

**First Draft Suffolk Coastal Local Plan
Consultation
July 2018**

Kelsale-cum-Carlton Parish Council Response
(Dated 4th September 2018)



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First Draft Suffolk Coastal Local Plan July 2018

Response from Kelsale-cum-Carlton Parish Council

Response Key	Blue = KcC PC's comments
	Black = Text extracted from SCDC First Draft Local Plan
	Red = Other items of importance

Kelsale-cum-Carlton Parish Council [KcC PC] is grateful to have been afforded the opportunity to contribute to the ongoing refinement of the First Draft Local Plan [The plan] for Suffolk Coastal District Council [SCDC].

KcC PC is pleased to see that many observations made during the previous consultation have been incorporated or answered by further clarification within The Plan.

In making this response, KcC PC is hopeful that this collaboration will continue and that some or all of the following well meant points, will be incorporated into The Plan before enactment of the next development phase.

Prior to dealing with the content of The Plan, KcC PC would like to make five points it believes SCDC should be mindful of:

- I. In light of The Plan recognising many rural areas are poorly provided for, in terms of broadband access and speed, and that the District also has an aging population, KcC PC believes that accessibility to the document and complementary volumes may have been overly restricted due to the high degree of dependence placed on the internet for this consultation and responses to it. In turn, this may have inhibited participation for some segments of the Suffolk Coastal community.
- II. KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of any treatment comparable with virtually every other category of dwelling contained in the First Draft Local Plan.

- III. KcC PC is surprised at the lack of evidence within the The Plan of deeper interworking with Waveney District Council to minimise potential issues in assimilating 'two become one', after the May elections. By contrast the focus on the IPSA & HMA seems overwhelming. Perhaps, all the more surprising given the apparent wave of confidence accumulating in respect to the creation of East Suffolk post May 2019.

As a consequence, KcC PC is concerned about the sustainability of The Plan and the alignment of policy of both 'donor' District Councils. As a Parish Council in the formative stages of developing a Neighbourhood Plan it would be reassuring for The Plan to at least reference the uncertainty and/or clarify any migratory arrangements for 'inflight' activity in Parish Councils. As SCDC must be aware, if the public engage in the Neighbourhood Plan activity and it subsequently suffers 'noise' during transition to East Suffolk, it would be very damaging.

- IV. KcC PC recognise that the East Suffolk Business Plan has the following included in 'Specific actions planned for Suffolk Coastal' in respect to Broadband:

"Hold the Better Broadband Suffolk Partnership to account to deliver their commitment of 100% rollout of superfast Broadband in Suffolk by 2020; and provide further financial support from the Council to ensure that connection is affordable, particularly in more remote and rural areas."

However, as the status of the East Suffolk Business Plan is still unclear and conversely, the Local Plan is an enduring document subject to measurement, public and governmental scrutiny - KcC PC believe that actions, intent, targets and ownership for this critical infrastructural element should be included within the Local Plan.

Accordingly, KcC PC has made periodic reference to the issue of Broadband (and other digitally delivered services) throughout their response to the Local Plan.

KcC PC would also remind SCDC that the origin of the Suffolk Broadband initiative was a pledge made by David Cameron to improve Rural Broadband. Unfortunately, this pledge was wantonly disregarded, with much of the capital being invested in the more 'urban' areas of Suffolk where BT (now Openreach) would have had an easily justifiable commercial case for a BT capitalised project.

Lest we forget, our MP was photographed 'kissing babies and shaking hands' as she welcomed the plethora of fibre cabinets in Southwold...a place we now understand has 'empty' residential properties allegedly bought by individual property speculators through 'shell companies', awaiting a capital gain as property prices rise still further.

- V. After reviewing The Plan, KcC PC is left feeling that, whilst SCDC are 'supportive' of huge range of things in The Plan and the Planning Policy intent also seems quite strong, the document (for want of a better description) lacks heart, thought leadership and clarity of ownership beyond the confines of the Planning function.

The last point is in no way intended to be critical, but rather to provide constructive feedback on a document that broadly represents a significant 'step-up' in both clarity, policy direction and cohesion.

KcC PC comments are made in the numerical order of the (printed) document to enable easier assimilation and analysis of feedback.

Section 1 Introduction

1.3 Suffolk Coastal Context In 2016 the mid year population was estimated at 126,000 residents *with the majority of people living in the urban areas* to the east of Ipswich such as Kesgrave, Martlesham and Rushmere St Andrew, the coastal resort town of Felixstowe and the market towns of Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge.

Q The purpose of this statement is unclear, but would it not be more relevant to express the urban/rural balance in slightly more detail than a 2016 estimate? Perhaps the 2023 electorate forecast used in the warding proposals would be more sensible and mean that a common basis had been applied?

1.31 Key Issues The table below identifies a series of key issues which the Suffolk Coastal Local Plan will seek to address. These issues have been identified through the Sustainability Appraisal Scoping Report, the evidence base and public consultation responses.

Q It is not clear from the table presentation or anywhere in The Plan what methodologies have been used to examine the causal basis and/or explore the correlation landscape between and across these key issues.

Has this work been done, what did it demonstrate and what key actions in The Plan are attributed with having a positive impact on each issue?

Have any programmes of action been costed? Should they be visible, preferably expressed in cost benefit terms for transparent monitoring, measurement and performance management?

1.50 East Suffolk Business Plan In partnership with Waveney District Council, Suffolk Coastal has adopted the East Suffolk Business Plan. The Business Plan adopted in 2015 sets out an up to date vision and priorities for the East Suffolk area. The vision for East Suffolk is to 'Maintain and sustainably improve the quality of life for everyone growing up in, living in, working in and visiting East Suffolk.' The Business Plan priorities are set out under themes of enabling communities, economic growth and financial self-sufficiency alongside a number of specific planned actions.

Q Whilst The Plan and even a powerful Vision may be capable of many things, is it really plausible to claim it has the power to:

'Maintain and sustainably improve the quality of life for everyone visiting East Suffolk.'?

It has all the feel of swanky marketing hyperbole, rather than a powerful and galvanising businesslike Vision.

Q Perhaps a revision should be made in order to maintain credibility?

Section 2 Wider Strategic Planning Area

SCLP2.1 Growth in the Ipswich Strategic Planning Area

a] New house build per new job created

Babergh	2.67 (8780/3300)
Mid-Suffolk	1.96 (11460/5860)
Suffolk Coastal	1.37 (9900/7220)
Ipswich	0.51 (8840/17310)
Average	0.86 (33690/38980)

b] New Jobs per Hectare of new employment land

Babergh	1270 (3,300/2.6ha)
Mid-Suffolk	689 (5,860/8.5ha)
Ipswich	673 (17,310/25.7ha)
Suffolk Coastal	555 (7,220/13ha)
Average	676 (33690/49.8ha)

c] New Jobs created per day of plan period

Babergh	0.46 (3,300/7,300)
Mid-Suffolk	0.80 (5,860/7,300)
Suffolk Coastal	0.99 (7,220/7,300)
Ipswich	2.37 (17,310/7,300)
Average	4.62 (33690/7,300)

Q With the disparities visible, is it not the case that the predominant employment pattern is Ipswich centric with 'dormitory towns and villages' throughout the surrounding Districts potentially bereft of working age residents from 7:00am to 7:00pm?

Q Under this scenario, traffic going south on the A12, exiting from Yoxford, Kelsale, Framlingham, Saxmundham, Leiston and Aldeburgh will further congest already busy peak periods. Is this sustainable?

Q Moreover with this employment pattern, as already occurs, is it not likely that shopping for food and everyday supplies will predominantly be made at Martlesham, further deepening the traffic problems there, or via home delivery - reducing Market Town retailer viability still further?

SCLP2.2 Strategic Infrastructure Priorities

The Council will work with partners such as the other local planning authorities in the ISPA, Suffolk County Council, Clinical Commissioning Groups, utilities companies, Highways England and Network Rail in supporting and enabling the delivery of key strategic infrastructure, and in particular the timely delivery of:

- Ipswich Northern Route;
- A12 improvements;
- A14 improvements;
- Sustainable transport measures in Ipswich;
- Improved cycle routes;
- Increased capacity on railway lines for freight and passenger traffic;
- Appropriate education provision to meet needs resulting from growth;
- Appropriate health provision to meet needs resulting from growth;

- i) Improvements to water supply and treatment capacity; and
- j) Provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses.

Q It is ironic that the District Council hosting the UK's 2nd largest Telecoms Group (the worlds 15th largest by capitalisation), has been unable to work collaboratively to develop a 'bleeding edge' distributed employment proposition capitalising the skills, technology, research and development capabilities held in high esteem worldwide and on the doorstep!

Instead it seems it is more cost effective (and presumably more ecologically beneficial?) to build substantially more road capacity and deploy a housing strategy that maintains separation between places of employment and domestic dwellings.

It is not clear if this list of priorities is ranked. However, if it is, then it is a sad indictment that relatively quickly deployed enabling technology is relegated to 10th place behind a first half dominated by more of the same old, same old.

Q Is the emergent strategy implied by these priorities truly sustainable and destined to deliver the economic, environmental, health and quality of life ambitions of the vision and The Plan?

Section 3 Suffolk Coastal Spatial Strategy

Vision for Suffolk Coastal 2016-2036

By 2036, the quality of life for everyone growing up in, living in, working in and visiting Suffolk Coastal will have been substantially improved through a healthy economy, a healthy population and a healthy environment. The District will have experienced significant levels of growth and created healthy communities through a planned approach which maintains the distinctive character and role of settlements, supported by adequate infrastructure without breaching environmental limitations.

Suffolk Coastal will have a diverse, strong and prosperous economy which supports key sectors as well as making the most of opportunities that emerge over the plan period. The stronger and more diverse economy will increase local earnings and job opportunities, ensuring that people can stay within their communities.

Supporting the job growth, there will be sufficient homes provided of the right types and tenures to meet the needs of the local population. The need for properties targeted at younger people and to meet the needs of older people will have been addressed, as well as the provision of homes to support people moving into the District.

Communities will be healthy and active with access to a diverse landscape of rural communities, suburban areas and market towns. The District will have an abundance of opportunities for physical activity on the doorstep of many residents' homes and businesses. Supporting healthy and active communities will have a positive impact on the health, wellbeing and happiness of all communities.

The high quality built and natural environment will have been protected, maintained and enhanced through development which is sensitive to the designated and protected landscapes found across the District, including the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, Special Protection Areas, River Valleys and Coastline. The natural environment will be supplemented through provision of accessible green infrastructure and other public open spaces.

Climate change is a key factor for Suffolk Coastal, but the Local Plan will address issues relating to flood risk, coastal erosion and wider coastal management and adaptation, as well as ensuring that human impact is reduced and mitigated accordingly.

All communities will have fulfilled their potential by 2036 and significantly improved the economic, social and environmental wellbeing of the area, safeguarded the prospects of current and future generations, and improved everyone's quality of life.

Observation

The Vision seems at odds with public and private sector Vision statements over the last 30 years, mixing content more appropriate to a Mission Statement with a Vision (often defined as insight, foresight or sagacity in planning).

As indicated in the introduction, the highlighted passages above do somewhat stretch credibility!

In contrast, some District Councils seem to have mastered the Japanese art of haiku, using it to be concise, but able to portraying a vision with clarity. Producing for example:

Our vision is to help our towns and villages thrive by creating vibrant communities where people want to live, work and invest.

Or

Our vision is to make xxxxxx a better place to live, work, visit and invest in.

Or

Understanding that our communities have diverse needs is fundamental to our ability to deliver the services that enable them to flourish and prosper.

Q Irrespective of whether the content is better suited to a Mission Statement or not the Vision raises the fundamental issue of linking actions directly to outcomes.

This is particularly unclear in The Plan, insofar as there are a number of statements where the combination of actions being taken (that are intended) to deliver the desired outcome is missing.

For example, it could be far easier for the reader to understand if the narrative described what the component actions are that:

- Increase local earnings and job opportunities across the settlement hierarchy
- Deliver a stronger and more diverse economy
- Young people particularly and people in general staying in their communities

Let alone how dwelling costs can be held for local housing need against a rising tide of second homes, holiday lets and most recently the 'shell company' property speculation, exposed in Southwold.

One is left with the feeling that The Plan only deals with facilitative and supportive policy statements, something that surely cannot be the case?

In this respect, the monitoring and delivery framework seems relatively lightweight compared to private sector programmes.

In similar circumstances, a private sector programme of this magnitude, over such a long period, would contain considerably more detail, an ownership and accountabilities matrix, a high level risk analysis, key milestones, critical path analysis and a 'soup to nuts' programme management structure.

Q In summary, The Vision in combination with The Plan does seem to ask residents, businesses and Parish Councils to place considerable trust in SCDC's Local Plan without really nailing what will make the step change?

Q Is there outcome-based modelling, substantive research and/or comparative evidence from similarly positioned District Councils, demonstrating that the desired outcomes can be delivered by the proposed actions?

Q In respect to the concluding paragraph of The Vision, is it really credible to say that "All communities will have fulfilled their potential by 2036..."? In most circles, it is generally accepted that forecasting anything beyond the ten year horizon is tantamount to 'witchcraft'. Consequently, to say **all** will have achieved their **potential** seems to be setting a course destined to fail.

Strategic Priorities and Objectives

3.3 Table 3.1 below identifies the strategic priorities and objectives for the Plan, to take forward the vision. These objectives are all implemented through a number of policies, as shown in the table.

Observation

The table catalogues around 200 Policies to deliver nine Objectives or Strategic Priorities.

However, it fails to provide the reader with an understanding of what differentiates an Objective from a Strategic Priority.

In the context of the preceding comments on The Vision, it also omits to reference any measurement framework attached to the Objectives, another attribute essential to a programme of activity of this size.

Taking this simple step would provide all participants with a tangible understanding of both 'What Success Looks Like' and progress throughout the entire journey.

Q Do the authors of The Plan intend to publish a digest of:

- Priorities
- SMART (or similarly framed) Objectives
- 'What success looks like' statements for each objective and
- The respective measures and milestones for each

3.10 The distribution of growth across the District aims to ensure the vision for the Local Plan is delivered alongside the requirements of the National Planning Policy Framework. The Local Plan seeks to be ambitious in respect of housing delivery led by increased economic growth and infrastructure requirements across the District. Increased economic growth across the District will provide more jobs and opportunities for better paid jobs, which will enhance local prosperity and address housing affordability. The need for further infrastructure has been identified by service providers and community consultation responses and increased residential development will help facilitate infrastructure delivery across the District and the Housing Market Area.

Observation

The paragraph appears a little opaque and confusing to the reader. Unpacking the paragraph, it is presumed that it lays out:

- *The NPPF & the Local Plan Vision* requires 'Ambitious Housing Delivery'
- *Housing Delivery* is led by Increased Economic & Infrastructure Growth
- *Increased Economic Growth* delivers more jobs & opportunities for better paid jobs
- *Better Paid Jobs* enhance prosperity
- *Enhanced prosperity* addresses housing affordability

Q Assuming the unpacking is correct, is this not an updated version of 'Which came first, the chicken or the egg?'

Q If so, what is the pump priming mechanism for this virtuous circle?

Q If it is the housing market, as it seems the most likely candidate, what will prevent external interventions (i.e. further second home ownership, holiday lets, property speculation, etc.) from disrupting the virtuous circle not long after initiation?

Q Is there any credible applied economic research that confirms that this has occurred in the UK? Have SCDC undertaken any research on the applicability of this theory to the Coastal Suffolk district and its vulnerability to external interventions?

3.11 Across the District many rural communities are thriving, but consultation responses have identified that in some locations, existing services and facilities are struggling to survive and remain viable. The Local Plan seeks to ensure that these rural communities are enhanced in order to sustain the variety of thriving rural communities over the plan period and for future generations.

Q Is 'enhanced' shorthand for housing development?

Q If so, what 'struggling services and facilities' (either individually or collectively) would justify an enhancement intervention?

3.15 The A12 is a well used road which provides connections to many communities. Directing development to locations well related to the A12 will enable opportunities to make more use of the road and rail connections between Ipswich and Lowestoft. Increasing the level of development in these locations will help to sustain the existing communities which are becoming popular with tourists and second home owners resulting in fewer properties being available for the local community.

Q The first assertion (above) implies that the road and rail connections between Ipswich are underutilised? Is this the case and can it be evidenced, particularly in relation to A12 and peak time loadings?

Q The second assertion seems to ignore the potential and continuing impact of 'buy to let', second homes, holiday let and the recently exposed Southwold 'shell company' property speculation purchasers, on overall property prices. This will continue, unless a method can be found to confine purchasers to those with local connections, at affordable prices.

Q What is the recent experience of Saxmundham in relation to the sales of new build homes at the A12 and Church Hill (B1119) developments? Does this bear out the assertion in 3.15 of The Plan?

3.17 Consultation responses have highlighted the need for further education provision, improvements to the capacity of the medical practice and congestion issues in relation to the B1119 and B1121 crossroads and access to the supermarkets on Church Street. This Local Plan seeks to address these issues through a comprehensive garden neighbourhood master plan for Saxmundham which will provide employment opportunities, primary school, residential units and other supporting infrastructure.

Q Will the Garden Neighbourhood Master Plan include scaling of new education, health and other service provision to account for the pre-existing 'service centre deficit' existing in the Benhall-Saxmundham-KcC area?

Q Will the Garden Neighbourhood Master Plan be cognisant of the potential increase of traffic levels through the B1119 and B1121 crossroads if extended health capacity is at the Garden Neighbourhood and services KcC and the Carlton Meres Holiday Park.

Q Likewise will the Garden Neighbourhood Master Plan be cognisant of the potential increase of traffic levels through the B1119 and B1121 crossroads, if the extended health capacity is sited at Lamsale Meadow and has to service the new residents at the Garden Neighbourhood in addition to the existing Saxmundham, Benhall, KcC and Carlton Meres service centre load?

Providing for employment

Unassigned table (top of page 34)

Provision of land to deliver significantly more than the baseline requirement of 13ha

- Creation of at least 7,220 jobs
- Provision of land to support the Port of Felixstowe
- Development of a new business park
- Sustaining and growing the rural economy

Observation

As highlighted in the response to SCLP2.1 it would seem that The Plan has the ambition to deliver just short of 1 new job in Coastal Suffolk every day, for the duration of the plan.

Commentary elsewhere indicates that the main employment sectors are likely to be Tourism and Business & Professional Services.

Q Is this a credible way to make a claim of a profound change that creates “...more jobs & opportunities for better paid jobs...” and provide an opportunity to “...enhance prosperity...” and thence “...address housing affordability...”?

Q What is the assumed employment mix and net ‘remuneration gain’ to the SCDC economy for this employment growth? Is it researched and/or evidenced?

Boosting the Supply of Housing

Unassigned table (upper third of page 35)

- 545 new homes per year (10,900 over the lifetime of the plan - 2016-2036);
- Increasing choice in the housing available;
- Meeting the housing needs of the growing elderly population;
- Delivering more affordable housing

Observation

As highlighted in the response to SCLP2.1 it would seem that The Plan has the ambition to deliver between 1.37 and 1.7 (allowing for contingency & windfall) new houses in Coastal Suffolk every day, for the duration of the plan – more new homes than new jobs (<1 per day) by a significant margin.

Q Taking this in the context of the other IPSA members numbers, this assumed surfeit is presumed to either:

- provide for increased commuting south and north via the A12 corridor and rail links

or

- an intervention in the Coastal Suffolk Housing Market to affect house affordability

Q Which scenario is this surfeit planned for?

Q Is the purpose researched and/or evidenced?

