Local Plan
Covering the former Suffolk Coastal area

Council Response to Matter 3
Area Specific Strategies – Development Allocations
(SCLP12.34 to SCLP12.72)

August 2019
www.eastsuffolk.gov.uk/localplanexamination

Source – www.thesuffolkcoast.co.uk
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Policy SCLP12.35: Land at Innocence Farm

Question 3.47

Is the proposed allocation of land at Innocence Farm justified, taking into account the employment land requirement for the plan area and reasonable alternatives for port related development, and is it based on proportionate evidence?

1. The Council considers that the proposed allocation of land at Innocence Farm (Policy SCLP12.35) is justified as it will support the economic opportunities found in the District. The East Suffolk Business Plan (Document G1) is clear in its desire to grow employment opportunities and ensure that the area continues to play a central role in the economic growth of the country. The Council believes that a strong local economy is essential for vibrant local communities across the District and the Local Plan plays an important role in this.

2. The Norfolk and Suffolk Economic Strategy (Document D5, page 12) identifies the economic sectors which give the local economy its real strength. The Transport, Freight and Logistics sector is one of these sectors which makes a significant contribution to boosting productivity both locally and across the country. The East Suffolk Business Plan (Document G1, page 6) identifies enterprises such as the Port of Felixstowe as having a significant role in the local economy and that operations should be supported over the plan period.

3. The Final Draft Local Plan (Document A1) has been prepared to reflect the Economic Strategy and the Council Business Plan and ensure that major economic opportunities within the district are supported in a comprehensive and timely manner.

4. As part of the plan making process, potential site allocations and alternatives have been considered. In respect of the land at Innocence Farm, this was done through consideration of alternative sites detailed in the Port of Felixstowe Growth and Development Needs Study (Document D1, Appendix 5 and Appendix 6). Each of the sites identified for consideration was put forward to the Council at either the call for sites exercise in 2016 or in response to the Issues and Options consultation in 2017. The sites identified were considered to meet the locational requirements of the economic sector in terms of the A14 corridor between the Port of Felixstowe and the Orwell Bridge. As part of the Study, the sites were considered against criteria detailed and then ranked based on the criteria set down in the evidence base document. The study identifies that there are reasonable alternatives but not all of these are appropriate in regards of size, location and opportunities.

5. However the purpose of the evidence was never to identify a specific site as that is the role of the Local Plan. The Council acknowledge that alternative sites are available within the District (and potentially outside of the District), but some of these opportunities are limited and do not provide the comprehensive opportunity to address requirements in an appropriate
location and in a timely and plan led manner. Innocence Farm is one of the highest scoring sites when considered against the criteria as set out in Appendix 6 of the Port of Felixstowe Growth and Development Needs Study (Document D1). It is also only one of a limited number of sites that are actively being promoted by the landowners for port related uses (other sites considered are being promoted for mixed use). The site appraisals were intended to provide a guide to the supply of land that might be, or become available to meet future off-port land demand associated with the Port of Felixstowe over the plan period to 2036 and has been interpreted into the Local Plan as Policy SCLP12.35 which has also been guided by other factors such as consultation responses and other evidence base documents.

6. Consultation responses from the Port of Felixstowe throughout the plan making process have continually identified a need for additional land to support the sector and operations. The Council are aware through its Annual Monitoring Report (Document E2) that the amount of available employment land within the A14 corridor is limited and any opportunities are relatively small scale, or not currently available and therefore do not provide the same benefits as land at Innocence Farm.

7. The Port of Felixstowe Growth and Development Needs Study (Document D1) was commissioned by the Council in response to consultation responses at the Issues and Options stage which identified a need for additional land/premises along with various site proposals (some of which had already been identified to the Council as part of an earlier Call for Sites exercise). The Growth and Development Needs Study (Document D1) is a robust and credible evidence base document which has been prepared by Lichfields in association with Royal HaskoningDHV. The Study (as outlined in the Executive Summary), “builds upon previous technical evidence carried out in 2008 which explored port-related land requirements and updates selected parts of this evidence to take account of more recent trends, development activity and economic growth recently prepared for the Ipswich Economic Area.”

8. The Study (Document D1) provides analysis of UK Container trade, the logistics sector, land requirements and the volume of containers passing through the Port of Felixstowe, implications for accommodating demand and an assessment of future supply. The Study identifies the Port of Felixstowe’s market share and the significance of this in both the context of the District and the wider Ipswich Economic Area and identifies a range of scenarios (low case, central case and high case) which draws on national forecasts as outlined in Chapter 4 of the Study. Each scenario exceeds the baseline requirement identified in the Sector Needs Assessment (Document D3) to identify alternative and more suitable supply to accommodate future demand for off-port land in full and the conclusion outlined in paragraph 6.16 of the Study recommends land is allocated specifically for port-related uses in the Local Plan.

9. Alongside other economic evidence in the form of the Employment Land Supply Assessment (Document D2), the Sector Needs Assessment (Document D3) and the Land Needs Assessment (Document D4), the Port of Felixstowe Growth and Development Needs Study
(Document D1) ensures that the Council has a proportionate evidence base on which to prepare the Local Plan.

10. It is noted that although many respondents to the Final Draft Local Plan questioned the findings of the Port of Felixstowe Growth and Development Needs Study, very little alternative evidence has been provided to substantiate representations. Representation 1378 from Bidwells on behalf of Trinity College does provide additional evidence to support the allocation, but no further evidence has been provided at this stage.

11. The Council is justified in the allocation identified at Innocence Farm due to the employment land requirements identified in the Port of Felixstowe study (Document D1).

   - The Study recommends that new land is specifically identified for port related uses in order to accommodate quantitative and qualitative requirements identified in the study.
   
   - A range of potential sites for new employment uses were appraised (10 in total). Innocence Farm scored favourably as part of the site appraisal exercise, although the land made available by the landowners would exceed the high case demand identified, the amount of employment land has been reduced as part of the Local Plan process which has taken into account consultation responses.
   
   - The allocation is supported by proportionate evidence which was commissioned in response from the Issues and Options consultation and reflects the importance of the Port of Felixstowe to the economic growth and prosperity of the District.

**Question 3.48**

*Is there any matter which would mean that the site would not be developable?*

12. In answering this question, in the absence of a specific definition of developable for employment sites, the Council have considered and applied the definition of developable as outlined in the Glossary of the National Planning Policy Framework (Document C1, page 66) which reads “to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

13. Land at Innocence Farm is considered to be in a suitable location, is it in close proximity to the Port of Felixstowe and can be accessed through the Strategic Road Network. Surrounding the Port of Felixstowe is the town of Felixstowe, the existing employment areas at Trinity Distribution Park and the water. Therefore further opportunities to develop land in this area are limited and likely to be unviable. The Council has therefore identified an alternative which can comprehensively meet the needs of the sector.
14. The Council is confident that there is more than a reasonable prospect that the site allocation will be implemented. Throughout the plan making the Council has engaged with the landowners promoting the site, the Port of Felixstowe and other statutory bodies such as Suffolk County Council to ensure that the policy requirements are sound and fit for purpose.

15. The policy provides opportunity for the site to be developed in phases, but is clear that key elements such as appropriate access to the site and significant landscaping mitigation are required in the first instance. Unlike residential allocations, the Council has not identified a point in time when the site will come forward, but indications from the landowners and supporting information provided in their representation (Rep ID: 1378) clearly outlines a requirement in the short to medium term.

16. Throughout the plan making process, the landowners have actively promoted the site and continue to do so through representations on the Final Draft Local Plan (Rep ID: 1378).

**Question 3.49**

**In terms of the proposed access to the A14 road, is the policy sufficiently clear so that it is evident how a decision maker should react to a development proposal?**

17. The Council consider that the policy and supporting text which deals with access to the site is clear and provides a policy framework on which future development proposals can be considered.

18. Consultation responses (Document A10) outline that any traffic movements associated with the proposed allocation at Innocence Farm should be kept away from the local road network serving the communities of Kirton and Trimley St Martin and Trimley St Mary. Locational evidence identified in the Sector Needs Assessment (Document D3) also identifies that proximity to the A14 and A12 is a key consideration and opportunities for direct access to the Strategic Road Network is a positive and has strong economic benefits.

19. Following the First Draft Local Plan (Document B4), the Council amended the allocation so that land on both sides of the A14 was included within the Local Plan to afford flexibility in terms of access. The Local Plan is not specific in terms of access arrangements and this will be a matter for future planning applications to consider and justify. Providing additional land on the south of the A14 ensures that a greater range of arrangements can be considered at the appropriate time.

20. Over the plan period, the Council will work with Suffolk County Council and Highways England to ensure that access arrangements to the site are provided to an acceptable standard in accordance with the policy requirements (for easterly and westerly access as outlined in paragraph 12.383 of the Final Draft Local Plan) and technical specifications. At this stage, the
Local Plan needs to ensure that opportunities to provide appropriate access arrangements are flexible and can be achieved over the plan period. Ensuring that access is provided in a comprehensive and timely manner is key to the success of the allocation and the realisation of the opportunities available.

21. Connected to the access arrangements, the Final Draft Local Plan (paragraph 12.384) provides information on the restrictions that the Council will look to introduce to manage the movements related to the site. Such restrictions will minimise the use of local roads such as Innocence Lane, Kirton Road and Junction 59 of the A14. Over the plan period, the requirement is for a comprehensive access to be provided which will match the policy requirement to provide access in both an easterly and westerly direction.

22. The Council considers that, notwithstanding the above, additional clarity could be provided in the policy in terms of the timing of delivery of the access in order that this does not become a requirement of later phases of development only. The Council would support a modification, as agreed through the Statement of Common Ground with Suffolk County Council and Highways England, as set out below.

New paragraph after 12.384:

“Whilst it may be possible to deliver some employment development from existing junctions in their current form, provision for access via an all-movement A14 junction must be achieved early in the development. Any planning permission for the site will need to include measures to guarantee early delivery of all-movement A14 access in order to avoid unacceptable significant impacts on the strategic or local highway networks.”

Modification to paragraph 12.395:

“Development is not expected to come forward all at once and therefore will be phased over the plan period and beyond 2036 if delivery is slower than anticipated. Infrastructure delivery must be phased to ensure comprehensive delivery of the site. It is essential that the landscaping and environmental improvements are undertaken up front to ensure that the impact of future development is minimised accordingly. The scale of the development will be kept under review by the Council in conjunction with representatives from the economic sector (such as Port of Felixstowe, warehousing and haulage companies) and the landowners and may be subject to review in future Local Plans if delivery is faster or slower than forecast.”

Modifications to second paragraph of policy:

“Dedicated access from the A14 at the western end of the site making use of existing junctions and utilising land south of the A14 is required to provide vehicular access to the site in both an easterly and westerly direction. Any planning permission for the site must include a requirement to ensure early delivery of this access, to ensure that the site is phased in an
effective manner and to avoid significant impacts on the highway network. HGV movements will be restricted to dedicated routes introduced to the satisfaction of Suffolk County Council and Highways England. Opportunities to connect Innocence Farm and the Port of Felixstowe by railway should be investigated and these will be supported where they further reduce the traffic movements on the main road network.”

Question 3.50
Is the provision of a rail connection justified and is it realistic? Is sufficient land allocated to accommodate adequate railway infrastructure to serve the site?

23. The Final Draft Local Plan acknowledges the importance of the railway connectivity at the Port of Felixstowe for transporting containers to locations outside of the District. In recent years, the North Rail Terminal has been at the Port of Felixstowe in partnership with Network Rail. These infrastructure improvements have enabled a larger volume of containers to be transported by rail, as opposed to HGVs on the road network. Utilising the railway connections is of benefit to the Port of Felixstowe, its customers, local communities and the environment through the reduction in carbon emissions which result from a more sustainable choice of transport.

24. Although not directly connected to the railway line at the moment, the Council consider that the opportunity to connect economic activities at Innocence Farm with the railway line should be retained through the Local Plan. Including references to the railway connections in paragraph 12.386 as well as specifically within Policy SCLP12.35 ensures that opportunities are considered at the appropriate time alongside future development proposals.

25. Representations received to the policy identify that additional land is required to facilitate the potential for a railway connection to the site in the future. Additional land may be required to serve the length of current train services but the Council consider that this could be done on land outside of the allocation for operational and technical reasons.

26. The additional land to the south of the A14 has been included within the allocation primarily to provide opportunity for vehicular access to ensure that the policy requirement for easterly and westerly access can be achieved.

27. The Council has taken a cautious approach to land south of the A14 to ensure that land is not included within the allocation which could be used for economic uses depending on how the policy is implemented. The viability and deliverability of railway connections has also not been tested as part of the Local Plan preparation, but is an opportunity that can be considered over the plan period through partnership between the landowners, the Council, Network Rail and the train operators.
Question 3.51

In regard to the criteria points a) – e) which specifies requirements for planning applications, would the policy be effective by not requiring an air quality assessment, landscape and visual assessment, noise assessment or transport assessment? Is point e) consistent with the findings of the HRA in referring to Habitats Regulation Assessment Screening?

28. The Council considers that the policy is effective and provides a sound basis on which to judge future proposals for the development of the site allocation.

29. The second paragraph of the policy focuses on transport and access to the site. Although a transport assessment is not specifically mentioned the policy requirement could not be satisfied without the preparation of a transport assessment which follows the guidance contained in Policy SCLP7.1. Paragraph 12.388 and the third paragraph of the policy specifically reference Landscape and Visual Impact Assessments and therefore the Council does not consider it appropriate to repeat this requirement in the criteria points.

30. The fourth paragraph of the policy seeks to address the local level issues with regards to the “impact of any built form on the nearby communities”. As part of these considerations, the Council has sought to address the representations received in response to the First Draft Local Plan from the local community, but also received representations referencing the impact on the local community in response to the Final Draft Local Plan.

31. The Council consider that following the representations received at Regulation 19, it would be appropriate to modify the policy criteria to include an “Air Quality Assessment” and a “Noise Assessment”. Although this results in a change to the policy, the Council does not consider that it affects the soundness of the Final Draft Local Plan as the policy would still be effective and justified without these additions.

32. The Habitats Regulation Assessment (Document A4) on page 44 outlines the requirement for a project level Habitats Regulation Assessment for the development proposals envisaged in Policy SCLP12.35. The Council has included the conclusions of the Habitats Regulation Assessment in paragraph 12.393 of the Final Draft Local Plan (Document A1) and acknowledge that the reference to “screening” in the policy is a typographical error. The Council suggest that the word screening is removed so that the criterion reads “Habitats Regulation Assessment screening” and that this amendment does not raise any issues of soundness.
Policy SCLP12.44: Land South of Forge Close between Main Road and Ayden, Benhall

Question 3.52

Is the Policy justified in allocating land for about 50 dwellings given the size of the village and existing housing commitments?

33. The approach to the identification of site allocations is set out in the Topic Paper: Site Selection – Final Draft Local Plan (Document D36). This explains that the approach to site allocations has been informed by the strategy of the Local Plan as well as by the suitability and availability of sites themselves and by other evidence including that related to infrastructure. Settlements identified as Large Villages or Small Villages through the review of the Settlement Hierarchy (Document D34) have been considered to be potentially suitable to accommodate growth through site allocations (noting that the approach to growth in the Major Centres and the Market Towns has been based upon the circumstances of those settlements in relation to the strategy of the Plan).

