

1 Introduction

- 1.3 Kelsale-cum-Carlton Parish Council [KcCPC] note the correction to the physical size of Suffolk Coastal District, down to 892sq km from the previously quoted 8915sq km.

KcCPC is concerned that the estimate of the 2016 mid year population has been revised up to 127,836, from 126,000 in the previous Draft Local Plan.

As an estimate, KcCPC recognise a small unqualified variance might be acceptable. However, a variance in excess of 11%, without explanation is clearly unacceptable. Particularly as subsequent figures used in the Draft Local plan may have been calculated from this base.

Q Can SCDC confirm - 127, 836 as the 'right' number, the reason for the variance and assure KcCPC that any derived numbers used elsewhere in the Final Draft Local Plan have also been confirmed correct.

- 1.5 KcCPC notes and supports the further inclusion of "...people growing up in the District who leave for a period of time for further education and other opportunities" as part of an housing availability and affordability issue that must be addressed.

In respect to the population question raised in 1.3 (above), 1.6 states that in 2015, 70,800 persons were of working age, attributing that to 57% of the total population. Extrapolating from that, the total population was circa 124,210 (at that point in time).

Q Can SCDC confirm this a robust figure or was it estimated on the same basis as 1.3 above?

- 1.7 KcCPC is concerned that the assertion "Despite the drop in delivery and subsequent upturn of completions the Council is well placed to continue to deliver **significant housing opportunities for all over the plan period.**" is an over simplification of the issue.

It is well known that some District Councillors and Officers believe that by building more housing it will materially impact the local housing market, reducing prices and making housing more affordable. While that may be in part true it does nothing to dissuade:

- A] A continuing elderly migration to Suffolk Coastal for affordable retirement
- B] Continuing intervention in the local housing market by investor second home owners who see Suffolk Coastal property as relatively affordable
- C] More local market intervention by those looking to extend their Private Rental portfolio, thereby removing flats and starter homes from the reach of the target local young aspirant 'home owners'.
- D] Other dis-functional behaviour in the local housing market as Sizewell C approaches.

Q Can SCDC confirm what additional steps are being taken to address the specific threats outlined A to D above?

- 1.8 KcCPC note the Suffolk median property price rose to £274,995 in 2017, compared £254,000 in 2016. A rise of over 8.25%, compared to a national rise of just 4.55%.

Q KcCPC believe that this rise evidences the assertions made (regarding 1.7) above and calls on SCDC to examine measures being deployed in the far South West, Cumbria (and elsewhere) to mitigate the risks that these behaviours have on the local housing market, detrimental to local aspirant home owners.

- 1.13** KcCPC note the increase in the number of Conservation Areas in the District to 36, up from 35 in the previous Draft Local Plan.

With concern, KcCPC also notes that the District has seemingly lost (or de-listed) circa 400 buildings since the last consultation and wonders whether this is a barometer of the District Council's attitude to the historic built environment.

- 1.14** KcCPC note that the District Council have reduced the importance of "...preserving this heritage..." from "...the utmost..." to "...a key..." priority.

Q Can SCDC advise KcCPC what motivated the District Council to seemingly downgrade their commitment to the preservation of the local heritage, holding as it does "...its own intrinsic value as well as for the health, prosperity and well-being of the residents."

- 1.15** KcCPC note the Environment Agency regard East Anglia as an area of 'serious water stress', whereas Anglian Water were previously quoted as regarding the area as one of 'severe water stress'.

Q Can SCDC advise KcCPC which 'expressed' view carries most weight and how the District Council's approach has changed as a consequence?

In addition, does this seeming divergence of opinion have any impact on the policies of those bodies engaged in this sensitive area of work and/or available funding, regulations and working practise – especially in regard to new housing and commercial premises development?

- 1.17** KcCPC note the insertion of this new paragraph, recognising the significant value of the network of "...public rights of way, including nationally promoted walking trails such as the Stour and Orwell Walk, and the Sandlings Walk". Moreover, it recognises that "Public rights of way not only act as walking and cycling links between communities, education sites and workplaces, but also contribute to the economic prosperity of the District through the tourist trade that they attract."

Q Given the importance of these natural assets, developed over hundreds of years, and requiring as they do a new and explicit paragraph in the Local Plan - can SCDC reassure KcCPC that these issues will be given prominence when future proposals for housing and highway development threaten their integrity and innate value?

- 1.25** (Previously para 1.24) KcCPC note that since 2015, Tourism revenues in the District have increased by 9% to £325m in 2017.

Q KcCPC understands that in 2017 the whole of the East of England generated Tourism revenues in excess of £1,710m, meaning Suffolk Coastal accounts for nearly 20% of the regional total, 1.7% of the England total and 1.37% of the total GB revenues. (Source VisitEngland)

However, is it really true to say that "...across the District 6,163 jobs were generated as a result of tourism spend...". Would it not be more appropriate to say that 'tourism spend supported 6,163 jobs'?

- 1.28** (Previously para 1.27) KcCPC note that "Strategic improvements to the rail lines have taken place in recent years and others are anticipated to come forward in the future."

Whilst KcCPC is largely supportive of strategic improvements in railway infrastructure, it is concerned that short- and medium-term prioritisation of either freight or passenger capabilities should not be decided in isolation, but in the round considering longer term impacts to immediate communities and across the district. SCDC confirmation of balanced decision making would be welcomed by KcCPC.

1.30 (Previously para 1.29) KcCPC note the change from “...serves a number of communities.” to “serves a number of settlements.”.

Q KcCPC would like clarification from SCDC on the ramifications of this textual change and the need for it?

1.32 (Previously para 1.31) KcCPC note and support a rewrite of an Environmental Key Issue, subset Biodiversity from: “High Biodiversity Value” to “Need to ensure that areas of biodiversity value are protected and enhanced.”

Q Given the importance of these natural assets, developed over hundreds of years, and requiring as they do a new and explicit Key Issue in the Local Plan - can SCDC reassure KcCPC that these issues will be given prominence when future proposals for housing and highway development threaten their integrity and innate value?

Page 9 KcCPC note a significant change in the length of the Suffolk Coastal coastline, reduced by nearly 20% to 48 rather than 58km on the District-wide Statistics graphic.

Q Can SCDC confirm that 48km is the correct estimate of the Suffolk Coastal coastline?

1.33 (Previously para 1.32) KcCPC note the change from “...2016-2036.” to “2018-2036”.

Q Can SCDC confirm the reason for this fundamental change and any ramifications (to whomever) that may arise from the timeframe changing so late in the consultation?

1.43 KcCPC note and welcome the inclusion of Suffolk Constabulary in this and subsequent paragraphs where previously there appeared to be no consideration of Police issues.

Q Can SCDC confirm that any omissions of the Fire Service and Coastguard in the Final Draft Local Plan are deliberate?

1.46 KcCPC note the insertion of “general” between in and conformity

Q For the avoidance of doubt, can SCDC confirm the interpretation of the word “general” in the context of this paragraph and those undertaking a Neighbourhood Plan?

1.46 KcCPC note and welcome the new final sentence added to this paragraph, potentially enlarging the scope and latitude of Neighbourhood Plans.

1.51 KcCPC note and welcome the newly inserted paragraph confirming “...the Council have undertaken a Habitats Regulation Assessment...”.

1.52 KcCPC note that despite comments made at the First Draft Local Plan stage the vision remains unaltered as ‘Maintain and sustainably improve the quality of life for everyone growing up in, living in, working in and visiting East Suffolk.’

Q Once again, whilst The Plan and even a powerful Vision may be capable of many things, is it really plausible to claim either or both will facilitate the goals it is set in this paragraph? Perhaps a revision should be made to maintain credibility and enable the setting of SMART or similar objectives?

1.55 (Previously para 13.1) KcCPC note the re-designation of this paragraph and its un-signposted relocation in the Introduction.

- 1.56** (Previously para 13.2) KcCPC note the re-designation of this paragraph and its un-signposted relocation in the Introduction.
- 1.57** (Previously para 13.4) KcCPC note the amendment, re-designation of this paragraph and its un-signposted relocation in the Introduction.
- 1.58** (Previously para 13.5) KcCPC note the re-designation of this paragraph and its un-signposted relocation in the Introduction.
- 1.59** (Including some of previous para 13.3) KcCPC note the new paragraph incorporating material elements of para 13.3 of the previously consulted draft.

2 Wider Strategic Planning Area

- 2.1** Kelsale-cum-Carlton Parish Council [KcCPC] note the amendment increasing the district wide minimum annual delivery rate of new homes from 545 to 582, an increase of 6.8% per annum.

Table 2.1

KcCPC note that Table 2.1, reflecting 2.1 (above) has been substantially amended and does make things much clearer than the prior consultations Table 2.1.

It is now clear that Suffolk Coastal rather than being tasked with delivering a minimum of 10,900 over 20 years (2016-2036), is now tasked with a minimum of 10,476 over 18 years (2018-2036).

Whilst this is clear, it does appear to be at odds with assertions alluding to being on track or slightly ahead of the necessary trajectory made in the previous Draft Plan Consultation.

Table 2.3

KcCPC note that Table 2.3 has been substantially amended and does make things much clearer than the prior consultations Table 2.3. However, it seems that annual jobs growth remains flat over both the 18 and 20 year calculations (7,220 reduced to 6,500).

In addition, presumably reflecting the reduction in employment being created, the minimum employment land required has also declined by 10% from 13ha to 11.7ha.



Consequently, taking Tables 2.1 and 2.3 in combination, it seems that Suffolk Coastal will now be building a minimum average of **1.595 houses per day** over the plan period, whilst only creating employment at the average rate just **less than 1 per day (0.99)** over the plan period.

Can SCDC provide KcCPC with an analysis of the 'oversupply' housing planned to be delivered by this iteration, the type, tenure and bedrooms foreseen, and the need(s) that will be met by it.

Policy SCLP2.1

KcCPC note that the policy refers to "...30,320 jobs through the provision of at least 49.8ha of employment land...", whilst the Table 2.3 shows 44.9ha.



Can SCDC confirm which figure is correct?