3.32 The ambitious target clearly demonstrates the Council’s commitment to delivering new housing across the District to meet its own objectives, and also provides an opportunity to provide a greater contribution to delivering housing across the Housing Market Area. A large amount of this housing is already accounted for through dwellings that have been built since 2016, those that are being built and those with planning permission. The role of this Plan is to identify further opportunities for new housing development to come forward to meet the identified requirement.

Noted 3.32

Spatial distribution of residual housing requirement

3.35 Allocations for housing in this Local Plan exceed the total dwelling requirement for the period 2016 – 2036 by approximately 10%. The over allocation will also ensure more affordable homes are delivered. This over-allocation also provides confidence that the overall housing requirement will be met even if some allocated sites fail to come forward. In addition there is likely to be further development which comes forward on sites not identified in the plan. These sites will either be within the Settlement Boundaries or through the exceptions and countryside policies or on additional sites identified in Neighbourhood Plans.

Q The assertion seems to ignore the potential and continuing impact of ‘buy to let’, second home, holiday let and the recently exposed Southwold ‘shell company’ property speculation purchasers, on overall property prices. This will continue, unless a method can be found to confine purchasers to those with local connections, at affordable prices.

Q What is the recent experience of Saxmundham in relation to the sales of new build homes at the A12 and Church Hill (B1119) developments? Does this bear out the assertion in 3.35 of The Plan?

SCLP3.3 Settlement Hierarchy

The Settlement Hierarchy enables the Council to achieve its vision for the District, meeting the scale of development required and enhancing the quality of the built, natural, historic, social and cultural environments whilst sustaining the vitality of communities.

The development requirements for Major Centres, Market Towns, Large Villages and Small Villages will be delivered through site allocations in the Local Plan or in Neighbourhood Plans, plus through windfall development in accordance with other policies in this Local Plan.

The development requirements in the Countryside will come forward through Neighbourhood Plans and windfall sites in accordance with other policies in this Local Plan.

Noted SCLP3.3

The designation of KcC as a 'Small Village' within the Settlement Hierarchy

3.42 Table 3.4 below summarises the type and scale of development that would be supported within the different categories of the hierarchy. This reflects policies which are set out in later Sections of this plan.

Below are extracts from Table 3.4 identified as applicable to KcC

Small Villages

Employment

Development within existing employment areas (Policy SCLP4.1)

Development of employment uses appropriate to the scale of the settlement (Policy SCLP4.2 and Policy SCLP4.5)

Retail

Protection of local shops (SCLP4.13)

Housing

New housing allocations (Section 12)

Small groups of new housing and infill within Settlement Boundaries (SCLP5.2)

Countryside

Employment

Conversion & replacement of rural buildings for employment uses (Policy SCLP4.6)

Farm diversification (Policy SCLP4.7)

Development within existing employment areas (Policy SCLP4.1)

New employment uses where need is demonstrated (Policy SCLP4.2)

Retail

Protection of local shops (SCLP4.13)

Housing

New housing within clusters of existing dwellings (SCLP5.4)

Affordable housing on exception sites (SCLP5.11)

Conversions of agricultural buildings / replacement dwellings (SCLP5.3)

Rural workers' dwellings (SCLP5.6)

Noted 3.42

The type and scale of development within the different categories and pertaining policies applicable to KcC (Settlement Boundaries) and KcC (Countryside).

3.43 The Settlement Hierarchy has informed the identification of land for allocation for housing in the Local Plan. Strategies for Major Centres and Market Towns are based upon the circumstances and opportunities relevant to each, as detailed in Section 12 of this Plan. The starting point is that Large Villages and Small Villages are, in principle, suitable places to accommodate new housing. Consideration has been given to other factors in determining whether a settlement is a suitable location for additional housing growth, including infrastructure capacity, the existence of suitable sites and consultation responses.

Noted 3.43

3.44 Table 3.5 below shows the anticipated level of housing delivery in each Town and Parish (for settlements in the Settlement Hierarchy). Note these figures do not include an allowance for windfall which it is anticipated will come forward across the District at a rate of 50 dwellings per year. It is anticipated that, with the greater development opportunities provided by the 'Housing in Clusters in the Countryside' policy (Policy SCLP5.4), windfall development in the countryside will increase above previous levels. Therefore the 1.5% indicative level of growth for countryside locations based on completions and commitments is presented as a minimum. A Housing Trajectory which indicates delivery on a timescale over the lifetime of the Local Plan is contained in Appendix A.

Below is an extract from Table 3.5 identified as applicable to KcC

	Completions 1/4/16 to 31/3/18	Permission & Resolution To Grant @ 31/3/18	Existing Allocations with no permission	Total to date	New allocation ¹	Indicative Contribution 2016 to 2036
KcC	2	12	30	44	20	64

¹Italics are provided to designated Neighbourhood Plan areas (Policy SCLP12.1)

Noted 3.44

Q Subject to confirmation of the basis of the 12 shown to have Permission or a Resolution To Grant.

Settlement Boundaries

3.45 Settlement Boundaries are a policy line on a map which is used to define the built up area(s) of a settlement. The Settlement Boundaries, subject to other policies of this Local Plan, indicate where development for housing, employment and town centre development would be suitable. Inside the Settlement Boundaries, there is a policy presumption that development is acceptable in principle. Outside of these boundaries, opportunities for housing development are considerably more limited as countryside policies of restraint will apply.

Noted 3.45

KcC is formed of a densely populated core, comprising the historic Kelsale and Carlton Villages and largely enclosed by the Settlement Boundaries.

Surrounding the core is largely agricultural land interspersed with small settlements comprising historic Greens (North, Curlew & East), Dorley's Corner, Carlton Lane & its surrounds, laying west of the A12.

In addition the core is bordered to the south by the historic Carlton Park (including Carlton Church) and a light industrial area accessed via Ronald Road. Elsewhere, KcC has micro settlements along the A12 and isolated properties on Clay Hills, Butchers Road, Lowes Hill and Tiggins Lane.

Major Energy Infrastructure

3.49 The decisions in respect of the new power station (Sizewell C) will be taken at a national level as a Nationally Significant Infrastructure Project (NSIP) with various regulators assessing safety, security and other issues through the necessary design and construction. However, it is considered that one of the biggest developments and construction programmes faced by the Council and its communities in generations should be developed alongside the overall policy framework for the District to enable the impacts and benefits to be managed, including addressing the issues of cumulative impact and outcomes of other large scale projects.

Noted 3.49

3.50 The role of the Local Plan will be to consider the suitability of any specific proposal and the mitigation of local impacts (both positive and negative) on the communities across the District and to realise the economic benefits. The current Sizewell site is a remote rural location in close proximity to the town of Leiston and other nearby settlements such as Aldringham cum Thorpe and Eastbridge. In addition the wider highway and rail network to this location is challenging. As well as the social impacts affecting the communities nearby, the environmental impacts of a site on the coast, within the Area of Outstanding Natural Beauty and close to protected landscapes such as Sizewell Marshes and Minsmere Nature Reserve, will need to be assessed both during construction and beyond. Where a project involves multiple consents, developers will be expected to work collaboratively with authorities to prepare a project wide Habitats Regulations Assessment.

Noted 3.50

3.51 Although the provision of nuclear energy is currently prominent, the Suffolk Coast is increasingly coming under pressure to support developments associated with the off shore energy sector and linking this into the national grid, as well as inter-continental connections to enable the exchange of electricity with other countries. Investment in a variety of major energy infrastructure projects needs to be supported by infrastructure and facilities on shore and these sectors are expected to require land to enable activities over the plan period. Where possible companies and developers will be encouraged to work collaboratively and share infrastructure and facilities that serve other requirements to reduce any potential impacts.

Noted 3.51

3.54 A variety of local issues have been identified by the Council, as local planning authority, which need to be addressed in relation to Major Energy Infrastructure Projects. The Council will work with the local community, other local authorities, government agencies, service providers and operators to ensure the most successful outcomes are achieved. Table 3.6 (over page) is intended to inform pre-application and early engagement discussions and provides an early view on potential constraints and opportunities across the District.

Theme	Issue – what needs to be considered?
Community	<ul style="list-style-type: none"> - Engagement with the local community on the provision of infrastructure - Housing - Community facilities - Health facilities - Legacy and local community benefits for hosting major significant energy developments

Economic Opportunity	<ul style="list-style-type: none"> - Economic strategies recognise importance of the Suffolk Energy Coast - Need to maximise the economic growth and balance these against economic and social impacts - Creation of jobs during the construction, operational and decommissioning stages of all projects - Realisation of local economic opportunities and benefits - Associated demands on local supply chain and sectors which support projects - Minimise adverse impacts and effects on the tourist economy in East Suffolk and maximise benefits where possible
Emergency Planning	<ul style="list-style-type: none"> - Requirement for a co-ordinated Emergency Plan to be established across all organisations
Environment	<ul style="list-style-type: none"> - Sites located within the Area of Outstanding Natural Beauty and Heritage Coast - Impact on designated and protected landscapes and habitats. Projects to be supported by Habitat Regulations Assessment - Physical form, scale and appearance of buildings within the landscape - Impact on built and natural environment arising from development, operation and decommissioning of projects - Potential impact on designated and non-designated heritage assets and archaeological assets in the areas surrounding Major Energy Infrastructure Projects - Risk of significant dust deposition and damage to vulnerable landscapes including Minsmere Nature Reserve - Impact of light pollution to nocturnal species - Appropriate landscaping of sites after the decommissioning Phases
Theme	Issue – what needs to be considered?
Health	<ul style="list-style-type: none"> - Construction & transportation noise impact on communities - Long term loss of tranquil areas - Loss of large areas of countryside used for leisure and tourism - Negative impact on air quality
Housing & Accommodation	<ul style="list-style-type: none"> - Provision of campus style accommodation for construction workers - Influx of construction workers into the area and overwhelming the accommodation opportunities for local people and people visiting the area
Training & Education Opportunities	<ul style="list-style-type: none"> - Availability of skills in the local area - Up skilling of the local workforce through appropriate training programmes and education - Investment in training opportunities for the local workforce
Transport Network	<ul style="list-style-type: none"> - Local roads are not well suited to carrying the number or type of vehicle movements that will be necessary to enable construction and operation of Major Energy Infrastructure Projects - Agreement of dedicated routes with local community Participation - Need for park and ride facilities to be created - Inadequate provision of laybys on the road network across Suffolk - Cumulative impact of other associated growth across and outside of Suffolk - Utilisation of existing rail networks

Noted 3.54

SCLP3.5 Proposals for Major Energy Infrastructure Projects

In its role either as determining authority for development under the Town and Country Planning Act, or as consultee on Nationally Significant Infrastructure Projects, the Council will take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts.

The Council will work in partnership with the scheme promoter, local communities, National Grid, Government, New Anglia Local Enterprise Partnership and relevant local authorities to ensure significant local community benefits and an ongoing legacy of the development is achieved as part of any major infrastructure projects.

- a) Proposals for Major Infrastructure Projects across the District and the need to mitigate the impacts arising from these will be considered against the following policy requirements:
- b) Relevant Neighbourhood Plan policies, strategies and visions;
- c) Appropriate packages of local community benefit to be provided by the developer to offset and compensate the burden and disturbance experienced by the local community for hosting major infrastructure projects;
- d) Requirement for a robust Environmental Impact Assessment and Habitats Regulations Assessment;
- e) Appropriate flood and erosion defences, including the effects of climate change are incorporated into the project to protect the site during the construction, operational and decommissioning stages;
- f) Appropriate road and highway measures are introduced (including diversion routes) for construction, operational and commercial traffic to reduce the pressure on the local communities;
- g) The development and associated infrastructure proposals to deliver positive outcomes for the local community and surrounding environment;
- h) Economic and community benefits where feasible are maximised through agreement of strategies in relation to employment, education and training opportunities for the local community;
- i) Measures to ensure the successful decommissioning and restoration of the site through appropriate landscaping is delivered to minimise and mitigate the environmental and social harm caused during operational stages of projects;
- j) Cumulative impacts of projects are taken into account and do not cause significant adverse impacts; and
- k) Appropriate monitoring measures during construction, operating and decommissioning phases to ensure mitigation measures remain relevant and effective.

Noted SCLP3.5

Q KcC PC are particularly concerned that as the Planning Authority, SCDC take a stronger role in future Consultations on Major Energy Infrastructure Projects. Moreover they take the 'honest broker role' in liaising and working with all the Coastal Suffolk communities impacted. Thereby enabling a 360 degree view, prior to developing and taking forward community focussed proposals.

Q KcC PC note that there appears to be no paragraph 3.55 - is this deliberate?

Infrastructure

3.56 The provision of new and improved infrastructure is essential to ensure the growth planned in the District is sustainable. Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences.

Noted 3.56

3.57 The Council has undertaken evidence to support the Local Plan, including:

Economic Area Needs Assessment (2017) - identifies forecasted economic growth across the District and any ancillary infrastructure that may be required to facilitate such growth.

Economic Area Sector Needs Assessment (2017) – identifies the specific needs of economic sectors across the District.

Retail & Leisure Study (2017) - assesses the retail and leisure need across the District, identifying projected retail and leisure infrastructure requirements going forward.

Level 1 Strategic Flood Risk Assessment (2018) - indicates areas of the District where flood defence infrastructure may be required based on allocated development.

Leisure Strategy – the Council's Leisure Strategy (2014) and supporting assessments identify the needs for open space and built leisure facilities across the District.

Transport modelling – analyses the effects of proposed growth on the transport network and identifies areas of the network where transport mitigation measures may be needed to accommodate growth.

Noted 3.57

Q It is noted with concern the Transport Modelling evidence did not become available until the week ending 17th August 2018. More than 3.5 weeks into an 8 week consultation. Why was the Transport Modelling method and data withheld for such a lengthy period of the consultation?

Noted and observed – WSP Methodology Report

KcC PC note that **2016 was calibrated and validated as the 'base year'** for the traffic conditions.

KcC PC note traffic forecasts were generated from the base year model to **reflect a forecast year of 2036**.

KcC PC note the forecast traffic generation detailed in this report leads to increases of between **34%-40%** in terms of growth in traffic between 2016 and 2036.

Q Following KcC PC's First Draft Local Plan 1:1 session with SCDC representatives on 17th August, KcC PC are concerned that the Transport Modelling work may omit any impact (in either the base year or 2036 forecast) arising from the established and rapidly expanding Carlton Meres Holiday Park.

Q Moreover, the full impact of Suffolk Coastal becoming an 'all year round tourism destination' may also have been omitted through lack of transport growth being forecast outside of housing and job drivers.

Q KcC PC requires immediate reassurance that the Transport Modelling work has been thoroughly tested and validated against these specific drivers.

Q KcC PC also seeks immediate confirmation that the Transport Modelling work is inclusive of forecast impacts arising from the execution of a Sizewell C development extending throughout the Plan period to (and beyond?) 2036.

Q KcC PC notes that the *List of future highway schemes (2.4.1)* assumed to be in place by 2036, excludes any changes to the A12 beyond those immediately facilitative of the Brightwell Lakes development (previously Adastral Park).

Q KcC PC is concerned that the omission of any A12 work north of Brightwell Lakes is a major shortcoming of the Local Plan and should be subject to further detailed analysis as a priority.

Q KcC PC note with concern that the WSP Transport Modelling Methodology Report shows three Suffolk Coastal Scenarios:

Scenario	Housing Growth	Employment Growth
Core	11,990	7,220
Scenario A	10,457	8,762
Scenario B	11,990	12,203

Given the WSP assertion that they used:

'assumptions to determine the number of full-time employees per sqm by land use type and are consistent with the 2016 Employment Land Needs Assessment (ELNA) for b-class land use types. For non b-class land uses either the 3rd edition of the Home and Communities Agency (HCA) report (2015) or 2nd edition of the Home and Communities Agency (HCA) report (2010) were utilised.'

Q It begs the question why SCDC's Local Plan is so far adrift from the 'norm', such that a correction factor of 0.675 had to be applied?

Q Given the criticality of both local employment opportunities and potential detrimental impacts on housing arising from inaccurate or poorly derived forecasts, KcC PC look forward to SCDC bringing forward more robust and complementary forecasts as a matter of urgency.

Q KcC PC has reviewed the 'Trip Generation' data to the rear of the WSP Methodology Report and finds no reference to general tourist based 'trip growth' nor specifically the high density, low alternative transport options site of Carlton Mere's. The omission of the former is clearly a concern but the omission of the latter is clearly a grave concern to KcC PC. KcC PC seeks an urgent remedy to this issue and looks forward to SCDC coming forward with proposals in the immediate future.

Noted and observed – WSP Forecasting Report – Volume 1

KcC PC note that:

"The model shows a growth in traffic by 2036. This growth in traffic is a result of changing patterns of travel behaviour and predicted future growth in housing and jobs across Suffolk. The transport modelling *factors in* an element of growth when predicting future traffic impacts and has been adapted for the purposes of this assessment to consider the specific growth locations identified in the named local authorities.

The results cannot therefore be interpreted as simply as 'Local Plan vs no Local Plan', i.e. it could not reasonably be assumed that if there were no Local Plan traffic patterns would be the same in 2036 as they were in 2016."

Further it notes:

"The analysis has shown that while many junctions may be close to or exceed capacity in 2036; there are also many parts of the network that will operate satisfactorily. Further, the development proposals assessed within the model would as part of their planning applications need to consider additional measures to help mitigate any impact."

And that:

"A mitigation scenario has not been considered at this point of assessment. This is because the modelling detailed in the report has been used to determine whether the level of housing and job growth leads to congestion and to test alternative scenarios."

Q KcC PC has reviewed the report and is particularly concerned that the conclusions drawn in respect to Saxmundham may not fully reflect the impact of Volume on Capacity at the Chantry Road/B1121 because of two particular issues:

i] the impact of traffic from Carlton Mere's Holiday Park crossing the A12 from Rendham Road and entering Saxmundham via Mill Road and Chantry Road (or the B1119) in order to go shopping and access Tesco and Waitrose and/or then proceed to the coast via Leiston, Thorpeness, etc.

ii] whilst KcC PC acknowledge that generally the morning 'peak hour' may be perceived as between 08:00-09:00, it believes that the demographic of Saxmundham and surrounding area, combined with access to the Health Surgery at Lambsale Meadow and locals shopping at Waitrose or Tesco may cause a distorted traffic peak between 08:30-09:30.

Q KcC PC is concerned that congestion at the point where the A12 is crossed by Rendham Road (B1119), forming the through route to Framlingham from Saxmundham (and vice versa) has not been examined. This concern is based on two principal issues:

i] the disproportionate impact of traffic leaving and returning to Carlton Mere's Holiday Park, its anticipated request for more growth (EIA request earlier this year) in the future and the desire of SCDC to increase use of Suffolk Coastal as an all year tourist destination.

ii] the increased use of the northern (unclassified road) leg of Rendham Road by local traffic, HGV traffic and Satnav followers as a cut through to avoid the B1119 and A12 junction.

3.58 The Council has worked closely with Suffolk County Council and other infrastructure providers to ascertain infrastructure requirements related to growth planned in the Local Plan. This engagement will continue throughout the production of the Plan. Over the plan period, the Council will continue to update its evidence base and where necessary engage with service providers, funding partners and the Government to ensure that infrastructure projects are delivered in a timely manner to the benefit of the District, the county of Suffolk and the rest of the country.

Q Attention is again drawn to the vital anomaly first raised in comments regarding SCLP2.2. Specifically, the huge deficit in reliable, high quality, high speed broadband and mobile services in the countryside, beyond settlement boundaries.

Q The Plan remains surprisingly unclear on the; what, where, when, who and how this appalling state of affairs will be resolved, almost to the point of resignation. For a District Council & Planning Authority to seemingly ignore the essential nature of these elements of infrastructure in the 21st century is deplorable.