34. The strategy of the Local Plan, as set out in Policy SCLP3.1 of the Final Draft Local Plan (Document A1, page 36), identifies the A12 as one area of focus for growth in the Plan. Benhall is identified as a Small Village in the settlement hierarchy due to having some facilities and services as indicated in the Topic Paper: Settlement Hierarchy – Final Draft Local Plan (Document D34, page 8) including a primary school, early years provision and a retail facility, and also notes that it is within 1km of Saxmundham, a Market Town. In principle, Benhall is therefore a location where additional growth would contribute positively to the strategy of the Plan.

35. Whilst Benhall itself is a Small Village, the proximity to the A12, relative proximity to a railway station (in Saxmundham) and the proximity to Saxmundham itself all support the level of growth identified.

36. The existing housing commitments in Benhall are as set out in Table 3.5 which identifies that there are 11 dwellings with planning permission as at 31.3.2018 which comprises of one development of nine dwellings and two single dwellings. Along with a contribution of 50 from the allocation under Policy SCLP12.44, this would equate to 61 identified in the plan period (minus any windfall which may come forward in the Parish). The approach taken to site allocations has not been to divide equally or proportionately the number of dwellings amongst the Large Villages and Small Villages but has been based on the strategy of the Plan, the availability of suitable sites and other evidence such as in relation to flood risk and landscape, as well as infrastructure capacity and constraints. The character and form of settlements, including the presence of any heritage assets, has also been considered.
37. Consideration has also been given to the capacity of sites. Development of 50 dwellings on a 1.76ha site would provide a density of 28 dwellings per hectare. A lower density may be less viable, as the Whole Plan Viability Study has identified that lower densities are less viable in the mid value area (Document D39, page 52, paragraph 5.32).

38. Consideration has been given to infrastructure capacity based upon the 50 dwellings plus the existing commitments of 11, and the resulting infrastructure requirements are described in paragraphs 12.466 to 12.472 of the Final Draft Local Plan.

39. It is therefore concluded that the allocation of land for 50 dwellings is justified.

Policy SCLP12.46: Land to the South of Station Road, Campsea Ashe

Question 3.53
Would the Policy be effective in conserving the significance of the Listed Buildings near the site?

40. The Council considers the Policy to be effective in conserving the significance of the Grade II* Listed Church of St John the Baptist and the Grade II Listed Old Rectory, through criteria a), b) and c). Criterion a) ensures that the design and layout of development proposals appropriately consider the significance of the nearby Listed Buildings. Criteria b) and c) ensure the surrounding natural environment and landscape character is conserved, which would limit the impact that development would have on the setting of Listed Buildings. These criteria ensure proposals are designed in a manner that conserves the character of the setting of nearby Listed Buildings.

41. The existing views west over the proposed site allocation from both the Grade II* Listed Church of St John the Baptist and the Grade II Listed Old Rectory are heavily vegetated. The high density of tall trees would limit views of the site throughout the seasons. The impact of the proposed site allocation on the setting of the Listed Buildings therefore will be limited throughout the year, particularly during spring and summer months.

42. Historic England have not raised any concerns with this site allocation. For this reason and those stated above the Policy (SCLP12.46) is considered effective in conserving the significance of listed buildings near the site and is thus sound.
Question 3.54

Is the site located where it would enhance or maintain the vitality of the village or local communities?

43. The site is located where it would enhance the vitality of the village and local communities. The former Suffolk Coastal area is predominantly rural, within which the rural economy is particularly important to the success of the broader economy. This is reflected in the Plan’s ambition to sustain and grow the rural economy, as set out in the text box at page 29 of the Plan (Document A1), and in Paragraphs 83 and 84 of the National Planning Policy Framework (NPPF).

44. Paragraph 84 of the NPPF sets out that planning policies should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. The site lies outside the Campsea Ashe settlement boundary but follows the built form of development to the east of the settlement boundary and so is physically well-related to the Campsea Ashe settlement boundary. The site is located between a number of village facilities, namely the Church of St John the Baptist to the east and Wickham Market Railway Station and the pub to the west. Thus, the site is situated where future residents of the site would enhance these local facilities, which is supported in Paragraph 83 d) of the NPPF. The Church, pub, railway station and the village shop can all be accessed via a footway along the south of the B1078 and thus the ease of pedestrian access to the aforementioned village facilities renders the site an accessible location that would enhance or maintain the vitality of the village and local communities.

Question 3.55

Should paragraph 12.496 refer to Wickham Market railway station?

45. Paragraph 12.496 should refer to Wickham Market railway station. Thus, the following modification is proposed to Paragraph 12.496: “In this respect, a contribution relating to Campsea Ashe Wickham Market railway station may be required through the Community Infrastructure Levy.”
Policy SCLP12.47: Land behind 15 St Peters Close, Charsfield

Question 3.56

Would the Policy be effective in conserving the significance of the Grade I listed St Peters Church?

46. The Council considers the Policy to be effective in conserving the significance of the Grade I Listed St Peters Church. Criterion a) ensures that development proposals on the site are designed in a way that conserves the Grade I Listed St Peters Church. Criterion b) requires smaller dwellings and bungalows as part of the housing mix. Together these two criteria should result in a development that responds to the need to conserve the significance of the Church by positioning, for example, the smaller dwellings and bungalows on the more prominent parts of the site, as detailed in Paragraph 12.500. Criterion d) ensures that existing boundary features such as hedgerows and trees are retained. Historic England have not raised any concerns with this site allocation.

Question 3.57

Is it justified that the Policy does not require a biodiversity survey and appropriate mitigation measures?

47. Consideration has been given to the presence of any protected species or biodiversity assets through the Strategic Housing and Economic Land Availability Assessment (Document D10, pages 167 – 168) and the Sustainability Appraisal (Document A3, pages 579 – 581). This has not identified any specific issues in relation to this site. The Council is nevertheless aware that the Suffolk Wildlife Trust (Rep ID: 829) have identified that there are records of protected species adjacent to the site and that there is appropriate habitat on site to support such species.

48. In this respect the Council has entered into a Statement of Common Ground with the Suffolk Wildlife Trust to agree to modifications to Policy SCLP12.47 and the supporting text as follows:

“12.499 The site is allocated for development of approximately 20 dwellings. The site slopes gently upwards to the east, and is bounded by existing trees and hedgerows on all sides. To integrate with the more rural areas to the north, development proposals should retain these hedgerows and trees. There are records of protected species in the vicinity of the site, and the retention of trees and hedgerows which form the boundary of the site alongside inclusion of permeable features would help to support biodiversity in and around the site.”
Insert additional criterion into Policy SCLP12.47

“g) An ecological survey and appropriate mitigation will be required.”

**Question 3.58**

*Can safe and suitable access to the site be achieved for all users?*

49. Through the process of identifying sites for consideration for allocation in the Local Plan, Suffolk County Council as Highways Authority have identified that access can technically be achieved, and this is to be from St Peters Close, as set out in the Strategic Housing and Economic Land Availability Assessment (Document D10, page 167).

50. The Council is aware that the boundary of adopted highways land in St Peter’s Close is not contiguous with the southern part of the allocation. However, correspondence from the agent acting on behalf of the landowner has identified that the owner and prospective developer are aware of the position, that a right to access the land exists and that the access to the development can be achieved.

**Policy SCLP12.48: Land to the South of Darsham Station, Darsham**

**Question 3.59**

*Is the Policy justified in dealing with the whole site area as mixed use, when the built development, except for access, would be provided in the north of the site?*

51. The Council consider that the Policy and supporting text as currently worded are robust in ensuring residential development is restricted to the northern half of the site. This ensures effective links are made with Darsham railway station and other facilities and the southern half is safeguarded for provision of access and a rural setting to the adjacent Parkland. The Policy (SCLP12.48) achieves this through criteria a) and f) alongside Paragraphs 12.513 and 12.514.

52. However, the Policy as currently worded does not provide the same support in respect of employment uses. Thus, the Council considers the following modification to the final sentence of the Policy (SCLP12.48) would ensure employment uses are located in the northern half of the site: “Development of employment uses falling within Use Class B1 would also be supported as part of a mixed use scheme in the northern half of the site.”
Question 3.60
Is the site located where it would enhance or maintain the vitality of the village or local communities?

53. The site is located where it would enhance the vitality of Yoxford, the facilities at Darsham Station and local communities, as is stated in the opening sentence of Paragraph 12.513. The former Suffolk Coastal area is predominantly rural, within which the rural economy is particularly important to the success of the broader economy. This is reflected in the Plan’s ambition to sustain and grow the rural economy, as set out in Policy SCLP3.1 of the Plan (Page 36, Document A1), and in Paragraphs 83 and 84 of the National Planning Policy Framework (NPPF). The site also lies within the A12 corridor, which as detailed in Policy SCLP3.1 is an important area in which opportunities for growth will be pursued.

54. Darsham Railway Station located just to the north of the site is home to a range of facilities including a local shop, Darsham Station Emporium, Darsham Nurseries shop, Darsham Nurseries Cafe and a petrol filling station. The range and diversity of such rural businesses and facilities around Darsham railway station is supported by Paragraph 83a) of the NPPF. The development of the site for housing would provide an uplift in footfall to these facilities. This increased footfall could also enhance any compatible B1 employment uses brought forward on the site. The suitable B1 employment uses on the site could also act synergistically with other employment uses around Darsham railway station.

55. Paragraph 84 of the NPPF sets out that planning policies should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. The site lies outside the Yoxford and Darsham settlement boundaries but is physically well-related to residential development south of Darsham railway station. In these locations it is noted that available public transportation should be exploited, which accords with the location of the site’s close proximity to Darsham railway station. Criterion e) of the Policy (SCLP12.48) requires pedestrian and cycle connectivity with the railway station and Yoxford village to be enhanced and a crossing point on the A12 to be provided for safe pedestrian access along the existing footway.

Question 3.61
Is the second sentence of paragraph 12.512 clear?

56. As there is no woodland on the site the Policy as currently written is inaccurate. Thus, the following modification would address the accuracy of the sentence and provide greater clarity: “Development should resist the planting of horticulture such as Poplar in this landscape to integrate the site with the character of the adjacent Parkland and avoid change to the character of its woodland.”
Policy SCLP12.49: Land North of the Street, Darsham

Question 3.62
Is access via the Millfields development as set out in criterion a) deliverable and justified?

57. Criterion a) of Policy SCLP12.49 states that access could be provided through the existing Millfields development or via The Street. Whilst the inclusion of reference to access via Millfields is as a possibility (as opposed to a requirement) it is considered that for consistency with other site allocations policies, the criterion instead should refer to the provision of a safe and suitable vehicular access. The Council would support the modifications set out below, as agreed through a Statement of Common Ground with Hopkins Homes and Hopkins & Moore Ltd and Suffolk County Council.

Changes to paragraph 12.531:

“Access to the site could be via the adjoining Millfields development or via The Street provided that trees and hedgerows are retained where possible.”

Changes to paragraph 12.529:

“The site is allocated for development of approximately 20-25 dwellings.”

Changes to Policy 12.49:

“1.11ha of land north of The Street, Darsham, as shown on the Policies Map, is identified for the development of approximately 25 dwellings.

Development will be expected to comply with the following criteria:

a) Provision of a safe and suitable access Access to be provided through the existing Millfields development or via The Street;
b) Existing hedgerows and trees on the frontage of The Street to be retained subject to provision of satisfactory access;
c) Retention of trees on the southern boundary of the site;
d) Enhancements to the existing footway along part of southern boundary linking into the site;
e) A site-specific Flood Risk Assessment;
f) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity and provision for treatment or that this can be provided;
g) Affordable housing to be provided on-site; and
h) An archaeological assessment will be required.”

Question 3.63
Paragraph 12.529 is inconsistent with Policy SCLP12.49 in respect of the number of dwellings anticipated.

58. The correct number of dwellings is detailed in the Policy (SCLP12.49). Thus, the first sentence of Paragraph 12.529 is incorrect, which the following modification would resolve:

“The site is allocated for development of approximately 2520 dwellings.”

Policy SCLP12.50: Land off Laxfield Road, Dennington

Question 3.64
Is the provision of approximately 50 dwellings at the site justified given the size of the site and the proposed policy requirements?

59. The Council considers an error has been made in identifying the scale of acceptable development on the site and therefore that approximately 50 dwellings would result in a particularly high density that would not accord with the Policy criteria f), g), h), i) and j). This has arisen as the result of changes that have taken place between the First and Final Drafts of the policy.

60. The combination of 0.7ha from criterion f), the potential 0.1ha from criterion g), and approximately 0.26ha in line with the standard metric of 2.4ha of open space per 1000 residents as set out in paragraph 12.548 (considering an average household size of 2.2 persons), would total approximately 1.06ha. Thus, a policy compliant scheme would result in only 1.06ha of residentially developable land of the 2.04ha site, upon which a density of approximately 50 dwellings per hectare (dph) would result. 50dph would not be an appropriate density given the location of the site on the rural periphery of the village and its position within the setting of the adjacent Conservation Area and Listed Buildings, which are sited on large plots.

61. A modification is therefore proposed to the opening sentence of the Policy (SCLP12.50), as follows: “2.04ha of land off Laxfield Road, Dennington, as shown on the Policies Map, is identified for the development of approximately 350 dwellings.”
62. In addition a modification is proposed to Paragraph 12.541, as follows: “The site is allocated for development of approximately 359 dwellings.” These changes will also require consequential changes to Chapter 3 and the Appendices.

63. The Whole Plan Viability Report (Document D38; Page 52) details that residential development on greenfield sites in the mid value zone, which Dennington occupies, is viable at densities above 23 dwellings per hectare. Where development density is comparatively higher at around 31 dwellings per net hectare, development becomes significantly more viable. Thus, the proposed allocation in its modified form will be viable.

**Question 3.65**

**Is the provision of dwellings designed to meet the needs of the older population justified?**

64. Paragraph 1.5 of the Final Draft Local Plan explains that there is an ageing population which will have an impact in terms of the types of housing to be planned for. This is expanded upon, through reference to the Strategic Housing Market Assessment (Documents D15 and D16), in relation to Policy SCLP5.8 on Housing Mix.

65. In planning to meet the needs of older people consideration has not only been given to the type of housing that could meet the needs of older people, principally through Policy SCLP5.8, but also the location of housing for older people with a view to providing opportunities to reduce social isolation and loneliness.

66. The need to reduce social isolation and promote social interaction is contained within policy in the NPPF. Paragraph 91 a) of the NPPF states that:

‘Planning policies should aim to achieve healthy, inclusive and safe places which a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;’

67. The Planning Practice Guidance (Document C2, Housing for Older and Disabled People) was updated in June 2019 to include guidance on Housing for Older and Disabled People. Whilst this specific guidance wasn’t available during the preparation of the Local Plan, it nevertheless is reflective of the approach that has been undertaken through the Final Draft Local Plan. The PPG states that:

‘Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’ (Paragraph: 001 Reference ID: 63-001-20190626)
68. The PPG goes onto state that:

‘Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.

Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.’

(Paragraph: 012 Reference ID: 63-012-20190626)

69. In identifying the needs for older people the PPG states that evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can be useful. The Joint Health and Wellbeing Strategy for Suffolk (Document H16) sets an outcome around older people in Suffolk having a good quality of life, and also looks to create resilient communities which can reduce loneliness and isolation.

70. Through the site allocations process, consideration has therefore been given to opportunities to plan for housing in locations which would potentially address isolation and loneliness through locating in areas of activity where there may be opportunities for social interaction. For example, locations which are close to schools, open spaces or other facilities. To maximise the potential for these benefits, relevant site allocations policies contain a reference to provision of housing for older people to ensure that development in such locations has the potential to be attractive to older people. The policies do not limit the housing to catering for older people only, however it would be expected that the design of the development would reflect the potential needs of older people. Paragraph 5.44 of the Final Draft Local Plan provides an explanation and examples of the types of housing that this may involve.