KcCPC note that the policy refers to "...at least 37,328 dwellings across the Ipswich Housing Market Area", whilst the Table 2.1 shows 37,278.



Can SCDC confirm which figure is correct?

Policy SCLP2.1

KcCPC note the policy amendments and welcome the newly inferred delivery improvements being sought (over and above those identified in the previous iterations) for:

- Walking & cycling routes
- Health and leisure provision to meet needs resulting from growth
- Appropriate police, community safety and cohesion provision to meet needs resulting from growth
- Provision of green infrastructure and Suitable Alternatives Natural Greenspace
- Provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses

3 Suffolk Coastal Spatial Strategy

Vision for Suffolk Coastal 2018-36

KcCPC note multiple amendments and changes to the Vision, something that leaves the exact nature of the Vision at question.



Can SCDC confirm the exact wording of the Vision and also confirm that it has been adopted (in its totality) in all the places where it appears?

Will SCDC reconsider whether it should be allowed to be used in part, rather than in its totality?

Will SCDC consider whether such a lengthy Vision is appropriate and whether it is easily and consistently communicable?

Table 3.1

KcCPC note that the table has been heavily amended with the renumbering of a significant number of policies making the audit trail through the iterations of consultations unnecessarily arduous and complex within a constrained time window.

KcCPC also note:

- the revision of the first Objective/Strategic Priority, through the insertion of "...safe, cohesive..."
- the removal of a policy "Presumption in Favour of Sustainable Development" previously SCLP3.1
- the reframing of many policies so that some become specific, whilst others become broader



KcCPC believe that the number and breadth of changes to; Policy Numbering, Policy Titles, Policy Content and Policy applicability, etc. within each of each Objective/Strategic Priority has made responding to this consultation unnecessarily complex and time consuming, when resources and time are limited.

KcCPC believe that this added complexity is not deliberate, but rather a product of an introspective approach to development of The Plan and only then thinking about the needs of the potential audience(s).

Perhaps there is a valuable lesson for SCDC (and East Suffolk) in the conduct of future complex consultations?

3.4-3.7 KcCPC note that there is no longer a Presumption in favour of sustainable development Policy (previous iteration's SCLP3.1 refers)



Can SCDC confirm that this removal/omission is deliberate?

3.8 KcCPC notes the substantial changes to this paragraph and broadly supports the revised tenor brought about by these changes.

3.10 KcCPC notes the dominant thrust of this paragraph, but finds the absence of hard evidence supporting the economic arguments portrayed, very concerning. As indicated in comments made in respect to 1.7 (above), KcCPC believe that 'uncontrollable' interventions and potential dis-functional behaviours in the local property market can swiftly derail the best intended provision of new dwellings. Please reference 1.7 (above) to save repetition of the same observations here.

Furthermore, assertions that “...increased residential development will help facilitate infrastructure delivery across the District and the Housing Market Area.”, whilst invariably true (in part) vis-à-vis CIL and S106 funding, there remain significant questions about the availability of investment beyond that.

Q Can SCDC provide KcCPC with compelling evidence that both of these concerns are ill founded?

3.11 KcCPC notes the intention of the Local Plan to use future development in Rural Communities to sustain and maintain the vitality and viability of them. KcCPC believe that without strong safeguards to accompany such developments, some rural communities may instead risk becoming ‘quiet communities’ and/or “7 to 7” deserts, dominated by second home owners, holiday lets and daily commuters.

Q Will SCDC champion the provision of safeguards to mitigate these potential risks, as has been done in the far South West of England, Cumbria and elsewhere?

Ambitions For Growth

KcCPC note the bullet points made below this heading. However, KcCPC notes that the first bullet refers to “Provision of land to deliver significantly...baseline requirement of 13ha”. This appears to conflict with the 11.7ha used in Table 2.13.

Q Can SCDC be consistent in the use of figures throughout the document prior to progressing the Draft further? Not to do so will surely damage the standing of the Local Plan and that of SCDC.

3.17 (Previously para 3.27) KcCPC note the intent “Over the plan period (2018 – 2036) the number of jobs in Suffolk Coastal is forecast to grow by 6,500, to 68,450, predominately in the service, tourism, business and professional services sectors.”

However, KcCPC believes that a gross return of less than 1 new job per day (district wide) for the duration of the proposed Local Plan, in no way can be regarded as ‘ambitious’. Moreover, with many of the sectors earmarked for the ‘job growth’ not widely regarded as high pay sectors – do SCDC ambitions for economic growth through employment growth really stand scrutiny?

Q Can SCDC substantiate the claim that the described job growth will deliver prosperity and address housing affordability?

3.18 KcCPC note the intent of SCDC in trying to reverse the decline of the ‘High Streets’ of Suffolk Coastal and welcomes any initiative that generates vibrancy within town centres.

Boosting the Supply of Housing

KcCPC notes the intent of the Local Plan to facilitate:

- “Increasing choice in the housing available”
- “Meeting the housing needs of all sectors of the population, including the growing elderly population”
- “Delivering more affordable housing.”

As rehearsed in preceding comments, KcCPC is concerned that potential unforeseen consequences may derail well meaning policy. Potentially this could fuel further issues of local affordability, as Suffolk Coastal property becomes even more attractive to those wanting to leave behind the increasing basket of socio-economic issues of Greater London and the South East.

3.19-3.23

KcCPC note the intent of “A housing requirement of 582 dwellings per annum is considered to represent an ambitious approach to housing delivery, which will assist in meeting the needs of local communities, as well as significantly boosting the supply of housing, consistent with the Council’s corporate objectives.”.

KcCPC directs SCDC to preceding comments regarding the need for safeguards to ensure that Policy aimed at improving the prospect of suitable, affordable homes for local communities, families, the young and old is delivered.

3.24-3.26

KcCPC note the summary content in regard to strategic and soft infrastructure, and some of the issues surrounding its maintenance and provision.

In response, KcCPC restates concerns expressed in responses to preceding Local Plan Consultations, where long standing and fundamental issues of inadequate, ageing and poor quality infrastructure were highlighted.

Unfortunately, little positive change has occurred in the interim and the immediate prospects look fairly bleak with additional primary school capacity put on ice, telecommunications, broadband, roads, public transport, health provision all under considerable pressure just to maintain service.

3.27 (Previously para 3.12) KcCPC note the distribution of growth and intent expressed in regard to the role of the new Garden Neighbourhoods. KcCPC believes that the substantive response to these proposals should be made by those directly impacted and exceptionally, other communities who potentially are materially impacted indirectly.

3.28 (Previously para 3.13) KcCPC note the distribution of growth and intent expressed in regard to the role of the Felixstowe Garden Neighbourhood. KcCPC believes that the substantive response to these proposals should be made by those directly impacted and exceptionally, other communities who potentially are materially impacted indirectly.

3.29 (Previously para 3.14) KcCPC note the distribution of growth and intent expressed in regard to the role of the Felixstowe Peninsula Area Action Plan legacy. KcCPC believes that the substantive response to these proposals should be made by those directly impacted and exceptionally, other communities who potentially are materially impacted indirectly.

3.30-3.32 (Previously paras 3.15-3.17)

KcCPC note the distribution of growth and intent expressed in regard to the role of the Saxmundham Garden Neighbourhood. KcCPC believes that the substantive response to these proposals should be made by those directly impacted and exceptionally, other communities who potentially are materially impacted indirectly.

As a community obtaining a wide range of services from Saxmundham, KcCPC wish to reiterate their grave concerns at the Garden Neighbourhood proposal, as expressed in the previous iteration of the Local Plan consultation. KcCPC does not believe that material progress has been made in addressing most of the concerns expressed at that time – Health provision, traffic congestion, Primary school capacity, etc. and is concerned that unfamiliarity with the impact of other factors such as the Carlton Meres Holiday Village, may mean work thus far has delivered a less than robust baseline for some key metrics.

3.33 (Previously para 3.18) KcCPC note the distribution of growth and intent expressed in regard to Rural Areas.

However, as written this paragraph appears to concatenate a number of individual assertions without any clarity as to specific ‘rural areas’ that they may be individually or collectively applicable to.

Q Can SCDC provide clarity about the structure of the proposals implied in the strategy for Rural Areas at 3.33?

3.34 (Previously para 3.19) KcCPC note the distribution of growth and intent expressed in regard to communities neighbouring Ipswich. KcCPC believes that the substantive response to these proposals should be made by those directly impacted and exceptionally, other communities who potentially are materially impacted indirectly.

3.35 (Previously para 3.20) KcCPC note the contents of this paragraph and believe that the substantive response to these proposals should be made by those directly impacted and exceptionally, other communities who potentially are materially impacted indirectly.

However, the purpose and extent of the comments made therein appear to have wider implications than communities neighbouring Ipswich given the inclusion of comments regarding Framlingham and Leiston.

Q Can SCDC provide clarity about the purpose and applicability of this paragraph to communities that are not direct neighbours of Ipswich?

Policy SCLP3.1

(Previously SCLP3.2 amended) KcCPC note the amended and renumbered policy.

Here 11.7ha is described as the baseline requirement for land for employment uses. See previous comments regarding the inconsistency in use of 13ha and 11.7ha.

KcCPC note the extensive amendment, refocussing and recalibration of point b]. However, the underpinning narrative and widespread use of the term 'commercial leisure' elsewhere seems to lack any substance or specific ambition.

Q Can SCDC provide structure and clarity to exactly what the ambition is for 'commercial leisure' in the communities where they see it playing out?

KcCPC note the insertion of point e] "Protecting and enhancing the quality of the historic, built and natural environment across the District." and welcome a renewed focus on these valuable assets.

KcCPC note the insertion of point i] "Strategies for market towns which seek to reflect and strengthen their roles and economies" and look forward to receiving detailed proposals that enact this strand of the SCDC Strategy for Growth in Suffolk Coastal District.

KcCPC note and welcome the insertion of "Appropriate..." to point j] clarifying a previous concern. The revision now reading "Appropriate growth in rural areas that will help to support and sustain existing communities" and look forward to receiving detailed guidance on how 'appropriateness' will be gauged and applied through the SCDC Planning Processes.