3.59 Section 14 of this Plan provides a summary of all the infrastructure needed in the District and how and when it is expected to be delivered to support growth.

Noted 3.59

Q A review of the all the infrastructure needs itemised in Section 14 of The Plan has identified the areas where KcC may obtain some beneficial gain. However, seemingly there is no direct or implied intent within The Plan or Section 14 to direct infrastructure, facilities or funding towards KcC.

Q It is presumed that KcC may be able to obtain some infrastructure gain from allocation based developments and seeks clarification prior to the next phase of The Plan development process.

Q Areas where KcC may potentially have some beneficial gain are identified in the table below as:

Type	Approx. Cost	Contributor
'Early Years Benefit' from District wide activity	Unknown	S106/CIL
Primary School Capacity Saxmundham	£7.1m	CIL
700 sq mtrs of Clinical Floorspace Saxmundham area	£1.61m	CIL
Secondary School capacity District wide activity	Unknown	CIL
Community Facilities District wide activity	£1.75-£2m	CIL
Sports Pitches District wide activity	£1.85-£2m	CIL
Play Area & Youth District wide activity	£640k-£680k	S106/CIL
Natural Green Spaces District wide activity	Unknown	CIL
Cemetery capacity District wide activity	Unknown	CIL
Allotment provision District wide activity	£200k-£225k	CIL
Green Infrastructure District wide activity	Unknown	S106/CIL

33.60 New development has a responsibility to contribute towards the cost of new infrastructure. Infrastructure is often funded by developers either through section 106 planning obligations or the Community Infrastructure Levy. Section 106 planning obligations are bespoke agreements made between the Council and the developer where the developer either delivers new infrastructure or contributes money to fund infrastructure to meet the need that development generates. The Community Infrastructure Levy is a standard per sqm charge currently on housing and convenience retail development which the Council pools together to deliver necessary infrastructure.

Noted 3.60

33.61 Suffolk Coastal has had a Community Infrastructure Levy in place since July 2015, and this is currently the main way in which the Council collects funds from development. The rates of the Levy are set out in the Council's Charging Schedule. The Council intends to retain the Levy for most infrastructure funding. The Council will however, need to review the Levy, particularly with respect to the larger sites allocated in the Local Plan. This is because these sites will have on-site infrastructure which may be more effectively secured through section 106 planning obligations.

Noted 3.61

 KcC PC would like clarity on what constitutes "larger sites" in the context of the intention to review the Levy.

3.63 Most needs generated by new development will necessitate improvements to existing infrastructure rather than completely new provision. Therefore, most infrastructure provision will take place outside of development sites. This infrastructure will be funded by the Community Infrastructure Levy and other sources of funding such as the Clinical Commissioning Group.

Noted 3.63

3.64 Opportunities may arise for the provision of open space on site as part of new housing sites. This will be assessed on a case by case basis. The provision of new open space on site increases the opportunities and accessibility for play, physical activity and recreation which contributes significantly towards the health and well-being of the population. This will be secured through planning conditions and/or section 106 planning obligations. Provision of open space can also help to mitigate impacts of recreational pressure on protected environments. The necessary infrastructure requirements should form part of the Habitats Regulations Assessment where one is required, and information will be required to be submitted to demonstrate that the infrastructure provision will not impact upon European protected sites.

Noted 3.64

3.65 Other on-site infrastructure is only likely to be necessary as part of much larger developments where a new primary school or community centre for example may be needed. However, there are specific local needs where smaller developments can enable the delivery of infrastructure that satisfies local needs on site. On-site infrastructure will generally be secured through section 106 planning obligations.

Noted 3.65

3.66 Effective telecommunications, including broadband and mobile phone signals are essential for economic development and to support communities. However, coverage remains poor in some areas, particularly outside of the towns. Policy SCLP8.4 is supportive of its facilitation where necessary and appropriately designed.

Q Attention is again drawn to the vital anomaly first raised in comments regarding SCLP2.2. Specifically, the huge deficit in reliable, high quality, high speed broadband and mobile services in the countryside, beyond settlement boundaries.

Q The Plan remains surprisingly unclear on the; what, where, when, who and how this appalling state of affairs will be resolved, almost to the point of resignation. For a District Council & Planning Authority to seemingly ignore the essential nature of these elements of infrastructure in the 21st century is deplorable.

SCLP3.6 Infrastructure Provision

The Council will work with partners including, Suffolk County Council, Parish and Town Councils, Highways England, Environment Agency, Anglian Water, Essex and Suffolk Water, UK Power Networks and the Ipswich and East Suffolk Clinical Commissioning Group to ensure that the growth outlined in this Local Plan is supported by necessary infrastructure.

Developers must consider the infrastructure requirements needed to support and service the proposed development. All development will be expected to contribute towards infrastructure provision to meet the needs generated.

Off-site infrastructure will generally be funded by the Community Infrastructure Levy. On-site infrastructure will generally be secured and funded through section 106 planning obligations.

Open space should be provided on new residential development sites to contribute to the provision of open space and recreational facilities to meet identified needs, in accordance with Policy SCLP8.2.

In locations where there is inadequate capacity within local catchment schools development should contribute to the expansion or other measures to increase places available at the school. Where new primary schools are provided these should be in locations which are well located in relation to the catchments they will serve, and which maximise opportunities for walking and cycling to school.

Development will not be permitted where it would have a significant effect on the capacity of existing water infrastructure. Specifically, developers should provide evidence to ensure there is capacity in the water recycling centre and the wastewater network in time to serve the development. Where there is no capacity in the water recycling centre, development may need to be phased in order to allow improvement works to take place.

Development should not be permitted where the electricity supply network cannot accommodate it. Particular regard should be had to large scale employment sites, which are regarded as particularly energy intensive development. The Council will work with UK Power Networks to ensure that development proposed in this Local Plan does not conflict with the electricity supply network.

The Council will work with the digital infrastructure industry to maximise access to super-fast broadband, wireless hotspots and improved mobile signals for all residents and businesses. All new developments must provide the most viable high-speed broadband connection. Infrastructure relating to new developments should be designed so as not to impede or obstruct connection to antennae or masts in the local vicinity. Early engagement with the relevant digital infrastructure provider should be undertaken to avoid such a scenario.

Q In the first paragraph of SCLP3.6, it is saddening but alas not surprising to find that no named Telecommunications Infrastructure or Service Provider is included in the array of enterprises unifying "...to ensure that the growth outlined in this Local Plan is supported by necessary infrastructure."

Q As previously stated this is a deplorable situation and may have a significant impact on the aspirations of The Plan if it isn't addressed by the Council quickly and with determination.

Q The provision of open space on new developments in small villages is critical, not only for the health and wellbeing of residents, but also to create neighbourhood and community capable of sustaining mixed tenure and demographic integration.

Q With no easily accessible or local Secondary Education, it is imperative that the needs of the children of newly developed KcC households should be carefully considered apropos "...other measures to increase places available...". Whilst the provision of school places is important, accessibility to them is a very different thing, particularly where affordable housing is being delivered.

Q In the sixth paragraph, regarding the water recycling centre and wastewater network capacity, it is disappointing not to see a more forward thinking philosophy regarding on-site rain harvesting, recycling and associated technologies.

Q The final paragraph, when referencing digital infrastructure, seems to confirm that any efforts to make progress in this area continue to be frustrated, using phrases like "The Council will work with the digital infrastructure industry to maximise access..." and "All new developments must provide the most viable...".

The comments appear in stark contrast to those normally applying to a partnership, where the partner(s) are actively engaged in achieving the optimum solution to a fundamental and pressing need!

Q The final paragraph also includes the comment that "Infrastructure relating to new developments should be designed so as not to impede or obstruct connection to antennae or masts in the local vicinity."

Q For the sake of absolute clarity and avoidance of doubt, can the Council confirm that this must exclude the loss or destruction of the natural habit of existing or new plantings of trees that may (now or over time) inhibit 'line of sight' access to antennae, masts or point-to-point microwave service delivery infrastructure?

3.67 The concept of enabling development, whereby an exception to planning policy is permitted in order to allow for development that will provide sufficient public benefit, is one supported by the Council where appropriate. Across the District, a number of successful examples have been

delivered through partnerships between landowners, service providers, local communities and the Council.

3.68 Enabling development could be required in a number of circumstances such as to retain a heritage asset, enhancement of sports facilities, coastal defence and flood adaptation measures where necessary. The exceptional individual circumstances where enabling development may be supported by the Council in exceptional circumstances needs to be justified, transparent and deliverable as a comprehensive package, with clear community benefits.

Q In respect to 3.67 & 3.68 it would be reassuring for a brief example or two to be given in order to illustrate how the provision for exceptions has been used in the past and going forward could be justifiable in special circumstances.

3.69 Over the plan period the public benefits associated with enabling development are expected to change and the Council will keep this under review through regular monitoring. If considered necessary, the Council may introduce a Supplementary Planning Document to provide further detail and justification in respect of enabling development.

Q It is very concerning that prior to implementation of The Plan, a provision is being brought forward for a separate procedure that could be used to circumvent the provisions of a specific policy contained therein.

Q Is it not better practice to correctly frame the policy provision at the outset?

Section 4 Economy

KcC PC recognises the enabling role of The Plan in setting out a framework for land use which, in combination with other wide ranging policies (SCDC and SCC) and external factors, provide for business growth and a strong resilient District economy.

Q However, it is also concerned that despite the emphasis on business growth as the engine for a strong and resilient economy, and by implication for so much else in Coastal Suffolk, The Plan sees the outcome emerging in 2036 as one whereby just one (net?) new employment opportunity per day has been created.

New Jobs created per day of plan period

Babergh	0.46 (3,300/7,300)
Mid-Suffolk	0.80 (5,860/7,300)
Suffolk Coastal	0.99 (7,220/7,300)
Ipswich	2.37 (17,310/7,300)
Average	4.62 (33690/7,300)

Q As the table (above) demonstrates, whilst this compares favourably with Babergh and Mid-Suffolk it is significantly lower than Ipswich.

This is despite Coastal Suffolk hosting significant employers at Felixstowe Port, BT at Adastral Park, Sizewell, with the prospect of more energy oriented employment emerging during and beyond The Plan lifetime.

Employment Areas

4.6 The local economy is also diverse, made up of many small and medium enterprises that collectively provide a variety of economic opportunities, jobs and services. Planning policies reflect that over the Local Plan period new businesses and business sectors will emerge, as experienced in recent years, with the emergence of creative businesses and film technologies at locations like Rendlesham which has boosted the number of enterprises in Suffolk Coastal.

Q KcC PC are disappointed that seemingly the Council are a passive conduit for new businesses and business sectors seeking a base in Coastal Suffolk.

Q Instead it is suggested the Council should commission research to examine high correlation businesses (incubators, micro, small, medium & large) and business sectors attracted by the specific attributes of Coastal Suffolk, its potential employment sites, educational output, etc.

Q Armed with the research results, it would then be possible to test market (to chosen employers in target sectors), asking them to look at Suffolk through the lens of a potential relocater and provide structured feedback on the attractiveness of the proposition.

Q Through analysis of the feedback, the Council could then identify the most beneficial target businesses/business sectors for the District, examine the implications of the feedback and cost/benefits of generating a fully rounded Coastal Suffolk business/business sector proposition.

Q Without a structured approach, it is likely that Coastal Suffolk could be overlooked as a possible relocation option for the want of relatively small things that might be easily resolved.

4.7 The mixture of large scale strategic businesses alongside small and medium enterprises reflects the economic potential across the District. The Local Plan needs to ensure that the economy is able to prosper and grow with a combination of suitable sites for serviced employment land and supporting infrastructure.

Q KcC PC would like to remind the Council that a ubiquitous, fast, high quality and reliable digital infrastructure is now 'table stakes' for all businesses in Coastal Suffolk, be they large, small or micro, with an urban or rural location, tourism, manufacturing, services or craft. To overlook the criticality of this relatively simply provided utility is to ignore the future economic prosperity of Coastal Suffolk.

4.8 To support the District's economy and realise the economic ambitions for the area as outlined in the Economic Strategy for Norfolk and Suffolk and the East Suffolk Economic Growth Plan, the Local Plan needs to identify and preserve a range of employment sites to achieve these ambitions. Previous Local Plans made a distinction between strategic and general employment areas. This Local Plan seeks to simplify these allocations as Employment Areas. Through simplifying the allocations, the Council believes it can facilitate business opportunities and growth on a variety of sites across the District to deliver the economic vision for the District.

Noted 4.8

4.10 A variety of employment areas are identified to cater for the needs of all sectors in the District. Some of these are established sites with buildings and infrastructure already in place and covered by existing planning permissions or established lawful uses. The Local Plan allocates new strategic areas for employment uses close to the A14 at Felixstowe and at the Seven Hills junctions of the A12 and A14, as well as expecting some employment development to come forward alongside the development of the garden neighbourhoods at Saxmundham and Felixstowe. In other locations, the policies support new employment development within Settlement Boundaries, along with appropriate development in the countryside, such as through conversions and farm diversification schemes.

Noted 4.10

Q Subject to appropriate Policies SCLP4.2 and SCLP4.5 respectively

SCLP4.1 Employment Areas.

Noted SCLP4.1

Q Subject to Policy SCLP12.32 - relating to Carlton Park (Ronald Road)

New Employment Areas

4.11 to 4.15 & SCLP4.2: New Employment Areas.

Noted 4.11 to 4.15 & SCLP4.2

Q KcC PC - there are no New Employment Areas within the Settlement Boundaries

Expansion and intensification of Employment Sites

4.16 to 4.19 & SCLP4.3: Expansion and intensification of Employment Sites

Noted 4.16 to 4.19 & SCLP4.3

KcC PC notes that Carlton Park (Ronald Road) may be subject to Planning Applications for B1, B2 & B8 uses and expansion and/or intensification, each of which would fall within the terms of policies SCLP4.3 & SCLP12.32.

Observation

KcC PC wish it to be known that the Carlton Park Industrial Area (Ronald Road) is immediately adjacent to the rear of Kelsale CEVC Primary School, which in turn is immediately across Carlton Road adjacent to Beaumont Cottages – KcC's largest high density residential area, with a significant proportion of elderly and restricted mobility residents.

To the east of the school, on the same side of Carlton Road is Spinney Pocket, a small residential area which is home to a sheltered housing scheme and some more limited mobility residents.

School speed restrictions exist with varying degrees of compliance.

Carlton Road joins the A12 to the west and as a consequence is used by mixed vehicular traffic coming cross country from; Theberton, Leiston, Middleton and further afield to gain southbound access.

By the same token, it is also used by North and Southbound A12 traffic, as well as vehicles crossing the A12 from Peasenhall Road to gain access to Leiston, Sizewell, Saxmundham, Middleton and further afield.

In addition, it must be noted that Carlton Road does (during term time) suffer a twice daily high vehicular traffic period which generates intense parking issues for a 20-30 minute period, whilst parents drop-off and pick-up primary school age children.

There have been a number of 'close shaves', but thankfully no fatalities or serious injuries.

Informal and formal discussions with SCC, County Councillors and other agencies, regarding permanent crossings, alternative parking arrangements, assisted crossing arrangements (Lollipop etc.), etc. have not met with any resolution coming forward.

Comments made by KcC's County Councillor at a Parish Council Meeting earlier this year made it clear that no resolution was likely in the short or longer term.

Q Consequently, expansion and/or intensification of use on the Carlton Park (Ronald Road) site, leading to increased traffic movements would require significant re-engineering of the immediate road network and environs to mitigate the danger to:

- school children and their parents
- elderly residents
- people of limited mobility
- care services visiting Carlton Road & Beaumont Cottage residents

Protection of Employment Sites

4.20 to 4.22 & SCLP4.4: Protection of Employment Sites.

Noted 4.20 to 4.22 & SCLP4.4

Economic Development in Rural Areas

4.23 Economic activity also takes place outside of the towns and the identified Employment Areas in rural locations. It is important that the Local Plan continues to maximise the potential of these activities to support the rural economy and provide a valuable source of jobs locally.

4.24 National Planning Policy seeks to support a prosperous rural economy through the sustainable growth and expansion of businesses in the rural areas. Across the District there are a large number of farms and rural diversification schemes on isolated sites which provide employment opportunities

or which through investment, could provide new economic opportunities in the form of traditional B class industries, cultural or tourism activities.

4.25 Public consultation responses have highlighted the need to improve digital services such as mobile and broadband signal to support business activity in the rural areas. The Local Plan supports this need and encourages the increased provision of infrastructure to ensure greater coverage and reliability of this type of utility.

4.26 It is acknowledged that employment opportunities in the rural areas are generally only accessible via motor vehicle and public transport opportunities are limited. In such locations any development needs to be sensitive to the surrounding landscape and not have an unacceptable impact (such as high volumes of HGV traffic) on the local road network including routes to the main road network. However, the benefit of retaining these types of sites for economic activity in the majority of cases is considered to outweigh the negatives that arise from location and access arrangements.

4.27 Within the Suffolk Coast and Heaths AONB, the Council will still support economic development in rural areas but will strive to ensure that higher levels of design and appropriate screening are delivered to reflect their location within the protected landscape.

Q Previously rehearsed comments regarding rural Broadband and Digital services are once again drawn to the attention of the Council, in the strong belief that their position has to be more than:

“The Local Plan supports this need and encourages the increased provision of infrastructure to ensure greater coverage and reliability of this type of utility.”

Q It is regrettable that 4.26 includes such a bald statement as:

“However the benefit of retaining these types of sites for economic activity in the majority of cases is considered to outweigh the negatives that arise from location and access arrangements.”

Q KcC PC believe that each case will have to be considered on its merits, taking into account the employment opportunity, the economic, social, environmental and opportunity costs and the creation of a notional ‘balance sheet’ of positives and negatives on the site.

Q An ‘employment at any cost’ continuance of use policy will not deliver the optimum solution 100% of the time and will benefit from a fuller consideration.

SCLP4.5 Economic Development in Rural Areas

Proposals that grow and diversify the rural economy, particularly where this will secure employment locally, will be supported. Proposals will be supported where:

- a) They accord with the vision of any relevant Neighbourhood Plan in the area;
- b) The scale of the enterprises accord with the Settlement Hierarchy;
- c) The design and construction do not have an adverse impact on the character of the surrounding area and landscape or harm the natural environment;
- d) Small scale farm and rural diversification schemes make good use of previously developed land;
- e) The proposed use is compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity concerns; and
- f) The proposal delivers additional community, cultural or tourism benefits.

Noted 4.5

Conversion and Replacement of Rural Buildings for Employment Use

4.28 to 4.31 & SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use.

Noted 4.28 to 4.31 & SCLP4.6

Farm Diversification

4.32 to 4.35 & SCLP4.7: Farm Diversification

Noted 4.32 to 4.35 & SCLP4.7

Town Centres and Retail

4.36 to 4.41

Noted 4.36 to 4.41

The Retail Hierarchy in Suffolk Coastal District

4.42 The purpose of the following Retail Hierarchy for the District and the different levels within the hierarchy is to set out the provision of facilities and scales of shopping development that can be expected of a centre. This recognises retail relationships between centres in the hierarchy, especially in the south of the District between Woodbridge, Felixstowe, the out-of-centre retail destination at Martlesham and the neighbouring County Town of Ipswich.

4.43 An out of centre location is one that is neither in, nor on the edge of a centre, but is within the urban area. As an out-of-centre location, Martlesham Retail Park is not sequentially preferable for new retail and commercial leisure so it is therefore not included in the retail hierarchy.

4.44 Small parades of shops serving only the immediate neighbourhood are not classed as centres in national policy, and therefore are not designated. These include corner shops and other very small parades serving the immediate area.