71. Land off Laxfield Road, Dennington, is adjacent to the primary school and therefore provides an opportunity for future residents to live in a location where there is activity and where there would be interaction with other parts of the community. Providing dwellings that would suit the older population, will help to ensure that the development provides this opportunity.

72. The policy is therefore justified and is sound in respect of this matter.

73. However for clarity the Council would support an amendment to criterion b) to reflect the wording used in other similar policy requirements, as follows:

“b) Provision of a mix of housing including dwellings designed to meet the needs of the older population”
Question 3.66
Is the provision for specified areas for future school expansion and drop off point and new early years setting justified and if so, should they be specifically identified/safeguarded on the Policies Map?

74. The Council has engaged extensively with Suffolk County Council, the lead education provider in Suffolk, in accordance with paragraph 94 of the NPPF in order to identify and address issues relating to school places across the District. This engagement focussed on school catchment areas and pupil capacity of schools to assess the impact of proposed development on the existing primary schools and to allocate land for expansion, accordingly. In this respect, provision for school expansion is justified.

75. It is worth noting that this site is carried forward from the Site Allocations and Area Specific Policies Development Plan Document (Document F2). The existing policy refers to the opportunity for the inclusion of a drop off area for the school on this site. In reviewing this allocation, school drop offs have still been identified as a local issue and, as such, this justifies criterion f) as a policy requirement. As detailed by Suffolk County Council in their representation to the Final Draft Local Plan Regulation 19 public consultation (Rep ID: 1090), the inclusion of a drop off area within the 0.7ha of land outlined in criterion f) will be fully considered and educated upon at the planning application stage.

76. In terms of early years provision. Suffolk County Council have indicated that this development will result in overcapacity in the Framlingham ward, the relevant early years catchment for this area. Therefore, a new early years setting will be required at this site. Given the location of an existing school nearby, Suffolk County Council have suggested that this site is a prime location for a new early years setting due to the potential for co-location with the existing school. Considering this, a new early years setting is justified on this site.

77. It is considered unnecessary to specifically identify an area for future school expansion, a drop off point and a new early years setting on the Policies Map, as this would preferably be decided at planning application stage. In any case, paragraph 12.545 notes the location of the existing school to the south of the site; as such, any future development proposal on this site will need to respect the location of the school.

78. The Council proposes a modification to amend the Policies Map to identify the site as a mixed use allocation in light of the fact that the policy potentially involves future school expansion, a drop-off point and an early years setting. This allows for a consistent approach to highlighting mixed use allocations on the Policies Maps.
Policy SCLP12.51: Land to the South of Eyke CoE Primary School and East of the Street, Eyke

Question 3.67

Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

79. Paragraph 1.5 of the Final Draft Local Plan explains that there is an ageing population which will have an impact in terms of the types of housing to be planned for. This is expanded upon, through reference to the Strategic Housing Market Assessment (Documents D15 and D16), in relation to Policy SCLP5.8 on Housing Mix.

80. In planning to meet the needs of older people consideration has not only been given to the type of housing that could meet the needs of older people, principally through Policy SCLP5.8, but also the location of housing for older people with a view to providing opportunities to reduce social isolation and loneliness.

81. The need to reduce social isolation and promote social interaction is contained within policy in the NPPF. Paragraph 91 a) of the NPPF states that:

‘Planning policies should aim to achieve healthy, inclusive and safe places which a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;’

82. The Planning Practice Guidance (Document C2, Housing for Older and Disabled People) was updated in June 2019 to include guidance on Housing for Older and Disabled People. Whilst this specific guidance wasn’t available during the preparation of the Local Plan, it nevertheless is reflective of the approach that has been undertaken through the Final Draft Local Plan. The PPG states that:

‘Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’ (Paragraph: 001 Reference ID: 63-001-20190626)

83. The PPG goes onto state that:

‘Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which
can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.

Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.’ (Paragraph: 012 Reference ID: 63-012-20190626)

In identifying the needs for older people the PPG states that evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can be useful. The Joint Health and Wellbeing Strategy for Suffolk (Document H16) sets an outcome around older people in Suffolk having a good quality of life, and also looks to create resilient communities which can reduce loneliness and isolation.

84. Through the site allocations process, consideration has therefore been given to opportunities to plan for housing in locations which would potentially address isolation and loneliness through locating in areas of activity where there may be opportunities for social interaction. For example, locations which are close to schools, open spaces or other facilities. To maximise the potential for these benefits, relevant site allocations policies contain a reference to provision of housing for older people to ensure that development in such locations has the potential to be attractive to older people. The policies do not limit the housing to catering for older people only, however it would be expected that the design of the development would reflect the potential needs of older people. Paragraph 5.44 of the Final Draft Local Plan provides an explanation and examples of the types of housing that this may involve.

85. Land to the South of Eyke CoE Primary School and East of The Street, is adjacent to the primary school and therefore provides an opportunity for future residents to live in a location where there is activity and where there would be interaction with other parts of the community. Providing dwellings that would suit the older population, will help to ensure that the development provides this opportunity. Under criterion a), applicants would be expected to incorporate designs that may suit the lifestyle of the older population. This may include those examples set out under paragraph 5.44 of the Final Draft Local Plan, and the intention behind this paragraph is to provide some guidance in relation to the types of housing that may help to address the needs of the older population. It is not intended to limit occupation of properties to older people.

86. The policy is therefore justified and effective and is sound in respect of this matter.
Question 3.68

Is the provision for specified areas for future school expansion and drop off point and new early years setting justified and if so, should they be specifically identified/safeguarded on the Policies Map?

The Council has engaged extensively with Suffolk County Council, the lead education provider in Suffolk, in accordance with paragraph 94 of the NPPF in order to identify and address issues relating to school places across the District. This engagement focussed on school catchment areas and pupil capacity of schools to assess the impact of proposed development on the existing primary schools and to allocate land for expansion, accordingly. In this respect, provision for school expansion is justified.

In terms of early years provision, Suffolk County Council have indicated that this development will result in overcapacity in the Orford and Eyke ward, the relevant early years catchment for this area. Therefore, a new early years setting will be required at this site. Given the location of an existing school nearby, Suffolk County Council have suggested that this site is a prime location for a new early years setting due to the potential for co-location with the existing school. Considering this, a new early years setting is justified on this site.

It is considered unnecessary to specifically identify an area for future school expansion, a drop off point and a new early years setting on the Policies Map, as this would preferably be decided at planning application stage. In any case, paragraph 12.559 notes the location of the existing school adjacent to the site; as such, any future development proposal on this site will need to respect the location of the school.

Policy SCLP12.52: Land to the West of Chapel Road, Grundisburgh

Question 3.69

Would the proposed access via Chapel Road and the wider village road network achieve safe and suitable access for all users? Is the Policy sufficiently clear as to how a decision maker should react to a development proposal in this regard? In terms of vehicular and pedestrian access and the requirement for any off site works, is the site deliverable or developable as per the Framework definitions?

During the identification of appropriate sites to allocated, the Council has liaised with Suffolk County Council as Highways Authority in relation to the suitability of access. The site identified for allocation under Policy SCLP12.52 represents part of the site which was
promoted for development. The full site area (site reference 351) is shown in the Strategic Housing and Economic Land Availability Assessment - Map Book (Document D11, page 52).

91. The Council acknowledges that a large volume of representations were received in relation to the policy in the Final Draft Local Plan which expressed concern around access to the site and the suitability of Chapel Road for access. The representation from Suffolk County Council, as Highways Authority, (Rep ID: 1115), states that the site appears to be deliverable but significant off-site measures will be required in order to make the proposed development acceptable in transport terms and that these may be challenging to deliver in terms of cost and land ownership.

92. In considering these representations, the Council would support a modification to extend the boundary of the allocation southwards in order that it is contiguous with Park Road, to provide further options in respect of vehicle access.

93. In relation to pedestrian access, the policy requires pedestrian access to the site and paragraph 12.577 explains that it is expected that opportunities to create safe access to Ipswich Road (to the west) via the recreation ground would be explored.

94. The Policy is sufficiently clear in that it identifies that pedestrian access and footways would need to be provided. However to add greater clarity, the Council would support a modification to criterion d) as set out below:

“Provision of pedestrian access and footways to support access to services and facilities in the village.”

95. The site is identified as deliverable in the Housing Trajectory of the Final Draft Local Plan (Appendix D, page 494), in that it is anticipated that 20 of the 70 dwellings would be completed within the first five years of the Plan. The Council acknowledges Suffolk County Council’s representation as referred to above which identifies challenges for delivery and would support a modification (as stated above) to provide further options for vehicle access and to provide greater certainty as to the deliverability of the site.

**Question 3.70**

*Is the requirement for the provision of on-site public open space justified?*

96. Policy SCLP8.2 requires new residential development to contribute towards provision of open space, and paragraph 8.12 refers to national standards which would require 2.4ha of open space per 1,000 people. Throughout the Plan, the Council has sought to require that public open space provides for all ages, which is consistent with paragraph 91 of the NPPF which requires opportunities for social interaction between people who otherwise might not come into contact with each other and also aims to enable and support healthy lifestyles.
97. As a development of 70 dwellings it is therefore considered appropriate that the site allocation provides for open space.

**Question 3.71**

*Is the provision of dwellings designed to meet the needs of the older population justified?*

98. Paragraph 1.5 of the Final Draft Local Plan explains that there is an ageing population which will have an impact in terms of the types of housing to be planned for. This is expanded upon, through reference to the Strategic Housing Market Assessment (Documents D15 and D16), in relation to Policy SCLP5.8 on Housing Mix.

99. In planning to meet the needs of older people consideration has not only been given to the type of housing that could meet the needs of older people, principally through Policy SCLP5.8, but also the location of housing for older people with a view to providing opportunities to reduce social isolation and loneliness.

100. The need to reduce social isolation and promote social interaction is contained within policy in the NPPF. Paragraph 91 a) of the NPPF states that:

   ‘Planning policies should aim to achieve healthy, inclusive and safe places which a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;’

101. The Planning Practice Guidance (Document C2, Housing for Older and Disabled People) was updated in June 2019 to include guidance on Housing for Older and Disabled People. Whilst this specific guidance wasn’t available during the preparation of the Local Plan, it nevertheless is reflective of the approach that has been undertaken through the Final Draft Local Plan. The PPG states that:

   ‘Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’ (Paragraph: 001 Reference ID: 63-001-20190626)

102. The PPG goes on to state that:

   ‘Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.'
Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.’

(Paragraph: 012 Reference ID: 63-012-20190626)

In identifying the needs for older people the PPG states that evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can be useful. The Joint Health and Wellbeing Strategy for Suffolk (Document H16) sets an outcome around older people in Suffolk having a good quality of life, and also looks to create resilient communities which can reduce loneliness and isolation.

103. Through the site allocations process, consideration has therefore been given to opportunities to plan for housing in locations which would potentially address isolation and loneliness through locating in areas of activity where there may be opportunities for social interaction. For example, locations which are close to schools, open spaces or other facilities. To maximise the potential for these benefits, relevant site allocations policies contain a reference to provision of housing for older people to ensure that development in such locations has the potential to be attractive to older people. The policies do not limit the housing to catering for older people only, however it would be expected that the design of the development would reflect the potential needs of older people. Paragraph 5.44 of the Final Draft Local Plan provides an explanation and examples of the types of housing that this may involve.

104. Land West of Chapel Road, Grundisburgh, is adjacent to the recreation ground and therefore provides an opportunity for future residents to live in a location where there is activity and where there would be interaction with other parts of the community. Providing dwellings that would suit the older population will help to ensure that the development provides this opportunity.

105. The policy is therefore justified and is sound in respect of this matter.

Policy SCLP12.54: Land North of the Street, Kettleburgh

Question 3.72

Is the provision of approximately 16 dwellings on the site justified given the character and appearance of the area?

106. Hopkins Homes and Hopkins & Moore Ltd have stated in their representation (Rep ID: 1292) that they don’t consider that 16 dwellings can be delivered on the site as shown in the Final Draft Local Plan. The site boundary was amended between the First Draft Local Plan and the
Final Draft Local Plan in response to the Whole Plan Viability Study (Document D39) which advised that higher densities would assist with viability.

107. However considering the representations received, the Council would support a modification to revert to the site contained in the First Draft Local Plan (Document B4, page 295). This would represent a density of 21 dwellings per hectare.

108. As such the Council would support a modification to the opening sentence of the Policy, as follows: “0.430.75ha of land north of The Street, Kettleburgh, as shown on the Policies Map, is identified for the development of approximately 16 dwellings.” The inset map and Policies Map will be amended accordingly. See map in schedule of modifications.

109. 16 dwellings on the site at a density of 21 dwellings per hectare would accord with the character of the area along The Street and align with the settlement boundary to the rear of properties north east and south west of the site.

Question 3.73

If the capacity of the site is less than that stated, should the criterion in regard to affordable housing be qualified given the requirements of Policy SCLP5.10 that contributions would be sought for schemes of 10 units or more?

110. As demonstrated in response to Question 3.72 approximately 16 dwellings could be delivered on a site of 0.75ha, in line with the draft Policy SCLP12.50 of the First Draft Local Plan. This would lead to a density of approximately 21 dwellings per hectare, which would accord with the character and appearance of the area.

111. As the Council would support a modification to the site area in a way that maintains the approximate number of dwellings (16) and addresses representations made, the Council consider that no change is necessary to criterion b). Policy SCLP5.10 sets out that schemes of 10 or more dwellings, or sites of 0.5ha or more, will be expected to deliver 1 in 3 units as affordable dwellings. Policy SCLP5.10 also states that only in exceptional circumstances where on site affordable housing is demonstrated to be unfeasible should a commutable sum be paid towards the provision of affordable housing off site. Thus, with the modifications set out under question 3.72 Criterion b) of Policy SCLP12.54 is consistent with Policy SCLP5.10 in that on site affordable housing is expected to be provided as the site is over 0.5ha (0.75ha) and expected to deliver more than 10 dwellings (approximately 16 dwellings).
Policy SCLP12.55: Land to the rear of 31-37 Bucklesham Road, Kirton

Question 3.74

What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Kirton Water Recycling Centre?

112. The Council and Anglian Water have entered into a Statement of Common Ground (SoCG) which demonstrates that this site is deliverable, in line with national planning policy, and that there are no water recycling impediments preventing the site from coming forward. Furthermore, Anglian Water as sewerage undertaker has indicated its commitment to engaging with developers to ensure deliverability of this site through the SoCG.

113. It is considered that this site is deliverable from a water recycling perspective subject to criterion e) and the modification set out below.

114. Modification to add the following criteria: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity”

115. Modification to the Infrastructure Delivery Framework (Appendix B) to include Kirton water recycling centre under the ‘Utilities’ section:

   Project: “Potential treatment improvements at Kirton water recycling centre”

   Priority: “Essential”

   Lead Provider: “Anglian Water”

   Approximate Cost: “Unknown”

   Funding Sources: “Developers”

   Potential Funding Amount: “Unknown”

   Required Developer Contribution: “Unknown”

   Type of Developer Contribution: “Anglian Water Asset Management Plan”

   Potential Remaining Funding Gap: “Unknown”

   Potential Funding Sources to Fill Gap: “Anglian Water”

   Timescale/Progress: “During plan period”
Policy SCLP12.56: Land at School Road, Knodishall

Question 3.75

What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Benhall Water Recycling Centre?