3.36 (Previously 3.21) KcCPC note the revisions to the Key Diagram, specifically:

- The revision of Wenham to 'Small Village' status within the hierarchy

And

- The complete removal of Aldringham from the Key Diagram
- The complete removal of Dallinghoo from the Key Diagram
- The complete removal of Sutton from the Key Diagram

3.37 (Previously 3.33) KcCPC note the revisions to this paragraph and the rebasing of figures in Table 3.2 to deal with the revised scope of the Local Plan (i.e. 2018-36 rather than the previous 2016-2036). KcCPC are particularly concerned with the following revisions:

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|---|-------|
| - The removal of Completions (1-4-16 to 31-3-18) | 1,130 |
| - Outstanding P.P. at 31-3-18 reduced from 4,128 to | 3,609 |

And

- | | |
|--|-------|
| - Residual requirement increasing from 2,277 in the last consultation iteration to | 3,478 |
|--|-------|



Can SCDC provide an explanation for these disadvantageous changes (i.e. poor assumptions on qualifying contributions by the SCDC Local Plan, changes to Government qualification criteria, etc. and when they were made known?

KcCPC note that the impact of these changes from the position portrayed in the previous Local Plan iteration is a **52.7%** increase in the Residual Requirement, prior to the addition of any contingency.

Factoring in the additional contingency of 892 dwellings from Table 3.3 brings the increase (over the last iteration figure including contingency 3,370) to **29.7%**.

However, KcCPC does recognise that despite this, and as confirmed by SCDC in 3.39 (below), these challenges remain within the overall allocations already identified, excluding any 'windfall' gains.

3.38 (Previously 3.34) KcCPC note the revisions to this paragraph and the rebasing of figures in Table 3.3 to deal with the disadvantageous changes made in Table 3.2 and the contingency provision of 892 dwellings.

KcCPC also notes with some concern that there is an implied reliance on the so called 'windfall' amounting to 800 dwellings (not included in the figures) between 2020 and 2036. KcCPC are concerned that appropriate safeguards need to be in place to ensure that as the plan period progresses, policies remain robust when 'windfall' opportunities may be seen (by some) to present expedient options in overcoming deficiencies in planned performance.



Will SCDC seek to incorporate safeguards into the SCDC Local Plan, any subsequent East Suffolk replacement and the Planning processes to ensure that 'windfall' is treated consistently throughout the Local Plan period?

3.39 (Previously 3.35) KcCPC note the significant revisions to Table 3.3 brought about by the rebasing of figures described in the preceding paragraphs and tables. Specifically:

- An increase of 232 units (a 53% increase) being built in "Other A12 communities"
- An increase of 28 units (a 5.4% increase) being built in "Rural Settlements"
- An increase of 450 units (a 1,125% increase) being built in "Communities neighbouring Ipswich"
- An increase of 50 units (a 100% increase) being built in "Framlingham"
- An increase of 50 units (a 100% increase) being built in "Leiston"

KcCPC note that "Other A12 communities" does not appear to be defined within the Local Plan, except for a footnote that says that it is constituted of "Woodbridge northwards".



For the avoidance of doubt, will SCDC include within the Local Plan an exhaustive list of communities that fall within each of the collective terms used in the document and tables?

Policy SCLP3.2

(Previously SCLP3.3 amended) KcCPC note the amended and renumbered table enshrined in this policy.

KcCPC note the re-designation of; Wenhaston to a 'Small Village, Aldringham to 'Countryside', Sutton to 'Countryside' and other small alignments.

KcCPC note that Stratford St Andrew appears to have a "Countryside" designation.



KcCPC remains committed to the principle that communities should largely be responsible for their own responses and interactions with the Local Planning process. However, the designation of Stratford St Andrew (above) as "Countryside" does on the face of it seem anomalous. Can SCDC confirm that all designations in the revised SCLP3.2 are correct and appropriate?

KcCPC note that potential confusion may arise with the term "Countryside" being applied in two different situations:

- 1] Where "Countryside" is used to refer to a specific community in the context of the Settlement Hierarchy (i.e. as in the above Stratford St Andrew case)
- 2] Where land in a Village/Parish lays outside of the Settlement Boundaries and is described as "Countryside"



For the avoidance of doubt, KcCPC request that SCDC be explicit about the use of the term "Countryside" unless all areas, whether they be villages/settlements/Parishes in their entirety or land in villages/settlements/Parishes that lays outside of Settlement Boundaries are treated in Policy terms on an entirely equal basis.

Table 3.5

KcCPC note the amendments and revisions to Table 3.5 arising from the re-scoping of the timeframe of the Local Plan (i.e. 2018-36 rather than 2016-36).

KcCPC also note that these changes describe a contribution by Kelsale-cum-Carlton of 62 over the plan period.

- 3.50** (Previously 3.45) KcCPC note the revision of this paragraph to include a new provision "Settlement Boundaries are drawn to include any allocations for development that adjoin the previous boundary."

Policy SCLP3.3

(Previously 3.4) KcCPC note the revision of this paragraph to include a new provision "New development within defined settlement boundaries will be acceptable in principle, subject to consideration of other relevant policies of the development plan."

- 3.54** (Previously 3.49) KcCPC note and strongly support that in respect to Nationally Significant Infrastructure Projects (i.e. Sizewell C) "The Council [SCDC] would be a statutory consultee in this process."



KcCPC look forward to receiving details of how SCDC propose to use the status of 'statutory consultee' for any NSIP in Suffolk Coastal; to strengthen ties with Town and Parish Councils and galvanise new mechanisms that exploit the depth of knowledge and perspective of Town & Parish Councils to strengthen the District response to NSIP proposals and consultations.

- 3.55** (Previously 3.50) KcCPC note the revision of this paragraph to include a new provision in respect to the Sizewell C proposal that “Focus should be on prevention of impact on the natural and historic environments as opposed to compensation for the effect.”



KcCPC look forward to receiving confirmation that this “Focus...on prevention of impact...to compensation for the effect.” is applicable to all Suffolk Coastal natural and historic environments impacted by works connected with the Sizewell C development, not just areas within an AONB, protected landscapes and seascapes.

Table 3.6

KcCPC note and welcome the amendment to include “Police Facilities” in the Community Theme when considering energy infrastructure proposals.

Likewise, it notes and welcomes;

- Inclusion of an “Impact on Suffolk Seascape” line in the Environment Theme
- Amendment of the light pollution line in the Environment Theme to read “Impact of light pollution to nocturnal species and on the AONB”
- Inclusion of a “Habitat loss and noise disturbance for species” line in the Environment Theme
- Inclusion of an “Effect of light and dust on nature conservation sites” line in the Environment Theme
- Amendment of the Effect of climate change line in the Flood Risk Management and Coastal Change to read “Effect of climate change on the coastline and hydrological processes”



KcCPC look forward to receiving confirmation that lines in Table 3.6 are applicable to all Suffolk Coastal areas impacted by works connected with the Sizewell C development, not just areas within an AONB, protected landscapes and seascapes, etc.

Policy SCLP3.4

(Previously 3.5) KcCPC note and support the increase in scope of SCDC to “...take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning.”. In addition KcCPC support the inclusion of a provision of this policy that provides for the effective management of “Community safety and cohesion impacts”.

- 3.60** (Previously 3.56) KcCPC note and welcome the revision of this paragraph to include “...police facilities...public rights of way...”



Should SCDC give consideration to the explicit inclusion of Ambulance, Fire and Coast Guard services?

- 3.70** (Previously 3.66) KcCPC regard the appalling state of telecommunications, including broadband and mobile phone signals outside of virtually all urban areas as deplorable and unconscionable as we rapidly approach the second quarter of the 21st century.



Is it acceptable for a Local Plan that will see Suffolk Coastal enter the second third of the 21st century to limit its commitment to obtaining 21st century (in many cases 20th century would be an improvement!!) services for residents and businesses to a constraining policy “...supportive of its facilitation where necessary and appropriately designed.”?

How wide will the gap between urban ‘haves’ and ‘rural have nots’ need to be before SCDC decide to take assertive action to provide services capable of supporting the resident and business aspirations widely espoused in the Local Plan?

Policy SCLP3.5

(Previously 3.6) KcCPC note and welcome the inclusion of Suffolk Constabulary in the list of partners with whom SCDC will work “...to ensure that the growth over the plan period is supported by necessary infrastructure in a timely manner.”

KcCPC note and welcome the inclusion of requirements for new developments, that as recently as Dec-18 to Jan-19 have been omitted from Planning Permissions granted (i.e. infrastructure which encourages active lifestyles and healthy communities, open spaces, measures to increase places available at the school, etc.).

KcCPC are equally supportive of the need for water infrastructure, Holistic Water Management, electricity supply networks, high-speed broadband, etc. to be proven capable of supporting a development prior to the development being granted permission.



KcCPC assume that (as written) this policy is framed for all development and not just those of a particular scale and/or location (i.e. within or without Settlement Boundaries)?

3.71-3.73 (Previously 3.67 to 3.69)

KcCPC regard the occurrence of an Enabling Development as an exceptional occurrence where the decision to permit it should be open, transparent and open to public scrutiny prior to Planning Permission being granted.

KcCPC suggest that the burden of proof in respect to “community benefit” should be independently verified, prior to public scrutiny and Planning Permission being granted, with the cost borne by the developer.

KcCPC suggest that the monitoring of the realisation of “community benefit” should be independently verified during the agreed delivery period, with the cost borne by the developer.

4 Economy

- 4.14** KcCPC notes the insertion of this new paragraph, identifying the changing logistics sector and the potential opportunities these offer Suffolk Coastal.
- 4.15** KcCPC notes the insertion of this new paragraph rehearsing changes in policy regarding the use of Employment Area main road frontages for quasi-retail purposes (e.g. car showrooms, tyre & exhaust centres and builders' merchants).

Policy SCLP4.1

KcCPC note the aforementioned change in policy permitting the use of some Employment Area main road frontages for quasi-retail purposes. It is pleased to see that qualifying safeguards are included such that development should not be detrimental to the efficient and effective use of the remainder of the Employment Area.

