that encourages rural employment. Not just home based micro, mini and self employed, but also businesses which can take on a larger number of staff, especially those with lower levels of training and experience, those that in some circles have become known as the new rural poor.

These issues are clearly very complex and in no small part a long way from the remit of a small Parish Council who see the necessity of an enabling framework to, initiate the reinvigoration of rural employment opportunities in Suffolk Coastal and accompanying that create impetus in a more flexible, innovative planning approach to create employment and residential capacity out of opportunities that lay untouched at the moment (i.e. brown field sites, farm buildings, etc.).

The second housing anomaly alluded to in this consultation seems potentially even more intractable, insofar as the issues of surviving partners, divorcees and ‘down sizers’ are more (but not exclusively) likely to impact older age groups where employment, employment opportunities, health, income & wealth, environment and associations (friends, family, etc.) will have a far greater bearing on acceptable outcomes.

Moreover, as these segments steadily continue to age and increase their demands on health and social care, it is likely that the Suffolk County, Suffolk Coastal, the National Health Service and other agencies will have to work far closer in generating innovative and dynamic ways of delivering later life residency, healthcare and socialcare capabilities to meet the needs & means of the individual.

**Q40 Where provision for affordable housing on an ‘exception site’ is supported by, and can be shown to meet the needs of, that local community should planning policy be sufficiently flexible to allow for this?**

See Q38 & 39 above

**Q41 Should we continue to allow market housing to enable the delivery of affordable housing where the financial viability of a development is challenging?**

Is there any viable & sustainable alternative? Is this an allusion to a Housing Association model for all affordable housing in Suffolk Coast and if so what are the absolutes in terms of value, volume, timing, etc.? Or is the consultation suggesting that there is other funding available for a programme of Public Sector house building in Suffolk Coastal? If so what are the constraints, benefits and costs to the local area?

**Q42 Do you consider it appropriate for the Council to consider directing growth to a cluster of villages?**

KcCPC do not consider 'a cluster of villages' a universal resolution to employment and housing in rural communities.

That is not to say that if specific models have been implemented and proven elsewhere in UK rural areas, the opportunity to review the similarities to the Suffolk Coastal starting point and gain an understanding of the learning points might be a sensible way to alleviate the immediate concerns of villages and explore the efficacy of it as a way forward.

**Q43 What criteria should be used to identify a cluster of villages?**

Please see the answer to Q42 above – KcCPC would suggest that Suffolk Coastal seek to capitalise the experience of others and understand the difficulties in getting the 'correct' identification criteria, based on proven practice. Thereby by reducing the risk of getting any wrong 'candidate' clusters in Suffolk Coastal.

**Q44 How can the Council encourage the provision of fully serviced building plots for self build/custom build properties?**

KcCPC understands that there are different interpretations of 'self build' and/or 'custom build' being used in various parts of Great Britain & NI. Consequently, KcCPC are interested to understand the proportion of 'self build' and 'custom build' expressions of interest that fit a long term interpretation of 'affordable housing' and that are proposed as the sole residence of the builder(s).

In respect to the provision of fully serviced building plots for the use of 'self build' and 'custom built' housing, KcCPC suggests that potential sites may be found in, brown field sites, derelict buildings, land bank holdings and even the buildings at risk register, etc.

**Q45 Should these serviced plots be provided as part of a larger housing development?**

KcCPC is intrigued that the consultation seeks a view on this proposition whilst simultaneously (in Q41 above) expressing a view that they might be prepared to discontinue the requirement for affordable housing in a market housing development where financial viability is challenging?



**Q46 Should we continue with the current policy approach to housing size or take a more flexible approach that reflects the site location and characteristics?**

KcCPC are currently in the second consultation on a Conservation Area for the KcC village centre and are developing a Neighbourhood Plan. As a consequence it is becoming increasingly clear that not only does the overall size of a particular development have to be sensitive to the location, surroundings and character, but that individual buildings within it also have to be of a size, character and build standard that meets the needs of the community.

Consequently, KcCPC is interested to understand why the current policy approach precludes this or the advantages Suffolk Coastal see for communities in taking a more flexible approach.

**Q47 How can the Local Plan promote an increase in smaller units to meet specific needs?**

In the consultation document it is stated that “The Local Plan Review provides the opportunity to reconsider targets based on the information in the Strategic Housing Market Assessment which indicates the need for units which are 2, 3 or 4+ bedrooms.”

In respect to this question can it be clarified as to whether the question pertains to units below this profile (i.e. 1 bedroom) or relates to 2 bedroom...possibly 3 bedroom units.

In respect to the phrase “...specific needs.” used in the question, does this relate to specialist care, mobility needs, etc. or the more generic use of the ‘specific needs’ of an area, locality or site?

Irrespective of the answer to these questions, is it too simplistic to say that if the market wants smaller units, buyers are there for smaller units and planning policy determines that smaller unit developments have priority, then the market will respond accordingly?