116. The Council and Anglian Water have entered into a Statement of Common Ground (SoCG) which demonstrates that this site is developable, in line with national planning policy, and that there are no water recycling impediments preventing the site from coming forward. Furthermore, Anglian Water as sewerage undertaker has indicated its commitment to engaging with developers to ensure deliverability of this site through the SoCG.

117. Added to this, the Council and Anglian Water have come to the determination that this site drains to Thorpeness water recycling centre, where the Cross Boundary Water Cycle Study does not identify treatment limitations. As such, it is considered that this site is developable from a water recycling perspective subject to the modifications set out below.

118. Modification to delete paragraph 12.627 “Development proposals should have regard to the findings of the Suffolk Coastal & Ipswich Cross Boundary Water Cycle Study which indicates capacity limitations at Benhall Water Recycling Centre. Evidence will be required to demonstrate how capacity will be made available in time to serve the proposed development.”

119. Modification to delete criterion c) “Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided.”

Policy SCLP12.58: Land North of Mill Close, Orford

Question 3.76

Is the Policy in seeking a contribution towards affordable housing justified in the context of Policy SCLP5.10?

120. Policy SCLP5.10 Affordable Housing on Residential Developments requires developments for ten units or more or sites of 0.5ha or more to make provision for 1 in 3 units to be affordable dwellings. Policy SCLP12.58 takes forward allocation SSP11 in the Site Allocations and Area Specific Policies DPD (Document F2, page 44) for approximately 10 dwellings and which requires a contribution to affordable housing. This approach reflected the Planning Practice Guidance in place at the time of adoption of the Sites Allocations and Area Specific Policies DPD, which stated that contributions should not be sought on sites of ten units or less unless
within designated rural areas (which includes Areas of Outstanding Natural Beauty) where a financial contribution could be sought on developments of between 6 and 10 units (Archived Paragraph: 23b-031-20161116).

121. This position has been amended through the introduction of the revised National Planning Policy Framework and Planning Practice Guidance. Paragraph 63 of the NPPF states that provision for affordable housing should not be sought for residential developments that are not major developments (major developments are defined in the NPPF glossary as sites of ten dwellings or more or where the site has an area of 0.5ha or more) other than in designated rural areas where policies may set out a lower threshold of five dwellings or fewer. As this site is for approximately 10 dwellings, it is therefore appropriate to require provision of affordable housing from this site. This position is reflected in the PPG (Document C2, Planning Obligations, Paragraph 23b-023-20190315).

122. The Council therefore proposes a modification to reflect that affordable housing should be secured on-site in accordance with Policy SCLP5.10 and paragraph 63 of the NPPF:

“e) A financial contribution will be sought towards affordable housing provision [Provision of affordable housing on site];”

Policy SCLP12.59: Land adjacent to Swiss Farm, Otley

Question 3.77

Notwithstanding paragraph 12.659 and the reference to policy SCLP11.2, the proposed allocation boundary appears to bisect farm buildings, with other buildings and structures adjacent. Is the Policy justified in not addressing the future of these structures given the uncertainty they present for the living conditions of future occupiers of any dwellings at the site, or on the continued use of the adjacent land for agricultural purposes?

123. It is acknowledged in paragraph 12.659 that the development would need to ensure that the requirements of SCLP11.2 Residential Amenity are met. This is the principal planning matter related to the existing buildings and structures in terms of the potential proximity to future residential uses. It would not be appropriate for the policy to set requirements related to the buildings which are outside of the site allocation boundary. In order to also acknowledge the potential for amenity issues related to uses on the adjoining land, as well as the structures, paragraph 12.659 could be subject to a modification, as set out below:

“The built form of the existing agricultural buildings protrudes from the village into the landscape to the east. The layout of the site will need to be considered in relation to the
requirements of Policy SCLP11.2 Residential Amenity, acknowledging the potential for continued use of the land to the east for agricultural purposes. Any structures to the east of the site will need to be considered in relation to Policy SCLP11.2 Residential Amenity. The development of the site should enable the continuation of the built form provided by Vine Road and Little Meadows Drive and should maintain the gap in frontage between this part of Otley and the built area to the north.”

**Question 3.78**

*Is the Policy justified in not requiring a contaminated land survey given the previous use of the site?*

124. The Policy does not require a contaminated land survey and this is consistent with all of the site allocation policies, including those on land which has been previously developed. Nevertheless, due to the nature of current agricultural uses on the site, the Council considers that a criterion relating to the submission of a contaminated land assessment could be included as a modification, along with associated supporting text, as set out below:

Insert new criterion:

“g) Provision of landscaping to the eastern border of the site to provide an appropriate edge in relation to the open countryside beyond the site; and

h) An ecological survey will be required, along with any identified mitigation measures; and

i) Provision of a Contaminated Land Assessment.”

Supporting text to be added after paragraph 12.6612:

“Due to the nature of current and previous agricultural uses on the site, a Contaminated Land Assessment will be required in order to investigate and address this potential issue.”

**Question 3.79**

*In the context of the requirements for a transport statement particularly addressing the B1078/B1079 junction, can the site be considered to be deliverable or developable?*

125. In accordance with paragraph 108 of the National Planning Policy Framework the Council has considered the impact of proposed development on the highways network through the transport modelling and through liaising with Suffolk County Council as Highways Authority. The B1078 / B1079 junctions is to the south of Otley and is identified as becoming close to capacity through the transport modelling work undertaken as part of the preparation of the Local Plan (Document D32, Appendix A). It is not expected that a development of this scale
would on its own result in significant impacts on this junction however there may be potential for cumulative effects throughout the Plan period. It is not therefore considered that this requirement in the Policy would have implications for the developability of the site, noting that it is anticipated to come forward in the medium term due to the presence of existing uses on the site (as per the Housing Trajectory contained in Appendix D of the Final Draft Local Plan).

126. However, in order to ensure that any potential impacts are appropriately assessed the Council would support a modification, as agreed through the Statement of Common Ground with Suffolk County Council, as set out below:

“f) Provision of a Transport Assessment Statement, in particular to assess impacts on the B1078 / B1079 junction;”

This will require a revision to the text of 12.664 as follows:

“12.664 Transport modelling undertaken as part of the production of the Local Plan indicates that there will be potential capacity issues at the junction of the B1079 and B1078 to the south of Otley based upon growth within the area. Due to its proximity a Transport Assessment Statement will therefore need to consider the impacts of development on that junction.”

Policy SCLP12.60 Land Adjacent to Farthings, Sibton Road, Peasenhall

Question 3.80

Is the allocation of land for housing within an area of Flood Zone 2 justified in terms of the sequential test?

127. National policy, as set out in the NPPF, requires a sequential, risk-based approach to the location of development as part of plan preparations (taking into account the impacts of climate change). The main aim of this being to divert development away from areas at risk of flooding. In order to satisfy this requirement, the Council commissioned a Strategic Flood Risk Assessment (Document D23) across the East Suffolk area which considered all sources of flooding, taking into account climate change impacts.

128. Section 4.1.1 of the Strategic Flood Risk Assessment (Document D23) clearly sets out how the Sequential Test is applied. This approach was used by the Council in the Strategic Housing and Economic Land Availability Assessment (Document D10 & D11) and the Sustainability Appraisal (Document A3) which focussed on identifying sites for development and appraising proposed policies in the Local Plan. The Sustainability Appraisal determined if the allocated sites were at risk of flooding, therefore applying the parameters of the Sequential Test.
129. The Policy (SCLP12.60) takes account of the flooding constraints of the site as criterion f) sets out that a Site-specific Flood Risk Assessment is submitted alongside any application and any identified mitigation measures are implemented. Criterion b) states that the north eastern area of the site, which is recorded under Flood Zone 2, should provide a soft edge to the Parkland Setting beyond. Paragraph 12.675 supports criterion b) in suggesting this area should be safeguarded for landscaping and/or drainage.

130. Thus, the Policy has been informed by the Sequential Test through the Sustainability Appraisal (Document A3) and the Policy takes account of the level of flood risk on the site.

Policy SCLP12.61: Land between High Street and Chapel Lane, Pettistree (Adjoining Wickham Market)

Question 3.81

Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

131. Paragraph 1.5 of the Final Draft Local Plan explains that there is an ageing population which will have an impact in terms of the types of housing to be planned for. This is expanded upon, through reference to the Strategic Housing Market Assessment (Documents D15 and D16), in relation to Policy SCLP5.8 on Housing Mix.

132. In planning to meet the needs of older people consideration has not only been given to the type of housing that could meet the needs of older people, principally through Policy SCLP5.8, but also the location of housing for older people with a view to providing opportunities to reduce social isolation and loneliness.

133. The need to reduce social isolation and promote social interaction is contained within policy in the NPPF. Paragraph 91 a) of the NPPF states that:

‘Planning policies should aim to achieve healthy, inclusive and safe places which a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;’

134. The Planning Practice Guidance (Document C2, Housing for Older and Disabled People) was updated in June 2019 to include guidance on Housing for Older and Disabled People. Whilst this specific guidance wasn’t available during the preparation of the Local Plan, it nevertheless is reflective of the approach that has been undertaken through the Final Draft Local Plan. The PPG states that:
Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’ (Paragraph: 001 Reference ID: 63-001-20190626)

135. The PPG goes on to state that:

‘Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.

Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.’ (Paragraph: 012 Reference ID: 63-012-20190626)

In identifying the needs for older people the PPG states that evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can be useful. The Joint Health and Wellbeing Strategy for Suffolk (Document H16) sets an outcome around older people in Suffolk having a good quality of life, and also looks to create resilient communities which can reduce loneliness and isolation.

136. Through the site allocations process, consideration has therefore been given to opportunities to plan for housing in locations which would potentially address isolation and loneliness through locating in areas of activity where there may be opportunities for social interaction. For example, locations which are close to schools, open spaces or other facilities. To maximise the potential for these benefits, relevant site allocations policies contain a reference to provision of housing for older people to ensure that development in such locations has the potential to be attractive to older people. The policies do not limit the housing to catering for older people only, however it would be expected that the design of the development would reflect the potential needs of older people. Paragraph 5.44 of the Final Draft Local Plan provides an explanation and examples of the types of housing that this may involve.

137. Land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market), is on a prominent route into the village, and is located adjacent to a bus stop and to open space on the recent development to the north of the site at Morris Road. Further, Wickham Market has a large range of services and facilities as a Large Village as identified in the Topic Paper: Settlement Hierarchy – Final Draft Local Plan (Document D34). Providing dwellings that would suit the older population, will help to ensure that the development takes advantage of the opportunities provided by these factors to help address social isolation and loneliness.

138. Under criterion a), applicants would be expected to incorporate designs that may suit the lifestyle of the older population. This may include those examples set out under paragraph
5.44 of the Final Draft Local Plan, and the intention behind this paragraph is to provide some guidance in relation to the types of housing that may help to address the needs of the older population. It is not intended to limit occupation of properties to older people.

139. The policy is therefore justified and effective and is sound in respect of this matter.

**Question 3.82**

*Is the provision for the specified area of land for new early years setting justified and if so, should it be specifically identified/safeguarded on the Policies Map?*

140. The Council has engaged extensively with Suffolk County Council on the subject of education, including early years provision. Suffolk County Council have indicated that this development will result in overcapacity in the Wickham Market ward, the relevant early years catchment for this area. Therefore, a new early years setting may be required at this site, subject to capacity at existing early years settings in the catchment when the site comes forward. This is highlighted by the fact that criterion c) requires a new early years setting ‘if needed’. As such, the policy requirement for a new early years setting is justified on this site.

141. It is considered unnecessary to specifically identify an area for a new early years setting on the Policies Map, as this would preferably be decided at planning application stage.

**Question 3.83**

*Would the development criteria be effective in providing a ‘soft gateway’ to Wickham Market or maintaining the separation of Wickham Market and Pettistree?*

142. The site at Land between High Street and Wickham Market, Pettistree (adjoining Wickham Market) was included as a proposed allocation in the First Draft Local Plan (Document B4, page 308-309). Comments received to the First Draft Local Plan as set out in the Consultation Statement for the Suffolk Coastal Local Plan - Regulation 22(c) Statement (Document A10, pages 877 – 881) identified landscape impact and increasing coalescence with Pettistree village as concerns. In taking the allocation forward, the Council therefore strengthened the policy in order to provide confidence that the open space and landscaping will serve to retain the separation of the two settlements and to minimise any landscape impacts.

143. The site is located within Landscape character area N1 Boulge Park and Bredfield Rolling Farmland as set out in the Suffolk Coastal Landscape Character Assessment (Document D20), which extends southwards from Wickham Market (as shown on the maps after page 14 in Document D20). The Landscape Character Assessment states (page 129) that the future expansion of villages should be planned carefully to retain character and settlement patterns.
144. Criterion d) of Policy SCLP12.61 requires ‘provision of approximately 2.15ha open space to create a ‘soft’ and distinctive gateway to Wickham Market, and provide for all ages. Criterion e) of policy SCLP12.61 requires provision of landscaping and creation of a ‘soft’ edge to the southern boundary. Paragraph 12.684 explains that an extensive part of the site would be open space to ensure that the nature and scale of development provides a soft gateway to Wickham Market, a visual buffer to development inside Wickham Market parish and the separation of the distinct communities of Pettistree and Wickham Market.

145. Criteria d) and e) of the Policy would be effective in achieving this by, together, requiring that the area of open space and landscaping is within the southern part of the site. The requirement for this to be ‘approximately’ 2.15ha in size (and for the dwellings to be on ‘approximately 4ha’) provides some flexibility in how this may be accommodated at the planning application stage.

146. The Council acknowledges that, as written, the areas set out for dwellings (approximately 4ha), early years setting (0.1ha) and open space (approximately 2.15ha) equate to 6.25ha, whilst the area of the allocation is stated as 6.15ha in Policy SCLP12.61. This is reflected in the representation from Hopkins Homes and Hopkins & Moore Ltd (Rep ID: 1293). The Council is also aware that representations have been received to the Final Draft Local Plan that maintain concerns around coalescence. The Council would therefore support a modification, as set out below, to address the issues around site areas whilst also clarifying that it is expected that the area of landscaping is expected to be significant and within the southern part of the site. The proposed modification is set out below:

6.15ha of land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market) is identified for the development of approximately 150 dwellings.

Development will be expected to accord with the following criteria:

a) A mix of dwelling types including housing to meet the needs of older people and provision of self-build plots on a developed area of approximately 4ha within in the northern part of the site;

b) Provision of affordable housing on site;

c) Provision of 0.1ha of land for a new early years setting if needed;

d) Provision of approximately 2.15ha a significant area of open space including substantial landscaping, in the southern part of the site, to create a ‘soft’ and distinctive gateway to Wickham Market, and provide for all ages;

e) Provision of open space to provide for all ages;
f) Provision of landscaping and creation of a ‘soft’ edge to the southern boundary of the development;

f) Provision of pedestrian connectivity with footpaths to the north on the B1438;

g) Proportionate archaeological assessment will be required;

h) Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided; and

i) A site-specific Flood Risk Assessment will be required, and any necessary mitigation provided.

Question 3.84
What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Wickham Market Water Recycling Centre?

147. The Council and Anglian Water have entered into a Statement of Common Ground (SoCG) which demonstrates that this site is developable, in line with national planning policy, and that there are no water recycling impediments preventing the site from coming forward. Furthermore, Anglian Water as sewerage undertaker has indicated its commitment to engaging with developers to ensure deliverability of this site through the SoCG.

148. It is considered that this site is developable from a water recycling perspective subject to criterion h) and the modification set out below.

149. Modification to add the following criteria: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity”

Policy SCLP12.62: Land West of Garden Square Rendlesham

Question 3.85
Would criterion a) be effective in safeguarding the operation of the Rendlesham Water Recycling Centre and provide adequate living conditions for future residents of the site?