Policy SCLP4.8: Retail Hierarchy

The retail hierarchy in Suffolk Coastal is:

Level 1 – Town Centre - Felixstowe (resort town)

Level 2 – Town Centre - Aldeburgh, Framlingham, Leiston, Saxmundham & Woodbridge (market towns)

Level 3 – District Centres

Level 4 – Local Centres.

Noted SCLP4.8

 The table and narrative appear neither complementary nor clear. The language used in each is different. Presumably this is an important concept? In which case is this the best description of it?

Opportunities and capacity for retail growth

4.45 to 4.49 & SCLP4.9 New Retail Development

Noted 4.45 to 4.49 & SCLP4.9

New retail/commercial leisure development outside of Saxmundham's Town Centre that exceeds 350sqm (Gross) will require an impact assessment to be completed.

The Nature of Town Centre Development

4.50 to 4.53 & SCLP4.10 Development in Town Centres

Noted 4.50 to 4.53 & SCLP4.10

Town Centre Environments

4.54 to 4.55 & SCLP4.11 Town Centre Environments

Noted 4.54 to 4.55 & SCLP4.11

Q 4.55 Refers - will a seemingly piecemeal approach to improving our Town Centre Environments really bring about the required regeneration and/or transition of them?

Q For example the 'opportunity' in Saxmundham to "...enhance pedestrian connectivity and legibility...between the railway and town centre.", without further initiatives and the accompanying investment is hardly likely to deliver a huge influx of people and/or economic prosperity...or is it? And at what cost...where will the traffic go?

Observation

Reflecting the nationwide 'High Street Crisis', The Plan seems devoid of substantive ideas beyond quite a lot of traditional town planning motherhood and apple pie.

Q Perhaps a Cabinet 'Owner' (or even a Tsar!) for Town Centres could bring a much needed focus and provide towns with a forum for discussing and exchanging ideas.

Further down the track, the forum could perhaps be a vehicle for developing ideas for a new District wide programme of complementary and transformative 'new retail & leisure experience areas' in our town centres?

Martlesham and Kesgrave

4.56 & 4.57 & SCLP4.12 Retail in Martlesham and Kesgrave

Noted 4.56 & 4.57 & SCLP4.12

District and Local Centres

4.58 to 4.60 & SCLP4.13 District and Local Centres & Local Shops

Noted 4.58 to 4.60 & SCLP4.13

Q Little of substance, lacking in ideas, is this really a policy for the future?

Section 5 Housing

5.1 to 5.3

Noted 5.1 to 5.3

Confirming a plan with;

- A housing requirement of 545 dwellings per annum 2016 thro' 2036
- Supporting economic growth
- The provision of infrastructure
- Addressing the need for more affordable housing
- Housing to meet the needs of the elderly
- Diversification of housing supply
- Supporting existing infrastructure & services, particularly rural areas
- A mix of size, tenure and types reflecting the District's population
- Supporting community led housing initiatives
- Working with Housing Associations

Major Centres

5.4 to 5.6

Noted 5.4 to 5.6

Identifying North Felixstowe Garden Neighbourhood and Brightwell Lakes

Market Towns

5.7 to 5.9

Noted 5.7 to 5.9

Identifying Saxmundham Garden Neighbourhood and no new allocations proposed in the Market Towns, anticipating small scale development proposals coming forward in Settlement Boundaries.

Large Villages

5.10 to 5.12 and SCLP5.1 Housing Development in Large Villages

Noted 5.10 to 5.12 and SCLP5.1

SCLP5.1 Housing Development in Large Villages

Residential development will be permitted within defined Settlement Boundaries where this is:

a) Development of a scale appropriate to the size, location & character of the village

or

b) Infill development (in accordance with Policy SCLP5.7).

Residential development will be permitted on Exception Sites adjacent or well related to defined Settlement Boundaries in accordance with Policy SCLP5.11

Noted SCLP5.1

Small Villages

5.13 to 5.14 and SCLP5.2 Housing Development in Small Villages

Noted 5.13 to 5.14 and SCLP5.2

SCLP5.2 Housing Development in Small Villages

Residential development will be permitted within defined Settlement Boundaries where it is:

a) A small group of dwellings of a scale appropriate to the size, location and character of the village

or

b) Infill development (in accordance with Policy SCLP5.7).

Residential development will be permitted on Exception Sites adjacent or well related to defined Settlement Boundaries in accordance with policy SCLP5.11

Noted SCLP5.2

Countryside

5.15 to 5.20 Housing Development in the Countryside

Noted 5.15 to 5.20

SCLP5.3 Housing Development in the Countryside

Outside of the defined Settlement Boundaries, new residential development will be limited to:

a) Affordable housing to meet identified local needs on exception sites adjacent to, or well related to, Settlement Boundaries or clusters of housing in the countryside (in accordance with Policy SCLP5.11 and Policy SCLP5.4);

b) Limited development within existing clusters (in accordance with Policy SCLP5.4);

c) Replacement dwellings on a one to one basis where these are no more visually intrusive in the countryside than the building to be replaced;

d) Subdivision of an existing larger dwelling where this would meet an identified local need

e) Conversion of an existing building (in accordance with Policy SCLP5.5);

f) Rural workers dwellings, where there is an essential need for a rural worker to live permanently at or near their place of work (in accordance with Policy SCLP5.6);

g) Other residential development consistent with policy on residential development in the countryside contained in the National Planning Policy Framework3

Noted SCLP5.3

Housing Clusters in the Countryside

5.21 to 5.28 and SCLP5.4 Housing in Clusters in the Countryside

Noted 5.21 to 5.28

Particularly, the specific requirement that dwellings developed in clusters are well related to services and facilities. Seeking to minimise the need to travel and reliance on the private car and avoiding the development of isolated dwellings in the countryside except in special circumstances (i.e. accommodation in proximity to a rural occupation – wildlife warden, etc.). Planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

The policy requires applicants to demonstrate that meaningful and effective engagement has taken place with the community, including the Parish Council, and that the submitted scheme addresses any planning issues and reflects needs identified by the community. Applicants should submit a statement describing the consultation and engagement undertaken, the outcomes and how this is reflected in the proposal.

SCLP5.4 Housing in Clusters in the Countryside

Proposals for new dwellings within 'clusters' in the countryside will be supported where:

a) The proposal is for up to three dwellings within a cluster of five or more dwellings;

or

b) The proposal is for up to five dwellings within a cluster of at least ten existing dwellings which is well related to a Major Centre, Town, Large Village or Small Village;

and

c) The development consists of infilling within a continuous built up frontage, is in a clearly identifiable gap within an existing cluster, or is otherwise located adjacent to existing development on two sides;

d) The development does not represent an extension of the built up area into the surrounding countryside beyond the existing extent of the built up area surrounding, or adjacent to, the site; and

e) It would not cause undue harm to the character and appearance of the cluster or, result in any harmful visual intrusion into the surrounding landscape.

Where more than three dwellings are proposed, applicants must be able to demonstrate that the scheme has the support of the local community and that the mix of dwellings proposed would meet locally identified needs.

Particular care will be exercised in sensitive locations such as within or in the setting of Conservation Areas, the Area of Outstanding Natural Beauty and the special qualities and features of Landscape Character Areas in accordance with Policy SCLP10.3.

The cumulative impact of proposals will be a consideration in relation to the criteria above.

A 'cluster' in the context of this policy:

- Consists of a continuous line of existing dwellings or a close group of existing dwellings adjacent to an existing highway; and
- Contains 5 or more dwellings. Countryside

Noted SCLP5.4

Particularly, as the policy is designed to support limited development in clusters, it is important that consideration is given to the cumulative impacts. In this respect, consideration will be given to whether there is an extant permission or completed development permitted under this policy, and the cumulative impact on the character.

Conversion of Rural Buildings in the Countryside for Housing

5.29 & 5.30

Noted 5.29 & 5.30

Policy SCLP5.5: Conversions of Buildings in the Countryside for Housing

The conversion of agricultural buildings in the countryside for residential use will be permitted where:

- a) The building is redundant;
- b) The building provides a positive contribution to the landscape;
- c) The conversion does not require significant alteration;
- d) The design maintains or enhances the structure, form and character of the rural building;
- e) The design of the conversion, including any necessary works to the curtilage, does not have a harmful effect on the character of the landscape;
- f) Any impacts on the natural environment are adequately mitigated for;
- g) The conversion enhances the immediate setting of the area; and
- h) The site is served by an appropriate existing access.

Noted and SCLP5.5

Rural Workers Dwellings

5.31 to 5.33 and SCLP5.6 Rural Workers Dwellings

Noted 5.31 to 5.33 and SCLP5.6

Specifically; Policy on rural workers dwellings is well established in the planning system. There are a number of rural activities which require full time workers to be accommodated on site or nearby. In particular there are agricultural, horticultural and forestry practices which may require a worker to attend at short notice or to be available during night and day. The provision of a rural workers dwelling should therefore only be supported where it is essential to meet the needs of the business.

Where planning permission is granted for a rural workers dwelling, occupancy restriction conditions will be imposed to ensure the dwelling is used for that purpose and remains available for that purpose in the future. To avoid new isolated market housing in the countryside proposals, to remove occupancy restriction conditions will rarely be approved. Where applications are made for the removal of an occupancy condition, evidence will be required to demonstrate that there is no longer a need for the accommodation for either the business or for the wider local area, or to meet needs for affordable housing. Evidence of marketing should be provided.

Infill and Garden Development

5.34 & 5.35 and SCLP5.7 Infill and Garden Development

Noted 5.34 & 5.35 and SCLP5.7

Particularly:

Infill development is that which takes place in a gap between existing buildings.

Garden development is that which takes place in the garden of an existing dwelling, often to the rear.

Infill development can have the potential to harm the character of a streetscape if not carefully designed or if it takes place on unsuitable sites such as those which are too small. In addition, development of backland or garden plots can impact on the landscape if they encroach into the countryside, or can raise amenity issues within built up areas.

This issue is recognised in the National Planning Policy Framework which states that Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

Housing Mix

5.36 In addition to ensuring a supply of housing land, it is also necessary to ensure that the right size, type and tenure mix of housing built is delivered. The National Planning Policy Framework requires planning authorities to identify the size, type and range of housing required and, furthermore, the National Planning Practice Guidance states that once identified, the housing need should be broken down by household size and type. Specifically, the National Planning Policy Framework requires planning authorities to plan for a mix of housing based on the needs of families with children, older people, people with disabilities, service families and people wishing to build their own homes.

Noted 5.36

5.37 The Strategic Housing Market Assessment for Ipswich and Waveney Housing Market Areas (2017) (SHMA) is a key piece of evidence which identifies the needs for mix and type of housing across the District to 2036.

Noted 5.37

5.38 The SHMA provides conclusions on the size of property needed in each tenure for the District as a whole. Evidence shows that this varies between tenure, but that overall there is a need for all sizes of property and that across all tenures there is a need for at least 40% to be 1 or 2 bedroom properties. At present, around 30% of all properties in the District are 1 or 2 bedrooms. To ensure that a mix of sizes is delivered, and in particular recognising the issues around affordability and the potential demand for properties for downsizing due to the ageing population, Policy SCLP5.8 includes a requirement for new development to provide for a mix which reflects the conclusions of the SHMA. It is acknowledged that, depending on the character of the surrounding area, some sites may present a greater opportunity to secure smaller properties and consideration will therefore be given to surrounding densities and character in this respect.

Noted 5.38

Table 5.1 Housing need by size, source: SHMA Part 2 (May 2017)

Number of bedrooms	Percentage of District wide need
1	13%
2	29%

3
4

30%
28%

Noted Table 5.1

5.39 In Suffolk Coastal District the number of households in private rented accommodation has increased by 35% between 2001 and 2011. Whilst this increase is lower than that of surrounding authorities, it nevertheless highlights a growing need for rental properties. The SHMA concludes that 16% of housing need to 2036 is for private rented properties.

Noted 5.39

Q An alternative conclusion to the assertion made in this paragraph might be that the increase in private rented accommodation reflects a detrimental impact on the affordability of housing and the lack of available Social Housing.

Q KcC PC would welcome additional evidence showing how the assertion in The Plan has been arrived at.

5.40 Other evidence of local housing needs may include the Housing Register or a housing needs survey carried out by a Town or Parish Council or Neighbourhood Plan group, however this would be considered alongside the conclusions of the SHMA which sets out the need at the District level. Any alternative assessment of local need would need to be viewed in the context that new housing development is contributing to the District wide need and not just to the needs of the Town or Parish where the development is proposed.

Noted 5.40

5.41 The SHMA highlights that within the Ipswich Housing Market Area the population of those aged over 65 is projected to increase by 57.8% between 2014 and 2036. The East Suffolk Housing Strategy recognises that there are an increasing number of older people living in housing that is too large or is not suited to their mobility needs. It states that there is a need for more housing to be adapted to make it accessible and for more specialist housing for older people, including higher level support for people with severe mobility problems, chronic physical health conditions and dementia. The development of new housing provides an opportunity to design-in such considerations. Provision of smaller, more suitable, accommodation may result in more of the existing larger properties becoming available.

Noted 5.41

5.42 The SHMA includes an assessment of the needs for specialist accommodation (sheltered housing, enhanced sheltered housing and extra care housing) and identifies a need for a total of 1,287 units by 2036. The SHMA also identifies a need for a further 1,118 spaces in Registered Care (nursing and residential care homes) over the plan period. However traditional forms of provision will not always match modern demands and it is considered that some of this need will be met through the provision of housing, and therefore it is important that the mix of housing helps to address these needs. Provision for sheltered and extra care housing and registered care will be secured through larger residential allocations where feasible, as part of a mix of housing types.

Noted 5.42

5.43 In 2015, the Government introduced two new 'optional' Building Regulations standards relating to accessible dwellings, which set standards in relation to accessible and adaptable dwellings (Part M4(2)) and wheelchair accessible dwellings (Part M4(3)) which are over and above the minimum requirements. Local authorities can apply these optional standards by incorporating a requirement within their planning policies. The SHMA identifies that there will be an increase of 3,120 people over 65 in Suffolk Coastal with a limiting long term illness by 2030. Considered alongside the number

of adaptations made annually to the existing stock and the scale of projected growth in population aged over 65, it is considered that there is a clear need for a significant proportion of new dwelling stock to be built to higher accessible and adaptable standards. The policy therefore requires 50% of dwellings in developments of 10 dwellings or more to meet the requirements of Part M4(2). Whilst the Council will support the development of dwellings built to the wheelchair accessible standard, a requirement for these will not be set as the needs for them will be specific to individual circumstances. This approach also supports the Joint Health and Wellbeing Strategy for Suffolk which identifies the provision of greater choice and innovation in housing for those with disabilities as one of its priorities, and the East Suffolk Housing Strategy which identifies a need for more accessible accommodation.

Noted 5.43

Q KcC PC regrets that the Council and Planning Authority have decided to not set wheelchair accessible standards, leaving it to the market to be fulfilled by individual circumstance (i.e. those who can pay...those who can't?).

Q It would be preferable to see a 'Pilot' (perhaps 3-4 sites across the District) undertaken during The Plan period to gauge demand and ways developers to adapt to delivering flexible living accommodation.

5.44 There is a range of types of housing that may be well suited to the older population. The Council will support innovative schemes which seek to create integrated communities and will expect developers to consider whether such types of housing would be feasible depending on the site size and location. Examples of housing types and design which may contribute to providing a mix of housing choices for older people could include:

Almshouses - housing provided by charities at a low rent, usually for older people;

Co-housing - community led schemes where residents share some spaces/facilities;

Bungalows - including dormer bungalows provided there is adequate living accommodation (i.e. bedroom(s) and bathroom(s)) on the ground floor;

Smaller properties - but which have larger than standard living and storage space;

Provision of - shared or smaller garden/outdoor spaces.

Noted 5.44

5.45 Opportunities should be taken to integrate older persons housing into the community, in order to address potential issues of isolation and to promote inclusivity. For example older persons housing on sites that are well related to schools, community centres or other focal points can help to create integrated communities.

Noted 5.45

5.46 To achieve a greater mix of housing types, the starting point will be that all developments of 5 or more residential units will be expected to provide a mix of house types and sizes. The Council will expect applicants to relate needs to the SHMA and/or to an assessment of local need where the methodology and scope for this is agreed with the Council.

Noted 5.46

5.47 To ensure that the size of dwellings appropriately reflects the needs identified, the Council will consider the number of rooms and layout of dwellings proposed in determining the size of dwelling by bedroom numbers.

Noted 5.47

 The sense of this paragraph, while perhaps obvious to a Planning professional, is not clear to a lay reader. Further clarification would be welcomed.

5.48 Neighbourhood Plans may wish to identify specific localised needs for certain types of dwellings where supported by evidence gathered through a local housing needs assessment which is supported by the Council.

Noted 5.48

Policy SCLP5.8: Housing Mix

Proposals for new housing development will be expected to reflect the mix and type of housing needs identified in the Strategic Housing Market Assessment or other evidence of local needs as supported by the Council.

Proposals for 5 or more units should provide for a mix of sizes and types based upon table 5.1, and should provide for at least 40% of 1 or 2 bed properties.

On proposals of 10 units or more at least 50% of the dwellings will need to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations, and will be required to demonstrate how the proposal contributes to increasing the choice and mix of housing available for the older population.

Sheltered and extra-care housing will be supported where there is an identified need and where the scheme incorporates a mix of tenures.

Neighbourhood Plans may set out an approach to housing type and mix specific to the local area where this is supported by evidence.

Noted SCLP5.8

Self Build and Custom Build Housing

5.49 From 1 April 2016, the Self Build and Custom Housebuilding Act 2015 requires Local Planning Authorities to keep a register of people who are interested in building their own homes. As part of meeting the needs for a mix of housing types, the National Planning Policy Framework states that planning authorities should plan for the needs of those wishing to build their own homes.

Noted 5.49

5.50 Self build projects are defined as those where someone directly organises the design and construction of their own home. This covers a wide range of projects including a traditional DIY self build home, to projects where the self builder employs someone to build their home for them. Community-led projects can also be defined as self build.

Custom build homes are where a person works with a developer as an individual or a group to help provide their own home. The developer may help to find a plot, manage the construction and arrange the finance for the new home. This is more of a hands-off approach but the home is tailored to match the individual's requirements. Modular construction may be an appropriate form of self-build or custom-build, where this is acceptable in design terms.

Noted 5.50

5.51 There are presently over 250 people on the Suffolk Coastal Self-build and Custom Build Register, and analysis of the Register indicates that a large proportion of the demand is in the area around the east of Ipswich and Woodbridge.

The SHMA identified that across the Ipswich HMA

- **94.7%** of those on the Register are interested in a single plot of land to build a home for themselves to live in (or employ someone else to build this home)
- **28.1%** are interested in a group self-build project (where a group of people come together to design and develop a custom build development which they then live in)
- **19.3%** in a developer led custom build (where a developer divides a larger site into individual plots and provides a design and build service to purchasers enabling people to customise existing house designs).

Those on the Self-build Register were also asked about the minimum number of bedrooms they would require in their new home.

- **46.9%** of respondents indicated they require three bedrooms
- **35.9%** require four bedrooms
- **15.9%** two bedrooms and
- **1.3%** five or more bedrooms.

Noted 5.51

5.52 Policy SCLP5.9 below sets out the Council's approach to delivering serviced plots across the District. As well as requiring all developments of 100 or more dwellings to provide a proportion of serviced plots for self and custom build units, the policy also supports the delivery of solely self build and custom build developments where they are in conformity with the other relevant policies of this plan.