**Q48 What more could be done to help ensure that more housing is provided specifically to meet the needs of older people, or those with specialist care needs?**

Please see last paragraph of Q47 (above) substituting ‘older people’ & ‘specialist care needs’ in place of “smaller units” - the same rule of thumb should apply.

**Q49 Should starter homes be part of the type and mix of units required?**

Could you please clarify what might distinguish a ‘smaller unit’ from a starter home?

If this is a significant design and/or construction differentiation, then within the context of keeping development of a type that maintains the character and community of its surroundings it seems to imply starter home provision should be integral to the mix.

**Q50 Should the Council encourage greater use of modular construction to provide a range of residential accommodation?**

KcCPC is of the view that as long as buildings are sensitive to the location, sympathetic to the surroundings and character of the community in which they are built, and as long as they meet the requirements of Building Regulations and other Standards in force at the time of their construction, then their use should not be precluded.

**Q51 Should specialist housing be delivered on specific sites or alongside other forms of residential development?**

KcCPC are of the view that KcC should maintain a mixed community where those with special care needs, mobility requirements, wardened accommodation etc. should not be precluded and by preference should sit within the generality of the village.

**Q52 Are there any other types of residential use that need to be planned for?**

KcCPC do not currently know of a particular local need beyond those identified in the consultation paper and identified above (Q51).

**Q53 The district contains a small number of houseboats. Existing planning policies limit the areas within which houseboats are permitted and the number of houseboats within these areas. Do you think this type of approach remains appropriate?**

KcCPC is unqualified to make any comment on this matter.

**Q54 Should the physical limits boundaries be tightly defined around existing built development or more loosely defined to allow for small scale development in communities?**

KcCPC are currently in the second consultation on a Conservation Area for the KcC village centre and are developing a Neighbourhood Plan.

Consequently, until completion of both of these activities KcCPC maintains that physical limit boundaries should remain tightly defined around existing built development.

**Q55 Can criteria based policies more appropriately deal with growth in the rural areas than physical limits boundaries?**

KcCPC are currently in the second consultation on a Conservation Area for the KcC village centre and are developing a Neighbourhood Plan.

It is not convinced that criteria based policies more appropriately deal with growth in rural areas and welcome Suffolk Coastal coming forward with case worked evidence and testimony from rural communities where criteria based policy has confounded KcCPC's current view.

**Q56 Do all settlements require physical limits boundaries?**

KcCPC can only express a view pertaining to KcC and its surrounding area where it believes that physical limit boundaries fulfil an important function for the residents and businesses of KcC.

**Q57 Do you think the current policy approach to development in housing clusters is working successfully or does it need to be amended?**

KcCPC does not think that amendment is necessary

**Q58 How should the Council consider applications for the re-use of redundant buildings in the countryside?**

The Council should consider the re-use of redundant buildings in the countryside to provide a blend of sustainable employment opportunities combined with affordable homes for rural individuals and families engaged in that employment.

As highlighted earlier in this response, KcCPC hold the view that because of transport, infrastructure and support constraints it is unsustainable to build pockets of development solely for employment purposes or solely for affordable accommodation purposes. Rejuvenation of the rural economy is dependent on a symbiotic relationship between the rural working and living environments.

**Q59 Should the Council introduce a sequential approach to the re-use of redundant buildings with priority given to, for example employment or tourism use?**

KcCPC is not convinced that a sequential approach to the re-use of redundant buildings offers significant advantages over the current criteria based approach, but would like Suffolk Coastal to bring forward any compelling evidence of the benefits of changing to a sequential approach in order that KcCPC can reconsider their view if there is tangible community benefit to be gained from doing so.

However, as the separate issue of priority is raised in the consultation question (Q59), KcCPC would like to place on record its belief that employment definitely should take priority over anything other than affordable housing, which ideally should be provided simultaneously and in equal measure to the requirement defined by employment opportunities available to local people.

## **Business & Industry**

**Q60 Should we continue to identify both strategic and general employment areas?**

KcCPC would like to understand any impact (be it positive or detrimental) to the interests of individuals and communities of changing the way employment areas in Suffolk Coastal are identified.

It is not clear from the consultation document as to what the nature, attributes and key considerations are that could be involved in making a decision to change.

**Q61 Should we continue to stipulate the uses of sites allocated for employment or should policies be more flexible to allow for a wider variety of uses?**

KcCPC is not convinced that a blanket change to a more flexible policy, allowing for a wider variety of uses for sites allocated for employment would necessarily be beneficial to Suffolk Coastal in the achievement of its Suffolk Coastal economic, social and Regional Centre ambitions for Ipswich.

However, KcCPC suggests that a pilot site could be established in the Suffolk Coastal area to understand and develop the working principles of a more flexible approach to use of sites.

**Q62 Should planning policies take a flexible approach to new employment development where there is an identified need by allowing development outside of allocated sites and physical limits boundaries?**

KcCPC are concerned that an unfettered more 'flexible approach' to new employment development outside of allocated sites and physical limits boundaries could lead to 'selective development' by planning applicants based on criteria other than the critical operational requirements of a site.