However, KcCPC is concerned that Neighbourhood Plans are not specifically mentioned as having a role in determining whether such quasi-retail are applicable within the confines of a Neighbourhood Plan area.

Q KcCPC seek an amendment to this Policy, reserving the role of Neighbourhood Plans to determine the applicability of main road frontages being made available for quasi-retail purposes.

- 4.17** (Previously 4.12) KcCPC notes the amendment of this paragraph and the addition of a final sentence "In appropriate locations opportunities to utilise the main road frontage of sites ensures that a high quality design is brought forward which is in keeping with the surrounding area and raises the economic potential across the area."

Q KcCPC seek an amendment to this paragraph, reserving the role of Neighbourhood Plans to determine the applicability of the utilisation of main road frontages for high quality designs to be brought forward.

- 4.20** KcCPC notes the insertion of this new paragraph rehearsing changes in policy regarding businesses within existing Employment Areas who wish to expand onto adjacent land outside of the existing Employment Area, and advising that Policy SCLP4.3 allows for this.

Q KcCPC seek an amendment to this paragraph, reserving the role of Neighbourhood Plans to determine the suitability of adjacent land for expansion of existing businesses.

- 4.21** KcCPC notes the insertion of this new paragraph rehearsing the proposed safeguards and evidential requirements accompanying the aforementioned proposal to allow expansion onto adjacent land by established businesses.

Q KcCPC seek an amendment to this paragraph, reserving the role of Neighbourhood Plans to determine the suitability of adjacent land for expansion of existing businesses.

Policy SCLP4.2

KcCPC note the amendments to this Policy.

Q KcCPC seek an amendment to this policy, reserving the role of Neighbourhood Plans to determine the suitability of land for new employment development falling within use classes B1, B2 and B8 outside of existing Employment Areas but within Settlement Boundaries.

Q KcCPC seek an amendment to this policy, reserving the role of Neighbourhood Plans to determine the suitability of land for new employment development falling within use classes B1, B2 and B8 on land outside of Settlement Boundaries.

4.23 KcCPC notes the introduction of this new paragraph and its content.

4.24 (Previously 4.16) KcCPC notes the amendment of this paragraph.

4.25 (Previously 4.17) KcCPC notes the amendment of this paragraph.

4.26 (Previously 4.18) KcCPC notes this paragraph.

Q KcCPC seek an amendment to this paragraph, reserving the role of Neighbourhood Plans to jointly determine with the Planning Authority whether applicants have demonstrated that their proposals for expansion or intensification of employment premises do not have a material harm on the environment and that any potential adverse impacts can be successfully mitigated.

4.27 (Previously 4.19) KcCPC notes the critical safeguard to 'close by' residential areas & the residents amenity, which in such cases is exercised by SCDC.

Policy SCLP4.3

KcCPC note the amendments to this Policy.

Q KcCPC seek an amendment reversing the change in a) and making the bullet read

"a) The scale of development would have a detrimental impact on the highway network; or"

KcCPC seek an amendment inserting 'unsocial traffic movement patterns' in d) and making the bullet read

"d) There is harm to the amenity and living conditions of local residents and businesses relating to matters of unsocial traffic movement patterns, noise, vibration, dust and light; and"

KcCPC seek an amendment to the last paragraph of this policy, reserving the role of Neighbourhood Plans to determine the suitability of adjacent land outside of Settlement Boundaries for the purposes of expansion or intensification.

4.28-4.30 (Previously 4.20 to 4.27)

KcCPC note the paragraphs relating to the Protection of Employment Sites and the changing of the Appendix reference to Appendix E (previously Appendix B).

Policy SCLP4.4

KcCPC note the change to Appendix E referred to above.

4.31-4.35 (Previously 4.23 to 4.22)

KcCPC note the paragraphs relating to Economic Development in Rural Areas and the amendment relating to Rural Estates.

Policy SCLP4.5

KcCPC note the additions and amendments within the Policy.

4.36 (Previously 4.28) KcCPC notes the rewrite of this paragraph and the contents therein.

4.37-4.39 (Previously 4.29 to 4.31)

KcCPC note the paragraphs relating to Conversion and Replacement of Rural Buildings for Employment Use

Policy SCLP4.6

KcCPC note the additions and amendments within the Policy.



KcCPC seek an amendment to this paragraph, reserving the role of Neighbourhood Plans to determine the suitability of proposals seeking the conversion or replacement of rural buildings for the purpose of Employment Use.

4.40-4.43 (Previously 4.32 to 4.35)

KcCPC note the paragraphs relating to Farm Diversification

Policy SCLP4.7

KcCPC note the addition at point (d.) within the Policy.

4.44-4.50 (Previously 4.36 to 4.41)

KcCPC note the paragraphs relating to Town Centres and Retail and the additions at 4.44 and 4.45.

4.51-4.60 (Previously included 4.45 to 4.49)

KcCPC note the paragraphs relating to Opportunities and Capacity for Retail Growth and the additions at 4.52 and 4.53.

Policy SCLP4.8 (Previously SCLP4.9)

KcCPC note the revisions to this Policy and its content.

4.61 (Previously 4.50) KcCPC notes the minor amendments to this paragraph

4.62 (Previously 4.51 & 4.52) KcCPC notes consolidation of the previous paragraphs 4.51 & 4.52, along with the subsequent edit and amendment. KcCPC also notes Table 4.1.

4.63 (Previously 4.53) KcCPC notes this paragraph and the contents therein

Policy SCLP4.9 (Previously SCLP4.10)

KcCPC note the addition of a residential development provision within this Policy.

4.64 (Previously 4.54) KcCPC notes this paragraph and the contents therein

4.65 (Previously 4.55) KcCPC notes this paragraph and the contents therein

Policy SCLP4.10 (Previously SCLP4.11)

KcCPC note the minor textural changes made within this Policy.

4.66 (Previously 4.56) KcCPC notes the change of focus to Retail and Commercial Leisure in Martlesham and the subsequent revisions made to the prior content of the paragraph.

4.67 (Previously 4.57) KcCPC notes the change of focus to Retail and Commercial Leisure in Martlesham

Policy SCLP4.11 (Previously SCLP4.12)

KcCPC notes the change of focus to Retail and Commercial Leisure in Martlesham and the subsequent revisions made to the prior content of the Policy.

4.68-4.70 (Previously included 4.58 to 4.60)

KcCPC note the paragraph (4.68) relating to District Centres and the insertion of comments regarding Garden Neighbourhood opportunities and the list of existing District Centres.

KcCPC note the paragraph (4.69) relating to Local Centres and the insertion of a list of current Local Centres

Policy SCLP4.12 (Previously SCLP4.13)

KcCPC notes the change of Policy number.

5 Housing

- 5.1 KcCPC notes the changes to the temporal and dwelling delivery requirements, discussed elsewhere in KcCPC's response.
- 5.3 KcCPC notes the textural changes from the previous consultation
- 5.5 KcCPC notes the changed applicable Policy to SCLP3.3 rather than SCLP3.4 in the previous consultation.
- 5.6 KcCPC notes the substantial changes from the previous consultation, including development goals for the former Suffolk Police Headquarters site and the aforementioned Policy reference change.
- 5.7 KcCPC notes the substantial changes from the previous consultation and in particular the applicable Policy (SCLP4.9) pertaining to residential development in town centres.
- 5.9 KcCPC notes the textural changes from the previous consultation and the addition of "or through made Neighbourhood Plans." at the end of the last sentence.

Policy SCLP5.1

KcCPC notes the Policy for Housing Development in Large Villages

- 5.13 KcCPC notes the insertion of "They can also serve the needs of those living in other settlements or the countryside nearby although will generally cater for a smaller catchment than the Large Villages." in relation to existing services in Small Villages.

Policy SCLP5.2

KcCPC notes the Policy for Housing Development in Small Villages, reinforcing that development within Settlement Boundaries will be **"A small group of dwellings of a scale appropriate to the size, location and character of the village."** or **"Infill development (in accordance with Policy SCLP5.7)."** and that **"Residential development will be permitted on Exception Sites adjacent or well related to defined Settlement Boundaries in accordance with Policy SCLP5.11."**

- 5.15 KcCPC notes the description of Countryside and (subject to confirmation of the previous question regarding two separate uses of Countryside within this document) assumes that **all Countryside is treated equally for the purposes of both the Local Plan and the Planning Processes.**
- 5.19 KcCPC notes the insertion of "Exception sites for affordable housing may include entry-level accommodation for first time buyers or those looking to rent their first home, in accordance with the National Planning Policy Framework, where this forms part of a scheme which aims to meet locally identified needs for affordable housing."



KcCPC seek an amendment to this paragraph, reserving the role of Neighbourhood Plans to determine the suitability of proposals seeking to utilise 'Exception Site' status.

Policy SCLP5.3

KcCPC notes the Policy for Housing Development in the Countryside and particularly the context, where a revision of point d) has removed "...where this would meet an identified local need;"



KcCPC seek an amendment to this Policy, reversing the change made at point d) reinstating "...where this would meet an identified local need;"

- 5.21** KcCPC notes the insertion of “Clusters can vary in size, and can include those settlements in the countryside which do not have the range or amount of facilities to be classed as a Major Centre, Town, Large Village or Small Village.” at the commencement of this paragraph.

KcCPC note and welcome the final qualification of the paragraph “...which are well related to services and facilities.”

Policy SCLP5.4

KcCPC notes the Policy for Housing in Clusters in the Countryside and particularly the new Policy reference (SCLP10.4) rather than SCLP10.3 at the previous consultation.

Policy SCLP5.5

KcCPC notes the Policy for Conversions of Buildings in the Countryside for Housing and welcomes the safeguards described in points a) thro’ h).



KcCPC seek an amendment to this paragraph, reserving the role of Neighbourhood Plans to determine the suitability of proposals seeking to convert buildings in the countryside for housing.

- 5.33** KcCPC notes and welcomes the insertion of “The Marketing Guidance in Appendix E should be referred to where relevant.”