Noted 5.52

5.53 A key element of self and custom build schemes is the flexibility to design and build homes to individual requirements however it is important that an element of coherence in the design and appearance of the overall site is maintained. As such, where groups of plots are concerned, a design code should be agreed as part of an outline planning permission which establishes design principles to which each plot should adhere. This will also provide greater certainty for self and custom builders that their individual designs will be granted permission. Design codes can address matters such as building heights; massing; position on plot; plot coverage; materials palette; landscaping; parking; and waste management amongst others.

Noted 5.53

5.54 Where serviced self build or custom build plots are made available (i.e. the required highways and services are in place) but are not taken up after 12 months, permission may be granted for the plots to be developed by a developer. In such instances, the Council will require evidence to demonstrate that the plots have been actively promoted as self build and custom build plots, in accordance with the marketing guidance contained in Appendix B. The Self Build Register will provide a source of information in relation to potential interest.

Noted 5.54

Policy SCLP5.9: Self Build and Custom Build Housing

Proposals for self build or custom build plots, or proposals that make a proportion of serviced dwelling plots available for sale to self builders or custom builders, will be supported where in compliance with all other relevant policies of this Local Plan.

Developments of 100 or more dwellings will be expected to provide a minimum of 5% self or custom build properties on site through the provision of serviced plots.

Once completed and available for development, the serviced plots should be marketed for a period of not less than 12 months. If, following this period, any of the serviced plots remain unsold; they may be built out by the developer.

Proposals for 5 or more self build or custom build dwellings in a single site location should be developed in accordance with a set of design principles to be submitted with planning applications and agreed by the Local Planning Authority.

Noted SCLP5.9

Affordable Housing on Residential Sites

5.55 High house prices across Suffolk Coastal District mean that many people cannot afford to purchase or rent a house on the open market. The Strategic Housing Market Assessment identifies that within Suffolk Coastal median property prices are higher than in the other parts of the Ipswich Housing Market Area.

Noted 5.55

 It is assumed that quantitative evidence is available to support the assertion that “...Suffolk Coastal median property prices are higher than in the other parts of the Ipswich Housing Market Area.” Inclusion would add weight to the affordability issue and the need for a sustainable resolution.

5.56 The East Suffolk Housing Strategy (2017 – 2023) identifies the affordability of housing as a key challenge and includes an area of focus around having a more proactive role towards supporting the delivery of affordable housing in East Suffolk. The provision of affordable housing through the development of market housing is an integral part of the delivery of the East Suffolk Housing Strategy, including through investing commuted sums into additional affordable homes and achieving on-site affordable homes which provide the right mix of sizes and tenures to meet local need.

Noted 5.56

5.57 Affordable housing is currently defined in the National Planning Policy Framework as social rented, affordable rented and intermediate housing (including shared ownership, shared equity and intermediate rent), provided to eligible households whose needs are not met by the market. Draft revisions to the National Planning Policy Framework also propose to introduce Starter Homes and discounted market sales housing into the definition of affordable housing.

Noted 5.57

5.58 The National Planning Policy Framework expects the need for affordable housing to be met on-site unless off-site provision or a financial contribution can be justified and where the agreed approach contributes to creating mixed and balanced communities. Following the Ministerial Statement of November 2014, the draft revisions to the National Planning Policy Framework (March 2018) state that affordable housing contributions should only be sought for major housing development (defined as sites of ten dwellings or more in the draft revised National Planning Policy Framework), other than in designated rural areas.

Noted 5.58

 Last sentence “...other than in designated rural areas.” Clarification/repetition of the provisions relating to “...designated rural areas.” would be valuable at this point, lest it is unclear to the reader.

5.59 The draft revised National Planning Policy Framework introduces a new requirement for major development (defined as that of ten or more dwellings) whereby at least 10% of the homes should be available for affordable home ownership unless this would exceed the level of affordable housing required in the area or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. The National Planning Policy Framework states that exemptions should be made where the development is for solely Build to Rent homes, is specialist accommodation for a group of people with specific needs, is self build or custom build, is exclusively for affordable housing or is a rural exception site.

Noted 5.59

5.60 The Strategic Housing Market Assessment identifies that of the total housing need across the District:

- 12.3% should be for social rent/affordable rent
- 6.3% should be for shared ownership and
- 6.9% should be for Starter Homes/discounted home ownership

The requirement in the proposed revisions to the National Planning Policy Framework 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.

Noted 5.60

5.61 The proposed revisions to the National Planning Policy Framework include amending the definition of affordable housing to include Starter Homes and discounted market sales housing. These tenures were excluded from assessment of need for affordable housing in the Strategic Housing Market Assessment, however some analysis was undertaken to identify their potential role in meeting housing needs. The Strategic Housing Market Assessment concluded that these tenures would most likely be suitable for those who currently reside in the private rental sector and concluded that there would be an indicative demand for 642 dwellings in these tenures.

The provision of Starter Homes and discount home ownership should not therefore be made at the expense of shared ownership and social/affordable rent. Further, as Starter Homes are not required to remain as such in perpetuity, policy needs to consider the longer term appropriateness of market housing in locations where Starter Homes are supported.

Noted 5.61

Q Regarding the amendment to include Starter Homes and discounted market sales housing, has the SHMA been recast to take this amendment into account. If not, is it planned to be recast (and when) or is the net impact viewed as statistically not significant enough to warrant recasting?

5.62 In exceptional circumstances where proposals are not able to meet the requirements for affordable housing for viability reasons, and to ensure that development can still come forward and overall housing delivery is not compromised, the Council may agree to alter the requirements subject to this being demonstrated through a comprehensive viability assessment, to the Council's satisfaction. Before reducing the overall provision of affordable housing, the tenure and type of affordable housing should be first adjusted to secure viability. In line with the draft revised National Planning Policy Framework, viability assessments will be made publicly available. Guidance on viability assessments is contained in Appendix D.

Noted 5.62

Q Regarding “...viability reasons...” is there a prescribed level of developer profit, investment return, etc. used in agreeing that the affordability content should be relaxed. If so what are they? If not, how is an objective assessment of “viability” made?

Policy SCLP5.10: Affordable Housing on Residential Developments

Proposals for residential development with capacity for more than ten units and which have a combined gross floorspace of 1,000sqm or more (gross internal area) will be expected to make provision for 1 in 3 units to be affordable dwellings, and to be made available to meet an identified local need.

Of these affordable dwellings:

- 50% should be for affordable rent/social rent
- 25% should be for shared ownership and
- 25% should be for discounted home ownership.

Provision is expected to be made on-site, unless it can be demonstrated in exceptional circumstances that it is not feasible or practical to provide the units on site in which case it may be agreed that a commuted sum could be paid towards provision of affordable housing elsewhere.

In exceptional circumstances, where the Council is satisfied that the provision of affordable housing is not viable, as demonstrated through a viability assessment the Council may agree to vary the requirement for affordable housing.

Neighbourhood Plans may set requirements for a greater proportion of affordable housing where this is supported by evidence of need and viability assessment.

Noted SCLP5.10

Affordable housing in the countryside

5.63 Limiting development beyond Settlement Boundaries lowers land values in these locations by removing the ‘hope value’ for high value developments such as market housing. This allows the Council to develop ‘exception site’ policies which allow for certain types of development such as 100% affordable housing schemes or schemes for the relocation of homes at risk from coastal erosion which wouldn’t otherwise be viable if they were competing for land with market housing. This approach is supported by national planning policy.

Noted 5.63

Q Is evidence available to support the assertion “...that Limiting development beyond Settlement Boundaries lowers land values...”?

Q Does SCDC or neighbouring Councils have experience/examples where the relocation of homes at risk have been successfully relocated, in a manner aligning with this provision? If so, the value of them being shared would provide demonstrable evidence and strengthen the provision.

5.64 Consideration should first be given to whether the need can be met within the Settlement Boundary or on allocated sites. To be supported, the housing proposed on exception sites should relate to an identified local need. The need may be identified through, for example, a community planning exercise or a local housing needs assessment. Developers are encouraged to work closely with the Council’s Housing team to ensure appropriate evidence is provided with any planning application. Affordable housing provision on exception sites should have a tenure mix which is reflective of local housing needs identified in the local housing needs assessment.

Noted 5.64

Q KcC PC regrets that the Council and Planning Authority have decided that Starter Homes may be part of a mixed affordable housing development on an exception site in the countryside.

Thereby leaving the door open for the creation of a 'false market' within a market, in the countryside. A situation unlikely to foster good relations and potentially emphasising the widely held view of continuing social inequality.

5.65 In recognition of the fact that Starter Homes are not required to remain as such in perpetuity, they are not considered appropriate on their own on exception sites but may form part of a mix of affordable housing where they would meet an identified local need.

Noted 5.65

Q KcC PC regrets that the Council and Planning Authority have decided that Starter Homes may be part of a mixed affordable housing development on an exception site in the countryside.

Thereby leaving the door open for the creation of a 'false market' within a market, in the countryside. A situation unlikely to foster good relations and potentially emphasising the widely held view of continuing social inequality.

Policy SCLP5.11: Affordable Housing on Exception Sites

Proposals for the development of affordable housing in the countryside will be permitted where:

It is demonstrated there is an identified local need for affordable housing and this cannot be met through existing housing allocations in the Local Plan or relevant Neighbourhood Plan, or through development within the Settlement Boundary;

The scheme is adjacent to an identified Settlement Boundary or a cluster of houses in the countryside (as defined in Policy SCLP5.4);

The scheme incorporates a range of dwelling sizes, types and tenures appropriate to the identified local need; and

The location, scale and design standard of a scheme will retain or enhance the character and setting of the settlement or cluster and not lead to settlement coalescence.

A limited amount of market housing will be permitted as part of affordable housing development in the countryside where it is required to cross-subsidise the affordable housing. Where market housing is to be provided on site this will be subsidiary to the affordable housing element of the proposal and the amount of market housing required will need to be demonstrated through a viability assessment. The amount of market housing on the site should be no more than one third of the dwellings on the site.

Where Starter Homes are proposed, they should form part of a mix of tenures on site.

Where sites for affordable housing in the countryside are brought forward with an element of market housing, both housing tenures should be built to the same design standards and contribute towards the character of the area.

Noted SCLP5.11

Q KcC PC regrets that the Council and Planning Authority have decided that Starter Homes may be part of a mixed affordable housing development on an exception site in the countryside.

Moreover, as “...market housing will be permitted as part of affordable housing development in the countryside where it is required to cross-subsidise the affordable housing” the fundamental concept becomes devalued.

Thereby leaving the door open for the creation of a ‘false market’ within a market, in the countryside. A situation unlikely to foster good relations and potentially emphasising the widely held view of continuing social inequality.

Both provisions individually or in combination could make the base premise of ‘exception sites’ in the countryside for affordable homes, flawed from the outset, and should urgently be reconsidered.

Houses in Multiple Occupation

5.66 & 5.67 and SCLP5.12 Houses in Multiple Occupation

Noted 5.66 & 5.67 and SCLP5.12

Residential Annexes

5.68 to 5.70 and SCLP5.13 Residential Annexes

Noted 5.68 & 5.70 and SCLP5.13

Extensions to Residential Curtilages

5.71 & 5.72 and SCLP5.14 Extensions to Residential Curtilages

Noted 5.71 & 5.72 and SCLP5.14

Houseboats

5.73 & 5.80 and SCLP5.15 Houseboats

Noted 5.73 & 5.80 and SCLP5.15

Residential Caravans and Mobile Homes

5.81 & 5.83 and SCLP5.16 Residential Caravans and Mobile Homes

Noted 5.81 & 5.83 and SCLP5.16

Q KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Q KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

Gypsies & Travellers

5.84 & 5.88 and SCLP5.17 Gypsies, Travellers and Travelling Showpeople

Noted 5.84 & 5.88 and SCLP5.17

Section 6 Tourism

6.1 to 6.8

Noted 6.1 & 6.8

Q Whilst recognising the value of tourism to the district; employment, economy and business community, KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Q KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

Policy SCLP6.1: Tourism

Tourism is an important element of the District's economy. The Council will seek to manage tourism across the District in a way that protects the features that make the District attractive to visitors, and supports local facilities where the local road network has the capacity to accommodate the traffic generated from proposals.

The Local Plan will seek to improve the visitor experience by developing the tourist opportunities both in and out of season, as well as those less sensitive areas of the District where increased tourism uses can be accommodated.

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.

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.

Noted SCLP6.1

Q Whilst recognising the value of tourism to the district; employment, economy and business community, KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Q KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

Tourism Attractions

6.9 to 6.12

Noted 6.9 to 6.12

Policy SCLP6.2: Existing and New Tourism Attractions

The Council will support proposals for tourist attractions across the District for recreational, cultural and leisure uses.

All proposals should be of the highest standard of design and seek to protect and enhance the special character and interest of the attractions and the distinctiveness of the area with particular regard to sensitive landscapes and heritage assets.

Tourism attractions that attract visitors throughout the year are strongly encouraged.

Where necessary, applications for new attractions or the redevelopment or extension/intensification of attractions will need to be subject to screening under the Habitats Regulations Assessment. Any attractions which would result in significant adverse effects which could not be appropriately mitigated will not be permitted. A Landscape and Visual Impact Assessment will also be required where the attraction is in an area of landscape sensitivity in accordance with the Landscape policies.

Noted SCLP6.2

Q Whilst recognising the value of tourism to the district; employment, economy and business community, KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Q KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

Tourism in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Heritage Coast

6.13 to 6.20

Noted 6.13 to 6.20

KcC PC note the provisions of this section, deferring comment to those directly impacted and individuals and specialist groups with direct involvement in the management, safeguarding and development of these highly prized and respected assets.

Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast

Applicants are encouraged to engage with local communities and the Suffolk Coast and Heaths AONB Management Unit in evolving development proposals, with the aim of delivering development that takes an active role in the management of the local area.

Tourism development in the AONB and Heritage Coast will be supported where it:

- a) Enhances the long term sustainability of the area;
- b) Is small scale (10 pitches/units or fewer in relation to proposals for holiday accommodation);

- c) Is well related to existing settlements;
- d) Avoids or mitigates for adverse impacts on the natural environment;
- e) Supports the conservation of the AONB;
- f) Is of the highest design standards and where appropriate reuses existing buildings;
- g) Promotes innovative, contemporary design in appropriate locations;
- h) Minimises light pollution from artificial light sources;
- i) Avoids locations sensitive to the exposed nature of the AONB and Heritage Coast; and
- j) Demonstrates sustainable aspects of the development during construction and throughout the life of the development. Renewable energy provision is strongly encouraged.

Noted SCLP6.3

KcC PC notes the provisions of this Policy, deferring comment to those directly impacted and individuals and specialist groups with direct involvement in the management, safeguarding and development of these highly prized and respected assets.

Tourism outside the AONB

6.21 to 6.23

Noted 6.21 to 6.23

Q Whilst recognising the value of tourism to the district; employment, economy and business community, KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Q KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

Policy SCLP6.4: Tourism Development outside of the AONB

Tourism development outside of the AONB will be supported where it:

- a) Enhances the long term sustainability of the area;
- b) Is well related to existing settlements;
- c) Avoids or minimises adverse impacts on the natural environment;
- d) Is of a scale that reflects the surrounding area;
- e) Is of the highest design standards;
- f) Minimises light pollution from artificial light sources; and
- g) Demonstrates sustainable aspects of the development during construction and throughout the life of the development. Renewable energy provision is strongly encouraged.

Noted SCLP6.4

Q Whilst recognising the value of tourism to the district; employment, economy and business community, KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Q KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

New Self Catering Accommodation

6.24 to 6.28

Noted 6.24 to 6.28

Q Whilst recognising the value of tourism to the district; employment, economy and business community, KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Q KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

Policy SCLP6.5: New Self-Catering Tourist Accommodation

Proposals for new self-catering tourist accommodation will be acceptable where:

- a) The demand or need for tourist accommodation is clearly demonstrated;
- b) They are of a high standard of design;
- c) They are of a scale appropriate to the nature of the site and its setting;
- d) They do not have a material adverse impact on the AONB, Heritage Coast or estuaries;
- e) Covered cycle storage proportionate to the size of the site is provided on site;
- f) The road network is able to accommodate the volume of traffic generated without having a significant adverse impact on the free flow of traffic and highway safety;
- g) Ancillary facilities to support the tourist uses are provided on the site where required; and
- h) Flood adaptation and mitigation measures are included where required.

Self catering tourist accommodation comprising permanent buildings will only be permitted within the Settlement Boundaries through the conversion of rural buildings of permanent structure; or on medium and large scale sites where commercial, recreational or entertainment facilities are provided on site.

New self catering tourist accommodation will be restricted by means of planning conditions which permits holiday use only, restricts the period the accommodation can be occupied plus requires a register of all lettings, to be made available at all times.

Noted SCLP6.5

Q KcC PC seek clarification of the applicability of these provisions to existing Holiday Parks, their extension and new applications for establishments of a similar nature.

Q KcC PC notes the final paragraph of this Policy statement and seeks clarification in respect to the extent that this will extend the requirements beyond those currently in place and that have been proven to be completely ineffective and/or inadequate in dealing with the realities of dealing with an experienced Holiday Park operator.

Equally whilst recognising the value of tourism to the district; employment, economy and business community, KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Q KcC PC urgently seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

Q KcC PC believe the existing situation has arisen due to ineffective enforcement action and require clarification on measures to be taken that will make this Policy more effective.

Protection of Existing Tourist Accommodation

6.29 to 6.31

Noted 6.29 to 6.31

Policy SCLP6.6: Existing Tourist Accommodation

Existing tourist accommodation will be protected. Change of use will only be considered in exceptional circumstances where it can be fully and satisfactorily demonstrated that there is no current or future demand for the tourist accommodation.

Marketing evidence must be provided which demonstrates the premises has been marketed for a sustained period of a minimum of 12 months in accordance with the requirements set out in the Commercial Property Marketing information as seen in Appendix B.

Noted SCLP6.6

Q Whilst recognising the value of tourism to the district; employment, economy and business community, KcC PC is very disappointed that despite a number of ongoing discussions with SCDC regarding the impact of a holiday park on the community, it would appear SCDC does not feel it necessary to have in place (or framed within The Plan) any significant policy to rectify what KcC PC believes is an unsatisfactory and ongoing position.

Section 7 Transport

Transport

7.1 to 7.3

Noted 7.1 to 7.3

As a rural area, KcC PC confirms the (almost) complete lack of public transport accessible to its residents, without the use of private cars or walking and cycling for those able.

Apart from residential roads in the village, KcC accesses only three marked, continuous bi-directional roads:

- Clay Hills to Leiston and Theberton
- Carlton Road – to the A12
- Main Road – to and from Saxmundham and the A12

And of course, is bisected by the A12 giving access to Ipswich to the South and Lowestoft to the North.

The majority of other non-residential roads/lanes are in the majority single track, with a limited number of passing spaces and/or small bi-directional stretches:

Butchers Lane – Fordley Moor and Middleton Moor
Loves Hill – Leiston & Theberton
Peasenhall Road – Peasenhall, etc.
Rendham Road (aka Carlton Lane) – local onto the B1119 and thence Framlingham
Rosemary Lane – local access only
North Green – the A12
East Green – local access with manual level crossing
Curlew Green/Dorley's Corner – residential access
Tiggins Lane – local access byway

KcC PC also confirm sustainable transport on this basis is difficult and through initiatives like the acquisition of a lease on the central Kelsale Village car park, is trying to ease local parking congestion.

KcC PC is concerned that development on any of the bi-directional roads may lead to a further increase in inconsiderate parking accompanied by all the hazards and dangers that are created by it.