150. The Council has agreed, through a Statement of Common Ground, with Anglian Water a modification to criterion a) to ensure that evidence is provided to demonstrate that adverse odour impacts are minimised to an acceptable level in the interests of residential amenity as outlined in Policy SCLP11.2 and in line with paragraph 127 of the NPPF. The determination of
151. Modification to criterion a) “Ensure that the risk of odour and other amenity impacts from Rendlesham Water Recycling Centre is not detrimental to residential amenity as set out in Policy SCLP11.2. Evidence should be provided to demonstrate that there is no unacceptable impact on the occupiers of the future dwellings, and that the continuous operation of Rendlesham Water Recycling Centre is not effected. This will require the provision of a suitable Meet the minimum distance from the Water Recycling Centre within which new residential development is considered acceptable as advised by Anglian Water;”

Question 3.86

Is the figure of approximately 50 dwellings at the site justified?

152. The site at Land west of Garden Square, Rendlesham, is allocated under Policy SSP12 in the Site Allocations and Area Specific Policies DPD (Document F2) for 50 dwellings. As planning permission for the site has not been granted, the allocation is carried forward into the new Suffolk Coastal Local Plan. The supporting text to the adopted policy (Document F2, page 46, paragraph 2.95) describes the constraints in Rendlesham in terms of highways and the capacity of the local road network.

153. Infrastructure capacity has been revisited as part of the preparation of the new Local Plan, and this has demonstrated that education capacity also represents a current constraint on growth in Rendlesham. The infrastructure capacity in Rendlesham has been considered in combination with Policy SCLP12.63 Land east of Redwald Road, Rendlesham, which is also allocated for 50 dwellings under policy SSP13 of the Site Allocations and Area Specific Policies DPD (Document F2).

154. Paragraph 12.722 of the supporting text to Policy SCLP12.62 explains the position in relation to education capacity. Suffolk County Council’s representation to the policy (Rep ID: 1102) reaffirms this position and explains that the primary school is very close to capacity and unable to expand. Their representation explains that the allocations are only acceptable because proposals to increase primary provision elsewhere may result in fewer pupils attending Rendlesham from other places and that the County Council would not support a higher level of growth in Rendlesham.

155. Paragraph 2.95 of the Site Allocations and Area Specific Policies DPD (Document F2) refers to the capacity of the highways network. Melton crossroads has been considered further through the transport modelling as set out in Local Plan Modelling for Babergh & Mid Suffolk, Ipswich and Suffolk Coastal – Forecasting Report – Volume 2 – Ipswich and Suffolk Coastal Preferred Option (Document D32). The transport modelling identifies Melton crossroads as
an area which would experience congestion, as explained on pages 18-19, and therefore a detailed junction assessment has been carried out. The analysis is set out in Appendix B (page 7 – 9) and explains that whilst there are potential measures to optimise the junction, some capacity issues would remain.

156. The Sustainability Appraisal (Document A2, chapter Appendix D), in considering potential alternative site allocations, has taken into account the capacity issues at Melton crossroads and explains that the area around the Deben peninsula is not the focus for additional growth in the strategy of the new Local Plan.

157. Due to the infrastructure capacity issues referred to above, the policy is therefore justified in allocating the site for approximately 50 dwellings.

Policy SCLP12.63: Land East of Redwald Road, Rendlesham

Question 3.87

Where is the evidence that the Policy has been subject to Habitats Regulations Assessment screening?

158. As confirmed by paragraph 3.14 of the Habitats Regulations Assessment of the Suffolk Coastal Local Plan- Supplementary Note (Document H27), policy SCLP12.63 has been subject to Habitats Regulations Assessment.

159. Paragraph 3.11 of the Habitats Regulations Assessment Report (Document A4) confirms each allocation was checked individually as part of the screening process. The results of this are set out in table 3 on pages 27-46 of the Habitats Regulations Assessment Report (Document A4). Those sites within 1-13km were grouped together in the screening table and policy SCLP12.63 is included within the penultimate row of the screening table on page 46 (‘Housing site allocations over 1km but within 13km from a European site boundary’).

160. Further explanation of this approach is set out in the Habitats Regulations Assessment of the Suffolk Coastal Local Plan- Supplementary Note (Document H27).
Policy SCLP12.64: Land opposite The Sorrel Horse, The Street, Shottisham

Question 3.88

Given the stated stance of the shareholders of the Sorrel House in representations, is the site deliverable or developable within the plan period?

161. The site at Land opposite The Sorrel Horse, The Street, Shottisham, is allocated under Policy SSP15 in the Site Allocations and Area Specific Policies DPD (Page 54, Document F2) for approximately 10 dwellings. The Site Allocations and Area Specific Policies Development Plan Document (Document F2) was duly examined by an independent inspector, considered ‘sound’, and subsequently adopted on 26 January 2017.

162. The most recent land owner availability submission as part of the production of the Housing Land Supply Statement (Document H20) details that there are no current plans to submit a planning application and this position is reflected in Appendix D of the Plan (Page 465, Document A1), where the site is expected to be delivered outside the first 5 years of the Plan period.

163. The site lies in a relatively central location in respect of the Settlement pattern and is directly opposite the Sorrel Horse Public House, enabling easy pedestrian access to the village centre. The provision of 30 car parking spaces as set out in the Policy (SCLP12.64) is intended to alleviate car parking issues in the village and was identified via community engagement through the Site Allocations and Area Specific Policies DPD (Document F2). Suffolk County Council through their representation to the Final Draft Local Plan (Rep ID: 1119) stated that vehicular access could be provided. For these reasons the site allocation is situated in a suitable location.

164. Furthermore, the Whole Plan Viability Report (Document D38) considers the viability of growth in the rural areas and having tested a range of different housing scenarios has found the strategy to support the rural areas with some housing growth to be viable (Pages 80-90, Document D38). Document D38 also considers housing developments on greenfield sites in medium values zones, the value zone that Shottisham occupies, above densities of 23 dwellings per hectare to be viable. Thus, as the delivery of a policy compliant scheme will deliver a density over 23 dwellings per hectare the Council is confident the site can be viably delivered in a policy compliant manner.

165. The Council has also entered into a Statement of Common Ground (SoCG) with Anglian Water to address concerns raised by the shareholders of Sorrel Horse regarding the sewerage network. The SoCG includes the following modification to criterion i) of the Policy to clarify that a connection to a sewage treatment plant is required, unless it can be demonstrated...
otherwise on the grounds of viability and feasibility: “Developers will need to address a significant off-site sewerage requirement to provide foul water connections. Risks posed by septicity of pumped connection will need to be addressed provide connection to a public sewage treatment plant unless it can be demonstrated that it is not feasible or viable. A foul drainage strategy will need to be approved and implemented prior to the development connecting to the sewerage system, if it is deemed viable to do so.”

166. For the reasons stated above the Council has concluded that the site occupies a suitable location for housing development, will be available and could be viably developed at the point envisaged and thus that the site is developable as per the definitions of the Framework.

**Question 3.89**

*Where is the evidence that the Policy has been subject to Habitats Regulations Assessment screening?*

167. As confirmed by paragraph 3.14 of the Habitats Regulations Assessment of the Suffolk Coastal Local Plan- Supplementary Note (Document H27), policy SCLP12.64 has been subject to Habitats Regulations Assessment.

168. Paragraph 3.11 of the Habitats Regulations Assessment Report (Document A4) confirms each allocation was checked individually as part of the screening process. The results of this are set out in table 3 on pages 27-46 of the Habitats Regulations Assessment Report (Document A4). Those sites within 1-13km were grouped together in the screening table and policy SCLP12.64 is included within the penultimate row of the screening table on page 46 (‘Housing site allocations over 1km but within 13km from a European site boundary’).

169. Further explanation of this approach is set out in the Habitats Regulations Assessment of the Suffolk Coastal Local Plan- Supplementary Note (Document H27).

**Policy SCLP12.65: Land off Howlett Way, Trimley St Martin**

**Question 3.90**

*Paragraph 12.740. Is the site allocated in Felixstowe Peninsula Area Action Plan?*

170. Yes – the site is allocated as Policy FPP7 in the Felixstowe Peninsula Area Action Plan which was adopted by the Council in January 2017.

171. The reference to the Site Allocations and Area Specific Policies Development Plan Document in paragraph 12.740 of the Final Draft Local Plan (Document A1) is incorrect and should be amended to reference the correct document. The following wording should replace the first
sentence in paragraph 12.740 “This allocation is carried forward from the Felixstowe Peninsula Area Action Plan Document (January 2017).”

**Question 3.91**

Where is the evidence that the Policy has been subject to Habitats Regulations Assessment screening?

172. As confirmed by paragraph 3.14 of the Habitats Regulations Assessment of the Suffolk Coastal Local Plan- Supplementary Note (Document H27), policy SCLP12.65 has been subject to Habitats Regulations Assessment.

173. Paragraph 3.11 of the Habitats Regulations Assessment Report (Document A4) confirms each allocation was checked individually as part of the screening process. The results of this are set out in table 3 on pages 27-46 of the Habitats Regulations Assessment Report (Document A4). Those sites within 1-13km were grouped together in the screening table and policy SCLP12.65 is included within the penultimate row of the screening table on page 46 (‘Housing site allocations over 1km but within 13km from a European site boundary’).

174. Further explanation of this approach is set out in the Habitats Regulations Assessment of the Suffolk Coastal Local Plan- Supplementary Note (Document H27).

**Policy SCLP12.66: Land adjacent to Reeve Lodge, High Road, Trimley St Martin**

**Question 3.92**

Is the site boundary as defined justified in regard to the rear of properties on High Road?

175. The Council acknowledge that the site boundary on the eastern edge is drawn incorrectly as seen on page 390 and on Inset Map 71 found on page 609 of the Final Draft Local Plan (Document A1). The Council consider this error to be a typographical/mapping error and not one which raises any issues in relation to the soundness of the Local Plan.

176. The site boundary should be corrected to follow the rear boundary of the properties on High Road. See revised map in modifications at end of Statement.
Question 3.93

Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

177. Paragraph 1.5 of the Final Draft Local Plan explains that there is an ageing population which will have an impact in terms of the types of housing to be planned for. This is expanded upon, through reference to the Strategic Housing Market Assessment (Documents D15 and D16), in relation to Policy SCLP5.8 on Housing Mix.

178. In planning to meet the needs of older people consideration has not only been given to the type of housing that could meet the needs of older people, principally through Policy SCLP5.8, but also the location of housing for older people with a view to providing opportunities to reduce social isolation and loneliness.

179. The need to reduce social isolation and promote social interaction is contained within policy in the NPPF. Paragraph 91 a) of the NPPF states that:

‘Planning policies should aim to achieve healthy, inclusive and safe places which a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;’

180. The Planning Practice Guidance (Document C2, Housing for Older and Disabled People) was updated in June 2019 to include guidance on Housing for Older and Disabled People. Whilst this specific guidance wasn’t available during the preparation of the Local Plan, it nevertheless is reflective of the approach that has been undertaken through the Final Draft Local Plan. The PPG states that:

‘Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’ (Paragraph: 001 Reference ID: 63-001-20190626)

181. The PPG goes onto state that:

‘Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.

Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own
home for as long as possible, or to move to more suitable accommodation if they so wish.’

(Paragraph: 012 Reference ID: 63-012-20190626)

In identifying the needs for older people the PPG states that evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can be useful. The Joint Health and Wellbeing Strategy for Suffolk (Document H16) sets an outcome around older people in Suffolk having a good quality of life, and also looks to create resilient communities which can reduce loneliness and isolation.

182. Through the site allocations process, consideration has therefore been given to opportunities to plan for housing in locations which would potentially address isolation and loneliness through locating in areas of activity where there may be opportunities for social interaction. For example, locations which are close to schools, open spaces or other facilities. To maximise the potential for these benefits, relevant site allocations policies contain a reference to provision of housing for older people to ensure that development in such locations has the potential to be attractive to older people. The policies do not limit the housing to catering for older people only, however it would be expected that the design of the development would reflect the potential needs of older people. Paragraph 5.44 of the Final Draft Local Plan provides an explanation and examples of the types of housing that this may involve.

183. Land adjacent to Reeve Lodge, High Road, Trimley St Mary, is on a prominent route in to the village and the site itself will include the development of a new primary school. The policy also requires the provision of pedestrian and cycle links including to the surrounding countryside and AONB. Providing dwellings that would suit the older population, will help to ensure that the development takes advantage of the opportunities provided by these factors to help address social isolation and loneliness.

184. Under criterion a), applicants would be expected to incorporate designs that may suit the lifestyle of the older population. This may include those examples set out under paragraph 5.44 of the Final Draft Local Plan, and the intention behind this paragraph is to provide some guidance in relation to the types of housing that may help to address the needs of the older population. It is not intended to limit occupation of properties to older people.

185. The policy is therefore justified and effective and is sound in respect of this matter.

**Question 3.94**

_Is the provision for specified areas for future school expansion and drop off point and new early years setting justified and if so, should they be specifically identified/safeguarded on the Policies Map?_

186. The Inspector’s question 3.94 refers to future school expansion and a drop off point for this site, however, the Council would like to clarify that Policy SCLP12.66 for this site clearly
includes a requirement for ‘Provision of 2.2ha of land for a primary school’ and not provision for future school expansion and/or a drop off point, as inferred in the Inspector’s question. Please refer to criterion c) of the Policy for evidence of this.

187. The Council has engaged extensively with Suffolk County Council, the lead education provider in Suffolk, in accordance with paragraph 94 of the NPPF in order to identify and address issues relating to school places across the District. This engagement focussed on school catchment areas and pupil capacity of schools to assess the impact of proposed development on the existing primary schools and to allocate land for expansion or new provision, accordingly. Added to this, both Suffolk County Council (Rep ID: 1122) and the Department for Education (Rep ID: 954) have demonstrated support for a new primary school at this site in their representations. In this respect, provision of a new primary school at this site is justified.

188. In terms of early years provision, Suffolk County Council have indicated that this development will result in overcapacity in the Trimleys ward, the relevant early years catchment for this area. Therefore, a new early years setting will be required at this site. Given the inclusion of a new primary school within this policy, Suffolk County Council have suggested that this site is a prime location for a new early years setting due to the potential for co-location with the new primary school. Considering this, a new early years setting is justified on this site.

189. Suffolk County Council, in their representation (Rep ID: 1124), suggested a modification to criterion c) of this policy to remove reference to a certain amount of land for early years provision as it is deemed to be too prescriptive. The modification below to criterion c) has been agreed as part of the Statement of Common Ground between the Council and Suffolk County Council in order to address this.

190. Modification to criterion c): “Provision of 2.2ha of land for a primary school including and 0.1ha of land for early years provision;”

Question 3.95
What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Kirton Water Recycling Centre?

191. The Council and Anglian Water have entered into a Statement of Common Ground (SoCG) which demonstrates that this site is developable, in line with national planning policy, and that there are no water recycling impediments preventing the site from coming forward. Furthermore, Anglian Water as sewerage undertaker has indicated its commitment to engaging with developers to ensure developability of this site through the SoCG.
192. Added to this, the Council and Anglian Water have come to the determination that this site drains to Felixstowe water recycling centre, where the Cross Boundary Water Cycle Study identifies capacity limitations. As such, it is considered that this site is developable from a water recycling perspective subject to criterion e) and the modifications set out below.