In order to mitigate this risk, KcCPC suggest that a pre-planning application 'impact analysis' be conducted by a Suffolk Coastal appointed independent consultant (at cost to the applicant).

The purpose of this impact analysis is to inform the Parish, Town and District Councils of the direct and indirect likely impacts on people, communities, environment and local employment of a development proposal outside of allocated sites and physical limits boundaries.

This analysis should be undertaken without undue delay and with consideration to maintaining an informed and balanced decision making process.

**Q63 Should the Local Plan allocate more land than is required for employment uses or should we only allocate what is needed?**

KcCPC are aware of the unease expressed by several public bodies as well as concerned citizens in regard to the commercial practice of creating so called 'land banks' and the associated impacts on land and property prices.

Consequently, it seems somewhat contradictory for local authorities to seek to allocate more land than is required for employment uses. Although an allocation may not necessarily create the same 'bow wave' of impacts as acquisition by a commercial entity of a land bank site, it may adversely impact individuals, communities and existing businesses in an area.

KcCPC would like to further understand the safeguards proposed to ensure areas potentially affected by an overallocation strategy could expect to have triggered prior to formalising an allocation for employment use.

**Q64 What land is required to support the main economic sectors across the district?**

KcCPC is not qualified to make an assessment of what is sufficient to support the main economic sectors across the district.

**Q65 In which locations or specific economic sectors would a co-locating policy be appropriate?**

KcCPC is not qualified to make an assessment of which locations or specific economic sectors would obtain greatest benefit from a co-locating policy.

**Q66 Should the Council continue to identify rural employment sites?**

Yes, creating modern workplaces in our villages whether they be industrial or offices makes sense.

Whilst matching local employees with specific employers doesn't happen automatically it does make a difference. Some years ago in Bedfordshire, a village resident converted 7000 square feet of

redundant but attractive Victorian farm buildings into office space. Tenants now employ about 25 staff on site. A few come from the village itself, but it has created more indirect jobs in local hospitality, cleaning and maintenance activities, etc.

Internet connectivity has meant that this type of rural site could grow in appeal and in a place where local traffic is likely to become an issue, the option not to have to drive to work in a town and have ample parking on site could give a good stream of new users reducing pollution and requiring less maintenance of our roads. Of course this does mean further investment in the rural areas of Suffolk Coastal to ensure all have access to reliable, good speed broadband, it is no longer a luxury, but a necessity.

The perceived pressure these days is for most landowners to convert agricultural buildings into residential (be it permanent or holiday) accommodation.

However, recently a resident in Leiston has taken the view that getting planning consent for 4 houses is potentially less attractive than building some new small offices and starter workshops.

**Q67 What criteria should be used to define a rural employment site?**

KcCPC are currently in the second consultation on a Conservation Area for the KcC village centre and are developing a Neighbourhood Plan.

Ahead of the delivery of these two major projects, KcCPC remains interested in understanding what workplace creation opportunities may exist in KcC, as potentially they may provide a first rung on the ladder for some residents who own no transport to prospect for a job in the wider Suffolk Coastal area, let alone work out how to commute if they were to be successful.

In the medium term KcC is less sustainable or viable as a community if it is just a dormitory village with residents getting in their cars and driving the A12 to Martlesham and Ipswich, or in due course to Sizewell.

## **Town Centres, Retail & Commercial Leisure**

**Q68 Are the existing boundaries of town centres, primary shopping areas, primary shopping frontages and secondary shopping frontages still appropriate?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be inappropriate to make comment on the boundaries of nearby town centres, that may in time potentially have an impact on individuals, communities and other Councils with the remit for those towns.

**Q69 What areas or locations should be considered for inclusion or exclusion from these boundaries?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be inappropriate to make comment on the boundaries of nearby town centres, that may in time potentially have an impact on individuals, communities and other Councils with the remit for those towns.

**Q70 Should the Council introduce a local impact assessment threshold to help demonstrate no impact on existing town centres in an objective way?**

The remit of KcCPC extends to the interests of KcC residents and businesses. Therefore, KcCPC believe it would be inappropriate to make comment on this question.

**Q71 Should the Local Plan continue to protect retail provision within the district and local centres?**

KcCPC believe it is important for the Local Plan to continue to protect retail provision within the district and all towns and villages where the amenity exists.

**Q72 What uses are appropriate within district and local centres?**

The remit of KcCPC extends to the interests of KcC residents and businesses. Therefore, KcCPC believe it would be inappropriate to make comment on this question.

**Q73 What areas or locations should be considered for inclusion or exclusion from a district or local centre?**

The remit of KcCPC extends to the interests of KcC residents and businesses. Therefore, KcCPC believe it would be inappropriate to make comment on this question.