Development on the majority of other roads and lanes would almost certainly require structural changes to carriageways and investigation of suitable mitigation measures to avoid reduced freedom of use for walkers, cyclists, horse riders, dog walkers, agricultural traffic, mobility vehicles and residents.

KcC PC confirms it is aware of the current consultation regarding parking and Civil Parking Enforcement.

Sustainable Transport

7.4 Suffolk Coastal is a predominantly rural area and therefore has a high reliance on the car as a form of transport to conduct day-to-day business. Many areas do not have access to convenient public transport and many local roads are single track and unsuitable for conventional public transport. This is reflected by the level of household vehicle ownership in Suffolk Coastal which amounts to 86% compared to a national average of 74% (Census, 2011). Furthermore, approximately 44% of people in the District use a car as their primary mode of travel to work compared to a national average of 37% (Census, 2011). Census data also suggests that town and

district centres across Suffolk Coastal experience a similar level of vehicle ownership and modal share compared to the District average.

Noted 7.4

7.5 The Suffolk Local Transport Plan 2011-2031 sets out a priority to support the growth of businesses, reducing the demand for car travel, making efficient use of transport networks and improving infrastructure. In consideration of this, Policy SCLP7.1 below encourages and facilitates the use of sustainable transport options where possible, and supports the efficient use of existing transport networks.

Noted 7.5

7.6 Travel Plans are currently 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. This will help to leave a lighter footprint on the environment by enhancing sustainability and will ultimately create better places to live; an action of the Government's 25 year Environment Plan. It is not necessarily the size of the development that triggers the need for such a plan but more the nature of the use.

Noted 7.6

Given the access and egress to KcC described above, KcC PC would recommend that the Planning Authority look at the applicability of Travel Plans for all multiple dwelling development proposals within KcC, looking particularly at the likely resident profiles, housing mix, immediate road infrastructure (type, state of repair, free passage, leisure users, etc.) and any cumulative impacts.

7.7 Suffolk County Council are currently drafting new guidance for Travel Plans, and given that the National Planning Policy Framework is also under review, there presently exists an opportunity to shape policy in this area. The Council will engage with the Government and Suffolk County Council as guidance is subject to review. When published the new document will be considered by the Council and adopted for use as a material planning consideration if appropriate.

Noted 7.7

Policy SCLP7.1: Sustainable Transport

Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.

Development will be supported where:

- a) It is proportionate in scale to the existing transport network;
- b) It is located close to, and provides safe pedestrian and cycle access to services and facilities;
- c) It is well integrated into and enhances the existing cycle network including the safe design and layout of new routes and provision of covered, secure cycle parking;
- d) It is well integrated into and enhances the existing pedestrian routes and the public rights of way network;
- e) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety;
- f) It will improve public transport in the rural areas of the District; and
- g) The cumulative impact of new development will not create significant adverse

impacts on the existing transport network.

Proposals for new development that would have significant transport implications should be accompanied by a Travel Plan. A Travel Plan will be required for proposals for:

- a) New large scale employment sites;
- b) Residential development of 80 or more dwellings; and
- c) A development that when considered cumulatively with other developments, is likely to have an adverse impact on the local community or local road network.

In order to identify potential transport impacts and mitigation measures, a Transport Statement will be required for development of 50 -80 dwellings and a Transport Assessment will be required for developments of over 80 dwellings

Noted SCLP7.1

Observation

Given the access and egress to KcC described above, KcC PC would recommend that the Planning Authority look at the applicability of Travel Plans for all multiple dwelling development proposals within KcC, looking particularly at the potential resident profile, housing mix, immediate road infrastructure (type, state of repair, free passage, leisure users, etc.) and any cumulative impacts.

Q KcC PC is interested to know how proposed development levels in KcC "...will improve public transport in the rural areas of the District.", and would ask that any evidence relating to this assertion is either made available or published within The Plan. It would also value the opportunity to speak with any Bus Operator who has validated the assertion, to discuss the specific benefit pertaining to KcC residents.

Vehicle Parking

7.8 to 7.12

Noted 7.8 to 7.12

Parking Proposals and Standards

7.13 to 7.15

Noted 7.13 to 7.15

KcC PC confirms it is aware of the current consultation regarding parking and Civil Parking Enforcement and will not be commenting in this consultation.

Policy SCLP7.2: Parking Proposals and Standards

The Council will work with partners to ensure that vehicle parking provision is managed to support the economy and sustainable communities. The level of parking provision required will depend on the location, type and intensity of use. Proposals that minimise congestion, encourage sustainable transport modes and reduce conflict between road users across the District will be supported.

Proposals involving vehicle parking will be supported where they include:

- a) The provision of safe, secure, and convenient off-street parking of an appropriate size and quantity including addressing the need for parking or secure storage for cars, cycles and motorcycles, and where relevant, coaches and lorries;

- b) Opportunities to reduce the recognised problem of anti-social parking or potential problems that may arise which impacts the quality of life or vitality of an area for residents and visitors;
- c) Appropriate provision for vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles; and
- d) The incorporation of sustainable drainage systems (SuDS), permeable surfacing materials and means of protecting water quality in drainage schemes should be ensured.

Where proposals involve public transport improvements or re-developments, the Council will encourage the provision of Park & Ride facilities, if appropriate.

Proposals will be expected to meet the parking standards contained in the 2015 Suffolk Guidance for Parking (or subsequent revisions) where they do not relate to 'Residential Parking Design' unless other local planning considerations indicate otherwise. Proposals should also accord with both the East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy, or Neighbourhood Plans for the area where applicable.

Noted SCLP7.2

Section 8 Community Facilities and Assets

Community Facilities and Assets

8.1 to 8.2

Noted 8.1 to 8.2

Protection of Community Facilities

8.3 to 8.7

Noted 8.3 to 8.7

Policy SCLP8.1: Community Facilities and Assets

Proposals for new community facilities and assets will be supported if the proposal meets the needs of the local community, is of a proportionate scale, well related to the settlement which it serves and would not adversely affect existing facilities that are easily accessible and available to the local community.

Proposals to change the use, or redevelop for a non-community use, a facility registered as an asset of community value, will not be permitted.

Proposals to change the use, or redevelop for a different use, a community facility which is not registered as an asset of community value, will only be permitted if:

- a) It can be demonstrated that there is no community need for the facility and the building or the site is not needed for an alternative community use;
- b) It can be demonstrated that the current, or alternative community uses are not viable and marketing evidence is provided which demonstrates the premises have been marketed for a sustained period of 12 months in accordance with the Commercial Property Marketing Guidance;

Or

- c) Development would involve the provision of an equivalent or better replacement community facility either on site or in an alternative location in the vicinity that is well integrated into the community and has equal or better accessibility than the existing facility which meets the needs of the local population.

Noted SCLP8.1

Open Space and Recreational Facilities

8.8 to 8.15

Noted 8.8 to 8.15

Policy SCLP8.2: Open Space

The Council supports the provision of open space and recreational facilities across the District to encourage active lifestyles and to increase participation in formal and informal recreation for all sectors of the community. New residential development will be required to contribute to the provision of open space and recreational facilities in order to benefit community health and well-being.

There will be a presumption against any development that involves the loss of open space or community sport and recreation facilities.

Proposals for development that results in the loss of open spaces will only be permitted in exceptional circumstances where:

- a) The proposal is ancillary to the open nature of the area and will enhance local character, increase local amenity and be of greater community or wildlife benefit,
- b) An open space assessment demonstrates the site is surplus to requirements including its ability to be used for alternative open space uses;

Or

- c) The loss resulting from the proposed development will be replaced by equivalent or better provision in terms of quantity, quality and in a location that is equally or more accessible to the community.

Neighbourhood Plans may identify areas of Local Green Space and include policies relating to their protection.

Noted SCLP8.2

Allotments

8.16 to 8.18

Noted 8.16 to 8.18

Policy SCLP8.3: Allotments

The Council will encourage the provision of new allotments in order to meet a locally identified demand. Allotments and associated infrastructure should be located in locations well related to the existing community.

The loss of existing allotments to alternative uses will be resisted unless:

- a) Evidence shows that there is unlikely to be any future demand for the allotments;
- b) Other allotments exist and have the necessary capacity to meet demand;

Or

- c) Alternative provision is made on an alternative site within the settlement which ensures an increase in the overall level and standard of allotments across the District.

Noted SCLP8.3

Digital Infrastructure

8.19 to 8.24

Noted 8.19 to 8.24

Q Attention is again drawn to the vital anomaly first raised in comments regarding SCLP2.2. Specifically, the huge deficit in reliable, high quality, high speed broadband and mobile services in the countryside, beyond settlement boundaries.

Q The Plan remains surprisingly unclear on the; what, where, when, who and how this appalling state of affairs will be resolved, almost to the point of resignation. For a District Council & Planning Authority to seemingly ignore the essential nature of these elements of infrastructure in the 21st century is deplorable.

KcC PC notes the comments in The Plan:

“Public consultation responses have highlighted the importance of appropriate digital infrastructure for modern life. With more facilities being accessed on-line (such as personal banking and shopping) the need for modern digital infrastructure including mobile and broadband services which are reliable and meet the demands of both residents and businesses is fundamental to sustaining local communities.”

Q As sustaining local communities is a foundation stone of The Plan, do the actions of The Plan in regard to digital infrastructure and gaining the attributes described above amount to a programme for a rapid and fundamental change?

Specifically:

A] “...programmes supported by the government are continually being expanded and updated across the District. These are expected to continue and increase provision over the plan period...” – **really 2036?**

B] “The East Suffolk Business Plan demonstrates that the Council is committed to supporting the improved delivery of telecommunications across the District...” – **and how is that commitment manifested in tangible actions?**

C] “...widespread rollout of the 5G network is not expected in the immediate future...” – **so for the interim, ubiquity of reliable G4 would be a start wouldn't it!**

Policy SCLP8.4: Digital Infrastructure

Proposals to improve the provision of digital infrastructure across the District will be supported, provided:

- a) The siting and external appearance of all equipment does not have a significant detrimental impact on the surrounding area and is sympathetically located while respecting the operational needs of the digital infrastructure network;
- b) Equipment installed on buildings is sited and designed to minimise the impact on the external appearance of the building; and
- c) Applications are supported by evidence which demonstrates early engagement with relevant digital infrastructure providers and the need for the equipment to be located within that area.

Noted SCLP8.4

Section 9 Climate Change

Climate Change

9.1 The National Planning Policy Framework sets out strong measures to address climate change as well as encouraging local planning authorities to set target contributions and promote the uptake of decentralised renewable or low-carbon energy in developments. Transitioning to a low carbon future, encouraging the reuse of existing resources (including conversion of existing buildings), and encouraging the use of renewable resources are measures which are promoted by the National Planning Policy Framework. The Government's recently published 25 year Environment Plan outlines a broader commitment to reduce emissions from 1990 levels by 80% by 2050. The Council will aim to contribute to this wider national commitment to address climate change.

Noted 9.1

Renewable Energy

Suffolk Coastal is part of the Norfolk & Suffolk Energy Coast which is part of the wider East of England Energy Zone. The New Anglia Local Enterprise Partnership intends to maximise the energy opportunities in this area. This is an intention that the Council will endeavour to support, where possible. The Suffolk Coastal area can contribute towards the generation of renewable energy, most notably through biomass and anaerobic digestion schemes, solar panel schemes and wind power, including turbines and landing points to serve off-shore provision.

Noted

Q The meaning of the sentence "This is an intention that the Council will endeavour to support, where possible." is unclear.

A literal translation could be 'This is an aim (noun) that the council will try (noun) to support, but may or may not occur (Source: Merriam – Webster at Stack Exchange)'

Q Was this the intention of the sentence?

Renewable Energy

9.2 to 9.11

Noted 9.2 to 9.11

Policy SCLP9.1: Low Carbon & Renewable Energy

The Council will support low carbon and renewable energy developments where they are within an area identified as suitable for renewable or low carbon energy or satisfy the following criteria:

- a) They can evidence a sustainable and, ideally, local source of fuel;
- b) They can facilitate the necessary infrastructure and power connections required for functional purposes;
- c) Provide benefits to the surrounding community; and
- d) Are complementary of the existing environment without causing any significant adverse impacts, particularly relating to the residential amenity, landscape and visual impact, transport, flora and fauna, noise and air quality, unless those impacts can be appropriately mitigated.

For wind energy the proposed development must also have the backing of the local community.

The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed above.

When the technology is no longer operational there is a requirement to decommission, remove the facility and complete a restoration of the site to its original condition.

Noted SCLP9.1

Sustainable Construction

9.12 to 9.22

Noted 9.12 to 9.22

Policy SCLP9.2: Sustainable Construction

All new developments of more than 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO2 emissions below the Target CO2 Emission Rate (TER) set out in the Building Regulations. Exceptions should only apply where they are expressed in the Building Regulations or where applicants can demonstrate, to the satisfaction of the Council, that it is not viable or feasible to meet the standards.

All new residential development in the District should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day.

The use of locally sourced, reused and recycled materials, along with on-site renewable energy generation are encouraged in order to achieve environmental net gain in new build or conversion developments.

All new non-residential developments of equal or greater than 1,000sqm gross floorspace are required to achieve the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so.

Noted SCLP9.2

Observation

KcC PC note in Para 9.17 “The Council is mindful that local sustainable construction requirements lead to increased costs and may impact upon development viability (viability is defined in this context as what is practical and affordable). *On this basis and in exceptional circumstances where the additional costs attributed to achieving sustainable construction standards represent the overriding factor in preventing the site from going to market, the Council will be prepared to consider detailed information on the viability of a particular scheme, where justified, to alter the sustainable construction requirements.* The viability information must be compiled in line with viability assessment guidance set out in the National Planning Policy Framework.”

 KcC PC seek an urgent review of this position on the basis that it could potentially put developer profitability ahead of sustainability.

Moreover, if adopted as written, it precludes the active involvement of the community (PC or Neighbourhood Plan) in agreeing an exception where practicality and affordability are cited as the triggers.

Coastal Management Policies

9.23 and 9.24

Noted 9.23 and 9.24

Coastal Change Management

9.25 to 9.33

Noted 9.25 9.33

Policy SCLP9.3: Coastal Change Management Area

The Coastal Change Management Area is identified on the Policies Map. Reputable and scientifically robust evidence that emerges over the lifetime of this plan which effects the delineation of the Coastal Change Management Area should be considered when applying this policy.

Planning applications for all development within and 30 metres landward of the Coastal Change Management Area and within and 30 metres landward of areas where the intent of management is to Hold the Line, identified on the Policies Map must be accompanied by a Coastal Erosion Vulnerability Assessment.

In areas of soft cliff located up to 60 metres landward of coastal defences where known geological information indicates that the capacity of coastal defences are likely to be adversely affected by development, a Coastal Erosion Vulnerability Assessment should be considered.

In parts of the Coastal Change Management Area expected to be at risk from change within a 20 year time horizon, only temporary development directly related to the coast, for example beach huts, cafes, car parks and sites used for touring caravan and camping will be permitted.

In parts of the Coastal Change Management Area expected to be at risk from change beyond a 20 year time horizon, other commercial and community uses will be permitted providing they require a coastal location and provide economic and social benefits to the local community.

Proposals for new or replacement coastal 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 relevant Shoreline Management Plan and/or endorsed Coastal Strategy, and there will be no material adverse impact on the environment.

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.

Essential infrastructure, including transport infrastructure, utility infrastructure and wind turbines will only be permitted in the Coastal Change Management Area where no other sites outside of the Area are feasible and there is a management plan in place to manage the impact of coastal change including their future removal and replacement.

Planning permission for all development within the Coastal Change Management Area will be time-limited according to the risk identified in the Coastal Erosion Vulnerability Assessment.

Noted SCLP9.3

Adapting to a Changing Coast

9.34 to 9.36

Noted 9.34 to 9.36

KcC PC note the use of Coastal Relocation and/or rollback approaches as pragmatic in allowing coastal communities to thrive in their coastal locations for as long a period as it is safe to do so.

What is Currently Anticipated to be at Risk

9.37 Suffolk Coastal has some of the fastest eroding coastline in Europe. Over the next 20 to 100 years there is the potential for properties, agricultural land and conservation land in some of our more vulnerable areas to be considered 'at risk' or lost to increased coastal erosion.

Noted 9.37

Taking a Proactive Approach

9.38 to 9.43

Noted 9.38 to 9.43

Policy SCLP9.4: Coastal Change Rollback or Relocation

Proposals for the relocation and replacement of community facilities, commercial, agricultural and business uses affected by coastal erosion will be permitted in the Countryside, provided that:

- a) The proposed development replaces that which is within the Coastal Change Management Area as identified on the Policies Map and is forecast to be affected by erosion within 20 years of the date of the proposal;
- b) The new development is located at an appropriate distance inland with regard to Policy SCLP9.3 on the Coastal Change Management Area;
- c) The new development is in a location that is accessible to the coastal community from which it was displaced; and
- d) The existing site is either cleared and made safe or put to a temporary use beneficial to the local community.

Proposals for the relocation and replacement of dwellings affected by coastal erosion will be permitted in the Countryside where:

- a) The development replaces a permanent building which is within the Coastal Change Management Area as identified on the Policies Map and is forecast to be affected by erosion within 20 years of the date of the proposal;
- b) The relocated dwelling should be in an location which exhibits a similar or improved level of sustainability with respect to access to services and facilities as the original dwelling;
- c) The relocated dwelling is outside of the Coastal Change Management Area as identified on the Policies Map; and
- d) The existing site is either cleared and made safe or put to a temporary use beneficial to the local community.

Noted SCLP9.4

Flood Risk and Holistic Water Management

9.44 to 9.54

Noted 9.44 to 9.54

Policy SCLP9.5: Flood Risk

The Strategic Flood Risk Assessment should be the starting point in assessing whether a proposal is at risk from flooding.

Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (and any successor). These include the 'sequential test'; where needed the 'exception test' and also a site specific flood risk assessment that addresses the characteristics of flooding and has tested an appropriate range of flood event scenarios (taking climate change into consideration). This should address as a minimum: finished floor levels; safe access and egress; an emergency flood plan; flood resilience/resistance measures; any increase in built or surfaced area; and any impact on flooding elsewhere.

Developments should exhibit the three main principles of flood risk, in that, they should be safe, resilient and should not increase flood risk elsewhere. In this respect, single storey residential developments will not be permitted in areas of high risk of flooding within or outside Settlement Boundaries.

Developments are encouraged to include natural flood management measures that complement existing flood defences if pre-existing flood defences are in place, in the interests of integrated flood management.

Any new flood risk measures that result in significant depreciation of natural capital will be required to create compensatory natural capital.

Neighbourhood Plans can allocate land for development, including residential development, in areas at risk of flooding providing it can be demonstrated:

- a) There are no alternative available sites appropriate for the proposed use within the Neighbourhood Area;
- b) The development provides sustainability benefits which outweigh flood risk;
- c) Evidence is provided that it is possible for flood risk to be mitigated to ensure development is safe for its lifetime.

Noted SCLP 9.5

Sustainable Drainage Systems

9.55 to 9.58

Noted to 9.55 to 9.58

Policy SCLP9.6: Sustainable Drainage Systems

Developments should use sustainable drainage systems to drain surface water, where possible.

Developments of 10 dwellings or more, or non-residential development with upwards of 1,000 sq. m of floorspace or that equates to 1 hectare or more, will be required to utilise sustainable drainage systems, where possible.

Sustainable drainage systems should:

- a) Be integrated into the landscaping scheme and green infrastructure provision of the development;
- b) Not detract from the design quality of the scheme; and
- c) Deliver water quality and aquatic biodiversity improvements, wherever possible.

Runoff rates from new development must be restricted to greenfield runoff rates wherever possible. Where a site is previously developed, the proposed runoff rates should be restricted as close to the greenfield rates, or at the very minimum a betterment of at least 30% should be considered over the brownfield runoff rates.

