Local Plan
Covering the former Suffolk Coastal area

Council Response to Matter 4
Policies

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Policy SCLP5.4: Housing in Clusters in the Countryside

Question 4.1

Is the Policy consistent with national policy as set out in paragraph 78 of the Framework and what is the expected contribution to housing supply that would result from the Policy?

1. Paragraph 78 of the National Planning Policy Framework states that:

   ‘To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’

2. As stated in paragraph 5.21 of the Final Draft Local Plan, the geography of the Suffolk Coastal area is that there are many small, dispersed communities and clusters of houses outside of the Towns, Large Villages and Small Villages. The strategy of the Local Plan, as evidenced through the location of the site allocations, looks to focus the majority of the housing development towards the Towns, Large Villages and Small Villages, however also looks to ensure that there are appropriate opportunities to support smaller communities.

3. The policy should be viewed in terms of wider objectives. Paragraph 59 of the NPPF states that it is important to ensure that a sufficient amount and variety of land can come forward for housing development. Paragraph 91 of the NPPF seeks to promote social interaction. As indicated in the Settlement Hierarchy Topic Paper (Document D34, page 9-10), some of these rural communities do have some services and in particular many have a community hall which can be provide a valuable opportunity for interaction in smaller communities. The policy could provide opportunities for people to remain in small communities, which would support the aims of the East Suffolk Housing Strategy (Document G3, page 15) and of the Joint Health and Wellbeing Strategy (Document H16) in terms of seeking to address isolation.

4. The policy is therefore justified.

5. The expected contribution to the housing supply from this policy would form part of the windfall assumptions of 50 dwellings per year. Under the current adopted policy DM4 on housing in clusters in the Core Strategy and Development Management Policies DPD (Document F1, pages 92-93) 26 dwellings in developments of up to 3 dwellings have been permitted in the past five years, including conversions. It is anticipated that Policy SCLP5.4 would deliver more than this as it provides for larger scale development however this would
be within the windfall assumptions. The purpose of the policy is to provide opportunities rather than to demonstrate a clear contribution to supply.

**Question 4.2**

*Is the Policy clear and unambiguous and is it evident how a decision maker should react to a development proposal for housing development in an existing ‘cluster’ in the Countryside?*

6. Policy SCLP5.4 provides an opportunity for some limited housing development to come forward in locations where there is an existing small community but where there are not the scale of services and facilities that would enable the place to be categorised as a Small Village.

7. Communities in the countryside are of varying scale and character and therefore the policy needs to be capable of being applied to various locations. A decision taker would need to first establish whether a proposal is within a cluster, as defined at the end of the policy, prior to applying the remaining criteria. The Council acknowledges that the policy is conveying through words a number of various locational requirements, however the Council has a similar policy in place currently in the Core Strategy and Development Management Policies DPD (Document F1, page 93, policy DM4). The final sentence of Policy SCLP5.4 describes a cluster and paragraph 5.25 describes how any new development would be considered in terms of criterion c) which requires that the development does not represent an extension of the built up area in to the countryside.

8. The policy is clear in relation to the terms within which the scale of development would be considered acceptable, by setting out limits of either 3 or 5 dwellings depending on the scale of the existing cluster. In reflection of the representations received however, it is considered that additional explanation could be added to describe a ‘close group’ of dwellings, at the end of paragraph 5.25 as set out below:

“A ‘close group’ of dwellings adjacent to an existing highway, is one where the dwellings are considered to be adjacent to each other, and not separated by open areas. There may, for example, be garden space or other buildings between dwellings however separation by fields or open land would not constitute a close group. Criterion (c) in Policy SCLP5.4 sets out policy regarding the characteristics of the location of sites in relation to surrounding development. In considering whether a proposal would be acceptable under criterion (c), adjacent development on two sides can include circumstances where the site is separated from existing development by the highway. The adjacent development on two sides must extend along the entirety of the proposed site.”

9. The phrase well-related is described in paragraph 5.24, and provides explanation to the second part of criterion a).
Question 4.3

Is it justified to require that a scheme is supported by the local community? Is the Plan clear as to how such support should be demonstrated?

10. It is justified that the scheme is supported by the local community as the reasons for the policy are to help to sustain the rural communities. This approach is considered to be consistent with paragraph 77 of the NPPF which states that in rural areas planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.

11. In terms of the requirement of the second paragraph in relation to community consultation, paragraph 5.26 explains what is expected for a larger scheme of up to five dwellings to be supported. As one aim behind the policy is to support the more rural communities in Suffolk Coastal, it is considered important that larger levels of development have community support.

Policy SCLP5.8: Housing Mix

Question 4.4

The Framework in paragraph 61 states that the size, type and tenure of housing needed for different groups in the community should be assessed and be reflected in planning policies. Has the size, type and tenure of properties needed for the Plan area been adequately assessed and would the Policy be effective in meeting needs?

12. The Council’s response below is similar to the Council’s response to question 2.5 which asks whether the plan adequately addresses the needs of different groups in the community as set out in paragraph 61 of the NPPF.

13. Paragraph 61 of the NPPF (Document C1) requires that the ‘size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their own homes and people wishing to commission or build their own homes)’. Each of these groups is considered below.

Affordable housing

The Ipswich Housing Market Area - Strategic Housing Market Assessment – Partial Part 2 Update (January 2019) (Document D16, pages 22-23 and 43-44) identifies the need for affordable housing. The methodology is fully in line with the PPG and the assessment was
subject to consultation. The Strategic Housing Market Assessment Partial Part 2 Update disaggregates overall housing need by size and tenure and the needs for affordable housing are set out in paragraph 5.60 of the Final Draft Local Plan (Document A1, page 97). This states that of the total housing need across Suffolk Coastal 10.2% should be for social rent / affordable rent, 6.3% should be for shared ownership and 4.1% should be for Starter Homes / discounted home ownership.

14. The requirements have been reflected in Policy SCLP5.10 which requires 1 in 3 units to be affordable dwellings and to be made available to meet an identified local need. Policy SCLP5.11 Affordable Housing on Exception Sites sets out an approach to guide development of affordable housing on rural exception sites in accordance with paragraph 77 of the NPPF (Document C1). It is therefore not necessary for Policy SCLP5.8 to repeat these requirements, the plan is to be read as a whole.