**Q74 Are there in particular opportunities in relation to commercial leisure across the district?**

KcCPC believe that commercial leisure opportunities across the district that may benefit from Suffolk Coastal involvement should largely be limited to those that only Suffolk Coastal can do.

Specific areas that should be explored could be further provision of fitness and wellbeing pastimes & facilities, educational and craft skills development, life skills and financial awareness.

KcCPC believe that other specific commercial leisure opportunities are permanently being identified and developed by the private sector and that the planning process should be an effective agent in ensuring that balance is maintained.

The phrasing of the question leads KcCPC to ask 'does Suffolk Coastal have or anticipate having a direct interest in initiating any new commercial leisure activity across the district?'

**Q75 Do the existing Local Plan & Neighbourhood Plan policy boundaries assist opportunities for accessible new leisure provision?**

Earlier this year KcCPC embarked on the process of engaging residents in drawing up a Neighbourhood Plan. Consequently it is too early to set out an agreed, clear and detailed position on this issue.

**Q76 What is a successful mix of retail and commercial leisure uses across the district?**

KcCPC is not qualified to make an assessment of what is a successful mix of retail and commercial leisure across the district.

It does seem that similarly to the previous 6-7 decades there is very little affordable, accessible leisure aimed specifically at children and young adults. This seeming deficiency is further exacerbated by expensive and scarce public transport provision in the evenings and weekends.

**Q77 Where is the best place for new retail development to meet the needs of areas east of Ipswich?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward or promote ideas for more or less out of centre shopping given that such suggestions might potentially have detrimental impacts on traffic levels, individuals, communities, existing businesses and other interests within the greater Suffolk Coastal area.

KcCPC suspects that the thinking of KcC residents on a new retail shopping development is as divided as in any other community and that there is equal contradictory evidence for such an area.

**Q78 Does out of town Martlesham affect your town centre or local area? If so how?**

The remit of KcCPC extends to the interests of KcC residents and businesses.

Therefore, KcCPC believe it would be wholly inappropriate to put forward or promote ideas for more or less out of centre shopping given that such suggestions might potentially have detrimental impacts on traffic levels, individuals, communities, existing businesses and other interests within the greater Suffolk Coastal area.

KcCPC suspects that the thinking of KcC residents on out of centre shopping is as divided as in any other community and that there is equally contradictory evidence both for and against out of centre shopping.

**Q79 Are the existing policy approaches and planning policies operating appropriately in relation to retail?**

KcCPC is not qualified to make an assessment of whether existing policy approaches and planning policies are operating appropriately in relation to retail.

However, increasing traffic congestion around out of centre shopping areas, the continuing diminution in specialist shops in the town centres and the increasingly sad sight of empty town centre shop units seems to suggest that the pendulum has swung too far in a detrimental direction.

**Q80 Is the existing town centre and leisure policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a more comprehensive approach?**

KcCPC is not qualified to make an assessment as to whether existing town centre and leisure policy coverage and scope is sufficient?

## Tourism

### **Q81 What specific types of tourism accommodation are required across the district and in which locations?**

KcCPC is not qualified to make an assessment of the specific types of tourism accommodation that are required across the district and in which locations.

What is clear is that holiday let property realised out of small unit, previously affordable housing stock in rural villages has had a progressively detrimental affect on local families and the dynamics of village life.

### **Q82 Should tourist accommodation be encouraged across the whole district or just in specific areas?**

Tourist accommodation should be encouraged across the whole of the Suffolk Coastal area both to alleviate the pressure on local affordable housing stock and also to enable community cohesion to redevelop where it has been detrimentally impacted as a result of part-time occupation.

Moreover a Suffolk Coastal concerted effort to promote increased tourist and holiday accommodation that does not impact the affordable housing stock (i.e. glamping, camping, caravanning, so called shepherd huts, yurts, etc.) aimed at landowners and existing facility proprietors could lead to an expansion in tourism without further depletion of the housing stock.

### **Q83 Do we need to protect existing tourist accommodation from conversion and redevelopment to other uses?**

No quite the contrary, Suffolk Coastal need to protect affordable housing stock from conversion and redevelopment to tourist accommodation. See answer to Q81 (above)

### **Q84 What is the most effective way of ensuring that tourism accommodation is not occupied for full time residential use?**

KcCPC have no evidence that this is a widespread issue, with the notable exception of a 'lodge park' where the continuing testing of the boundaries of regulation, planning and licensing seems to be a permanent state.

KcCPC believe that more rigorous policing of policy, regulations, planning and licensing compliance seems to be the only effective deterrent to these issues, taking enforcement and legal action as appropriate.

Perhaps Suffolk Coastal should consider joint working with other East Anglian and Essex councils dealing with similar infringements at other lodge parks using a saturation task force approach?

### **Q85 How can planning policy better facilitate the development of tourism attractions to support the resort of Felixstowe?**

KcCPC believe this question would best be addressed by those Councils closer to that area and others with knowledge of the Suffolk Coastal tourism industry.