No surface water connections should be made to the foul system and connections to the combined or surface water system should only be made in exceptional circumstances where there are no feasible alternatives. Foul and surface water flows should also be separated.

Noted SCLP9.6

Holistic Water Management

9.59 and 9.60

Noted 9.59 to 9.60

Policy SCLP 9.7: Holistic Water Management

Developments of 10 dwellings or more or non-residential developments upwards of 1,000 sqm or that equates to 1 hectare or more will be required to be phased to allow water and wastewater infrastructure to be in place when needed. This includes:

- a) Grey water recycling;
- b) Rainwater harvesting;
- c) Water use minimisation technologies; or
- d) Other more traditional forms of water and wastewater infrastructure.

Infrastructure that leads to a reduction in the amount of water released to the sewer system will be favoured.

Noted SCLP9.7

Section 10 Natural Environment

Natural Environment

10.1 Suffolk Coastal is a District with a high quality natural environment which is enjoyed by residents, visitors, businesses and wildlife. The natural environment is primarily rural with coastline, river valleys, undulating countryside interspersed with market towns and villages.

10.2 The Local Plan seeks to protect and retain the high quality natural environment and designated landscapes and sites found across the District which contribute to the overall success of the District and provides economic and social benefits for all.

Noted 10.1 & 10.2

Biodiversity & Geodiversity

10.3 and 10.15

Noted 10.3 to 10.15

Policy SCLP10.1: Biodiversity and Geodiversity

Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat 'stepping stones'.

Proposals that will have a direct or indirect adverse impact (along or combined with other plans or projects) on locally recognised sites of biodiversity or geodiversity importance, including County Wildlife Sites, priority habitats and species, will not be supported unless it can be demonstrated that new opportunities to enhance the green infrastructure network will be provided as part of the development that will mitigate or compensate for this loss.

Where compensatory habitat is created, it should be of equal or greater size than the area lost as a result of the development, be well located to positively contribute towards the green infrastructure network, and biodiversity and/or geodiversity and be supported with a management plan.

Where there is reason to suspect the presence of protected species or habitat, applications should be supported by an ecological survey undertaken by a suitably qualified person. If present, the proposal must be sensitive to, and make provision for their needs.

Any development with the potential to impact on a Special Protection Area or Special Area for Conservation within or outside of the District will need to be supported by information to inform a Habitat Regulations Assessment.

A Supplementary Planning Document will be prepared to implement a Recreational Avoidance and Mitigation Strategy in order to mitigate any potential significant adverse effects on Special Protection Areas and Special Areas for Conservation. The Council will work with neighbouring authorities and Natural England to develop this strategy. The strategy will include a requirement for developers to make financial contributions towards the provision of strategic mitigation within defined zones.

Noted SCLP10.1

KcC has its own Biodiversity initiative that has been running for over a year, undertaking surveys in all corners of the Parish to establish a 'rich picture' of the species of plants and animals, the genetic diversity within and between them and the communities or habitats (ecosystems) of which they are part.

As well as the surveys, the aims and objectives of the Biodiversity Action Plan [BAP] are to seek to identify the key habitats present in the Parish, attempt to identify those species present in and around

them, assess those species' status (e.g. common, scarce, threatened etc.) and then set out ways to preserve and enhance this biodiversity where possible. As well as being specific to the Parish our BAP should also relate to and complement the County and National BAPs.

Visitor Access to the Special Protection Areas

10.16 to 10.21

Noted 10.16 to 10.21

Policy SCLP10.2: Visitor Management of European Sites

The Council has a duty to ensure that development proposals will not result in an increase in activity likely to have a significant effect upon sites designated as being of international importance for their nature conservation interest.

Applications for new car parking provision (public or privately owned which are available for wider public use) located within 1km boundary of a designated site or new access points direct into the estuary such as slipways or jetties will need to demonstrate that they will not result in an increase in activity likely to have a significant effect upon a European site whether on their own, or in combination with other uses. Such proposals need to be subject to a project level Habitats Regulation Assessment.

Noted SCLP10.2

Landscape

10.22 to 10.26

Noted 10.22 to 10.26

Suffolk Coast and Heaths AONB

10.27 to 10.29

Noted 10.27 to 10.29

Landscape Character and Assessment

10.30 to 10.36

Noted 10.30 to 10.36

Policy SCLP10.3: Landscape Character

Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence.

Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and where possible enhance:

- a) The special qualities and features of the area;
- b) The visual relationship and environment around settlements and their landscape settings;
- c) Distinctive landscape elements including but not limited to watercourses,

commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;

- d) Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and
- e) The growing network of green infrastructure supporting health, wellbeing and social interaction.

Development will not be permitted where it will have a significant adverse impact on rural river valleys, historic park and gardens, coastal, estuary, heathland, AONB and other very sensitive landscapes. Proposals for development will be required to secure the preservation and appropriate restoration or enhancement of natural, historic or man made features across the District as identified in the Landscape Character Assessment, Settlement Sensitivity Assessment and successor landscape evidence.

Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network. Proposals for development should protect and enhance the tranquillity and dark skies across the District. Exterior lighting in development should be appropriate and sensitive to protecting the intrinsic darkness of rural and tranquil estuary, heathland and river valley landscape character.

Neighbourhood Plans may include local policies related to protecting and enhancing landscape character and protecting and enhancing tranquillity and dark skies.

Noted SCLP10.3

Settlement Coalescence

10.37 and 10.38

Noted 10.37 and 10.38

Policy SCLP10.4: Settlement Coalescence

Development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements.

Neighbourhood plans may include policies addressing local issues related to settlement coalescence.

Noted SCLP10.4

Section 11 Built Environment

Built Environment

11.1 Suffolk Coastal is fortunate to have a rich and varied built environment with significant heritage assets alongside contemporary developments which provide a significant boost to the local economy. The District contains over 2,500 Listed Buildings and 35 Conservation Areas.

11.2 High quality design is a critical part of good planning and sustainable development. Good design is concerned not only with how development looks, but also how it feels and functions. The Local Plan seeks to plan positively for high quality and inclusive design by creating places that function well and establish a strong sense of place with comfortable places to live, work and visit.

Noted 11.1 & 11.2

Design Quality

11.3 to 11.16

Noted 11.3 to 11.16

KcC PC note and welcome:

11.6 The introduction of Neighbourhood Plans in the Localism Act 2011 has encouraged local communities to take an active role in the plan-making process and prepare plans and policies that, in gaining statutory weight, have a real impact on the development of localities. In this regard, Neighbourhood Plans can, and are encouraged to, set out design policies which respond to their own local circumstances.

11.12 Suffolk Coastal has a large percentage of older peoples...it is therefore important that the design of the built environment caters for people throughout their lifetime and is suitable and accessible for people regardless of age, mobility or disability. This policy establishes the considerations against which residential developments will be considered, to provide for the needs of the most vulnerable in our society.

11.13 Creating a high quality environment for...those with disabilities will also result in a high quality environment for young people, for families with young children, and ultimately for everyone...

And

11.15 Developers are advised to undertake pre application consultation with local communities when proposing development. They are encouraged to seek views regarding the local community's needs and expectations from a broad spectrum of the community.

Policy SCLP11.1: Design Quality

The Council supports design which is innovative and which promotes inclusivity across the District. Development proposals will be expected to demonstrate high quality design which reflects local distinctiveness and character.

In so doing, permission will be granted where proposals:

- a) Support inclusive design environments which are legible, distinctive, accessible, comfortable, and safe, and adopt the principles of dementia friendly design;
- b) Demonstrate a clear understanding of the form and character of the built and natural environment and use this understanding to complement local character and distinctiveness;

- c) Respond to local context and the form of surrounding buildings in relation to the following criteria:
- i. the overall scale and character should clearly demonstrate consideration of the component parts of the buildings and the development as a whole in relation to its surroundings;
 - ii. the layout should fit in well with the existing neighbourhood layout and respond to the ways people and vehicles move around both internal and external to existing and proposed buildings;
 - iii. the height and massing of developments should be well related to that of their surroundings;
 - iv. the relationship between buildings and spaces and the wider street scene or townscape; and
 - v. by making use of materials and detailing appropriate to the local vernacular;
- d) Take account of any important landscape or topographical features and retain and/or enhance existing landscaping and natural & semi-natural features on site;
- e) Protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development;
- f) Take into account the need to promote public safety and deter crime and disorder;
- g) Create permeable and legible developments which are easily accessed, throughout the site and connections outside the site, and used by all, regardless of age, mobility and disability;
- h) Provide highway layouts with well integrated car parking and landscaping which create a high quality public realm, avoiding the perception of a car dominated environment;
- i) Include hard and soft landscaping schemes to aid the integration of the development into its surroundings; and
- j) Ensure that the layout and design incorporate adequate provision for the storage and collection of waste and recycling bins in a way which does not detract from the appearance of the development.

Major residential development proposals will be supported where they perform positively when assessed against Building for Life 12 guidelines. Developments should avoid red outcomes unless there are exceptional circumstances.

Neighbourhood Plans can, and are encouraged to, set out design policies which respond to their own local circumstances.

Noted SCLP11.1

Residential Amenity

11.17 The planning system plays an important role in safeguarding the quality of life of residents of the District. New development of any type is required to be located and designed with regard to the amenity of both existing and future residents to avoid generating significant harmful effects. Harmful effects can include those arising from overlooking, loss of privacy, noise, odour and light pollution and overbearing development. Residential amenity can be affected by individual developments or, as a result of cumulative impacts.

Noted 11.7

Policy SCLP11.2: Residential Amenity

When considering the impact of development on residential amenity, the Council will have regard to the following:

- a) Privacy/overlooking;
- b) Outlook;
- c) Access to daylight and sunlight;
- d) Noise and disturbance;
- e) The resulting physical relationship with other properties;
- f) Light spillage, air quality and other forms of pollution; and
- g) Safety and security.

Development will be acceptable where it would not cause an unacceptable loss of amenity to adjoining or future occupiers of development.

Noted SCLP11.2

Historic Environment

11.18 to 11.28

Noted 11.18 to 11.28

Policy SCLP11.3: Historic Environment

The Council will work with partners, developers and the community to conserve and enhance the historic environment by:

- a) Requiring development proposals to conserve and enhance the historic environment, including through the removal of existing features that detract from the historic environment and through the provision of interpretation where appropriate; and
- b) Applying the policies of the National Planning Policy Framework in respect of designated and non-designated heritage assets.

Noted SCLP11.3

Non-designated Heritage Assets

11.29 to 11.32

Noted 11.29 to 11.32

Policy SCLP11.4: Non-Designated Heritage Assets

Proposals for the re-use of Non-Designated Heritage Assets will be supported if compatible with the fabric and setting of the asset. New uses which result in harm to a non-designated heritage asset or its setting will be considered based on the wider balance of the scale of any harm or loss.

In considering proposals which involve the loss of a non-designated heritage asset, consideration will be given to:

- a) Whether the asset is structurally unsound and beyond feasible and viable repair (for reasons other than deliberate damage or neglect); or
- b) The extent to which measures to sustain the existing use, or find an alternative use/user, have been investigated.

Neighbourhood Plans can identify heritage assets. However, the protection afforded to these should be no more than that provided to Non-Designated Heritage Assets protected by this policy. Heritage assets identified should at least meet the criteria for identifying Non-Designated Heritage Assets.

Noted SCLP11.4

Conservation Areas

11.33 and 11.34

Noted 11.33 and 11.34

Policy SCLP11.5: Conservation Areas

Development within Conservation Areas will be assessed against the relevant Conservation Area Appraisals and Management Plans and any subsequent additions or alterations. Developments should be of a particularly high standard of design and materials in order to preserve or enhance the character or appearance of the area.

Proposals which involve the demolition of Non-Listed Buildings in a Conservation Area will only be permitted where:

- a) The building is structurally unsound and beyond feasible and viable repair (for reasons other than deliberate damage or neglect);
- b) All measures to sustain the existing use or find an alternative use/user have been exhausted; or
- c) The building has no architectural, historic or visual significance.

In all cases, proposals for demolition should include comprehensive and detailed plans for redevelopment of the site. Redevelopment proposals should seek to preserve and enhance the character and appearance of the Conservation Area.

Noted SCLP11.5

Archaeology

11.35 and 11.40

Noted 11.35 to 11.40

Policy SCLP11.6: Archaeology

A full Archaeological Assessment must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains.

Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and/or deposition of archive is more appropriate.

Noted SCLP 11.6

Parks and Gardens

11.41 Registered Parks and Gardens are identified as Designated Heritage Assets within the National Planning Policy Framework. In addition to these, Supplementary Planning Guidance (SPG) 6 identifies 21 parks and gardens of historic interest of 50 hectares or more, which are important within Suffolk Coastal District. The site size threshold is considered to be an appropriate measure for identifying parklands of District-wide significance. They are identified primarily for their historic landscape significance, and also contribute towards other objectives such as the protection and enhancement of habitats.

Noted 11.4

Policy SCLP11.7: Parks and Gardens of Historic or Landscape Interest

Within the plan area 6 parks are included in the National Register of Parks and Gardens of Special Historic Interest compiled by Historic England and have the status as Designated Heritage Assets:

- Campsea Ashe Park
- Heveningham Hall and Gardens
- Bawdsey Manor
- Henham (part)
- Woodbridge Cemetery
- Glemham Hall Park, Little Glemham

Development proposals affecting these assets will be considered in relation to the policy on Designated Heritage Assets contained in the National Planning Policy Framework and guidance contained in Supplementary Planning Guidance SPG6 (or any subsequent Supplementary Planning Document).

The following historic parklands have been identified as being of District wide significance, and have the status of Non-Designated Heritage Assets.

A major attribute of a parkland 'of note' is its extensive coverage within the landscape:

- Benhall Park, Benhall
- Boulge Park, Boulge
- Broke Hall Park, Nacton
- **Carlton Park, Kelsale cum Carlton**
- Cockfield Hall Park, Yoxford
- Easton Park, Easton
- Glemham Hse Park, Gt Glemham
- Glevering Hall Park, Hacheston
- Grove Park, Yoxford
- Grundisburgh Hall Park, Grundisburgh
- Marlesford Hall Park, Marlesford
- Orwell Park, Nacton
- Rookery Park, Yoxford
- Sibton Park, Sibton
- Spa Gardens Felixstowe
- Town Hall Gardens, Felixstowe
- Staverton Park, Wantisden
- Sudbourne Park, Sudbourne

The delineated boundary of each of these locally listed historic parklands includes the area currently forming the visual extent of the parkland as well as any additional areas that historically formed part of the extent of the parkland and which continue to display the remnants of the former parkland.

The District Council will encourage the preservation and/or enhancement of these parks and gardens of historic interest and their surroundings. Applications for planning permission will be permitted where the development proposal will not have a materially adverse impact on the character, features or immediate setting of the delineated park or garden and which have due regard to the additional advice and guidance in Supplementary Planning Guidance SPG6 (or any subsequent Supplementary Planning Document).

Noted SCLP11.7

Areas to be Protected from Development

11.42 and 11.42

Noted 11.42 and 11.43

Policy SCLP11.8: Areas to be Protected from Development

Areas to be protected from development as identified on the Policies Map comprise local scale sites, gaps, gardens and spaces that make an important contribution to the character and setting of a settlement in their undeveloped form. In some locations these areas maintain settlement separation. Accordingly, development within these areas will be severely restricted to maintain the character of the area and ensure settlement coalescence is not compromised.

Noted SCLP11.8

Newbourne: Former Land Settlement Association Holdings

11.44 to 11.46

Noted 11.44 to 11.46

Policy SCLP11.9: Newbourne - Former Land Settlement Association Holdings

The Council will encourage the retention in horticultural or agricultural use of those parts of the former Land Settlement Association Holdings shown on the Policies Map, not currently used or required in connection with the residential curtilages, taking account of any physical features which currently mark garden limits.

New employment uses on backland plots will be supported where:

- a) It is demonstrated that the land and/or buildings are surplus to agricultural and horticultural requirements;
- b) Any new or replacement buildings are of a scale and nature appropriate to the character of the Former Land Settlement Association Holdings area; and
- c) They do not result in physical separation of individual plots.

The erection of new or replacement dwellings, or extensions to existing dwellings or ancillary residential development will be supported where:

- a) Their scale and design would not harm the character of the former Land Settlement Association Holdings area; and
- b) In the case of new dwellings, it would represent infill development within the existing frontage and not result in backland development.

Noted SCLP11.9

Section 12 Area Specific Strategies

Area Specific Strategies

12.1 This part of the Plan sets out the strategy for specific parts of the District including the Major Centres of Felixstowe and the communities neighbouring Ipswich, the towns and the rural areas. This reflects the strategy of the Plan which looks to create two new Garden Neighbourhoods to the north of Felixstowe and the south of Saxmundham, respond to opportunities presented by transport connections, and sustain and enhance the vitality of the rural parts of the District.

12.2 The areas are considered below in Settlement Hierarchy order, following the section on Neighbourhood Plans, as follows:

- Neighbourhood Plans
- Approach to Site Allocations
- Strategy for Felixstowe
- Strategy for Communities to the East of Ipswich
- Vision for Aldeburgh
- Vision for Leiston
- Vision for Framlingham
- Vision for Saxmundham
- Vision for Woodbridge
- Vision for the Rural Areas

Neighbourhood Plans

12.3 Neighbourhood Plans were introduced through the Localism Act 2011 and enable communities to produce their own policies and to allocate sites for development. Across the District, a number of communities have sought to develop their own plan, with a total of 18 Neighbourhood Plan areas designated (see Table 12.1 and map below). Of these, there are 5 'made' Neighbourhood Plans, with a further two (Martlesham and Wenhaston with Mellis Hamlet) having recently received a positive vote through referendum. Once 'made' a Neighbourhood Plan forms part of the Development Plan for the District.

Table 12.1 Neighbourhood Plans in Suffolk Coastal District

Neighbourhood Plan area	Status
Aldringham cum Thorpe	Neighbourhood area approved
Bredfield	Neighbourhood area approved
Earl Soham	Neighbourhood area approved
Easton	Neighbourhood area approved
Framlingham	Neighbourhood Plan 'made' 23 March 2017
Great Bealings	Neighbourhood Plan 'made' 23 March 2017
Kelsale-cum-Carlton	Neighbourhood area approved
Kesgrave	Neighbourhood area approved
Leiston	Neighbourhood Plan 'made' 23 March 2017
Martlesham	Referendum – Positive vote 25 May 2018
Melton	Neighbourhood Plan 'made' 25 January 2018
Playford	Neighbourhood area approved
Rendlesham	Neighbourhood Plan made 8 January 2015
Saxmundham	Neighbourhood area approved
Trimley St Mary	Neighbourhood area approved
Wenhaston with Mellis Hamlet	Referendum – Positive vote 25 May 2018
Wickham	Market Neighbourhood area approved
Woodbridge	Neighbourhood area approved

12.4 Neighbourhood Plans have to be produced in accordance with legislation and, prior to going through a referendum, are subject to an Examination undertaken by an independent Examiner. Neighbourhood Plans must be in conformity with the strategic policies of the Local Plan.

The Council is committed to supporting those communities who wish to produce a Neighbourhood Plan and a number of the Local Plan policies contain specific guidance in relation to areas of policy that Neighbourhood Plans may choose to cover.

12.5 Proposed revisions to the National Planning Policy Framework would require local planning authorities to provide a housing requirement for designated Neighbourhood Plan areas.

The Council also appreciates that it is beneficial to groups who are planning for housing in their Neighbourhood Plan to have an understanding of the broad number their plan should address.