**Families with children**

15. The projected households of families with children, based on the housing need figure as calculated through the standard method as per the Council’s response to question 2.1, is shown in the Ipswich Housing Market Area - Strategic Housing Market Assessment – Partial Part 2 Update (January 2019) (Document D16, pages 40-41 of 2014-based outputs). This shows that the number of households which are couples with child/children is projected to decline by 1.7% over the plan period. The Strategic Housing Market Assessment has identified the need for housing by size across Suffolk Coastal as set out in Table 5.1 of the Final Draft Local Plan (Document A1, page 91) and Policy SCLP5.8 expects that new housing development will reflect the mix and type of housing needs identified in the Strategic Housing Market Assessment or other evidence of local needs as supported by the Council. In addition to the direct provision of dwellings that would be suitable for families with children, the Local Plan has sought to identify opportunities where infrastructure improvements can be provided alongside housing development, including provision for education and early years settings, which will further support provision for families with children.

**Older people**

16. The NPPF defines older people as ‘People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs. The Planning Practice Guidance (Housing and Economic Needs Assessment Paragraph 017 Reference ID: 2a-017-20190220) contains guidance on housing for older people which states that strategic policy making authorities will need to consider the size, location and quality of dwellings needed in the future for older people 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.
17. The Planning Practice Guidance (Document C2, Housing for Older and Disabled People) was published in June 2019 to set out 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, and continues the approach of the earlier PPG in terms of providing accommodation to enable people to live independently. 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)

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)

18. The accommodation needs of older people have been assessed through the Ipswich Housing Market Area Strategic Housing Market Assessment Volume 2 (September 2017) (Document D15, Chapter 6). Paragraphs 6.7 – 6.8 of the Strategic Housing Market Assessment Partial Part 2 Update (page 14 of 2014 based results) identify the need for older persons accommodation by tenure and size. This identifies that across the HMA there is a proportionately high need for market housing and for social rent / affordable rent rather than for other tenures. The Strategic Housing Market Assessment identified that the number of those aged 65 or over is going to increase by 46.3% over the plan period in the HMA.

The needs identified in relation to housing for older people, reflect the relatively high proportion of older people and the ageing population in Suffolk Coastal. In response to these needs the Local Plan has sought opportunities to diversify the housing stock to provide a greater mix and choice of housing for such groups, and this thread runs throughout the Plan.

19. Paragraph 5.43 of the Final Draft Local Plan (Document A1, page 92) explains the application of accessible and adaptable dwellings as an ‘optional technical standard’ that can be required through planning policy (as per the Planning Practice Guidance, Document C2, Optional Technical Standards). Policy SCLP5.8 Housing Mix requires that on proposals of 10 units or more at least 50% of the dwellings will need to meet the requirements for accessible and
adaptable dwellings under Part M4(2) of the Building Regulations, and will be required to demonstrate how the proposal contributes to increasing the choice and mix of housing available for the older population. The SHMA does not identify a numerical need for M4(2) properties however the Council has considered the data provided by the SHMA alongside other data in assessing an appropriate policy requirement. This analysis is presented in the response to Inspector’s question 4.6. This approach is reflective of the PPG by increasing the supply of housing that would enable people to remain living independently. Policy SCLP5.8 also requires proposals of ten units or more to demonstrate how the proposal contributes to increasing the choice and mix of housing available for older people, and paragraph 5.44 sets out examples of the types of housing that may fulfil this need.

20. It is also appropriate to consider the Plan as a whole as it is not just the type and tenure of housing that would create living environments that would support people in older age. Policy SCLP11.1 Design Quality requires developments to adopt the principles of dementia friendly design, Policy SCLP8.2 Open Space encourages participation in formal and informal recreation for all sectors of the community and a number of the site allocation policies, in locations where it is considered that issues of isolation or loneliness could be addressed, refer to housing designed to meet the needs of older people.

Specialist housing

21. The PPG (Housing and Economic Needs Assessment Paragraph 017 Reference ID: 2a-017-20190220) states that the needs for specialist accommodation for older people should be broken down by tenure and type and can also set out the need for residential institutions. The PPG states that many older people may not want or need specialist accommodation or care and may wish to stay in general housing that is already suitable or that can be adapted. The needs for specialist accommodation are assessed separately using the Strategic Housing for Older People (SHOP) tool, as reported in the Ipswich Housing Market Area Strategic Housing Market Assessment Volume 2 (paragraphs 6.9 – 6.13 and page 185 – 186). These needs are assessed using the SHOP tool. The needs identified are for 986 sheltered housing units, 103 enhanced sheltered housing and 198 extra care units. Consistent with the guidance in the PPG, paragraph 6.11 of the SHMA explains that the actual numbers and type of accommodation may depend on changes in patterns of demand and expectations, and therefore should not be considered as too prescriptive.

22. The Strategic Housing Market Assessment has also assessed the needs for nursing and residential care homes (Document D16, paragraph 6.13 and Appendix 6 page 185 – 186). This identifies a numerical need for 1,118 spaces over the period 2014 – 2036.

23. Policy SCLP5.8 sets out support for sheltered and extra care housing where this is to meet an identified need. Due to the changing nature of this need, as recognised in paragraph 6.12 of the Strategic Housing Market Assessment Volume 2 (Document D15), it is considered appropriate to set out support within the policy should proposals come forward. This is
consistent with the approach set out in the East Suffolk Housing Strategy (Document G3, page 24-25) which states that the Council is reviewing demand for specialist housing and will identify opportunities which would effectively meet changing needs.

**People with disabilities**

24. The Strategic Housing Market Assessment Volume 2 (Document D15, chapter 6) also assesses the accommodation needs of those with disabilities. The PPG (paragraph Reference ID: 2a-017-20190220) states that there is no one source of information but refers to a range of sources of data and identifies that not all disabilities will require adaptations in the home. Paragraphs 6.14 – 6.19 of the Strategic Housing Market Assessment Volume 2 (document D15, paragraph 6) assesses the projected health of the future population, including those over 65 with a limiting long term illness and those aged 18-64 with a serious physical disability, using the recognised Projecting Older People Information System (POPI) and Projecting Adult Needs and Service Information (PANSI) tools.

25. Policy SCLP5.8 requires 50% of dwellings on proposals of 10 units or more to meet the requirements for accessible and adaptable dwellings as set out under Part M4(2) of the Building Regulations, which will assist in meeting the accommodation needs of disabled people as set out in the response to question 4.6. The Planning Practice Guidance (Document C2, Optional Technical Standards, paragraph: 009 Reference ID: 56-009-20150327) states that wheelchair accessible homes, under Part M4(3) of the Building Regulations, should only be applied where the local authority is responsible for allocating or nominating a person to live in that dwelling, and it is therefore not appropriate for the Plan to include a requirement for these.