**Q86 What type of resort activities will help extend the tourism season and increase visitor spend?**

KcCPC is not qualified to make an assessment of the specific types of resort activities that will help extend the tourism season and increase visitor spend.

**Q87 Do we need a different approach to tourism development in the AONB as opposed to areas outside the AONB?**

KcCPC is not qualified to make an assessment as to whether a different approach to tourism development is required in the AONB as opposed to areas outside the AONB.

## **Vehicle Parking**

**Q88 Are the current SCC parking standards appropriate in the context of Suffolk Coastal? If not, what changes would you wish to see and why?**

KcCPC support the provision of and encouragement to use, designated Public Car Parks, thus minimising the use of on-street parking.

Moreover, the Parish Council looks forward to obtaining long term security of tenure (or acquisition) of the sole public car park in Kelsale-cum-Carlton, in order to enable both visitors and residents to enjoy this scenic and historic village without undue hindrance due to increased on-street parking.

With that understanding we offer free car parking in the village car park and also intend installing a free secure bicycle rack to encourage bicycle use.

This approach also negates the need for yellow lines in the village.

On the basis that this provision is used by residents whose housing was built prior to car ownership being so prevalent, and visitors to the village - it is important that any new housing has car parking included as part of the design and build.

Although many would wish that car ownership and use was reduced, at present the alternatives are few and although bicycle use could be encouraged by the provision of cycle lanes linking housing developments, there is still need for provision rather than blocking access to streets.

**Q89 Is the need for and the importance of, vehicle parking sufficiently reflected in existing planning policies?**

See Q88 (above). Although many would wish that car ownership and use was reduced for both environmental and health reasons, the reality is that the alternatives are very few.

On that basis, vehicular parking should continue to be treated as a basic infrastructural requirement until such time as an integrated public service transport system (or other measures) is attractive enough to reduce the overall need for personal transport vehicles.

## **Community Facilities**

**Q90 Should we continue to protect all existing community services and facilities?**

KcCPC is interested to understand the volume of facilities and the degree to which Suffolk Coastal currently '...protect all existing community services and facilities' and the reality of what that actually means.

As the consultation points out many facilities are owned and operated by 'private' individuals and organisations.

Has it been investigated whether it is possible to pass any of these facilities into the care of a Trust, a Community Interest Company, etc.?

If so what was the conclusion? And where does that initiative currently sit?

Without further understanding of the parameters and answers to the foregoing questions KcCPC is unable to answer the question with any degree of certainty.

**Q91 Should some types of services and facilities be given more protection than others?**

Please see the response to Q90 (above)

**Q92 Where it is not possible to retain the existing community use should we require an alternative community use to be investigated prior to allowing redevelopment?**

Please see the response to Q90 (above)

**Q93 Which areas lack appropriate provision of community facilities?**

KcCPC is largely reliant on Saxmundham and Leiston for community facilities, augmented by an independent Trust managed Village Hall & Centre and a similar arrangement pertaining to the Recreation Ground and Allotments.

Specific comments regarding infrastructural deficiencies in health, education and public transport facilities are made variously elsewhere in this response.

**Q94 Should the Council continue to use CIL or section 106 agreements or a mixture of both?**

KcCPC is not qualified to make an informed response to this question.

**Q95 Should specific sites be allocated for community facilities?**

As phrased KcCPC are unable to respond to this question in the consultation document primarily due to a lack of clarity and/or detail in the question.

**Q96 Should future Local Plan policies provide greater protection for facilities identified as assets of community value?**

As phrased KcCPC are unable to respond to this question in the consultation document primarily due to a lack of clarity and/or detail in the question.

## Healthy Communities

**Q 97 How can the Local Plan assist the enhancing and re-development of modern leisure centres and sports hubs facilities across the district?**

KcCPC is not qualified to make an informed response to this question.

**Q98 What policies are needed to ensure that appropriate leisure provision is provided across the district?**

KcCPC is not qualified to make an informed response to this question.

**Q99 Is the provision of a new modern leisure facility for Felixstowe, enabled through the redevelopment of the existing facilities for other uses, better than seeking to refurbish the existing ageing leisure facilities?**

KcCPC is not qualified to make an informed response to this question.

**Q100 Should we continue with the existing standards, or should the provision of new open space and play space be guided by the deficiencies identified in the Leisure Strategy.**

KcCPC is not qualified to make an informed response to this question.

**Q101 What type of facilities/provision should be considered as Open Space?**

As phrased KcCPC are unable to respond to this question in the consultation document primarily due to a lack of clarity and/or detail in the question.

**Q102 Under what circumstances may it be acceptable to allow the loss of open space to development?**

As phrased KcCPC are unable to respond to this question in the consultation document primarily due to a lack of clarity and/or detail in the question.

**Q104 Which areas of the district experience deficiencies in health facilities?**

Kelsale-cum-Carlton relies on the Saxmundham Health Lamsale Meadow for its GP services.