Policy SCLP5.6

KcCPC notes the Policy for Rural Workers Dwellings and welcomes the safeguards in points a) thro’ h).

- 5.35** KcCPC notes and welcomes the insertion of “Policy SCLP11.9 identifies Areas to be Protected from Development and within these infill policies would not apply. ”

Policy SCLP5.7

KcCPC notes the Policy for Infill and Garden Development and welcomes:

- the safeguards described in points a) thro’ e)
- the insertion of “...and incorporates landscaping where appropriate to mitigate any potential impacts or to enhance the appearance of the site;” at point b)
- the facility for Neighbourhood Plans to set their own policies on this type of development in response to local circumstances

- 5.36** KcCPC notes and welcomes the insertion of “...students...”, presumably if applicable, as a discrete category of people to be considered in determining housing mix.

- 5.38** KcCPC notes the extensive revisions made and “...a requirement for at least 40% of new dwellings to be 1 or 2 bedroom properties.” outlined in Policy SCLP5.8.

KcCPC also note that the subsequent table (5.1) portrays the District level need whilst acknowledging that, depending on the character of an area, some development sites may present a greater opportunity to secure smaller properties and “consideration will therefore be given to surrounding densities and character in this respect.”.

Table 3.6

KcCPC note that at a District wide level there is:

- a 1% decline in the need for 1 bedroom properties, now 12% rather than 13%
- 2 bedroom need remains steady at 29%
- 3 bedroom need has declined by 3% to 27% whilst
- Need for 4 bedrooms has leapt by 5% to 33%

5.44 KcCPC notes the inclusion at Line 1 of “...but may also help to improve choice in the housing stock across the District more generally.” made in regard to a range of types of housing that may be particularly well suited to the older population.

5.45 KcCPC notes and welcomes the inclusion at Line 5 of “The Suffolk Healthy Ageing Needs Assessment (2018) identifies tackling social isolation and loneliness as one of its recommendations. There is a particular need for older and vulnerable people to have opportunities to access sustainable transport and modes of travel other than the car.”

Q KcCPC look forward to SCDC (working with its partners) bringing forward Policies and practical solutions to a problem that continues to develop as transport options are withdrawn, which especially hit vulnerable groups (i.e. low-income families, young mothers, single parents, the disabled, those with limited mobility, the elderly, dementia sufferers, etc.).

5.47 KcCPC notes a change to this paragraph, replacing “...the size of dwelling by bedroom numbers.” with “the number of rooms that could be used as bedrooms” as a method for ensuring “that the size of dwellings appropriately reflects the needs identified,...”

5.48 KcCPC notes the insertion at Line 4 of “There are also other or complementary mechanisms in which communities can deliver the homes needed in the local community, for example through the establishment of a Community Land Trust.”

Policy SCLP5.8

KcCPC notes the Policy pertaining to Housing Mix and welcomes:

- clarity in respect to specific bedroom thresholds dependent on the overall development size
- clarity on thresholds where the requirements of Part M4(2) are invoked
- the requirement for any sheltered and extra-care housing proposal to incorporate a mix of tenures and sizes to meet an identified need
- the facility for Neighbourhood Plans to set out an approach to housing type and mix specific to the local area, where this is supported by evidence

5.51 KcCPC notes the revision at Line 2 where “...a large proportion of demand (*for Self Build & Custom Build Housing Plots*) is in the area around the east of Ipswich and Woodbridge.” has been replaced with “a large proportion of the demand is for village and countryside locations, and geographically, where a location is identified, the area around the east of Ipswich, Woodbridge and the Deben peninsula are popular locations.”.

5.54 KcCPC notes the change in the Appendix to ‘E’ from ‘B’ at Line 13.

Policy SCLP5.9

KcCPC notes the Policy relating to Self Build and Custom Build Housing and the insertion of new text at Line 6 referring out to meeting principles “set out in Appendix E.”.

5.57 KcCPC notes the revision of this paragraph defining what ‘Affordable Housing’ is.

5.58 KcCPC notes the revision of this paragraph, deleting all beyond “...balanced communities.” and replacing the remainder with “The NPPF states that affordable housing contributions should only be sought for major housing development (defined as sites of ten dwellings or more in the National Planning Policy Framework).”

5.59 KcCPC notes the revision of this paragraph, following the adoption of the NPPF in 2018.

KcCPC further notes that the NPPF states that exemptions, in respect to a requirement for 10% of developments (of 10 or more dwellings) should be made available for affordable home ownership, where the development is (amongst other things) a rural exception site.

5.60 KcCPC notes the revision of this paragraph and in particular:

- a drop in the need for social rent/affordable rent to 10.4% from 12.3% at the last consultation
- a drop in the need for Starter Homes/Discounted Home ownership to 4.1% from 6.9% at the last consultation with;
- the need for shared ownership remaining at 6.3%

KcCPC also notes that “The NPPF requirement for 10% of homes on major development to be for affordable home ownership will be considered alongside the conclusions of the Strategic Housing Market Assessment and other evidence of local need on a case by case basis.”

5.61 KcCPC notes the revisions to this paragraph and in particular the issue of Starter Homes and the ease with which they might/could migrate to market housing over time.

5.63 KcCPC notes this new paragraph and the encouragement to get developers to work with the Council Housing Team to ensure appropriate evidence is provided with any planning application.

5.64 KcCPC notes this new paragraph and the intention of SCDC to operate the allocation of any secured affordable housing provision through its Housing remit.

Policy SCLP5.10

KcCPC notes the Policy relating to Affordable Housing on Residential Developments

KcCPC notes and welcomes the insertion of “...or sites of 0.5ha or more...” in those developments required to make provision for 1 in 3 units as affordable dwellings.

KcCPC also notes a new sentence inserted in this Policy “Proposals which provide a higher amount of affordable housing than that set out above will also be permitted.”



KcCPC are concerned that without further qualification this newly inserted provision could potentially be abused, with a developer playing mathematics with a proposal. For example, formulating proposals where fractional increments (i.e. 1.1 in three) provide leverage for larger developments.

KcCPC note the change from “...elsewhere.” to “...outside of the site.” at Line 10 and wonder what the motivation is for the change?

5.67 (Previously 5.65) KcCPC notes and welcomes the clarifying addition of “A Starter Home is as defined in the Housing and Planning Act 2016.”

5.68 KcCPC notes this new paragraph.

Policy SCLP5.11

KcCPC notes the Policy relating to Affordable Housing on Exception Sites.

KcCPC notes the new inclusion at point b) “...or well related to...”



KcCPC are concerned that this insertion adds an unnecessary complication to something that was clear and unambiguous in the previous consultation.

At worst, this amendment could be regarded as inserting ‘wiggle room’ a ‘fudge factor’ or ‘flag of convenience’ for an exception that has no other provision elsewhere in the Local Plan or NPPF. With that in mind, KcCPC would like to see the amendment removed!

Policy SCLP5.12

KcCPC notes the Policy relating to Houses in Multiple Occupation

5.73 (Previously 5.70) KcCPC notes and welcomes the clarifying addition of “Particular care will be taken in respect of residential annexes to ensure that, through design and/or planning conditions, annexes are not able to be separated from the main building in order to create a separate dwelling.”

Policy SCLP5.13

KcCPC notes the Policy relating to Residential Annexes and the new requirement inserted “f) There is sufficient off-road parking; and”.

KcCPC also note the revision of the final paragraph such that “Conditions will be applied to limit occupation to prevent future use as a separate dwelling and where an annex is proposed as an extension, it should be designed in a way which will enable it to be incorporated into the host dwelling when no longer required.”

5.75 (Previously 5.72) KcCPC notes and welcomes the revised provisions of this paragraph such that “The size and scale of the proposed extension should reflect the character of the property and the local area. Retention of boundary features or the use of appropriate landscaping and native species can help to address any potential visual impacts. Permitted Development rights may be withdrawn for the extended area where it is considered that the addition of swimming pools, greenhouses and garden sheds for example could potentially detract from the openness of the landscape or character of the area, Consideration will also be given to the landscape character of the area in terms of Policy SCLP10.4.”

Policy SCLP5.14

KcCPC notes and welcomes the Policy relating to Extensions to Residential Curtilages

Policy SCLP5.15

KcCPC notes the Policy relating to Residential Moorings, Jetties and Slipways

Policy SCLP5.16

KcCPC notes the Policy relating to Residential Caravans and Mobile Homes.

KcCPC welcome the inclusion of the new provision, specifically “c) They are located outside of Flood Zone 2 and Flood Zone 3; and”



KcCPC are concerned that despite a request in the previous consultation there is still **no consideration given within the Local Plan to policies for Holiday Parks, Static Holiday Caravans, Cabins and Chalets.**

Consequently, KcCPC seek either amendment of SCLP5.16 to include Holiday Parks, Static Holiday Caravans, Cabins and Chalets policies **or** a new Policy is written to explicitly deal with the issues of Holiday Parks, Static Holiday Caravans, Cabins and Chalets policies

As a starting point, KcCPC propose that the **Development Management Policy DM18** (2013) be reviewed, revised and augmented to deal with the policy issues pertaining to **Holiday Parks, Static Holiday Caravans, Cabins and Chalets policies.**

Policy SCLP5.16

KcCPC notes the Policy relating to Gypsies & Travellers

6 Tourism

- 6.1 KcCPC notes the new/ heavily revised paragraph at 6.1
- 6.2 KcCPC notes the new/ heavily revised paragraph at 6.2
- 6.3 (Previously 6.1) KcCPC notes the paragraph
- 6.4 (Previously 6.2) KcCPC notes the paragraph and especially the increase to 12% of total employment attributable to tourism revenues, up from 11% in the last iteration.

KcCPC also note the insertion of “The Suffolk Coastal Economic Impact of Tourism Report 2017 identifies that over 6.3 million tourist trips were recorded generating a total of £325 million total tourism value across the District.”