**Students**

26. The Strategic Housing Market Assessment Volume 2 (September 2017) considered the need for students related to the University of Suffolk which is located in Ipswich Borough (Document D15, pages 101-102, paragraphs 6.31 – 6.33). This identified that the majority of students live at home with their parents and that private rented accommodation is located within one mile of the University. The Strategic Housing Market Assessment concluded that any need for future accommodation is likely to be small. There is therefore no identified need for students for the Suffolk Coastal Local Plan to address. The Council has not therefore identified a need for Policy SCLP5.8 to set out policy related to student accommodation.

**Service families**

27. The Strategic Housing Market Assessment Volume 2 (Document D15, paragraphs 6.23 – 6.30) considered the need for accommodation for service families in the Ipswich Housing Market Area. Of particular relevance to the Suffolk Coastal area is paragraph 6.30 which identifies a potential supply from Rock Barracks from 2027 onwards of 208 dwellings, however there is
no requirement to plan for additional housing for service families identified. The Council has not therefore identified a need for Policy SCLP5.8 to set out policy related to service families.

**Travellers**

28. The needs for Gypsies and Travellers, Travelling Showpeople and Boat Dwellers have been assessed through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (Document D17). Paragraphs 1.1 and 1.2 (page 8) of the ANA explains that the purpose of the assessment was to quantify the accommodation and housing related support needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers to be used as an evidence base to inform planning policy. The assessment has therefore been carried out within the context of this overall objective. Paragraphs 1.4 – 1.5 (pages 8 and 9) of the ANA summarise the methodology that has been followed and this is explained in further detail in the subsequent chapters. The methodology involved a review of secondary information, direct contact with key stakeholders and extensive face to face surveys with Gypsy and Traveller households and postal and face to face surveys of boat dwellers. The Norfolk and Suffolk Gypsy and Traveller Liaison service were closely involved in the production of the ANA.

29. The needs that have been identified for permanent pitches for Gypsies and Travellers, plots for Travelling Showpeople and for Short Stay Stopping Sites, as identified through the Accommodation Needs Assessment (Document D17), are explained in Council Response to Inspector Questions – H2 (20/05/19) (Document H4) and are set out below for clarity:

**Accommodation needs for permanent pitches for Gypsies and Travellers**

<table>
<thead>
<tr>
<th></th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent pitches</td>
<td>0</td>
<td>12</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>15</td>
</tr>
</tbody>
</table>

**Table 3: Accommodation needs for Travelling Showpeople**

<table>
<thead>
<tr>
<th></th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travelling Showpeople plots</td>
<td>2</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
</tbody>
</table>

The need for short stay stopping sites is for 2 to 3 sites across the study area over the period 2016 - 2036 (which is the area comprising the former Suffolk Coastal District, Babergh District, Mid Suffolk District, Ipswich Borough and the former Waveney District).
30. These needs are planned for through SCLP5.17 Gypsies, Travellers and Travelling Showpeople, and it is not necessary to also include this within Policy SCLPS.8 as the plan is to be read as a whole.

People who rent their own homes

31. The needs for private rented accommodation (i.e. people who rent their own homes) has been assessed for the Ipswich Housing Market Area as explained in paragraphs 6.38 – 6.44 of the Strategic Housing Market Assessment Volume 2 (Document D15). The Strategic Housing Market Assessment Partial Part 2 Update (Document D16, page 42 of 2014-based outputs) shows a need for 880 additional private rented dwellings over the period 2018 – 2036. The Strategic Housing Market Assessment also identifies that provision of discounted home ownership dwellings is likely to address some demand for housing that would otherwise be within the private rented sector. The demand for 390 additional discounted home ownership dwellings (as set out on page 42 of the 2014-based outputs) should therefore be viewed as a subset of the need for 880 additional rented dwellings. Policy SCLP5.10 requires 25% of the affordable housing provision on residential sites to be for discounted home ownership. This provision will therefore reduce the overall demand for private rented accommodation, which would be provided for as part of the market housing that is planned for in the Local Plan.

People wishing to commission or build their own homes

32. In relation to the needs of those wishing to commission or build their own homes, the Strategic Housing Market Assessment Volume 2 (Document D15) provides an overview, in paragraphs 6.45 – 6.47, of the role of the self build and custom build registers and the needs across the Ipswich Housing Market Area. This identified that across the Ipswich Housing Market Area 94.7% of those on the register were interested in a single plot of land, 28.1% were interested in a group self-build project and 19.3% were interested in a developer led custom build. The numbers on the register for the Suffolk Coastal area have increased since the production of the Strategic Housing Market Assessment and this is reported as over 250 people as at November 2018 in the Final Draft Local Plan (Document A1, paragraph 5.51), and indicates that a large proportion of the need is for village and countryside locations. In addition to Policy SCLP5.9 Self Build and Custom Build Housing, which requires developments of 100 dwellings or more to provide a minimum of 5% self build or custom build plots, other policies in the Plan are intended to support the delivery of self-build and custom-build properties, including Policy SCLP5.4 Housing in Clusters in the Countryside. The Council does not therefore find it necessary to also include specific policy in SCLPS.8 in relation to self build and custom build.

33. The Council is therefore confident that Policy SCLP5.8, along with other relevant policies in the Local Plan, would effectively meet the needs of the groups outlined in paragraph 61 of the NPPF.
Question 4.5

Is it justified to apply the housing size requirements as set out in Table 5.1 to all proposals of 5 or more dwellings? Have the viability implications of such requirements been assessed?

34. Table 5.1 sets out the needs for different sizes of dwellings, as taken from the Strategic Housing Market Assessment Part 2 Partial Update (Document D16, page 42-44 of the 2016-based outputs), and whilst Policy SCLP5.4 requires the mix to be based on the mix set out in Table 5.1 it does require this to be directly applied as the appropriateness of the precise mix will depend upon the circumstances of each site, for example in relation to the character of the surroundings and the characteristics of the site. Page 91 of the Final Draft Local Plan (Document A1) identifies increasing the choice of housing available as part of the strategy of the Local Plan, and this is reflected in criterion (c) of Policy SCLP3.1 (page 36) which refers to significantly boosting the mix of housing available. Paragraph 61 of the NPPF requires the size, type and tenure of housing needed for different groups in the community to be reflected in planning policies.