Having spoken with the Saxmundham Health Lamsale Meadow regarding Primary Care Services, they have confirmed that an ongoing house building programme is something they are extremely concerned about as seemingly there is no consultation with local health providers.

They are struggling to provide services to the patients they currently have, and have long waiting lists.

They also have difficulty in providing the services they once delivered (i.e. they have had to abandon ear syringing, weight and travel clinics) and are also sending more patients to Ipswich Hospital for blood tests due to lack of capacity at the Saxmundham Health Lamsale Meadow.

However, they also recognise that many other factors impact the current situation, for example

- an ageing population in both Saxmundham & Kelsale-cum-Carlton
- greater patient expectations
- increased demand
- cuts to social care
- an increased incidence of hospitals discharging patients with complex needs into the community
- increases in dealing with mental health issues and care

KcCPC understand that seasonal growth in the local population due to static caravan parks, lodge parks, holiday lets and tourists further burden the surgery during a period of high staff holiday absence.

In fairness, Saxmundham Health Lambale Meadow recently benefited, in a roundabout way, from a Section 106 provision which meant they could carry out building works, facilitated in part by a substantial contribution from Hopkins Homes.

However, on the whole, this only ameliorates the effect of large house building programmes to a very small degree.

Consequently, the length of time it takes to see a GP is increasing and yet despite more consultations on more housing, this current shortfall of capability is not being addressed.

**Q105 How can the Local Plan Review further promote the provision of high speed broadband and communication networks across the district?**

Within the existing legislative framework BT's Openreach is likely to remain the pre-eminent supplier of terrestrial Broadband Infrastructure to KcC. This is not to minimise the potential impact of a growing number of differing technology providers of Broadband Services in the District.

However, it is imperative that the Local Plan review once again brings to the fore the paucity of reliable, high speed & high quality communication services (terrestrial telephone, mobile phone and broadband) outside of the major and some lesser urban areas of the Suffolk Coastal and stresses the social and commercial impacts that this deficiency brings.

For example, the loss of rural jobs and employment opportunities over the past few years experienced in an outlying area of Kelsale-cum-Carlton where a business had to relocate to Woodbridge in pursuit of high speed broadband (an essential requirement for a rapidly developing business), only to lose competitive advantage through the price differential between locations (rents, business rates, parking, travel etc.).

It is suggested that along with the Local Plan Review, the Local Authority once again look to BT and/or other high speed broadband providers to work co-operatively in delivering to the whole district not just the most commercially attractive new housing and business development areas.

This is essential to establishing smaller thriving commercial enterprises in close proximity to communities and bolstering the increasing number of self employed 'new technology' & 'knowledge based workers.

This could and should develop employment communities or 'villages' of micro, small and medium businesses that have been developing successfully in numerous urban areas across the UK.

For example the Highlands & Islands Development Area, London's Shoreditch, Cambridge, Salford, Wigan, Reading, IoW, etc.

**Q106 How can the Local Plan Review create safe and accessible communities which do not undermine the quality of life across the district?**

As phrased KcCPC are unable to respond to this question in the consultation document primarily due to a lack of clarity and/or detail in the question.

## Climate Change

**Q107 Should we continue with the CCMA existing policy approach?**

KcCPC is not qualified to make an informed response to this question.

**Q108 What types of development should be considered appropriate within a CCMA?**

KcCPC is not qualified to make an informed response to this question.

**Q109 Should the CCMA boundaries also be redrawn to reflect the topography and infrastructure?**

KcCPC is not qualified to make an informed response to this question.

**Q110 If required, should the Council proactively allocate land for the relocation of property at risk from erosion?**

KcCPC is not qualified to make an informed response to this question.

**Q111 Could houseboats, floating homes or caravans be used as an alternative or temporary means of re-housing those affected by coastal erosion?**

Yes, it is entirely appropriate to use temporary accommodation for re-housing in such emergencies.

**Q112 How can the council attract buy-in from coastal business owners to contribute to the costs of coastal protection?**

KcCPC is not qualified to make an informed response to this question.

**Q113 Should the CCMA be defined in an area where the SMP policy is to 'hold the line', subject to evidence of how coastal protection can be funded in this area?**

KcCPC is not qualified to make an informed response to this question.

**Q114 What wider sustainability benefits to the community could justify development taking place in an area of flood risk?**

KcCPC is not qualified to make an informed response to this question.

**Q115 Are there any particular uses that land at risk of flooding could be used for?**

Farming, and as these days there is so much pressure on open spaces for wildlife and a need to encourage biodiversity, sanctuaries.

**Q116 Should the Local Plan Review identify sites for renewable energy development across the district? Which areas across the district would be appropriate and for which types of technology?**

Buildings could and should encompass a great deal more to help reduce climate change (as could all industry like agriculture) On this basis the more that is done to encourage householders and builders to add specific useful features to houses i.e. Solar PV tiles to roofs the less land is taken away from agriculture and tourism. If it becomes normal to incorporate such features the need to set aside sites will not be necessary.