193. Modification to add the following criteria: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity”

194. Modification to paragraph 12.768: “Development proposals at Trimley St Martin should have regard to the findings of the Suffolk Coastal & Ipswich Cross Boundary Water Cycle Study which indicates capacity treatment limitations at Kirton Felixstowe Water Recycling Centre.”

**Question 3.96**

*What is the purpose of criterion j) and would it be effective?*

195. Criterion j) is intended to ensure people living in, working in and visiting the area maintain easy access to the countryside, in order to deliver on one of the Plan’s objectives for supporting a healthy population as set out in the Plan’s Vision for Suffolk Coastal 2018-2036 (Page 23, Document A1) and the fourth paragraph of Policy SCLP3.5: Infrastructure Provision (Page 56, Document A1). This is consistent with national policy through paragraphs 91 and 98 of the NPPF (Document C1) in supporting healthy lifestyles, encouraging walking and cycling, and enhancing public rights of way through new connections to such rights of way.

196. Another objective of the Plan is to ensure the important natural environment of the Suffolk Coast is preserved and enhanced where possible, as is detailed in the Vision for Suffolk Coastal 2018-2036. These two objectives need to be carefully considered as in certain situations conflicting priorities can arise. In this case, access to the wider countryside while beneficial in respect of supporting healthy and active lifestyles can lead to recreational impacts on nearby European Sites, namely the Stour and Orwell Estuaries SPA and Ramsar Site. Thus, The Policy (SCLP12.66) carefully considers the needs of both the natural environment and the amenity of future residents, which is reflected in the array of criteria intent on achieving these objectives within the Policy (SCLP12.66). Criteria d), e), f), g) and j) all contribute to ensuring the aforementioned objectives are achieved.

197. However, criterion j) as currently written extends the provision of pedestrian and cycle links beyond the site boundary and to the AONB which lies approximately 340m from the site boundary. The Council considers the extension beyond a connection/s to the existing public rights of way might adversely affect the rural undeveloped character of the countryside particularly in relation to the provision of cycle links. Thus, in order to deliver healthy lifestyles and protect the natural environment the Council would support the following modification: “j) Provision of pedestrian/cycle links through from the site, including connectivity into the surrounding countryside and AONB,”
Question 3.97

Where is the evidence that the Policy has been subject to Habitats Regulations Assessment screening?

198. As confirmed by paragraph 3.14 of the Habitats Regulation Assessment- Supplementary Note (Document H27), policy SCLP12.66 has been subject to Habitats Regulations Assessment.

199. Paragraph 3.11 of the Habitats Regulations Assessment Report (Document A4) confirms each allocation was checked individually as part of the screening process. The results of this are set out in table 3 on pages 27-46 of the Habitats Regulations Assessment Report (Document A4). Those sites within 1-13km were grouped together in the screening table and policy SCLP12.66 is included within the penultimate row of the screening table on page 46 (‘Housing site allocations over 1km but within 13km from a European site boundary’).

200. Further explanation of this approach is set out in the Habitats Regulation Assessment-Supplementary Note (Document H27).

Policy SCLP12.67: Land off Keightley Way, Tuddenham

Question 3.98

In respect of access and potential effects on the wider highway network is the Policy justified?

201. The Council have liaised closely with Suffolk County Council, as Highways Authority, during production of the Plan. The ability to achieve access to a site has initially been considered through the Strategic Housing and Economic Land Availability Assessment as part of the methodology for determining the potential suitability of a site (Document D10, page 53). In relation to Land off Keightley Way, Tuddenham, this identified that there is an existing access and that visibility is good (page 551). The Consultation Statement for the Suffolk Coastal Local Plan – Regulation 22(c) Statement (Document A10, page 906) shows that Suffolk County Council commented on the First Draft Local Plan that a link with existing footways on Keightley Way and links to local amenities should be provided where feasible, and that cumulative traffic impact from this site and Ipswich Garden Suburb should be considered.

202. The cumulative impacts of this allocation on the highways network, along with other growth in the Ipswich Strategic Planning Area, has been assessed through the transport modelling. The Local Plan Modelling for Babergh & Mid Suffolk, Ipswich and Suffolk Coastal – Methodology Report sets out the sites that have been included in the modelling (Document D31, Appendix D). The results of the Transport Modelling, whilst highlighting cumulative
impacts on junctions in and around Ipswich (Document D32, page 31-34), does not identify any specific capacity issues in the immediate area around Tuddenham.

203. The Infrastructure Delivery Framework contained in Appendix B of the Final Draft Local Plan (Document A1, page 452) identified the access related infrastructure requirements associated with Land off Keightley Way, Tuddenham.

204. It is therefore concluded that the policy is justified in respect of access and potential effects on the wider highway network as these have been assessed as part of the preparation of the Plan in order to inform an appropriate strategy.

Policy SCLP12.69: Land West of the B1125, Westleton

Question 3.99
In the context of the proposed community led housing schemes, is the scale of development proposed at Westleton justified?

205. Representations to Policy SCLP12.69 and SCLP12.70 of the Final Draft Local Plan (Document A1) indicate that two community led housing schemes are being progressed, one for 20 dwellings at Glebe Meadows (Site 877, Page 110, Document D13) and another for 10-15 affordable houses to be developed by Hastoe Housing Association at Heath View.

206. The Glebe Meadows Community Interest Company sought pre-application advice from Suffolk Coastal District Council in January 2019. Since then an application for planning permission has been submitted to East Suffolk Council dated 16/07/2019 for the development of 20 dwellings and change of use of 1 no. existing dwelling (The Vicarage) into a communal social hub, although it is yet to be validated (Ref: DC/19/2839/FUL). This gives a strong indication of the willingness of Glebe Meadows Community Interest Company to bring forward the proposed development. The Glebe Meadows site occupies a central location within the village adjacent to the Church of St. Peter, albeit half of the site submitted in the aforementioned planning application (Ref: DC/19/2839/FUL) is outside the settlement boundary and would thus constitute development in the countryside. Furthermore, the Council cannot make a judgement as to the viability of the scheme. Thus, the Council cannot consider the site to be developable.

207. The most recent publicly available Westleton Parish Council minutes, dated 24/06/2019, details that meetings are ongoing with Hastoe Housing Association as to an affordable housing scheme at Heath View, however, the current progress of the scheme towards delivery is unknown. Thus, the availability of the land, the envisaged time of delivery and the viability of an affordable housing scheme are all unknown to the Council and as such the Council cannot judge the scheme to be developable. In this regard, the potential scheme should not be considered to realistically affect the overall scale of development likely to come
forward in the village. Moreover, while this potential scheme would help to deliver affordable housing to meet the locally identified need of 10-15 affordable dwellings, as identified in Westleton Parish Council’s representation to the Final Draft Local Plan (Rep ID: 136), the two proposed site allocations (Policies SCLP12.69 and SCLP12.70) would deliver approximately 12 affordable dwellings thereby helping to meet local affordable housing need as well as the wider housing need through open market housing. It would be for the proponents of this community led scheme to demonstrate a need for a further 10-15 affordable dwellings, in addition to that provided for in the proposed site allocations (Policies SCLP12.69 and SCLP12.70) and the scale of development in the village that would result.

208. In light of the above, the scale of developable housing developments in Westleton would be approximately 35 dwellings, which equates to that coming forward from the two proposed site allocations (Policy SCLP12.69 and Policy SCLP12.70). Appendix D to the Final Draft Local Plan (Document A1) indicates that Policies SCLP12.69 and SCLP12.70 are expected to be completed by the end of 2026. The Council considers that the developable housing sites in Westleton (Policies SCLP12.69 and SCLP12.70) would constitute a scale of development (approximately 35 dwellings) in accordance with the character of Westleton and with the sustainability status of Westleton as a small village.

209. Due to the developability of the proposed site allocations (Policies SCLP12.69 and SCLP12.70) and the uncertainty surrounding potential community led housing, any housing proposals additional to the developable site allocations (Policies SCLP12.69 and SCLP12.70) should consider and justify the resultant scale of development in Westleton.

**Question 3.100**

*Is the provision of dwellings designed to meet the needs of the older population justified and would the policy be effective in this regard?*

210. Paragraph 1.5 of the Final Draft Local Plan explains that there is an ageing population which will have an impact in terms of the types of housing to be planned for. This is expanded upon, through reference to the Strategic Housing Market Assessment (Documents D15 and D16), in relation to Policy SCLP5.8 on Housing Mix.

211. In planning to meet the needs of older people consideration has not only been given to the type of housing that could meet the needs of older people, principally through Policy SCLP5.8, but also the location of housing for older people with a view to providing opportunities to reduce social isolation and loneliness.

212. The need to reduce social isolation and promote social interaction is contained within policy in the NPPF. Paragraph 91 a) of the NPPF states that:
‘Planning policies should aim to achieve healthy, inclusive and safe places which a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;’

213. The Planning Practice Guidance (Document C2, Housing for Older and Disabled People) was updated in June 2019 to include guidance on Housing for Older and Disabled People. Whilst this specific guidance wasn’t available during the preparation of the Local Plan, it nevertheless is reflective of the approach that has been undertaken through the Final Draft Local Plan. The PPG states that:

‘Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’ (Paragraph: 001 Reference ID: 63-001-20190626)

214. The PPG goes onto state that:

‘Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.

Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.’ (Paragraph: 012 Reference ID: 63-012-20190626)

In identifying the needs for older people the PPG states that evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can be useful. The Joint Health and Wellbeing Strategy for Suffolk (Document H16) sets an outcome around older people in Suffolk having a good quality of life, and also looks to create resilient communities which can reduce loneliness and isolation.

215. Through the site allocations process, consideration has therefore been given to opportunities to plan for housing in locations which would potentially address isolation and loneliness through locating in areas of activity where there may be opportunities for social interaction. For example, locations which are close to schools, open spaces or other facilities. To maximise the potential for these benefits, relevant site allocations policies contain a reference to provision of housing for older people to ensure that development in such locations has the potential to be attractive to older people. The policies do not limit the housing to catering for older people only, however it would be expected that the design of the development would
reflect the potential needs of older people. Paragraph 5.44 of the Final Draft Local Plan provides an explanation and examples of the types of housing that this may involve.

216. Land west of the B1125, Westleton, is on a prominent route in to the village, and is located close to Westleton Common. Providing dwellings that would suit the older population, will help to ensure that the development takes advantage of the opportunities provided by these factors to help address social isolation and loneliness.

217. Under criterion a), applicants would be expected to incorporate designs that may suit the lifestyle of the older population. This may include those examples set out under paragraph 5.44 of the Final Draft Local Plan, and the intention behind this paragraph is to provide some guidance in relation to the types of housing that may help to address the needs of the older population. It is not intended to limit occupation of properties to older people.

218. The policy is therefore justified and effective and is sound in respect of this matter.

**Question 3.101**

*What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Westleton Water Recycling Centre?*

219. The Council and Anglian Water have entered into a Statement of Common Ground (SoCG) which demonstrates that this site is deliverable, in line with national planning policy, and that there are no water recycling impediments preventing the site from coming forward. Furthermore, Anglian Water as sewerage undertaker has indicated its commitment to engaging with developers to ensure deliverability of this site through the SoCG.

220. It is considered that this site is deliverable from a water recycling perspective subject to criterion h) and a modification to include the following additional criterion: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity”

**Question 3.102**

*Would criterion e) be effective in safeguarding the characteristics of Westleton Common County Wildlife Site?*

221. The western boundary of the County Wildlife Site (CWS), opposite to the site proposed for allocation in policy SCLP12.69, is largely wooded before opening out into a more open mosaic of habitats further to the south.

222. Westleton Common CWS is comprised of a diverse mosaic of remnant and naturally regenerated heathland, acid grassland, scrub, woodland, early successional/ruderal vegetation communities and bare ground. The development of these habitats has been
heavily influenced by the site’s history of gravel extraction which dates back to at least the 1880s, continuing until the 1960s. Following the cessation of large scale gravel extraction, no formal ‘restoration’ of the quarried areas took place. This has resulted in the steep sides of the pits remaining, along with damp areas of former washing pits, a bank of washed sand, bare ground and hard standings.

223. Development of the allocation site would not result in any direct impact on the County Wildlife Site as they are separated by Reckford Road. The below proposed modification to criterion e) of the policy (alongside criterion d)) would allow a landscaping scheme and biodiversity enhancements to be secured which would extend the habitats characteristic of the CWS thorough the development.

224. The Suffolk Wildlife Trust through their representation (Rep ID: 688) to the Final Draft Local Plan raised concerns that the Policy (SCLP12.69) as currently worded does not make appropriate consideration of the potential impacts on Westleton Common CWS. The Council would therefore support a modification, as set out below, to address this. The proposed modification to criterion e) of the Policy (SCLP12.69) is set out below: “An ecological assessment, including assessment of impacts on Westleton Common County Wildlife Site must accompany any planning application. Alongside any mitigation measures required, development should provide for biodiversity enhancements, in line with the characteristics of Westleton Common County Wildlife Site.”

225. The above modification has been proposed by the Suffolk Wildlife Trust through its representation (Rep ID: 688) against the Final Draft Local Plan and agreed between the Council and the Suffolk Wildlife Trust through a Statement of Common Ground.

**Question 3.103**

*Is there any reason that the proposed allocation would not be deliverable or developable as per the definitions in the Framework?*

226. The site is identified to come forward from year 5 of the housing land trajectory set out in Appendix D to the Final Draft Local Plan (Document A1). In terms of the NPPF, paragraph 67a) states that planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period (Document C1, page 18). The definition for a deliverable site is set out in the Glossary of the NPPF (Page 66) which states that “to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years”.

227. Savills, acting on behalf of the landowner, made representations to the First Draft Local Plan (Rep ID: 2225) and the Final Draft Local Plan (Rep ID: 1298) confirming the availability of the land for residential development. Thus, at the most recent consultation period, the Final Draft
Local Plan consultation, Savills has noted the landowner’s continued desire to bring the site forward for residential development. The Council is therefore satisfied that the site is available now.

228. The Strategic Housing and Economic Land Availability Assessment (SHELAA) (Document D10) acts as the initial piece of work identifying potentially suitable sites to take forward for further suitability assessment. The holistic criteria used to assess all sites can be seen in the methodology section of the SHELAA (Page 9, Document D10). Through the SHELAA the site (site reference number: 554) has been assessed to be suitable subject to certain mitigation measures against a thorough and robust SHELAA methodology, as can be seen in the Site 554 Assessment Form (Page 613, Document D10). The Sustainability Assessment (SA) (Page 164, Document A4) concludes that the proposed site allocation (SCLP12.69) is a suitable location for residential development that is consistent with the Local Plan strategy for growth in support of the rural areas of the District. The SA also states that while certain constraints have been identified, through the SHELAA and community engagement, these identified constraints should not preclude development but act to ensure high quality design acknowledges the constraints and seeks appropriate mitigation measures. As an aside the SHELAA has assessed the site in its submitted form, which is that present in the First Draft Local Plan (Page 327, Document B4), which encompasses a larger site area than that proposed in Policy SCLP12.69 of the Final Draft Local Plan (Page 400, Document A1).

229. The aforementioned Savills representations made on behalf of the landowner conclude that the site is deliverable, economically viable and that there are no known technical constraints that would make the development of the site difficult or unacceptable. Savills also state that they would be able to progress the development of the site, through identifying a suitable development partner, as soon as the site is accepted as a site allocation. The delivery of approximately 20 dwellings would result in a density of approximately 28 dwellings per hectare. The Whole Plan Viability Report concludes densities of over 23 dwellings per hectare in mid value zones, which Westleton occupies, would be viable (Paragraph ES19, Page 11, Document D38). Therefore, the Council is satisfied that there is clear evidence that housing completions will begin on site within five years.