It is acknowledged that not all Neighbourhood Plan groups will wish to address housing, however the Council's starting point is that Neighbourhood Plan groups should have the opportunity to address housing wherever this is appropriate to the strategy of the Local Plan. Policy SCLP12.1 therefore provides each Neighbourhood Plan area with an indicative number, and the Council will support Neighbourhood Plan groups in the production of Neighbourhood Plans to identify sites to deliver these figures. In identifying numbers, consideration has been given to the strategy of the Local Plan and the position of the settlement in the Settlement Hierarchy.

Where positive strategies for the delivery of housing are not forthcoming in a timely way through Neighbourhood Plans, the Council may consider it is appropriate to allocate land for housing through a future Local Plan review.

12.6 In instances where growth in a community is fundamental to the strategy of the Local Plan, it is appropriate for this to be planned through the Local Plan as a strategic policy. In such cases however, Neighbourhood Plans may add value through creating locally specific policies on other topics. This applies to Saxmundham where the Local Plan allocates land for the development of a new Garden Neighbourhood to the south of Saxmundham.

12.7 The Neighbourhood Plans that have been made identify visions for their areas and cover a range of topics that reflect the unique local circumstances of each area.

Some, but not all, of the 'made' Neighbourhood Plans allocate sites for housing, employment or others uses. Other policies cover such topics as identifying areas of Local Green Space or provision for walking and cycling.

Where figures are provided below for designated neighbourhood areas that already have made Neighbourhood Plans, this provides an opportunity for these to be reviewed to identify sites that would meet the indicative minimum requirements set out.

Whilst Woodbridge and Trimley St Mary have designated Neighbourhood Plan areas, as these plans are not being progressed a number is not included.

Noted 12.1 to 12.7

Policy SCLP12.1: Neighbourhood Plans

The Council will support the production of Neighbourhood Plans in identifying appropriate, locally specific policies that are in general conformity with the strategic policies of this Local Plan.

Where Neighbourhood Plans seek to plan for housing growth, they will be expected to plan for the indicative minimum housing requirements set out below:

Neighbourhood Plan Area	Indicative minimum number of dwellings
Aldringham cum Thorpe	Existing Local Plan allocation of 40 dwellings, plus small-scale additional development and windfall
Bredfield	20

Earl Soham	25
Easton	10
Framlingham	50 in addition to allocations in 'made' neighbourhood plan
Great Bealings	Housing development as per countryside policies
Kelsale cum Carlton	20
Kesgrave	20
Leiston	50 in addition to allocations in 'made' neighbourhood plan
Martlesham	20
Melton	Existing Neighbourhood Plan allocation of 55, plus windfall
Playford	Housing development as per countryside policies
Rendlesham	Existing Local plan allocations of 100, plus windfall
Saxmundham	800 dwellings to be allocated in Local Plan at South Saxmundham Garden Neighbourhood. Small scale additional development and windfall.
Wenhaston with Mellis Hamlet	25
Wickham Market	100 This is in addition to Local Plan allocation SCLP12.56 (in Pettistree Parish, adjoining Wickham Market)

Where new Neighbourhood Plan areas are designated, indicative housing requirements will be based on a range of factors including the location of the settlement in relation to the strategy of the Local Plan, the position of the settlement in the settlement hierarchy and any known significant constraints to development.

Noted SCLP12.1

Site Allocations

12.8 In order to ensure that the strategy of the Local Plan is delivered, and to provide a degree of certainty to communities, landowners and developers in relation to the scale and location of growth which will come forward during the Local Plan period, the Local Plan allocates sites for housing and employment development.

12.9 The approach to site allocations is based primarily around delivering the strategy of the Local Plan, through strategic mixed use allocations for new Garden Neighbourhoods in Felixstowe and Saxmundham, and focussing strategic employment allocations in relation to the Port of Felixstowe and the A14/A12.

12.10 A 'call for sites' was undertaken in autumn 2016 which invited sites to be submitted for consideration for allocation through the Local Plan review. Sites submitted, along with sites which

had been submitted through previous consultations and call for sites exercises, were presented in the 2017 Issues and Options consultation document. The 2017 consultation also invited further sites to be submitted.

12.11 Criteria for assessing a site's suitability were developed to align broadly with other local planning authorities in the Ipswich Housing Market Area (Babergh District Council, Mid Suffolk District Council and Ipswich Borough Council). The criteria cover the following topics:

- Access to Site;
- Utilities Capacity;
- Utilities Infrastructure;
- Contamination;
- Flood Risk;
- Coastal Change;
- Market Attractiveness;
- Landscape/Townscape;
- Biodiversity and Geodiversity;
- Historic Environment;
- Open Space;
- Transport and Roads; and
- Contributions to Regeneration/Re-use

12.12 The outcome of this initial site assessment work is presented in the Draft Strategic Housing and Employment Land availability Assessment (SHELAA).

12.13 The Settlement Hierarchy forms the starting point for identifying potential locations for site allocations, whereby Major Centres, Towns, Large Villages and Small Villages are considered in principle to be suitable locations for development. Consideration was then given to the opportunities and constraints present in each settlement, in particular in relation to:

- The existence of suitable sites;
- Capacity of infrastructure, such as schools and highways;
- Consultation responses and feedback from one to one sessions held with Town and Parish Councils; and
- Environmental constraints

12.14 Following this, potential sites were considered further in settlements where it was considered that there was potential for development. This involved considering the outputs of the SHELAA and the Sustainability Appraisals of sites, the relationship of the site to the settlement form and character, as well as consultation responses received in relation to specific sites.

12.15 By using the evidence provided in the Ipswich Economic Area Sector Needs Assessment (September 2017) and the Employment Land Supply Assessment (2018), the Council is able to direct employment related allocations to those sites within the identified areas most attractive to the market. Directing future allocations into these areas will ensure that the Council has greater confidence in the deliverability of these sites over the plan period. The Council also commissioned a Port of Felixstowe Growth and Development Needs Study (2018) which has helped to inform the selection of an allocation at Innocence Farm, Trimley to meet the future needs related to the Port.

12.16 This Local Plan has reviewed and will carry 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 12.2 and Table 12.3). These allocations have been made relatively recently, and unless the Council becomes aware of evidence that these are unlikely to be implemented, it is appropriate to carry them forward.

Noted 12.8 to 12.6

Extract from Table 12.2: Site Allocations carried forward from Site Allocations and Area Specific Policies Development Plan Document (January 2017)

Kelsale specific allocations

Policy SSP10 Land south of Ambleside , Main Road, Kelsale cum Carlton **SCLP12.49**

Policy SSP25 Carlton Park Industrial, Main Road, Kelsale cum Carlton **SCLP12.32**

Noted Table 12.2: Site Allocations carried forward from Site Allocations and Area Specific Policies Development Plan Document (January 2017)

Carlton Park Industrial Estate, Kelsale cum Carlton (SCLP12.32)

This allocation is carried forward from the Site Allocations and Area Specific Policies Development Plan Document (January 2017).

12.252 Carlton Park is an existing and well established employment site of around 8ha which allows for a range of B1 Business, B2 General Industry and B8 Storage and Distribution employment uses. With direct access onto Main Road, Kelsale, it is well related to the A12 and thereby the main road network for the District. It is the only significant industrial estate in the Saxmundham locality and is particularly important given the amount of new residential development permitted in and around the town.

Noted 12.252

KcC PC notes that Carlton Park (Ronald Road) may be subject to Planning Applications for B1, B2 & B8 uses and expansion and/or intensification, each of which would fall within the terms of policies SCLP4.3 & SCLP12.32.

Observation

KcC PC wish it to be known that the Carlton Park Industrial Area (Ronald Road) is immediately adjacent to the rear of Kelsale CEVC Primary School, which in turn is immediately across Carlton Road adjacent to Beaumont Cottages – KcC's largest high density residential area, with a significant proportion of elderly and restricted mobility residents.

To the east of the school, on the same side of Carlton Road is Spinney Pocket, a small residential area which is home to a sheltered housing scheme and some more limited mobility residents.

School speed restrictions exist with varying degrees of compliance.

Carlton Road joins the A12 to the west and as a consequence is used by mixed vehicular traffic coming cross country from; Theberton, Leiston, Middleton and further afield to gain southbound access.

By the same token, it is also used by North and Southbound A12 traffic, as well as vehicles crossing the A12 from Peasenhall Road to gain access to Leiston, Sizewell, Saxmundham, Middleton and further afield.

In addition it must be noted that Carlton Road does (during term time) suffer a twice daily high vehicular traffic period which generates intense parking issues for a 20-30 minute period, whilst parents drop-off and pick-up primary school age children.

There have been a number of 'close shaves', but thankfully no fatalities or serious injuries.

Informal and formal discussions with SCC, County Councillors and other agencies, regarding permanent crossings, alternative parking arrangements, assisted crossing arrangements (Lollipop etc.), etc. have not met with any resolution coming forward.

Comments made by KcC's County Councillor at a Parish Council Meeting earlier this year made it clear that no resolution was likely in the short or longer term.

Q Consequently, expansion and/or intensification of use on the Carlton Park (Ronald Road) site, leading to increased traffic movements would require significant re-engineering of the immediate road network and environs to mitigate the danger to:

- school children and their parents
- elderly residents
- people of limited mobility
- care services visiting Carlton Road & Beaumont Cottage residents

Q **Para 12.252** makes reference to this site being “the only significant industrial estate in the Saxmundham locality and is particularly important given the amount of new residential development permitted in and around the town.”.

KcC PC would emphasise the difficulty of passage through Saxmundham experienced currently and the congestion at the traffic controlled crossroads in the centre of Saxmundham and further north at Lamsale Meadow primarily because of the beleaguered Saxmundham Health Centre and inadequate car parking.

Consequently, expansion or intensification of the site leading to higher traffic volumes through Saxmundham (possibly from Saxmundham Garden Neighbourhood or beyond?) would have to be considered very carefully to avoid further congestion in and through the town.

Moreover, attention is drawn to the ‘accident waiting to happen’ situation on Carlton Road (see above), so an alternate A12/Carlton Road route would also have to be regarded as unlikely without significant mitigation of the dangers posed by additional traffic and school drop off/pick-up congestion.

Currently, HGV's although not 100% effectively, are routed away from the school and Carlton Road.

12.253 Approximately 3ha of land within the site as defined on the Policies Map remains available for development. Whilst the site remains appropriate to a range of employment uses, particular encouragement should be given to new uses which have a high employee to floorspace ratio, given the limited opportunities for employment around Saxmundham.

Noted 12.253

Q **Para 12.253** makes reference to “particular encouragement should be given to new uses which have a high employee to floorspace ratio, given the limited opportunities for employment around Saxmundham”.

KcC PC would emphasise the difficulty of passage through Saxmundham experienced currently and the congestion at the traffic controlled crossroads in the centre of Saxmundham and further north at Lamsale Meadow primarily because of the beleaguered Saxmundham Health Centre and inadequate car parking.

Consequently, expansion or intensification of the site leading to higher traffic volumes through Saxmundham (possibly from Saxmundham Garden Neighbourhood or beyond?) would have to be considered very carefully to avoid further congestion in and through the town.

Moreover, attention is drawn to the ‘accident waiting to happen’ situation on Carlton Road (see above), so an alternate A12/Carlton Road route would also have to be regarded as unlikely without

significant mitigation of the dangers posed by additional traffic and school drop off/pick-up twice daily congestion.

Currently, HGV's although not 100% effectively, are routed away from the school and Carlton Road.

12.254 The Environment Agency have highlighted that the site overlies a Principal Aquifer and is within Groundwater Source Protection Zone 3. Whilst this does not affect the allocation of the site it may impact on future uses or activities. Contamination from previous uses will also need to be investigated prior to the submission of a planning application.

Noted 12.254

Please see comments made in respect to this site under **Para 12.252**

12.255 The site includes a small area of Flood Zone 3 along the southern boundary, and a wider extent of Flood Zone 2 which encroaches into the undeveloped area. Any proposals for development must therefore have regard to this issue and be accompanied by a Flood Risk Assessment.

Noted 12.255

Please see comments made in respect to this site under **Para 12.252**

12.256 Suffolk County Council have advised that any development proposals should include a desk-based assessment and historic assets assessment of the buildings to be affected. Proposals should include appropriate treatment of heritage assets. Archaeological investigation will be required at an appropriate stage in the development process, depending on the scale and nature of proposals.

Noted 12.256

Please see comments made in respect to this site under **Para 12.252**

Policy SCLP12.32: Carlton Park, Main Road, Kelsale cum Carlton

Carlton Park as identified on the Policies Map comprises some 8ha of employment land. 3ha of land remains vacant. The site contains lawful uses within Use Classes B1, B2 and B8.

Proposals for development of B1, B2 and B8 uses will be permitted subject to the following criteria:

- a) Proposals for further development of the site should be accompanied by a Flood Risk Assessment;
- b) An investigation into any potential contamination of the site should be undertaken prior to the submission of a planning application; and
- c) Where appropriate, measures should be taken to assess and manage any heritage assets on the site.

In recognition that it is the largest employment site close to Saxmundham and well related to the local transport network, encouragement will be given to those uses which have a high employee to floorspace ratio.

Noted SCLP12.32

Q Policy SCLP12.32 makes reference to "In recognition that it is the largest employment site close to Saxmundham and well related to the local transport network, encouragement will be given to those uses which **have a high employee to floorspace ratio.**".

KcC PC would emphasise the difficulty of passage through Saxmundham experienced currently and the congestion at the traffic controlled crossroads in the centre of Saxmundham and further north at Lambsale Meadow primarily because of the beleaguered Saxmundham Health Centre and inadequate car parking.

Consequently, expansion or intensification of the site leading to higher traffic volumes through Saxmundham (possibly from Saxmundham Garden Neighbourhood or beyond?) would have to be considered very carefully to avoid further congestion in and through the town.

Moreover, attention is drawn to the 'accident waiting to happen' situation on Carlton Road (see above), so an alternate A12/Carlton Road route would also have to be regarded as unlikely without significant mitigation of the dangers posed by additional traffic and school drop off/pick-up twice daily congestion.

Currently, HGV's although not 100% effectively, are routed away from the school and Carlton Road.

Land south of Ambleside, Main Road, Kelsale cum Carlton (SCLP12.49)

This allocation is carried forward from the Site Allocations and Area Specific Policies Development Plan Document (January 2017)

12.370 Kelsale (2011 pop. 990) is a Small Village in the settlement hierarchy, located just north of Saxmundham and with direct access to the A12. It is well related to the neighbouring market town of Saxmundham, and the services and facilities the town provides. Facilities within Kelsale include a primary school, general employment area, and a church.

Noted 12.370

In respect to village size, KcC PC would like it noted that in addition to formalised residential occupation in the Parish, a sizeable static caravan and cabin site is located across with A12, within the Parish. There is currently some doubt cast on whether or not this site is in part being used informally on a permanent dwelling basis, by some residents. KcC PC are advised some residents are registered at Saxmundham Health Centre and others are allegedly registered to vote. It is understood SCDC are conducting investigations to establish the true position in respect to residents on the site.

An EIA Screening Opinion has recently been requested for up to 200 further static caravans.

KcC PC are not aware of any formal traffic movement assessments having been made recently, either in regard to construction traffic during the winter and spring, or in regards to guests through the season(s).

However, construction traffic has been observed by immediate neighbours to the Carlton Meres site as heavy during the winter and spring, with numerous cement lorry deliveries accessing the site daily down Clay Hills, along Main Road past the **SCLP12.49** site and onward to the A12.

This is in addition to the normal HGV, LGV and car traffic to and from the Carlton Park Industrial site at Ronald Road, local traffic to and from Saxmundham and the A12.

12.371 Land south of Ambleside, Main Road is 1.86 hectares in size with an indicative capacity for 30 units. It has the potential for more given the varied character and density of development to the west on the opposite side of Main Road, and to the north on Rosemary Lane. Immediately to the south of the site a single dwelling has recently been constructed.

Noted 12.371

Please see general notes made in respect to Kelsale cum Carlton (above – [Para 12.252 & Para 12.370](#)) and the site.

Specific comments have been made to SCDC Planning by KcC PC and multiple residents in response to a recent planning application for 44 dwellings on this site (DC/18/2621/FUL).

12.372 The Parish Council have indicated a need for a mix of dwellings across the site to meet the needs particularly of older and younger residents wishing to remain local, and which would be available to buy or rent.

Noted 12.372

Please see general notes made in respect to Kelsale cum Carlton (above – [Para 12.252 & Para 12.370](#)) and the site.

Specific comments have been made to SCDC Planning by KcC PC and multiple residents in response to a recent planning application for 44 dwellings on this site (DC/18/2621/FUL).

12.373 In terms of physical constraints, the allocation site is not subject to any identified constraints. Any development scheme will be expected to ensure that the management of surface water run off is undertaken in accordance with the surface water management hierarchy. There are views across the site from the village and a carefully designed scheme could retain some of those views.

Noted 12.373

Please see general notes made in respect to Kelsale cum Carlton (above – [Para 12.252 & Para 12.370](#)) and the site.

Specific comments have been made to SCDC Planning by KcC PC and multiple residents in response to a recent planning application for 44 dwellings on this site (DC/18/2621/FUL).

12.374 Kelsale CEVP Primary School is operating close to capacity and, considering this allocation along with forecasts, would be over capacity during the first five years of the plan period. Therefore the development will be required to contribute towards additional primary school places.

Noted 12.374

Please be advised that Kelsale CEVP has been the subject of successive extensions over the recent past and another is understood to be being carried out during this summer. This not only reflects the success of the school, but also the wide geographic area from which children come. However, it must be recognised that the site is relatively compact and may be unable to take much more extension without substantive, lengthy and expensive renewal and/or replacement.

Please see general notes made in respect to Kelsale cum Carlton (above – [Para 12.252 & Para 12.370](#)) and the site.

Specific comments have been made to SCDC Planning by KcC PC and multiple residents in response to a recent planning application for 44 dwellings on this site (DC/18/2621/FUL).

12.375 Suffolk County Council Archaeology note that the site has not been systematically investigated for archaeological remains, but that it is located in a topographically favourable valley side location close to the historic core of the settlement. An archaeological investigation will therefore be required at an appropriate stage in the design of new development to allow for in situ preservation if appropriate.

Noted 12.375

Please see general notes made in respect to Kelsale cum Carlton (above – [Para 12.252 & Para 12.370](#)) and the site.

Specific comments have been made to SCDC Planning by KcC PC and multiple residents in response to a recent planning application for 44 dwellings on this site (DC/18/2621/FUL).

Policy SCLP12.49: Land south of Ambleside, Main Road, Kelsale cum Carlton

1.86ha of land south of Ambleside, Main Road, Kelsale cum Carlton, as shown on the Policies Map, is identified for residential use for approximately 30 units although a higher quantum of development may be appropriate subject to design and layout.

Development will be expected to accord with the following criteria:

- a) Provision of affordable housing;
- b) The need to increase the surface water network capacity in accordance with the water management hierarchy;
- c) Provision of a flood risk assessment;
- d) An archaeological investigation will be required;
- e) Suitable planting to southern boundary of the site where it abuts open countryside;
- f) A mix of housing types and densities across the site to blend with the mix of densities on the surrounding sites;
- g) Surface water disposal must be in accordance with the water management hierarchy; and
- h) The layout should where possible, look to retain some views through to open countryside beyond.

Noted SCLP12.49

Please see general notes made in respect to Kelsale cum Carlton (above – **Paras 12.252 & Para 12.370 to 12.375**) and the site.

Specific comments have been made to SCDC Planning by KcC PC and multiple residents in response to a recent planning application for 44 dwellings on this site (DC/18/2621/FUL).