**Q117 How can the Local Plan Review encourage new residential developments to reduce carbon emissions?**

The main housebuilders may need to be encouraged to build better houses by legislation and this could be another basic infrastructure requirement. This needs to be seen as normal and not the exception.

**Q118 Should the Local Plan Review require other kinds of development like employment, retail, leisure and tourism to meet higher standards of energy efficiency?**

Yes, absolutely

## **Design**

**Q119 How can we improve the design and quality of estate scale development?**

At present a landowner with the chance of planning gain gets perhaps a 100X value uplift with planning permission granted.

It is very difficult for a landowner even with the right intentions to sell their land for building without doing so for the top price.

The developer or builder who buys it at top price has limited choice to do anything other than build the sort of houses local communities dislike. Even if they have a bit of choice they tend to build what they built last time.

We therefore need incentives or restrictions placed on the landowners. ‘

**Q120 How can we improve design quality through planning policy?**

One way may be by putting Fabric-first sustainability into planning policy.

If homes are built to Code for Sustainable Homes (CSH) level 4, the AECB Silver standard or above and the developer is continually asked to look for new ways to improve the design of our homes.

The design of all homes incorporate the use of energy saving features such as solar panels and photovoltaic panels (PV) and we look closely at the opportunities afforded by innovative techniques like straw bale or Passivhaus homes.

**Q121 How do we promote locally distinctive design?**

There could be local awards and recognition for builders adopting Suffolk specific design attributes, for example the inclusion of pargetting on homes in suitable locations.

**Q122 Is it possible to secure high quality design which is locally distinctive through factory build development?**

It is potentially possible to achieve locally distinctive high quality design through a factory built product, with or without on-site final detailing.

**Q123 Should large scale developments be required to follow the “Garden City” principles?**

KcCPC is not qualified to make an informed response to this question.

**Q124 Should the principles of “Building for Life 12” be used as a tool to improve the design quality of new development?**

Yes, absolutely

**Q125 Should local housing densities be set for new developments?**

No

**Q126 Should different design principles be applied to housing developments at high/low densities? For example avoid using detached housing at higher densities in order to maintain sufficient space between buildings?**

Each case should be assessed on a case by case basis to ensure that the location and character of the nearby built environment is treated sympathetically by any new development.

**Q127 When would development of residential gardens be acceptable?**

KcCPC takes the view that development of residential gardens should not be acceptable as the Parish Council believes that spaces and voids are an important and integral characteristic of a rural Suffolk village.

**Q128 Should the council adopt additional optional standards in respect of accessibility, internal space and water efficiency?**

Accessibility and water efficiency certainly

## Heritage

### **Q129 What should be included in a positive strategy for the protection of assets across the district?**

KcCPC are currently in the second consultation on a Conservation Area for the KcC village centre and are developing a Neighbourhood Plan.

Both of these major pieces of work are designed to get a fuller understanding of KcC's character and assets that either already have or need protection. Once complete KcCPC believes it will have a rich picture of those assets which contribute to the character of the village and should be included in a protection strategy. These assets are not only the built environment but also the spaces between and around the more tangible assets.

### **Q130 What does the Council need to include in a positive strategy for the protection and enhancement of heritage assets?**

KcCPC is not qualified to make an informed response to this question and suggests that the views of appropriate organisations be sought on an ongoing basis (i.e. English Heritage, CPRE. etc.).

### **Q131 What level of protection should be given to non-designated heritage assets and locally listed buildings?**

KcCPC is not qualified to make an informed response to this question and suggests that the views of appropriate organisations be sought on an ongoing basis (i.e. English Heritage, CPRE. etc.).

## Landscape

### **Q132 Is a Landscape Character approach to considering the impact of development on the landscape preferable to retaining Special Landscape Areas for this purpose?**

An objective approach to landscape character is preferred. This should take account of various elements such as the percentage tree cover, the presence/extent of hedgerows, the presence of habitats not under intensive agriculture or commercial management, the general lack of visual intrusion by buildings, roads, noise or light pollution, degree of rural tranquillity, etc.

### **Q133 Other than those protected as part of the AONB and Heritage Coast, which other sensitive landscapes require special protection?**

Sensitive landscapes to be protected should include all river valleys, including small tributaries such as the river Fromus inland to Kelsale and beyond. In addition, protection should be given to all semi-natural woodland, hedgerows, veteran trees, semi-natural grassland/meadows, ancient quarries/former sand and gravel pits, ponds and other wildlife sites, particularly where these occur in combination with features of historic interest

### **Q134 Should areas of tranquillity be identified and protected and if so, which areas should be considered?**



Yes, tranquil areas are important both for people and wildlife and these should be protected from new development. In KcC special protection should be given to the land adjacent to a number of quiet rural lanes, in particular the following: Tiggins Lane, Butchers Lane, Rosemary Lane and the 'loop road' between Curlew Green and Dorleys Corner. These particular lanes are currently relatively traffic-free, narrow, and of a rural character with mature trees and hedgerows - such places should be safeguarded, ideally by designating them as 'Quiet Lanes' subject to a 20 mph speed limit. There are already too few areas in the country which are unaffected by noise & light pollution. Suffolk Coastal is precious in that respect, it must not squander what it has.