35. The Whole Plan Viability Study (Document D38) in paragraph 5.9 (page 37) shows that the mix of dwellings outlined in Table 5.1 and Policy SCLP5.8 of the Final Draft Local Plan (Document A1) has been taken into account as part of the viability appraisals. Appendix 1 of the Whole Plan Viability Study shows that Policy SCLP5.8 has a high impact on viability as well as detailing how the costs have been dealt with in the study. It should be noted that the Whole Plan Viability Study has not tested a mix of units on sites of less than 5 units due to the impractical nature of not being able to satisfy the policy requirements on a small site.

36. It should be noted that the Council’s response to question 2.2 explains the modifications that would result from the application of the 2014-based outputs which do not significantly change the proportions in the table.

Question 4.6

Is Policy SCLP5.8 justified and consistent with national policy in applying M4(2) standards to at least 50% of dwellings and on developments of more than 10 units?

37. The Planning Practice Guidance (PPG) (Document C2, Housing – Optional Technical Standards) states that local planning authorities can include policies in their local plans which require new housing development to meet the ‘optional’ Building Regulations M4(2) accessible and adaptable dwellings requirement. In relation to requirement M4(3) the PPG states that Local Plan policies for wheelchair accessible homes M4(3) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.
38. The PPG (Document C2, paragraph: 007 Reference ID: 56-007-20150327) states that based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations.

39. New guidance in the PPG published in June 2019 (Document C2, Housing for Older and Disabled People) provides guidance on planning for the accommodation needs of older and disabled people. The PPG acknowledges that accessible and adaptable dwellings would enable people to live more independently and also states that where a need exists local plans are expected to make use of the optional technical standards.

40. In terms of the extent of the need for M4(2) dwellings in relation to the elderly population, the 2014-based household projections show the following change in over 65s households. 

(Note that this data relates to the period 2016 – 2041 but is nevertheless considered to be broadly representative of change during the Local Plan period).

- Total households over 65 (2014) = 21,312
- Total households over 65 (2039) = 34,819
- Change = 13,507 (9,725 pro-rata to 2018 – 2036)

41. It is accepted that not all households aged 65 or over will require or demand accessible accommodation, however the data indicates the scale of challenge in relation to the growing elderly population in Suffolk Coastal.

42. The Strategic Housing Market Assessment for the Ipswich Housing Market Area Partial Part 2 Updated (Document D16, page 15 of 2014-based outputs, paragraph 6.6) identifies that the population of those aged 65+ would increase by 46.3% between 2018 and 2036, under the housing need figure calculated using the standard method and the 2014-based household projections.

43. Using the POPPI tool, the Strategic Housing Market Assessment Part 2 (Document D15, page 90 – 91, paragraphs 6.6 – 6.8) analysed the need for specialist housing and concluded a need for 986 sheltered housing units, 103 enhanced sheltered housing units and 198 extra care units over the period 2014 to 2036, within the Suffolk Coastal area. The SHMA also identifies a need for 1,118 additional spaces in nursing and residential care homes (page 186).

44. The East Suffolk Housing Strategy (Document G3, page 24) and the Strategic Housing Market Assessment Part 2 (Document D15, page 93, paragraph 6.11) both recognise that traditional forms of provision to meet these needs may not be the most appropriate, and the East
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Suffolk Housing Strategy states that many older people will only move into older persons’ housing when they have significant mobility and other needs.

45. Table 6.3 of the Strategic Housing Market Assessment Part 2 (Document D15, page 97) identifies that there will be an increase of 3,120 people over 65 in Suffolk Coastal with a limiting long term illness by 2030. Analysis of POPPI data extracted in July 2019 (updated for the purpose of this response), shows that in 2019 there are 6,736 people aged 65 and over who are unable to manage at least one activity on their own, and by 2035 this is expected to increase to 10,298, an increase of 3,562. There is almost certainly an overlap between this, the 3,120 people with a limiting long term illness and the needs identified for sheltered, enhanced sheltered and extra care housing and therefore to avoid double counting the need for specialist accommodation or nursing and residential homes these figures have not been added or extrapolated to identify a ‘total’ for the purposes of this calculation. However, together these figures provide an indication of the scale of future need for dwellings that are accessible and adaptable.

46. In terms of the suitability of the existing stock, the Suffolk Housing and Health Needs Assessment (March 2018) (Document H28, page 34) presents an analysis of the 2014 Suffolk Housing Needs Survey that was undertaken in 2014. This states that 6% of respondents to a question asking whether the home had been built or adapted to meet the needs of someone with a disability, stated that it hadn’t been but that adaptations were needed. If this 6% were applied to the 55,942 households in Suffolk Coastal (2018 figure based on the 2014-based household projections), this would equate to a need of 3,357 households. The suitability of the existing stock is further demonstrated by the number of Disabled Facilities Grants within Suffolk Coastal District. Figure 6.3 of the Strategic Housing Market Assessment Part 2 (Document D15, page 98) shows that over the five years 2011/12 – 2015/16 the number of Disabled Facilities Grants completions averages around 80 per year (although it is acknowledged that the introduction of accessible and adaptable homes would not fully alleviate the need for Disabled Facilities Grants). Page 43 of the Suffolk Housing and Health Needs Assessment (Document H28) explains that the Disabled Facilities Grant is means tested and is only available in certain circumstances, and therefore it does not provide a full account of the scale of need.

47. Based on past applications for Disabled Facilities Grant it could be estimated that 0.14% of occupants of new housing would require some form of adaptation, which would equate to around 137 dwellings of the total housing need to be planned for through the Local Plan. However in order to also benefit the existing population it is considered that 80 dwellings per year (based on past Disabled Facilities Grant applications) built to accessible and adaptable dwellings standards would better help to address this issue.

48. The figures below are therefore used to demonstrate an appropriate requirement for M4(2) dwellings.
• Increase in people aged 65 or over with a limiting long term illness = 3,120

• Average disabled facilities grants per year suggests that of the existing stock approximately 80 per year would need to be adapted = 1,440

• 1,440 + 3,120 = 4,560

• 4,560 as a percentage of the housing requirement of 9,756 = 47%.

49. Considering also the extent of the growth in over 65 households and that almost 7,000 dwellings of the requirement are already committed (as at 31.3.2018) as set out in Table 3.5 of the Final Draft Local Plan (Document A1), it is therefore appropriate to require 50% of all new dwellings on sites of ten or more dwellings to meet the standards for accessible and adaptable dwellings i.e. Part M4(2). It is considered justified to apply the requirement to developments of ten dwellings or more (i.e. major development) as this threshold is consistent with other requirements in the plan (for example affordable housing under policy SCLP5.10).