- 6.5 (Previously 6.3) KcCPC notes the revised paragraph
- 6.7 (Previously 6.5) KcCPC notes the revised paragraph
- 6.8 (Previously 6.6) KcCPC notes the revised paragraph
- 6.9 (Previously 6.7) KcCPC notes the heavily revised paragraph
- 6.10 (Previously 6.8) KcCPC notes the paragraph

Policy SCLP6.1

KcCPC notes the Policy relating to Tourism



KcCPC are concerned that despite a request in the previous consultation there is still **no consideration given within the Local Plan to policies for Holiday Parks, Static Holiday Caravans, Cabins and Chalets.**

KcCPC note that within SCLP6.1:

“Proposals for tourist related development will be determined by the area’s capacity for further growth in the following locations:

- a) The resorts of Felixstowe and Aldeburgh;
- b) Market towns of Woodbridge, Framlingham, Saxmundham and Leiston;
- c) The Heritage Coast environment which is of national significance;
- d) The Suffolk Coast and Heaths Area of Outstanding Natural Beauty; and
- e) Rural areas across the rest of the District.”

As a consequence of the inclusion of Rural Areas (at Point e above), KcCPC seek either amendment of SCLP5.16 to include Holiday Parks, Static Holiday Caravans, Cabins and Chalets policies **or** a new Policy is written to explicitly deal with the issues of Holiday Parks, Static Holiday Caravans, Cabins and Chalets policies

As a starting point, KcCPC propose that the **Development Management Policy DM18 (2013)** be reviewed, revised and augmented to deal with the policy issues pertaining to **Holiday Parks, Static Holiday Caravans, Cabins and Chalets policies.**

Current activity and outline proposals for the further development of a Holiday Park cum Static Holiday Caravan Cabin and Chalet site are already failing tests within the **DM18 (2013)** Policy and suitable alternative

Policies going forward are essential to safeguard: the health and wellbeing of local residents, infrastructure and health facilities.

In the absence of district Holiday Parks, Static Holiday Caravans, Cabins and Chalets policies, KcCPC note and welcome the following provisions of SCLP6.1;

“Applicants will be expected to undertake biodiversity and habitat assessments to ensure that any development of tourism related facilities does not conflict with environmental policies. Where appropriate the Council will support the introduction of local management solutions to address any issues caused by tourism.”

KcCPC look forward to SCDC exercising the provision of **SCLP6.1** (above) and any further Holiday Parks, Static Holiday Caravans, Cabins and Chalets policies early, to address current and future issues.

6.11 (Previously 6.9) KcCPC notes the revised paragraph

6.12 KcCPC notes the revised paragraph

6.13 (Previously 6.10) KcCPC notes the revised paragraph and welcomes the new provision, specifically:

“In sensitive locations across the District, proposals will need to be subject to consideration under the Habitats Regulations to ensure that development does not cause any significant adverse impacts.”

Policy SCLP6.2

KcCPC notes the lightly revised Policy relating to Tourism Destinations (previously Existing and New Tourism Attractions).

6.16-6.23

(Previously 6.13-6.20) KcCPC notes the paragraphs

Policy SCLP6.3

KcCPC notes the lightly revised Policy relating to Tourism Development within the AONB and Heritage Coast and welcomes additional safeguards and provisions at:

- d) inserts “...prevents...” in respect to adverse impacts on the natural environment
- e) inserts “...and enhancement of the natural beauty and special qualities of the AONB and its setting.”
- h) inserts “...and ensures the retention of dark skies.” in regard to artificial light sources & light pollution

6.24 (Previously 6.21) KcCPC notes the revised paragraph and is concerned with regard to the last sentence. Specifically, “The areas outside of the AONB can play a key role in supporting and facilitating the increase of destinations and **accommodation** across the District.” Tourism



KcCPC are concerned that despite a request in the previous consultation there is still **no consideration given within the Local Plan to policies for Holiday Parks, Static Holiday Caravans, Cabins and Chalets.**

KcCPC understands the need for a wide range of holiday accommodation styles and is accepting of well regulated and properly authorised development (within the framework of a Local Plan and District Policies). However, it anticipates more exploitation of policy gaps if no further provisions are adopted. Consequently, KcCPC urges SCDC to urgently re-examine this issue of Holiday Parks, Static Holiday Caravans, Cabins & Chalets and formulate appropriate policy safeguards for the environment, residents and infrastructure.

Policy SCLP6.4

KcCPC notes the revised Policy relating to Tourism Development outside of the AONB and embraces the provisions of the policy, but also believes that the same degree of diligence should apply to developments under this policy as is exercised over developments within the AONB. Not to do so would seem to treat; the environment, historical assets, residents and businesses in places other than the AONB inequitably to their counterparts who happen to be sited within the AONB.



As a consequence, KcCPC urges SCDC to urgently re-examine the issue of Holiday Parks, Static Holiday Caravans, Cabins & Chalets and formulate appropriate policy safeguards for the environment, historical assets, residents and infrastructure.

6.27-6.33

(Previously 6.24-6.28) KcCPC notes the revised paragraphs and welcomes the inclusion of:

“...It is important that the design of new accommodation ensures that such developments do not conflict with the character of the landscape.”

“Providing a diverse range of tourist accommodation across the District is desirable and the Council is generally supportive of opportunities that come forward subject to compliance with other policies in the Local Plan.”

“National Planning Policy supports tourism opportunities in the rural areas which respect the character of the area.”.

“In the interests of sustainable travel, proposals for new tourist accommodation will need to demonstrate good connectivity with tourist destinations, local amenities and promote walking and cycling opportunities.”

“Planning conditions will limit the occupation of new self-catering tourist accommodation units to a continuous period of 56 days by one person or persons within one calendar year. The owners/operators of the accommodation will be required to maintain an up-to-date Register of all lettings, which shall include the names and addresses of all those persons occupying the units during each individual letting. The Register will be required to be made available at all reasonable times to the Local Planning Authority.”



As the Draft Local Plan does not currently have any appropriate policies, KcCPC urges SCDC to urgently re-examine the issue of Holiday Parks, Static Holiday Caravans, Cabins & Chalets and formulate appropriate policy safeguards for the environment, historical assets, residents and infrastructure.

Policy SCLP6.5

KcCPC notes the revised Policy relating to New Tourist Accommodation and the safeguards therein. However, KcCPC believe that this policy may be ineffective in dealing with some issues that may arise with new development applications for Holiday Parks, Static Holiday Caravans, Cabins & Chalets and similar Tourist Accommodation.



As a consequence, KcCPC urges SCDC to urgently re-examine the issue of Holiday Parks, Static Holiday Caravans, Cabins & Chalets and formulate appropriate policy safeguards for the environment, historical assets, residents and infrastructure.

6.34-6.37

(Previously 6.29-6.31) KcCPC notes the revised paragraphs and welcomes the clarity it provides in respect of tourist accommodation loss through conversion to residential occupancy.

Policy SCLP6.6

KcCPC notes the revised Policy relating to Existing Tourist Accommodation and welcomes the clarity it provides in respect of tourist accommodation loss through conversion to residential occupancy.

7 Transport

7.1-7.8 KcCPC notes the light revision of these paragraphs and particularly welcomes:

“In designing and assessing development proposals, the Public Rights of Way Network should be considered as a means of encouraging physical activity, providing access to the natural environment, supporting tourism, reducing travel by vehicular modes, reducing carbon emissions and (where relevant) aiding recreational avoidance of sensitive sites.”

“Travel Plans are required by the National Planning Policy Framework for all new developments that create significant amounts of movement. The purpose of a Travel Plan is to set out measures to facilitate sustainable forms of travel and reduce the use of the private car...It is not necessarily the size of the development that triggers the need for such a plan but more the nature of the use.”

Policy SCLP7.1

KcCPC notes the revised Policy relating to Sustainable Transport and welcomes the clarity it provides in respect of new developments and the safeguards it contains.



However, KcCPC are concerned that the threshold requiring Travel Plans for residential development is set too high at 80 or more dwellings.

KcCPC believe that because of the identified deficiencies in the existing roads infrastructure, particularly in and around villages and in Countryside, a more sensible threshold should be 40 or more.

Similarly, KcCPC welcome the revised final paragraph of the Policy:

“In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds a Transport Statement will be required for development of 50 -80 dwellings and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. Non residential development will be considered on a case by case basis dependent on the volume of movements anticipated with the use proposed.”



But, reiterate the belief that the thresholds in rural locations, villages and Countryside should be halved, reflecting the differing infrastructural conditions between urban and rural areas.

7.9-7.16

KcCPC notes the light revision of these paragraphs

Policy SCLP7.1

KcCPC notes the revised Policy relating to Parking Proposals and Standards and welcomes the clarity it provides in respect of new developments and the safeguards it contains.

8 Transport

8.1-8.8

(Previously 8.1-8.7) KcCPC notes the light revision of these paragraphs and the insertion of a new and additional paragraph at 8.3:

“8.3 Large scale developments provide the opportunity to create places where communities can thrive through the provision of social, recreational, cultural and community facilities to meet the needs of residents and visitors. Ensuring that community facilities and assets enable and support healthy lifestyles across the district is essential and will broaden the variety of provision for all.”

Policy SCLP8.1

KcCPC notes the unrevised Policy relating to Community Facilities and Assets

8.9-8.16

(Previously 8.8-8.15) KcCPC notes the light revision of these paragraphs and the additions of

“Open space such as countryside which provides a visual sense of openness is not included within this policy as normally those areas are not publicly accessible, other than on public rights of way.” at 8.9 (previously 8.8)

“apart from when local evidence and provision demonstrates the need for an alternative approach.” at 8.12 (previously 8.11)

Policy SCLP8.2

KcCPC notes the lightly revised Policy relating to Open Spaces

8.17-8.19

(Previously 8.16-8.18) KcCPC notes the light revision of these paragraphs.

Policy SCLP8.3

KcCPC notes the lightly revised Policy relating to Allotments



KcCPC question why there has been an insertion of:

“d) There is evidence to show that there is unlikely to be any future demand for allotments.”

when it appears to duplicate

“a) Evidence shows that there is unlikely to be any future demand for the allotments;”

8.20-8.25

(Previously 8.19-8.24) KcCPC notes the light revision of these paragraphs.