**Q135 In which areas should development be resisted to avoid settlement coalescence?**

Inter-settlement gaps are important to maintain community identity and a sense of place. In KcC there are a number of outlying hamlets or 'Greens' and these should not be allowed to merge with the village centre. For example, there should be no major new development between Kelsale Village Centre and the A12 at Dorleys Corner, or along Rosemary Lane between the Village Centre and the Poachers Pocket Public House, or between Saxmundham and Carlton Road. The existing gaps between long established settlements should be retained in order to protect their rural character and separate identity.

**Q136 Which areas require special protection from development?**

KcC is still a mainly rural parish with a wealth of biodiversity and wildlife interest. The Parish Council has identified a number of sites of potential or known importance for their biodiversity, based on current information, and these should be given special protection from development wherever possible. These sites are still being evaluated but are likely to include a number of grassland and partly wooded areas that have been shown in the Issues and Options Local Plan Review as land with potential for development. (The relevant sites are currently recorded on the plan as follows: 570, 458, 65, 239, 188, 487, 96, 242, 363, 450, 105 but other sites may also be added in due course).

**Q137 Do breaks and gaps in-between buildings need to be given specific protection against development?**

Yes, such gaps are needed for the benefit of existing residents in order to maintain views, trees, green corridors for wildlife and recreational space as well as potential access routes for pedestrians, cyclists, etc.

## **Biodiversity & Geodiversity**

**Q138 Should development be promoted in areas which are deficient in Green Infrastructure provision with respect to biodiversity and geodiversity?**

It is very important to ensure that all new development mitigates the impact on biodiversity and wildlife habitats. In addition, the provision and maintenance of green corridors is essential in order to provide new habitats and continued connections both for wildlife and people within the context of the new development. However, any such corridors must be wide enough to accommodate the needs of people for access and recreational purposes.

**Q139 Should the Council explore further options to work collaboratively with neighbouring authorities and Natural England to determine a consistent policy approach to biodiversity and geodiversity?**

Yes, the Council should actively seek the involvement of the Parish Council and other relevant bodies with local expertise and knowledge. Regarding wildlife this should include the RSPB and Suffolk Wildlife Trust wherever relevant.

**Q140 What level of protection should be given to locally designated sites of biodiversity value?**

All such sites should be fully protected from development, both residential and commercial, as well as transport or highway needs. Where they are at risk from development sensitive and appropriate mitigation measures should be provided and funded by the developer.

**Q140 Should the Council consider a policy which requires the creation of new habitats and enhancement of wildlife corridors on new development sites?**

Yes, the Council should have such a policy to ensure that every new development is expected to incorporate, create and fund appropriate measures to enhance biodiversity including wildlife corridors on new development sites.

**Q141 Do you have any suggestions for Local Plan policies to support biodiversity retention and enhancement?**

In the first instance, this could be achieved by a policy to require that a preliminary biodiversity assessment is carried out before any land is considered for potential development, in order to highlight sites that may be unsuitable.

The Local Plan should also have a policy to support and enhance biodiversity on each and every site proposed for development. There is great public concern for the environment and wildlife in Suffolk and the Council should be seen to lead the way in safeguarding and enhancing biodiversity, and mitigating against the long-term cumulative negative impacts of development on wildlife. Developers must also be required to recognise this need and encouraged to act to support positive measures for wildlife conservation in addition to the provision of access routes and recreational green spaces.

## **Other**

**Q142 Do you have any other comments on how current Local Plan Policies are working and whether they need to be amended?**

No, no comments at this time.

**Q143 Which sites do you consider to be appropriate for future development consideration by the Council?**

KcCPC in responding to this consultation has identified several key areas of infrastructure where there are already significant deficiencies that also make some sites that have been put forward unsuitable for consideration for development now or until the deficiencies are overcome.

KcCPC has also made it clear that it is currently engaged in seeking Conservation Area status for Kelsale Village Centre and undertaking the development of a Neighbourhood Plan. It is already clear that both of these pieces of work will almost certainly surface considerations that will colour the suitability of a number of sites that have been put forward.

As a consequence and in an effort to maintain the engagement of KcC residents in working on these projects KcCPC is reluctant to pre-empt or undermine public opinion by expressing a view on any sites appropriateness for future development consideration.

In responding to this consultation, KcCPC also believes it has asked questions of Suffolk Coastal where the answer may have a bearing on KcCPC's answer to the appropriateness of particular sites for consideration.

**Q144 Are there any other sites you are aware of which the Council should consider?**

No, please refer to earlier responses.