50. This requirement has been tested through the Whole Plan Viability Report (Document D38) which has concluded that the requirements for dwellings to comply with M4(2) standards would not result in development being unviable.

51. The policy is therefore justified and is consistent with national policy.

Question 4.7
Would the Policy be effective in meeting the housing needs of older people?

52. Effectively meeting the housing needs of older people has been central to the preparation of the Local Plan, and is a thread running through the Local Plan. The Vision, on page 23 of the Final Draft Local Plan (Document A1) identifies a need to address the need for properties to meet the needs of older people, and a number of the site allocations also place an emphasis on housing to meet the needs of older people where these are in locations that would also offer opportunities to address isolation (see responses to questions 3.65, 3.67, 3.71, 3.81, 3.93 and 3.100). Policy SCLP5.8 should therefore be viewed within this context, and is not the only part of the Plan that seeks to meet the housing needs of older people. It is also necessary to consider the policies which would apply to enhancing the wider environment to provide improved environments for older people. Policy SCLP11.1 Design Quality would require development to incorporate dementia friendly design and Policy SCLP8.2 Open Space aims to increase participation in formal and informal recreation for all sectors of the community.

53. Needs for accommodation for older people have been established through the Strategic Housing Market Assessment Volume 2 (Document D15), as set out in response to questions
2.5 and 4.4, and have been considered further in relation to requirements for M4(2) properties as set out in response to question 4.4 above.

54. As stated in response to question 4.6 above, Policy SCLP5.8 would be effective in requiring proposals of 10 units or more to provide at least 50% of dwellings to meet the requirements for accessible and adaptable dwellings as set out under Part M4(2) of the Building Regulations. This would contribute to meeting the needs of older people as set out in response to question 4.6. Policy SCLP5.8 also requires that such proposals explain how they will contribute to increasing the choice and mix of housing available for the older population.

55. The Strategic Housing Market Assessment Volume 2 (Document D15, paragraphs 6.9 – 6.13 and page 185 – 186) also identifies needs for sheltered, enhanced sheltered and extra care housing, as set out in response to question 2.5. As explained in response to question 2.5 these needs are assessed using the Strategic Housing for Older People tool developed by the Housing Learning and Improvement Network. The needs identified are for 986 sheltered housing units, 103 enhanced sheltered housing and 198 extra care units over the period 2016-2036. Consistent with the guidance in the PPG, paragraph 6.11 of the Strategic Housing Market Assessment Volume 2 explains that the actual numbers and type of accommodation may depend on changes in patterns of demand and expectations, and therefore should not be considered as too prescriptive.

56. The Strategic Housing Market Assessment has also assessed the needs for nursing and residential care homes (Document D16, paragraph 6.13 and Appendix 6 page 185 – 186). This identifies a numerical need for 1,118 spaces over the period 2014 – 2036.

57. Due to the changing nature of this need, as recognised in paragraph 6.12 of the Strategic Housing Market Assessment Volume 2 (Document D15), it is considered appropriate to set out support within the policy should proposals come forward. This is consistent with the approach set out in the East Suffolk Housing Strategy (Document G3, page 24-25) which states that the Council is reviewing demand for specialist housing and will identify opportunities which would effectively meet changing needs.

58. Reflecting this position, Policy SCLP5.8 supports provision for sheltered and extra care housing where this incorporates a mix of tenures and sizes to meet an identified need, thus providing flexibility reflecting the position of authorities involved in provision and that demands for such accommodation are changing.

59. The policy would therefore be effective in meeting the needs for older people, whilst reflecting that the nature of provision of accommodation for older people is changing, and would act alongside other policies in the Plan such as site allocations and design policies as outlined above.
Policy SCLP5.9: Self Build and Custom Build Housing

Question 4.8

Is the policy justified in terms of need, threshold and minimum target and how would it be effective in encouraging and providing for self-build and custom-build housing?

60. The needs of those looking to build or commission their own homes is identified through the self build and custom build register as set out in the Strategic Housing Market Assessment Volume 2 (Document D15, paragraphs 6.45 – 6.47) and in paragraph 5.51 of the Final Draft Local Plan (Document A1) which states that as of November 2018 there were over 250 people on the Self-build and Custom Build Register. Policy SCLP5.9 will be effective in contributing to meeting these needs by requiring that on developments of 100 dwellings or more 5% of plots are available for self build or custom build.

61. Application of the policy to the allocated sites within the Plan would deliver around 195 plots over the lifetime of the Plan which will help to address the above need.

62. Alongside this, it is anticipated that additional opportunities for self build and custom build plots will continue to come forward through other policies in the plan such as SCLP5.4.

63. A degree of flexibility has been built into the policy by allowing unsold self build plots to be built out by the developer if they remain unsold after a period of 12 months which will help remedy issues related to lack of demand in any areas and support delivery of large sites.

64. The preceding paragraphs demonstrate that the threshold and minimum target set out in the policy will provide a significant and important contribution to the supply of self-build and custom-build plots. Alongside the other policies in the plan this will meet the evidenced need. The policy is therefore justified.

65. The policy is in conformity with national policy. Paragraph 61 of the 2018 National Planning Policy Framework requires the Council to plan for a wide choice of homes including those wishing to commission or build their own homes.

66. The policy sets out a positive and supportive approach to self build and custom build and provides confidence that a ready supply of serviced plots will be delivered which will diversify the mix of options available to those wishing to build their own homes. As such it will be effective in encouraging and providing for self-build and custom-build housing.
Question 4.9
Would self-build and custom build housing be provided through Policy SCLP5.4?

67. Yes. While it is not the primary aim of the policy, as set out in paragraph 5.27 of the Final Draft Local Plan (Document A1), it is anticipated that policy SCLP5.4 will deliver custom and self build dwellings by providing a supply of single dwelling plots across the district – either individually or as part of group self-build or custom build developments.

Policy SCLP5.10: Affordable Housing on Residential Developments

Question 4.10
Is the requirement for 1 in 3 dwellings on sites of ten units or more to be affordable units and the split between affordable/social rent, shared ownership and discounted home ownership justified and consistent with national policy? Are these requirements deliverable and viable?

68. Paragraph 63 of the National Planning Policy Framework (Document C1) states that provision of affordable housing should not be sought for developments that are not major developments, other than in designated areas (where policies may set a lower threshold of 5 units or fewer). In setting the requirement for sites of ten units or more the policy is therefore consistent with paragraph 63 of the NPPF.