KcCPC continue to be very concerned about the degree of “social division” resulting from investment pouring into urban areas to increase communication infrastructure and provide competing services – effectively reducing the costs to residents and businesses, whilst rural areas struggle to get decent basic services (even reliable, good quality, traditional telephone services) let alone benefit from competing service provision and the consequent reduction in charges.

KcCPC wonder why SCDC continue to be slow at addressing this issue and start taking pro-active steps to close the ever growing 'social chasm' between the "have access" and "don't have access"?

This is all the more puzzling as Suffolk Coastal plays host to one of the largest innovators (and apparently one of the District's key economic drivers) in these areas, namely BT Group plc at Adastral Park.

Why haven't SCDC sought commitment from BT Group plc to leverage their powers of innovation to bolster the competitiveness of the Suffolk Coastal area and heal some of the 'social division' they are helping to fuel through their local ineffectiveness at providing good quality services?

Policy SCLP8.4

KcCPC notes the unrevised Policy relating to Digital Infrastructure

9 Climate Change

9.1-9.11

KcCPC notes the light revision of these paragraphs and the insertion of “Proposals relating to offshore wind should also take account of relevant policies and guidance in the East Marine Plan.” at 9.2.

Policy SCLP9.1

KcCPC notes the lightly revised Policy relating to Low Carbon & Renewable Energy and the insertion of:

“with the exception of wind energy schemes,” at Line 1 and

“Wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan.” at Line 11

9.12-9.23

(Previously 9.12-9.22) KcCPC notes the light revision of these paragraphs and the additions, specifically:

“Coastal development proposals should also take account of Policy CC2 of the East Marine Plan when minimising emissions.” at paragraph 9.15

“9.17 Improved energy efficiency and a reduction in CO2 emissions in buildings can be achieved through various means including orientation, siting, photovoltaics and heat pumps. The Council supports viable and permissible methods of improving energy efficiency and reducing CO2 emissions in buildings.”

“The viability information must be compiled in line with viability guidance contained in Appendix G.” at 9.18 (previously 9.17)

“Waste arising from construction itself should be minimised, where possible.” at 9.19 (previously 9.18)

Policy SCLP9.2

KcCPC notes the lightly revised Policy relating to Sustainable Construction and additions, specifically:

“Development proposals are also encouraged to set out measures for minimising waste arising from the construction process.” at Line 9

“Proposals should improve the efficiency of heating, cooling and lighting of buildings by maximising daylight and passive solar gain through the orientation of buildings.” at Line 14

9.24-9.36

(Previously 9.23-9.33) KcCPC notes the light revision of these paragraphs and the change of included paragraphs in this section through the introduction of:

9.35 (Previously 9.42) Coastal Squeeze is the term used to describe habitats on the coast that are ‘squeezed’ between man-made barriers, such as river walls, sea walls and farmland, and an eroding coast. In a natural system, areas of saltmarsh or shingle ‘move’ inland as sea levels rise, and the animals and plants that depend on them migrate with the habitat.

and

9.36 (Previously 9.42) Realignment is one answer to the problems caused by coastal squeeze because it gives the coast room to evolve. This can be done in both a managed and unmanaged way. An example of this being the construction of walls inland of historic defences to protect land and property behind them, while

in front, natural processes take over and saltmarsh, for example, is allowed to develop. Innovative approaches such as this that are in keeping with the natural processes of the coastline will be supported, where appropriate, by the Council.

Policy SCLP9.3

KcCPC notes the lightly revised Policy relating to Coastal Change Management Area and after Line 20, the removal of:

“Proposals for new or replacement estuary defence schemes will only be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the endorsed estuary plans/strategies, and there will be no material adverse impact on the environment.”

9.37-9.43

(Previously 9.34-9.43) KcCPC notes these paragraphs and the and the movement of two Paragraphs (Previously 9.42 & 9.43) to become 9.35 & 9.36.

Policy SCLP9.4

KcCPC notes the unchanged Policy relating to Coastal Change Rollback or Relocation

9.45-9.56

(Previously 9.44-9.54) KcCPC notes the light revision of these paragraphs and a new paragraph at 9.52.

Policy SCLP9.5

KcCPC notes the lightly revised Policy relating to Flood Risk

9.57-9.60

(Previously 9.55-9.58) KcCPC notes the light revision of these paragraphs.

Policy SCLP9.6

KcCPC notes the lightly revised Policy relating to Sustainable Drainage Systems

9.61 (Previously 9.59) KcCPC notes the revised paragraph

9.62 KcCPC note the inclusion of a new paragraph (and the deletion of what was previously 9.60 in the earlier iteration.)

In respect to:

“9.62 The Deben Holistic Water Management Pilot Project provides a best practice example of holistic water management, in that, it involves the re-use of water that would normally be pumped into the river system which adds to flow velocity and ultimately the rate of erosion. Through holistic water management methods such as attenuation ponds and managed aquifer recharge, the pilot project will filter excess water from flooding into the groundwater tables which will help to improve river flows and water quality. The Council supports this approach to holistic water management and will aim to complement such an approach, where possible. “

KcCPC welcomes changes to SCDC policy where pilots are proven to be repeatable, sustained and deliver results offering quantum improvements over current practices.

Policy SCLP9.7

KcCPC notes and welcomes the heavily revised Policy relating to Holistic Water Management

10 Natural Environment

10.1-10.17

KcCPC notes and welcomes the clarifications and additive revisions to these paragraphs.

KcCPC are particularly supportive of the position taken in 10.7, specifically:

“...the potential exists nonetheless for all new developments to look at ways of increasing or improving areas of biodiversity and/or geodiversity importance, providing a net gain of biodiversity and/or geodiversity and enhancing the green infrastructure network.”

and KcCPC would support an even stronger approach, whereby any new development (large or small) was only approved where measures were included to facilitate a net gain of biodiversity and/or geodiversity and sustain and/or enhance green infrastructure.

KcCPC are reassured to note the inclusion of the new 10.14, specifically;

“10.14 The NPPF states that if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. This sequential approach is referred to as the ‘mitigation hierarchy’ and the policy has been created to cover these scenarios.”

However, KcCPC are concerned as to what would constitute ‘significant harm’ whilst being able to reflect the context and variable scale of proposed developments. The answer could possibly be one of proportionality up to a threshold, and then an absolute rule.

Policy SCLP10.1

KcCPC notes and welcomes the heavily revised Policy relating to Biodiversity and Geodiversity.

10.18-10.23

KcCPC notes and welcomes the clarifications and light revisions to these paragraphs.

Policy SCLP10.2

KcCPC notes the Policy which clear and concise

10.24-10.26

KcCPC notes and welcomes the introduction of a new section on Environmental Quality.

KcCPC is concerned about the tone of:

“...the Plan seeks to protect high quality agricultural land where possible. Whilst in some cases meeting wider objectives will necessitate the loss of agricultural land, particularly considering the relatively limited amount of brownfield land available for development in the District, the policy seeks to ensure that loss of agricultural land is a consideration.”

KcCPC would seek to have the “high quality” deleted from the first line of the excerpt above. Variety in the quality of agricultural land in the UK enables a broad range of planting cycles to be adopted and for the growth of a wider range of food and fodder crops than would be economic if only high quality agricultural land was available.

Policy SCLP10.3

KcCPC notes the Policy which clear and concise

10.27-10.41

(Previously 10.22-10.36) KcCPC notes the light revision of these paragraphs.

Policy SCLP10.4 (Previously SCLP10.3)

KcCPC notes and welcomes the lightly revised Policy relating to Landscape Character

10.42 & 10.43

(Previously 10.37 & 10.38) KcCPC notes the light revision of these paragraphs.

Policy SCLP10.5 (Previously SCLP10.4)

KcCPC notes and strongly supports the unaltered Policy relating to Settlement Coalescence.

11 Built Environment

11.1-11.16

KcCPC notes and welcomes the clarifications and additive revisions to these paragraphs and has the following comments and observations.

- 11.1** KcCPC notes with some concern the revision of Listed Buildings to circa 2,300 compared to 2,500 in the previous iteration.



KcCPC question why the number of Listed Buildings has declined by nearly 10%

KcCPC note that the recent designation of Kelsale village centre has increased the number of Conservation Areas in the district to 36.

KcCPC note the removal of the subsequent paragraph beginning “High quality design is a critical...” at Line 4 of the previous iteration of the Draft Local plan.

- 11.2** (Previously 11.3) KcCPC notes the revised paragraph and further development of the requirements of the NPPF with:

“As stated in paragraph 124 of the National Planning Policy Framework ‘the creation of high quality buildings and places is fundamental to what the planning and development process should achieve’.”

- 11.3** (Previously 11.4) KcCPC notes the revised paragraph and further development of the requirements of the NPPF with:

“The National Planning Policy Framework also promotes the effective use of land and it is important that this is achieved alongside delivering high quality and inclusive design.”

- 11.5** KcCPC note and welcome the insertion of this new paragraph

“11.5 To help facilitate the understanding of local character and to support development that acknowledges and enhances the essence of local character it is important that the most appropriate information sources are referenced in relevant planning applications. Sources which may assist with identifying and assessing local character include Conservation Area Appraisals, Neighbourhood Plans, village/parish plans and the Suffolk Design Guide.”

- 11.15** KcCPC note and welcome the addition to this paragraph, specifically:

“...in relation to the design of a proposal. Applicants are encouraged to engage with communities through the use of Building for Life 12.”

Policy SCLP11.1

KcCPC notes and strongly support the provisions of this heavily revised Policy relating to Design Quality

Policy SCLP11.2

KcCPC note the content of the Policy relating to Residential Amenity

11.18-11.30

KcCPC notes and welcomes the clarifications and additive revisions to these paragraphs and has the following comments and observations.

- 11.19** KcCPC again express concern at the apparent loss of 200 Listed Buildings since the last draft of the Local plan.

KcCPC note the addition at the end of this paragraph, specifically;

“Within the District the heritage assets characteristic of the area reflect the important coastal, cultural, farming and military history and relate to a diverse range of building typologies including resort tourism, aviation, landed estates and park and garden structures amongst many others.”