230. For the above reasons the Council has concluded that the site is available now, is a suitable location for development now, and there is a realistic prospect that housing will be delivered on site within 5 years and thus that the site is deliverable.
Policy SCLP12.70: Land at Cherry Lee, Darsham Road, Westleton

Question 3.104

What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Westleton Water Recycling Centre?

231. The Council and Anglian Water have entered into a Statement of Common Ground (SoCG) which demonstrates that this site is developable, in line with national planning policy, and that there are no water recycling impediments preventing the site from coming forward. Furthermore, Anglian Water as sewerage undertaker has indicated its commitment to engaging with developers to ensure developability of this site through the SoCG.

232. It is considered that this site is developable from a water recycling perspective subject to criterion g) and the modification set out below.

233. Modification to add the following criteria: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity”

Question 3.105

Is there any reason that the proposed allocation would not be deliverable or developable as per the definitions in the Framework?

234. The site is identified to come forward from year 7 of the housing land trajectory set out in Appendix D to the Final Draft Local Plan (Document A1). In terms of the NPPF, paragraph 67b) states that planning policies should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 of the plan (Document C1, page 18). The definition for a developable site is set out in the Glossary of the NPPF (Page 66) which states that “to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.

235. Page 610 of the Strategic Housing and Economic Land Availability Assessment (SHELAA) (Document D10) details that the site has been made available for residential development and that the site is estimated to commence in 2023/24. Evolution Town Planning Ltd, on behalf of the landowner, has made representations to both the First Draft Local Plan (Rep ID: 2271) and the Final Draft Local Plan (Rep ID: 1351 & 1352). These representations demonstrate the landowner’s continued desire to bring the site forward for residential development.
236. The Strategic Housing and Economic Land Availability Assessment (SHELAA) (Document D10) acts as the initial piece of work identifying potentially suitable sites to take forward for further suitability assessment. The holistic criteria used to assess all sites can be seen in the methodology section of the SHELAA (Page 9, Document D10). The SHELAA assesses the site (site reference: 371) to be potentially suitable subject to certain mitigation measures against a thorough and robust SHELAA methodology, as can be seen in the Site 554 Assessment Form (Page 610, Document D10). The Sustainability Assessment (SA) (Page 165, Document A4) concludes that the proposed site allocation (SCLP12.70) is a suitable location for residential development that is consistent with the Local Plan strategy for growth in support of the rural areas of the District. The SA also states that while certain constraints have been identified, through the SHELAA and community engagement, these identified constraints should not preclude development but act to ensure high quality design acknowledges the constraints and seeks appropriate mitigation measures.

237. The representations made by Evolution Town Planning Ltd, on behalf of the landowner, to the Final Draft Local Plan support the allocation and state that development of approximately 15 dwellings could be delivered. It should therefore be understood that a development of approximately 15 dwellings could be viably developed at the point envisaged, as estimated in the housing land trajectory (Appendix D to the Final Draft Local Plan) to commence in 2023/24 (Page 495, Document A1).

238. For the reasons stated above the Council has concluded that the site occupies a suitable location for housing development, will be available and could be viably developed at the point envisaged and thus that the site is developable.

Policy SCLP12.72: Land at Street Farm, Witnesham (Bridge)

Question 3.106

Is the allocation of land for housing including an area of Flood Zone 3 justified in terms of the sequential test?

239. It must be noted that this allocation was reviewed and carried forward from the Site Allocations and Area Specific Policies Development Plan Document (Document F2).

240. National policy, as set out in the NPPF, requires a sequential, risk-based approach to the location of development as part of plan preparations (taking into account the impacts of climate change). The main aim of this being to divert development away from areas at risk of flooding. In order to satisfy this requirement, the Council commissioned a Strategic Flood Risk Assessment (Document D23) across the East Suffolk area which considered all sources of flooding, taking into account climate change impacts.
241. Section 4.1.1 of the Strategic Flood Risk Assessment (Document D23) clearly sets out how the Sequential Test is applied. This approach was used by the Council in the Sustainability Appraisal (Document A3) which focussed on appraising proposed policies in the Local Plan. The Sustainability Appraisal analysed the flood risk of allocated sites, therefore applying the parameters of the Sequential Test.

242. In the case of this allocation, a small portion of the northern part of the site lies within Flood Zone 3 (see Figure below). In recognition of this, criterion i) does not allow for development in this part of the site in order to ensure no impediments to flows are introduced that could increase the risk of flooding downstream. This is consistent with national policy which requires land to be safeguarded from development if it is likely to be required for future flood management. The Sustainability Appraisal (Document A3, page 641) also identifies criterion i) as a positive effect as it avoids development in Flood Zone 3. Section 4.7 and Appendix B of the Water Cycle Study (Document D24) highlights the need for a site-specific Flood Risk Assessment to be undertaken at this site which is translated to criterion a) of the policy.

243. The Council proposes the following modification to amend criterion i) of the policy to bring the policy in line with national planning policy regarding the impediment of flows in flood risk zones: “i) Any development within the area identified as Flood Zone 3 should be avoided to
ensure no other impediments to flows are introduced that could increase the risk of flooding downstream; and”.

244. The Council also proposes a modification to delete criterion d) as criterion a) is considered sufficient to fulfil the need for a flood risk assessment on this site due to the presence of an area of Flood Zone 3 on the site: “d) Flood risk assessment will be required.”

Question 3.107

The proposed allocation boundary appears to exclude certain farm buildings. Is the Policy justified in not addressing the future of these structures given the uncertainty they present for the living conditions of future occupiers of any dwellings at the site, or on the continued use of the adjacent land for agricultural purposes?

245. Policy SCLP11.2 Residential Amenity would require that consideration is given to the amenity of future occupiers of the dwellings. It would not be appropriate for the policy to set requirements related to the buildings which are outside of the site allocation boundary. In order to also acknowledge the potential for amenity issues related to uses on the adjoining land, as well as the structures, paragraph 12.831 could be subject to a modification, as set out below:

“12.831 This site of 0.7ha comprises a largely disused farm complex on the edge of Witnesham (Bridge). Given the exclusion of agricultural buildings on land to the south, the layout of the development will need to give consideration to the amenity of future occupiers under Policy SCLP11.2. The farmhouse, a Listed Building, is still occupied. Land south of Hall Road and The Street which includes this site, lies within the River Fynn Valley – a landscape of attractive and distinctive character. Suffolk County Council Archaeology notes that due to the site’s location on the south bank of the River Fynn, an archaeological investigation will be required. A small section of the site along its northern boundary where it borders the River Fynn is within Flood Zone 3. Any development within Flood Zone 3 is to be avoided having the highest potential risk from flooding. The Environment Agency have confirmed that a flood risk assessment will be required as part of any planning application. Anglian Water have confirmed they have no objection to the allocation of this site. Existing access to the site is narrow and directly onto a bend in the road (B1077). Use of the existing access may need to be re-assessed or may otherwise act as a limit to numbers of new dwellings it can serve.”
## Suggested Modifications

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| 3.34             | Paragraph 12.384 (MIQ3.49) | New paragraph after 12.384:  
“Whilst it may be possible to deliver some employment development from existing junctions in their current form, provision for access via an all-movement A14 junction must be achieved early in the development. Any planning permission for the site will need to include measures to guarantee early delivery of all-movement A14 access in order to avoid unacceptable significant impacts on the strategic or local highway networks.” |
|                  |                    | Reason |
|                  |                    | To ensure policy is effective in relation to delivery of the access. |
| 3.35             | Paragraph 12.395 (MIQ3.49) | Amend paragraph 12.395 to read:  
“Development is not expected to come forward all at once and therefore will be phased over the plan period and beyond 2036 if delivery is slower than anticipated. Infrastructure delivery must be phased to ensure comprehensive delivery of the site. It is essential that the landscaping and environmental improvements are undertaken up front to ensure that the impact of future development is minimised accordingly. The scale of the development will be kept under review by the |
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<td>Council in conjunction with representatives from the economic sector (such as Port of Felixstowe, warehousing and haulage companies) and the landowners and may be subject to review in future Local Plans if delivery is faster or slower than forecast.”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.36</td>
<td>Policy SCLP12.35 (MIQ 3.49)</td>
<td>Amend second paragraph of SCLP12.35 to read: “Dedicated Access from the A14 at the western end of the site making use of existing junctions and utilising land south of the A14 is required to provide vehicular access to the site in both an easterly and westerly direction. Any planning permission for the site must include a requirement to ensure early delivery of this access, to ensure that the site is phased in an effective manner and to avoid significant impacts on the highway network. HGV movements will be restricted to dedicated routes introduced to the satisfaction of Suffolk County Council and Highways England. Opportunities to connect Innocence Farm and the Port of Felixstowe by railway should be investigated and these will be supported where they further reduce the traffic movements on the main road network.”</td>
<td>To ensure policy is effective in relation to delivery of the access.</td>
<td>N/A</td>
</tr>
<tr>
<td>3.37</td>
<td>Policy c) Minerals Assessment;</td>
<td>To ensure policy is effective</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Modification No.</td>
<td>Paragraph / Policy</td>
<td>Change</td>
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<tr>
<td>3.38</td>
<td>Policy SCLP12.39</td>
<td>Additional criteria inserted requesting “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.39</td>
<td>Policy SCLP12.40</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.40</td>
<td>Policy SCLP12.42</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.41</td>
<td>Policy SCLP12.44</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.42</td>
<td>Policy SCLP12.45</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.43</td>
<td>Policy SCLP12.46</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>Modification No.</td>
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<tr>
<td>3.44</td>
<td>Paragraph 12.496</td>
<td>Amend the second sentence of paragraph 12.496 to read: “In this respect, a contribution relating to Campsea Ashe Wickham Market railway station may be required through the Community Infrastructure Levy.”</td>
<td>To ensure the railway station is accurately referenced.</td>
<td>N/A</td>
</tr>
<tr>
<td>3.45</td>
<td>Paragraph 12.499</td>
<td>Add text to paragraph 12.499 to read: “The site is allocated for development of approximately 20 dwellings. The site slopes gently upwards to the east, and is bounded by existing trees and hedgerows on all sides. To integrate with the more rural areas to the north, development proposals should retain these hedgerows and trees. There are records of protected species in the vicinity of the site, and the retention of trees and hedgerows which form the boundary of the site alongside inclusion of permeable features would help to support biodiversity in and around the site.”</td>
<td>To reflect identification of priority species in the vicinity of the site</td>
<td>Suffolk Wildlife Trust Rep ID: 829</td>
</tr>
<tr>
<td>3.46</td>
<td>Policy SCLP12.47</td>
<td>Insert additional criteria to SCLP12.47 to read: “g) An ecological survey and appropriate mitigation will be required.”</td>
<td>To reflect identification of priority species in the vicinity of the site</td>
<td>Suffolk Wildlife Trust Rep ID: 829</td>
</tr>
<tr>
<td>3.47</td>
<td>Policy SCLP12.47</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.48</td>
<td>Paragraph 12.512</td>
<td>Amend the second sentence of paragraph 12.512 to read: “Development should resist the planting of horticultural such...”</td>
<td>For clarity</td>
<td></td>
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<tr>
<td>Modification No.</td>
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<tr>
<td>3.49</td>
<td>Policy SCLP12.48 (MIQ3.59)</td>
<td>Amend the last sentence of SCLP12.48 to read: “Development of employment uses falling within Use Class B1 would also be supported as part of a mixed use scheme in the northern half of the site.”</td>
<td>To clarify the expected location of the employment use on the site.</td>
<td></td>
</tr>
<tr>
<td>3.50</td>
<td>Policy SCLP12.48</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.51</td>
<td>Paragraph 12.529 (MIQ3.63)</td>
<td>Amend paragraph 12.529 to read: “The site is allocated for development of approximately 20 25 dwellings.”</td>
<td>To correct typographical error</td>
<td>Hopkins Homes and Hopkins &amp; Moore Ltd Rep ID: 1255</td>
</tr>
<tr>
<td>3.52</td>
<td>Paragraph 12.531 (MIQ3.62)</td>
<td>Amend paragraph 12.531 to read: “A number of trees along the southern boundary of the site have Tree Preservation Orders, and should be protected wherever possible. Access to the site could be via the adjoining Millfields development or via The Street provided that trees and hedgerows are retained where possible.”</td>
<td>To ensure policy is consistent with other policies in relation to access</td>
<td>N/A</td>
</tr>
<tr>
<td>3.53</td>
<td>Paragraph 12.541 (MIQ3.64)</td>
<td>Amend paragraph 12.541 to read: “The site is allocated for development of approximately 350 dwellings.”</td>
<td>To ensure appropriate densities whilst making efficient use of land.</td>
<td>N/A</td>
</tr>
<tr>
<td>Modification No.</td>
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</table>
| 3.54            | Policy SCLP12.49 (MIQ3.62) | Amend SCLP12.49 to read: “1.11ha of land north of The Street, Darsham, as shown on the Policies Map, is identified for the development of approximately 25 dwellings. Development will be expected to comply with the following criteria:  
  i) Provision of a safe and suitable access. Access to be provided through the existing Millfields development or via The Street;  
  j) Existing hedgerows and trees on the frontage of The Street to be retained subject to provision of satisfactory access;  
  k) Retention of trees on the southern boundary of the site;  
  l) Enhancements to the existing footway along part of southern boundary linking into the site;  
  m) A site-specific Flood Risk Assessment;  
  n) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity and provision for treatment or that this can be provided;  
  o) Affordable housing to be provided on-site; and  
  p) An archaeological assessment will be required.” | To ensure policy is consistent with other policies in relation to access | N/A |
<p>| 3.55            | Policy SCLP12.49 | Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage” | For consistency | See Statement of Common Ground with |</p>
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<tr>
<td>3.56</td>
<td>Policy SCLP12.50</td>
<td>Amend the first sentence of SCLP12.50 to read: “2.04ha of land off Laxfield Road, Dennington, as shown on the Policies Map, is identified for the development of approximately 350 dwellings.” There will also be consequential changes required to Chapter 3 and the Appendices.</td>
<td>To ensure appropriate densities whilst making efficient use of land</td>
<td>N/A</td>
</tr>
<tr>
<td>3.57</td>
<td>Policy SCLP12.50</td>
<td>Amend criterion b) of 12.50 to read: “b) Provision of a mix of housing including dwellings designed to meet the needs of the older population;”</td>
<td>For clarity in relation to the provision of dwellings to meet the needs of older people</td>
<td>N/A</td>
</tr>
<tr>
<td>3.58</td>
<td>Policy SCLP12.50</td>
<td>Amend Policies Map to show a mixed use site in blue due to the inclusion of early years, a school drop-off point and school expansion in the policy</td>
<td>For consistency</td>
<td>N/A</td>
</tr>
<tr>
<td>3.59</td>
<td>Policy SCLP12.50</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.60</td>
<td>Paragraph 12.580</td>
<td>Amend paragraph 12.580 to read: “12.580 Consideration should be given to the topography and geology of the site and the surrounding area in terms of surface water drainage. Infiltration is unlikely to be feasible and an off-site drainage solution may be required. Evidence”</td>
<td>To correct the reference to the requirements for drainage</td>
<td>Suffolk County Council Rep ID: 1115</td>
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</table>
### Matter 3: Area Specific Strategies – Development Allocations SCLP(12.34 to SCLP12.72)