69. The requirements in relation to tenures of affordable housing set out in Policy SCLP5.10 reflect the outputs contained in the Ipswich Housing Market Area Strategic Housing Market Assessment Partial Part 2 Update (January 2019) (Document D16, pages 22-23 of 2016-based outputs) insofar as these relate to the housing need figure calculated using the 2016-based household projections. These are explained in paragraph 5.60 and 5.61 of the Final Draft Local Plan. Reflecting these assessed needs for affordable housing in the Suffolk Coastal area, Policy SCLP5.10 therefore requires 50% to be for affordable rent / social rent, 25% to be for shared ownership and 25% to be for discounted home ownership. The outputs related to the 2014-based household projections show a greater proportion of need for shared ownership and lower proportion of need for discounted home ownership.

As also set out under question 2.2, modifications to paragraphs 5.60 and 5.61 to reflect the housing need figure of 542 dwellings per annum are identified below:

“5.60 The Strategic Housing Market Assessment update carried out in 2018-2019 identifies that of the total housing need across the District 10.4%10.2% should be for social rent / affordable rent, 6.3%7.0% should be for shared ownership and 4.4%4.6% should be for
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Starter Homes / discounted home ownership. In recognition that market schemes below 10 dwellings will not need to provide affordable housing, it is appropriate that the proportion required on sites of ten or more dwellings makes a greater contribution to the overall District wide need. The National Planning Policy Framework requirement for 10% of homes on major development to be for affordable home ownership will be considered alongside the conclusions of the Strategic Housing Market Assessment and other evidence of local need on a case by case basis.

5.61 The Strategic Housing Market Assessment included some analysis of Starter Homes and discounted market housing to identify their potential role in meeting housing needs. The Strategic Housing Market Assessment concluded that these tenures would most likely be suitable for those who currently reside in the private rental sector and concluded that there would be an indicative demand for 642390 dwellings in these tenures. The provision of Starter Homes and discounted home ownership should not therefore be made at the expense of shared ownership and social / affordable rent. Further, as Starter Homes are not required to remain as such in perpetuity, policy needs to consider the longer term appropriateness of market housing in locations where Starter Homes are supported.”

70. Paragraph 64 of the NPPF states that where major development involving the provision of housing is proposed (i.e. on sites for ten or more dwellings or on 0.5ha or more), planning policies should expect at least 10% of the homes to be available for affordable home ownership, and footnote 29 explains that this is as part of the overall affordable housing contribution from the site. Policy SCLP5.10 requires 50% of the affordable units to be for affordable home ownership. Shared ownership and discounted home ownership dwellings both fall within the definition of being dwellings for affordable home ownership. As the requirement in SCLP5.10 is for one in three homes to be affordable, the policy requirements equate to at least 15% of the total dwellings being for affordable home ownership and the policy is therefore consistent with paragraph 64 of the NPPF.

71. Policy SCLP5.10 has been subject to viability testing through the Whole Plan Viability Assessment (Document D38). This has considered the viability of the requirements of Policy SCLP5.10, as explained in paragraph 5.14 and Table 5-10 of that study. Appendix 1 of the Whole Plan Viability Report explains that the requirements in SCLP5.10 would have a high impact on viability, and the appraisal therefore included sensitivity testing along with other affordable housing percentages. The Whole Plan Viability Study concludes (Document D38, page 51-53) that the achievement of the policy requirement is viable other than in relation to brownfield, flatted development. As this type of development is not central to the delivery of the strategy of the Plan it is not considered necessary to reflect this particular scenario in the Policy.
Policy SCLP5.11: Affordable Housing on Exception Sites

Question 4.11

Would the Policy be effective in conserving and enhancing landscape and scenic beauty in the AONB or preserving or enhancing Conservation Areas?

72. The Policy would be applied alongside of other policies within the Plan. Criterion d) would require the location, scale and design of development to retain and enhance the character and setting of the settlement or cluster and not lead to settlement coalescence, in recognition of such developments being on edge of village, rural locations where the potential for impact on character and landscape could be high. Where a proposal comes forward that may also impact on the AONB or on a Conservation Area, policies SCLP10.4 and SCLP11.5, respectively, would apply and would provide the appropriate considerations for impacts on those areas. In relation to the AONB, where proposed development constitutes ‘major development’ in the context of paragraph 172 of the NPPF (Document C1, page 49-50), the major development test would apply (as set out in paragraph 172).

73. The policy has been subject to Sustainability Appraisal (Document A3, page 368 – 370) which has identified positive or uncertain effects in relation to landscape, and comments positively in relation to the inclusion of criterion d). No effects are identified from the policy in relation to cultural heritage.

74. The policy, in combination with other policies in the Plan, would therefore provide an appropriate basis for conserving and enhancing landscape or scenic beauty in the AONB and for preserving and enhancing Conservation Areas where appropriate. A Statement of Common Ground has been agreed with the AONB Team which confirms that they agree with the approach in the Policy when it is considered alongside Policy SCLP10.4 Landscape (including suggested modifications to SCLP10.4).

Policy SCLP5.12: Houses in Multiple Occupation

Question 4.12

Would criterion b) of the Policy be effective in dealing with the transport implications of proposals?

75. The intention of criterion b) is to ensure that HMOs are developed in such a way as to encourage the use of sustainable modes of transport where possible whilst also ensuring that sufficient parking can be provided.
76. The Council acknowledge that the policy, as currently worded, is slightly unclear on the relationship between vehicle parking requirements and access to sustainable modes of transport. Suffolk County Council (Rep ID: 1077) also raised concerns regarding the effectiveness of the policy with regards to vehicle parking requirements for HMOs.

77. It is however, considered appropriate that the policy makes reference to the issue of vehicle parking requirements for HMOs and therefore the following modification has been proposed as part of a Statement of Common Ground with Suffolk County Council to provide clarity in this regard:

   “b) Provision can be made for sufficient parking and where the dwelling is, or can be made to be, accessible to public transport services and main employment and service centres on foot and by cycle; and - or the dwelling is served by good public transport or walking/cycling links which connect the dwelling to main employment and service centres; and”

78. The Council and Suffolk County Council agree that this modification would address this and that the Plan is therefore sound in respect of this matter.

**Policy SCLP5.13: Residential Annexes**

**Question 4.13**

Is the Policy and supporting text in paragraph 5.73 consistent with national policy as set out in paragraphs 54 to 56 of the Framework in regard to the use of planning obligations and conditions?

79. The Council considers the occupancy restriction detailed in paragraph 5.73 and Policy SCLP5.13 is justified and appropriate for the Suffolk Coastal Local Plan area.