- 11.20** KcCPC note and strongly support the content of this paragraph, added since the last iteration:

“These heritage assets need to be protected and enhanced for the benefit of current and future generations. National policies require Local Plans to set out a positive strategy for the protection and enhancement of these valuable assets. It is recognised that heritage assets are significant and are a resource that cannot be replaced. Therefore, the Council intends to pursue a policy approach that incorporates a positive strategy for the protection and enhancement of the District’s heritage assets.”

Policy SCLP11.3

KcCPC note and welcome the heavily revised content of the Policy relating to Historic Environment.

- 11.31** KcCPC note and strongly support the content of this paragraph, added since the last iteration

Policy SCLP11.4

KcCPC note and welcome this new Policy relating to Listed Buildings, added since the last iteration

- 11.32 & 11.33** (Previously 11.33 & 11.34)

KcCPC notes and welcomes the clarifications and additive revisions to these paragraphs

- 11.33** (Previously 11.34) As a recipient of a recently designated Conservation Area KcCPC welcome and strongly support the provisions of this heavily revised paragraph.

Policy SCLP11.5

KcCPC note and strongly support the provisions of this policy, dealing with Conservation Areas.

- 11.34-11.37** (Previously 11.29-11.32)

KcCPC notes and welcomes the clarifications and additive revisions to these paragraphs.

Policy SCLP11.6

KcCPC note and strongly support the provisions of this policy, dealing with Non-Designated Heritage Assets

- 11.38-11.43** (Previously 11.35-11.40)

KcCPC notes these unchanged paragraphs.

Policy SCLP11.7

KcCPC note and strongly support the provisions of this policy, dealing with Archaeology and welcome the addition made since the last iteration of the Local Plan, specifically:

“Archaeological conditions or planning obligations will be imposed on consents as appropriate. Measures to disseminate and promote information about archaeological assets to the public will be supported.”

- 11.44** (Previously 11.41) KcCPC note and strongly support the provisions of this heavily revised paragraph dealing with Parks & Gardens. In particular KcCPC welcomes the additions at the end of the paragraph, specifically:

“Policy relating to historic parks and gardens identified as Non Designated Heritage Assets is contained with policy SCLP11.6. The Council will keep the list of locally identified Historic Parks and Gardens under review and will designate further Historic Parks and Gardens where this is considered appropriate.”

Policy SCLP11.8 (Previously Policy SCLP11.7)

KcCPC note and strongly support the provisions of this policy, dealing with Parks and Gardens.

KcCPC welcome the addition of Cliff Gardens and Town Hall Garden (Felixstowe) Grade II Listed) since the previous iteration of the Draft Local Plan, and the consequent necessary revisions to the Policy.

KcCPC also note the added paragraph at the foot of the policy, specifically:

“Proposals affecting or within the designated and non-designated parks and gardens will be required to be accompanied by landscape design and management proposals, to ensure a high level of design, mitigation and enhancement is achieved.”

11.45 & 11.46 (Previously 11.42 & 11.43)

KcCPC notes these unchanged paragraphs.

Policy SCLP11.9 (Previously Policy SCLP11.8)

KcCPC note and strongly support the provisions of this unchanged policy, dealing with Areas to be Protected from Development.

11.47-11.49 (Previously 11.44 & 11.46)

KcCPC notes these unchanged paragraphs.

Policy SCLP11.10 (Previously Policy SCLP11.9)

KcCPC note the provisions of this policy, dealing with Newbourne - Former Land Settlement Association Holdings

12 Area Specific Strategies

12.1-12.5

As a Parish with a designated Neighbourhood plan Area, KcCPC notes the provisions within these paragraphs, with the amendments and revisions made since the previous iteration of the Draft Local Plan, where appropriate.

12.6 KcCPC note the content of Para 12.6 and in particular guidance that “The Planning Practice Guidance states that Neighbourhood Plans may meet their requirements through allocations plus windfall, however not through solely windfall.”

12.7 KcCPC note the insertion of a new paragraph at 12.7 and acknowledge the contents contained within it, and in particular that “...in a number of policies there is specific reference to the types of policies that Neighbourhood Plans may choose to include. However, Neighbourhood Plans may cover other topics and provide local detail in relation to other policy areas where appropriate.”

Policy SCLP12.1

KcCPC note a minimum indicative number of dwellings that the Kelsale cum Carlton Neighbourhood Plan Area should be planned for as 20 dwellings.

KcCPC further note that this number is “In addition to existing permissions, allocations and dwellings with resolution to grant (as at 31.3.18)”.

12.11-12.18

As a Parish with a designated Neighbourhood plan Area, KcCPC notes the provisions within these paragraphs, with the amendments and revisions made since the previous iteration of the Draft Local Plan, where appropriate.

12.19 (Previously 12.16)

KcCPC note that “This Local Plan has reviewed and carries forward the unimplemented allocations (as at 31st March 2018) contained in the Site Allocations and Area Specific Policies Development Plan Document and the Felixstowe Peninsula Area Action Plan Development Plan Document (see Table 12.3 and Table 12.4).”

KcCPC understand that total allocations made under this review and decided to be carried forward, that apply to Kelsale cum Carlton comprise the following:

Table 12.3

“Policy SSP10 – Land south of Ambleside, Main Road, Kelsale cum Carlton (SCLP12.53)” – Residential

And

Table 12.4

“Policy SSP25 – Carlton Park, Main Road, Kelsale cum Carlton (SCLP12.37)” – Employment Land

Policy SCLP12.28 (Previously 12.25)

KcCPC note the revised policy describing the Strategy for Saxmundham over the plan period.

As a village reliant on Saxmundham for virtually all its’ services, KcCPC are concerned about:

- the implied increase in traffic arising from the strategy, the impact on residents, roads, car parking and surrounding settlements

- the increase in pressure on infrastructure (water & sewerage, health, education, etc.) and the potential increase in traffic congestion as patients, parents and Holiday Park traffic cross and re-cross Saxmundham to access both existing and new; health, education and shopping facilities.
- mitigating the increase in risk of coalescence

Policy SCLP12.29 (Previously 12.26)

KcCPC note the heavily revised policy describing the South Saxmundham Garden Neighbourhood.

As a village reliant on Saxmundham for virtually all its' services, KcCPC are concerned about:

- the implied increase in general traffic arising from the strategy, the impact on residents, roads, car parking and surrounding settlements
- the concentration of seemingly all the new 'early years' provision at the southerly end of the Kelsale, Saxmundham & Benhall grouping, leading to further specific traffic movements.
- the increase in pressure on infrastructure (water & sewerage, health, education, etc.) and the potential increase in traffic congestion as patients, parents and Holiday Park traffic cross and re-cross Saxmundham to access both existing and new; health, education and shopping facilities.

Policy SCLP12.30 (Previously 12.27)

KcCPC note the revised policy describing the Land North East of Street Farm, Saxmundham.

As a village reliant on Saxmundham for virtually all its' services, KcCPC are concerned about:

- the implied increase in general traffic arising from the strategy, the impact on residents, roads, car parking and surrounding settlements
- the concentration of seemingly all the new 'early years' provision at the southerly end of the Kelsale, Saxmundham & Benhall grouping, leading to further specific traffic movements.
- the increase in pressure on infrastructure (water & sewerage, health, education, etc.) and the potential increase in traffic congestion as patients, parents and Holiday Park traffic cross and re-cross Saxmundham to access both existing and new; health, education and shopping facilities.
- mitigating the increase in risk of coalescence
- effective protection for the Countryside beyond the development and the amenity it offers.

Policy SCLP12.34 (Previously 12.29)

KcCPC note the lightly revised policy describing the Strategy for Rural Areas

KcCPC note that the Local Plan remains silent on any policy to address the increasing problem of 'second homes', reducing the vitality and vibrancy in villages and the Countryside.

KcCPC note that whilst the Local Plan recognises the potential for even more 'social division' between rural and urban areas resulting from being poorly served with basic telephony, mobile and broadband services - there is little of substance to accelerate resolution of the issue and address the social exclusion and isolation that is continuing to grow.

KcCPC note point c) but are concerned that, unprotected, new houses can fall victim to ‘externally driven inflation’ presenting attractive; holiday home, second home, investment property opportunities, to affluent visitors and professional ‘property portfolio builders’.

KcCPC note at d) “Enhancements to the visitor experience”, but finds little in the preceding paragraphs to describe how this will be achieved.

Policy SCLP12.37 (Previously 12.32)

KcCPC note the lightly revised policy describing the Strategy for Rural Areas

KcCPC note at point d) that “Proposals that generate a significant amount of traffic movements from the site will be required to provide a Transport Assessment, assessing the impact of the proposal on the local highway network.”



KcCPC seek the addition of “...the adjacent primary school, residential properties and the nearby sheltered housing.”

Policy SCLP12.53 (Previously 12.49)

KcCPC note the revised policy describing Land South of Ambleside, Main Road, Kelsale cum Carlton

KcCPC note that during the consultation on the Local Plan, SCDC has approved two planning applications on this site, totalling 43 dwellings (rather than the 30 described in the carried forward allocation).

There are two approved vehicular access points to the site, one for the main development onto Main Road, another for the individual property, onto Rosemary Lane (rather than the 1 described in the Policy)

The crossing facility currently appears to be little more than a ‘dimpled and ramped’ kerb termination to small lengths of footpath. Traffic conditions and the crossing location, make the minimum a mid-road island or a full pedestrian controlled crossing preferable.

Policy elsewhere in the Final Draft Local Plan infer that the only new ‘early years’ provision in the KcC, Saxmundham, Benhall grouping is planned for the Saxmundham Garden Neighbourhood, not immediately accessible to the young mothers of this development without (most likely) resorting to cars. Even then there is the issue of timing and availability.

The density of the larger permitted development is out of keeping with both the immediate surroundings and the village centre opposite.

A significant population of the protected Sandy Stiltball fungus is in close proximity to this site, but as far as can be determined this has not been mentioned by the developer or the Planning Authority.

DOCUMENT ENDS