<table>
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<tr>
<th>Modification No.</th>
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<tbody>
<tr>
<td>3.61</td>
<td>Policy SCLP12.52 (MIQ3.69)</td>
<td>Amend criterion d) of SCLP12.52 to read: “Provision of pedestrian access and footways to support access to services and facilities in the village;”</td>
<td>To provide greater clarity in relation to the provision of pedestrian access.</td>
<td>Suffolk County Council Rep ID: 1115</td>
</tr>
<tr>
<td>3.62</td>
<td>Policy SCLP12.53</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.63</td>
<td>Policy SCLP12.54 (Q3.72)</td>
<td>Amend the first sentence of paragraph to read: “0.430.75ha of land north of The Street. Kettleburgh, as shown on the Policies Map, is identified for the development of approximately 16 dwellings.”</td>
<td>To ensure the density is appropriate and the site is deliverable</td>
<td>Kettleburgh Parish Council Rep ID: 423 Hopkins Homes and Hopkins &amp; Moore Ltd Rep ID: 1292</td>
</tr>
<tr>
<td>3.64</td>
<td>Policy SCLP12.54</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with</td>
</tr>
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<tr>
<td>3.65</td>
<td>Policy SCLP12.55 (Q3.74)</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>Anglian Water</td>
</tr>
<tr>
<td>3.66</td>
<td>Policy SCLP12.56 (Q3.75)</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>N/A</td>
</tr>
<tr>
<td>3.67</td>
<td>Paragraph 12.659 (MIQ3.77)</td>
<td>Amend paragraph 12.659 to read: “The built form of the existing agricultural buildings protrudes from the village into the landscape to the east. The layout of the site will need to be considered in relation to the requirements of Policy SCLP11.2 Residential Amenity, acknowledging the potential for continued use of the land to the east for agricultural purposes. Any structures to the east of the site will need to be considered in relation to Policy SCLP11.2 Residential Amenity. The development of the site should enable the continuation of the built form provided by Vine Road and Little Meadows Drive and should maintain the gap in frontage between this part of Otley and the built area to the north.”</td>
<td>To protect residential amenity</td>
<td>N/A</td>
</tr>
<tr>
<td>3.68</td>
<td>After paragraph 12.661 (MIQ3.78)</td>
<td>Supporting text to be added after paragraph 12.661 to read: “Due to the nature of current and previous agricultural uses on the site, a Contaminated Land Assessment will be required”</td>
<td>To ensure the safe development of the site</td>
<td>N/A</td>
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</table>
### Matter 3: Area Specific Strategies – Development Allocations SCLP(12.34 to SCLP12.72)

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<tr>
<td>3.69</td>
<td>Paragraph 12.664 (MIQ3.79)</td>
<td>Amend paragraph 12.664 to read: “Transport modelling undertaken as part of the production of the Local Plan indicates that there will be potential capacity issues at the junction of the B1079 and B1078 to the south of Otley based upon growth within the area. Due to its proximity a Transport Assessment Statement will therefore need to consider the impacts of development on that junction.”</td>
<td>To ensure potential traffic impacts are appropriately assessed</td>
<td>N/A</td>
</tr>
<tr>
<td>3.70</td>
<td>Policy SCLP12.59 (MIQ3.79)</td>
<td>“f) Provision of a Transport Assessment Statement, in particular to assess impacts on the B1078 / B1079 junction;”</td>
<td>To ensure potential traffic impacts are appropriately assessed</td>
<td>N/A</td>
</tr>
<tr>
<td>3.71</td>
<td>Policy SCLP12.59 (MIQ3.78)</td>
<td>Insert new criterion to 12.59 to read: g) Provision of landscaping to the eastern border of the site to provide an appropriate edge in relation to the open countryside beyond the site; and h) An ecological survey will be required, along with any identified mitigation measures; and i) Provision of a Contaminated Land Assessment.</td>
<td>To ensure the safe development of the site</td>
<td>N/A</td>
</tr>
<tr>
<td>3.72</td>
<td>Policy SCLP12.60</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.73</td>
<td>Policy</td>
<td>Amend parts of 12.61 to read:</td>
<td>To address inconsistency in Pettistree Parish</td>
<td></td>
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|                 | SCLP12.61         | “Development will be expected to accord with the following criteria:  
a) A mix of dwelling types including housing to meet the needs of older people and provision of self-build plots on a developed area of approximately 4ha within the northern part of the site;  
b) Provision of affordable housing on site;  
c) Provision of 0.1ha of land for a new early years setting if needed;  
d) Provision of approximately 2.15ha a significant area of open space including substantial landscaping in the southern part of the site, to create a ‘soft’ and distinctive gateway to Wickham Market, and provide for all ages;  
e) Provision of open space to provide for all ages;  
f) Provision of landscaping and creation of a ‘soft’ edge to the southern boundary of the development;  
g) Provision of pedestrian connectivity with footpaths to the north on the B1438;  
h) Proportionate archaeological assessment will be required;  
i) Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided; and | the areas of land referred to Council (Hallett, Jeffrey) (Rep ID: 239, 295, 302, 313, 414) Lewin, Nicholas (Rep ID: 112) Deighton, Susan (Rep ID: 170) Numerous |
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<tr>
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<tr>
<td>3.74</td>
<td>Policy SCLP12.61 (MIQ3.84)</td>
<td>i) A site-specific Flood Risk Assessment will be required, and any necessary mitigation provided.”</td>
<td>For consistency</td>
<td>Pettistree Parish Council Rep ID: 302 Whitfield, Evelyn Rep ID: 316</td>
</tr>
<tr>
<td>3.75</td>
<td>Policy SCLP12.62 (MIQ3.85)</td>
<td>Addition of the following criteria: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity”</td>
<td>For consistency</td>
<td>Noske, Elaine Rep ID: 20 Capital Community Developments Ltd (Parker Planning Services Ltd) Rep ID: 38 Anglian Water Services Rep ID: 830</td>
</tr>
<tr>
<td>3.76</td>
<td>Policy SCLP12.62</td>
<td>Amend criterion a) to read: “Ensure that the risk of odour and other amenity impacts from Rendlesham Water Recycling Centre is not detrimental to residential amenity as set out in Policy SCLP11.2. Evidence should be provided to demonstrate that there is no unacceptable impact on the occupiers of the future dwellings, and that the continuous operation of Rendlesham Water Recycling Centre is not effected. This will require the provision of a suitable Meet the minimum-distance from the Water Recycling Centre within which new residential development is considered acceptable as advised by Anglian Water;”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
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</table>
| 3.77            | Policy SCLP12.62 | Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.” | For consistency | See Statement of }
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<tr>
<td>SCLP12.63</td>
<td></td>
<td>“Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td></td>
<td>Common Ground with Anglian Water</td>
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<tr>
<td>3.78 Policy</td>
<td>SCLP12.64</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.79 Policy</td>
<td>SCLP12.64 (MIQ3.88)</td>
<td>Modification to criterion i) “Developers will need to address a significant off-site sewerage requirement to provide foul water connections. Risks posed by septicity of pumped connection will need to be addressed provide connection to a public sewage treatment plant unless it can be demonstrated that it is not feasible or viable. A foul drainage strategy will need to be approved and implemented prior to the development connecting to the sewerage system, if it is deemed viable to do so.”</td>
<td>For clarity</td>
<td>Anglian Water Services Ltd</td>
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<td></td>
<td>Rep ID: 849</td>
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<tr>
<td>3.80 Policy</td>
<td>SCLP12.65</td>
<td>Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</td>
<td>For consistency</td>
<td>See Statement of Common Ground with Anglian Water</td>
</tr>
<tr>
<td>3.81 Paragraph</td>
<td>12.740</td>
<td>Amend paragraph 12.740 to read: “This allocation is carried forward from the Site Allocations and Area Specific Policies Development Plan Document Felixstowe Peninsula Area Action Plan (January 2017).”</td>
<td>To correct typographical error.</td>
<td>N/A</td>
</tr>
<tr>
<td>3.82 Policy</td>
<td>SCLP12.66</td>
<td>Change to site boundary – See map below.</td>
<td>To correct mapping error</td>
<td>Mason, Ben</td>
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<td></td>
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<td>Rep ID: 55</td>
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<tr>
<td>3.83</td>
<td>Policy SCLP12.66 (MIQ 3.90)</td>
<td>This allocation is carried forward from the Felixstowe Peninsula Area Action Plan Document (January 2017).</td>
<td>To correct error in respect of existing Local Plan document</td>
<td>N/A</td>
</tr>
<tr>
<td>3.84</td>
<td>Policy SCLP12.66 (MIQ3.95)</td>
<td>Amend paragraph 12.768 to read: “Development proposals at Trimley St Martin should have regard to the findings of the Suffolk Coastal &amp; Ipswich Cross Boundary Water Cycle Study which indicates capacity treatment limitations at Kirton Felixstowe Water Recycling Centre.”</td>
<td>To correct error in relation to the Water Recycling Centre</td>
<td>Numerous</td>
</tr>
<tr>
<td>3.85</td>
<td>Policy SCLP12.66</td>
<td>Amend paragraph 12.766 to read: “12.766 The site is located within a Minerals Consultation Area as defined by Suffolk County Council as the Minerals Planning Authority. Therefore any planning application should be supported by evidence which assesses the quality and quantity of sand and gravel resources on site in order to help judge whether on-site resources should be used on-site during development. This may help reduce the amount of material transported on and off site during development. Therefore any planning application should be supported by evidence which assesses the quality and quantity of sand and gravel resources. Planning applications should be supported by evidence considering the suitability for prior extraction having regard to the Suffolk Minerals and Waste</td>
<td>To reflect that prior extraction is unlikely to be feasible.</td>
<td>Suffolk County Council Rep ID: 1104</td>
</tr>
</tbody>
</table>
### Modification No. | Paragraph / Policy | Change | Reason | Related Representation
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3.86 | Policy SCLP12.66 (MIQ3.94) | Amend criterion c) of 12.66: “Provision of 2.2ha of land for a primary school including and 0.1ha of land for early years provision;” | To reduce prescriptiveness relating to early years. | Suffolk County Council Rep ID: 1124
3.87 | Policy SCLP12.66 (MIQ3.96) | Amend criterion j) to read: “j) Provision of pedestrian/cycle links through from the site, including connectivity into the surrounding countryside and AONB;” | For clarity | N/A
3.88 | Policy SCLP12.66 (MIQ3.95) | Additional criteria inserted requesting: “Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity” | For consistency | Numerous
3.89 | Policy SCLP12.69 (Q3.102) | Amend criterion e) of 12.69 to read: “An ecological assessment, including assessment of impacts on Westleton Common County Wildlife Site must accompany any planning application. Alongside any mitigation measures required, development should provide for biodiversity enhancements, in line with the characteristics of Westleton County Wildlife Site are assessed.” | To ensure impacts on the County Wildlife Site are assessed. | Suffolk Wildlife Trust Rep ID: 688
<table>
<thead>
<tr>
<th>Modification No.</th>
<th>Paragraph / Policy</th>
<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
</tr>
</thead>
</table>
| 3.90            | Policy SCLP12.69   | Addition of the following criteria:  
“Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity” | For consistency | Numerous |
| 3.91            | Paragraph 12.831 (MIQ3.107) | Amend paragraph 12.831 to read:  
“This site of 0.7ha comprises a largely disused farm complex on the edge of Witnesham (Bridge). Given the exclusion of agricultural buildings on land to the south, the layout of the development will need to give consideration to the amenity of future occupiers under Policy SCLP11.2. The farmhouse, a Listed Building, is still occupied. Land south of Hall Road and The Street which includes this site, lies within the River Fynn Valley – a landscape of attractive and distinctive character. Suffolk County Council Archaeology notes that due to the site’s location on the south bank of the River Fynn, an archaeological investigation will be required. A small section of the site along its northern boundary where it borders the River Fynn is within Flood Zone 3. Any development within Flood Zone 3 is to be avoided having the highest potential risk from flooding. The Environment Agency have confirmed that a flood risk assessment will be required as part of any planning” | To safeguard residential amenity | N/A |
<table>
<thead>
<tr>
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<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
</tr>
</thead>
</table>
| 3.92            | Policy SCLP12.70  | Addition of the following criteria:  
“Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity” | For consistency | Numerous |
| 3.93            | Policy SCLP12.72  | Delete criterion d) “Flood risk assessment will be required.” | To avoid duplication of criterion a) and in the interests of consistency | N/A |
| 3.94            | Policy SCLP12.72  | Amend criteria i) to read:  
“i) Any development within the area identified as Flood Zone 3 should be avoided to ensure no other impediments to flows are introduced that could increase the risk of flooding downstream; and” | For consistency with national policy. | N/A |
<p>| 3.95            | Deletion of paragraph 12.627 (MIQ3.75) | “Development proposals should have regard to the findings of the Suffolk Coastal &amp; Ipswich Cross Boundary Water Cycle Study which indicates capacity limitations at Benhall Water...” | For consistency. | N/A |</p>
<table>
<thead>
<tr>
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<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Recycling Centre. Evidence will be required to demonstrate how capacity will be made available in time to serve the proposed development.”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.96</td>
<td>Deletion of criterion c) (MIQ3.75)</td>
<td>“c) Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided.”</td>
<td>For consistency</td>
<td>N/A</td>
</tr>
<tr>
<td>3.97</td>
<td>Modification to paragraph 12.753</td>
<td>“Development proposals at Trimley St Martin should have regard to the findings of the Suffolk Coastal &amp; Ipswich Cross Boundary Water Cycle Study which indicates capacity limitations at Kirton Felixstowe Water Recycling Centre.”</td>
<td>For clarity</td>
<td>N/A</td>
</tr>
<tr>
<td>3.98</td>
<td>Modification to Infrastructure Delivery Framework</td>
<td>See Infrastructure Delivery Framework Modification below</td>
<td>To recognise the treatment limitations of the Kirton Water Recycling Centre highlighted in the Cross Boundary Water Cycle Study</td>
<td>Anglian Water Statement of Common Ground</td>
</tr>
</tbody>
</table>
## Infrastructure Delivery framework Modification

### Modification 3.98

<table>
<thead>
<tr>
<th>Project</th>
<th>Priority</th>
<th>Lead Provider</th>
<th>Approximate Cost</th>
<th>Funding Sources</th>
<th>Potential Funding Amount</th>
<th>Potential Developer Contribution</th>
<th>Type of Developer Contribution</th>
<th>Potential Remaining Funding Gap</th>
<th>Potential Funding Sources to Fill Gap</th>
<th>Timescale/Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential treatment improvements at Kirton water recycling centre and supporting infrastructure</td>
<td>Essential</td>
<td>Anglian Water</td>
<td>Unknown</td>
<td>Developers</td>
<td>Unknown</td>
<td>Unknown</td>
<td>Anglian Water Asset Management Plan</td>
<td>Unknown</td>
<td>Anglian Water</td>
<td>During plan period</td>
</tr>
</tbody>
</table>
Mapping Modifications

Policy SCLP12.50: Land off Laxfield Road, Dennington

Modification 3.99 - Change to inset map
Modification 3.100 - Change to Policies Map 23
Policy SCLP12.54: Land North of the Street, Kettleburgh

Modification 3.101 - Change to inset map
Modification 3.102 - Change to Policies Map 42
Policy SCLP12.66: Land adjacent to Reeve Lodge, High Lodge, Trimley St Martin

Modification 3.103 - Change to inset map
Modification 3.104 - Change to Policies Map 71
Trimley St Martin and Trimley St Mary Settlement Boundary

Modification 3.105 - Additional inset map change to recognise the correct settlement boundary for Trimly St Martin and Trimley St Mary
Modification 3.106 - Additional Policies Map 70 change to recognise the correct settlement boundary for Trimley St Martin and Trimley St Mary.
Write to us

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