80. The approach is consistent with paragraphs 54 to 55 of the National Planning Policy Framework dealing with conditions. The inclusion of this requirement in the policy is necessary to ensure that the policy is not supporting the delivery of single dwellings in the countryside which would be contrary to paragraph 79 of the NPPF.

81. The restriction of occupancy is an established position in Policy DM6 of the Core Strategy and Development Management Policies Document (Document F1). No specific objections to this element of the policy were received when the Final Draft Local Plan was published for representations.
Policy SCLP5.14: Extensions to Residential Curtilages

Question 4.14

Is the Policy clear as to which permitted development rights may be removed and why, and would the Policy be effective and consistent with national policy as set out in paragraph 53 of the Framework?

82. Policy SCLP5.14 of the Final Draft Local Plan seeks to ensure that extensions to residential curtilages do not impact on the landscape character or visual amenity of the area. The policy states that the Council will consider the removal of Permitted Development rights in granting planning consent for the extension of residential curtilages. The Council consider that the inclusion of this option within the policy is effective and consistent with paragraph 53 of the National Planning Policy Framework for the reasons set out below.

83. The supporting text in paragraph 5.75 of the Final Draft Local Plan provides clear examples of the types of permitted development rights that may be withdrawn as part of any consent to allow an extension to a residential curtilage.

84. As further explained in the supporting text at paragraph 5.75, providing a policy which enables the Council to restrict certain development ensures that any potential extension of a residential curtilage will not impact on the openness of the landscape and character of the area. The supporting text includes a cross reference to policy SCLP10.4 which addresses landscape character.

Policy SCLP6.2: Tourism Destinations

Question 4.15

Is the final paragraph of the Policy clear, consistent with national policy and is it evident how a decision maker should react to a development proposal where an assessment is required under the Habitats Regulations?

85. As highlighted in the Habitats Regulation Assessment of the Suffolk Coastal District Local Plan at Final Draft Stage (Document A4, page 50, paragraph 5.1) increased recreation from tourism is recognised as a having potential likely significant effects on European sites in the district.

86. Policy SCLP6.2 is states that new or extended/intensified tourism destinations may need to be subject to screening under the Habitats Regulations. The Council, however, consider that the following modification would help clarify this requirement:
“Where necessary, applications for new destinations or the redevelopment or extension/intensification of destinations will need to be subject to screening under the Habitats Regulations Assessment. Any destinations which would result in significant adverse effects on European sites which could not be appropriately mitigated will not be permitted”

87. These amendments to the first two sentences of the final paragraph of Policy SCLP6.2 make it clear how decision makers should respond to proposals where an assessment is required under the Habitats Regulations.

88. This approach ensures that proposals for tourist related facilities do not conflict with other environmental policies within the plan and can be delivered in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017.

89. The requirement to provide a Landscape and Visual Impact Assessment is included in accordance with Policy SCLP10.4.

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

Question 4.16
Is the 10 pitches/units threshold in criterion b) justified?

90. The Council consider that the threshold of 10 pitches/units in Policy SCLP6.3 (b is an appropriate scale for developments within the Area of Outstanding Natural Beauty and Heritage Coast. Paragraph 172 of the National Planning Policy Framework (Document C1) outlines that “great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty” and the Local Plan acknowledges this local characteristic throughout. Paragraph 172 also goes on to outline that “the scale and extent of development within these designated areas should be limited”. The Local Plan provides a policy response to instances where tourism development will be supported in the AONB, or its setting and the Heritage Coast. The threshold of 10 units is considered to be an appropriate tipping point at which development will have a greater impact within the designated area and therefore has been introduced in the policy.

91. The National Planning Policy Framework (Document C1) in footnote 55 on page 50 outlines that “major development is a matter for the decision maker, taking into account its nature, scale and setting...”. The threshold of 10 units/pitches included in Policy SCLP6.3 is the Council’s response (as Local Planning Authority) to the national policy which seeks to restrict major development in designated areas (such as the AONB and Heritage Coast).
A similar policy requirement was included within the First Draft Local Plan (Document B4), but this read “small scale” (Document B4, page 108, Policy SCLP6.3). To provide greater certainty for applicants, the Council considered that a change of text from “small” to “appropriate” was justified and ensured greater consistency with the National Planning Policy Framework and the Planning Practice Guidance.

Policy SCLP6.5: New Tourist Accommodation

Question 4.17

Is the Policy clear as to where new tourism accommodation comprising permanent buildings would be permitted and would it be effective?

The Council has sought to provide clarity on the circumstances under which new tourism accommodation in permanent buildings would be permitted. However, as it is currently written the circumstances under which these can come forward are not clear.

In order to ensure greater clarity for applicants and the decision maker, the Council suggest the following format change, grammatical corrections and text modification to Policy SCLP6.5 to read.

“Tourist accommodation comprising permanent buildings will only be permitted:

- Within the Settlement Boundaries;
- Through the conversion of buildings of permanent structure where they lie outside the Settlement Boundary;
- On medium and large scale sites where commercial, recreational or entertainment facilities are provided on site; or
- Where such development forms part of a comprehensive landscape creation master plan which supports wider landscape and ecological gain.”

Question 4.18

Are the Policy and supporting text in paragraph 6.33 consistent with national policy as set out in paragraphs 54 to 56 of the Framework in regard to the use of planning obligations and conditions? Is the restriction of occupancy to a period of 56 continuous days justified and should this be set out in the Policy?

The Council considers the occupancy restriction detailed in paragraph 6.33 and then referenced in Policy SCLP6.5 is justified and appropriate for the District.
96. The approach set out is consistent with paragraphs 54 to 56 of the National Planning Policy Framework as it is relevant to the development permitted and ensures that the conflict between tourism accommodation and permanent residential uses are accounted for through planning condition.

97. Consultation responses have highlighted the impact self catering tourist accommodation can have on communities in the District, such as the “loss” through change of use of residential properties to tourism uses. The popularity (through demand) of holiday accommodation across the District is a key issue and the Council consider it appropriate to ensure that the provision of new tourism accommodation is controlled so that residential properties are retained for their intended use.

98. The restriction of occupancy is an established position in Policy DM18 of the Core Strategy and Development Management Policies Document (Document F1). The purpose of the restriction is to ensure that no holiday unit is to be occupied by the same person for 56 days or more in a calendar year. The approach is working well across the District and is an established approach which provides clarity and flexibility to operators and is considered appropriate to continue and is in accordance with paragraph 56 of the National Planning Policy Framework.

99. The Council consider the supporting text and policy to be clear and justified, but to provide additional clarity the wording of Policy SCLP6.5 is proposed to be amended to reflect the occupancy restriction of 56 days. The following modification to Policy SCLP6.5 is proposed. “New tourist accommodation will be restricted by means of planning conditions which permits holiday use only, restricted to a continuous period of 56 days by one person or persons within one calendar year restricts the period the accommodation can be occupied plus required a register of all lettings, to be made available at all times.”

Policy SCLP7.1: Sustainable Transport

Question 4.19

What is the justification for the thresholds for Travel Plans and Transport Assessments and is the Policy consistent with paragraph 111 of the Framework?

100. The thresholds set out in Policy SCLP7.1 for Travel Plans align with thresholds set out in the recently published Suffolk Travel Plan Guidance (Table 3.3, Document 14). This guidance complements the Suffolk Local Transport Plan (Document 23) which seeks to support economic growth whilst reducing the environmental impact of transport. Both documents have been prepared in consultation with the Local Planning Authorities across Suffolk and are based on government guidance, therefore both documents are considered to be proportionate and justified, in line with paragraph 35 of the NPPF.
101. The thresholds for Transport Assessments and Transport Statements set out in Policy SCLP7.1 are outlined as indicative thresholds and should be considered in consultation with the Highway Authority as stated. Suffolk County Council, as the Highway Authority, have raised no objections to these indicative thresholds, as such, they are considered to be justified. The thresholds are applied in this policy on an indicative basis to allow for a wider scope to take into account the specific circumstances of particular developments as and when they come forward.

102. Paragraph 111 of the NPPF requires all development that will generate significant amounts of movement to provide a travel plan, informed by a Transport Assessment or Statement so that the likely impacts of the proposal can be addressed. The Council is of the view that Policy SCLP7.1 is consistent with the NPPF as it requires transport assessments and transport statements at indicative thresholds. Added to this, the implementation of the policy is not limited to these indicative thresholds as it requires the scale, location and nature of development to be considered in determining how the transport impacts of development should be assessed, in consultation with the Highways Authority.

103. The travel plan thresholds set out in this policy are in line with recently published Suffolk Travel Plan Guidance (Document 14) which was informed by government guidance and Local Planning Authority feedback. The policy also allows for the scale, location and nature of development to be considered when applying such thresholds, to ensure that the transport impacts of all relevant developments are appropriately assessed. In this respect, the thresholds are considered justified and consistent with paragraph 111 of the NPPF.

**Question 4.20**

Would criterion f) be effective in seeking public transport in rural areas only and is that consistent with national policy?

104. The Council has reviewed Policy SCLP7.1 in light of further work on mitigating the impacts of growth in the Ipswich Strategic Planning Area on the highway network, and as a result has identified modifications to policy SCLP7.1 which involve the resultant deletion of criterion f). These amendments continue to recognise the importance of the provision of public transport in rural areas, which can also help to sustain rural communities and reduce isolation which is consistent with wider policy objectives; However, they also recognise that public transport is important in achieving sustainable development in urban areas. This is consistent with paragraph 103 of the NPPF which states that ‘opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in decision making.’

The deletion of criterion f) would be replaced by the inclusion of the paragraph below, as set out in the response to question 4.21:
“Opportunities to improve provision of or access to public transport, in particular within rural areas, will be supported.”

Question 4.21

Would the Policy be effective in preventing significant impacts on the highway network?

105. Policy SCLP7.1 aims to ensure that impacts on the transport network and on highways safety can be mitigated, through providing a focus on opportunities for journeys to be made by sustainable transport modes. This is consistent with paragraph 102 of the National Planning Policy Framework (Document C1) which states that opportunities to promote walking, cycling and public transport use are identified and pursued. The Council does recognise however, in the context of the representation to the Final Draft Local Plan from Suffolk County Council (Rep ID: 1079), that further clarity could be added by specifically referring to the need for significant impacts on the highway network to be mitigated to an acceptable degree, and a modification to address this would be supported and is set out at the end of this response and in the Statement of Common Ground with Suffolk County Council.

106. This question should also be viewed in the context of the results of the transport modelling work undertaken across the Ipswich Strategic Planning Area (ISPA). The assessment of potential impacts on the highways network across the ISPA has been undertaken using the Suffolk County Transport Model, which has been developed as a model which can be used across the county for test impacts on the highways network. This has been undertaken as follows:

- Local Plan Modelling for Babergh and Mid Suffolk, Ipswich and Suffolk Coastal – Methodology Report (August 2018) (Document D29) and Local Plan Modelling for Babergh and Mid Suffolk, Ipswich and Suffolk Coastal – Forecasting Report – Volume 1: Suffolk Coastal and Ipswich (August 2018) (Document D30) – this represents the initial stage of testing options for the Suffolk Coastal Local Plan.

- Local Plan Modelling for Babergh and Mid Suffolk, Ipswich and Suffolk Coastal – Methodology Report (January 2019) and Local Plan Modelling for Babergh and Mid Suffolk, Ipswich and Suffolk Coastal – Forecasting Report – Volume 2: Suffolk Coastal and Ipswich Preferred Option (January 2019) – this represents the testing of the ‘preferred option’ which is the development planned for within the Final Draft Local Plan, alongside preferred options for Ipswich and development options for Babergh and Mid Suffolk.

107. The modelling has identified that there would be a number of locations where the highways network is likely to experience issues related to capacity by 2036, including the junctions on
the A14 within the ISPA. The ISPA Councils are aware of ongoing capacity issues at these junctions, and the transport modelling has confirmed the extent of these issues in 2036.

108. Whilst the network outside of the area in and around Ipswich and away from the A14 also presents issues in some locations, these are considered to be mitigatable through measures identified within the respective Local Plans and deliverable through site-specific mitigation measures. The cumulative ISPA local plan growth impacts are particularly evident within Ipswich Borough and on the A14 junctions.

109. Broad mitigation measures to address these identified impacts are set out in the Infrastructure Delivery Framework to the Final Draft Local Plan (Appendix B) and include reference to improvements to the Copdock, Wherstead, Nacton and Seven Hills junctions (junctions 55, 56, 57 and 58) as well as sustainable transport measures in Ipswich. It should be noted that since the publication of the Final Draft Local Plan a decision has been taken by Suffolk County Council to not progress with the full Upper Orwell Crossings project. In anticipation of this, the transport modelling was undertaken with a ‘no Upper Orwell Crossings’ scenario.

110. The position outlined above is reflected in the representation received from Suffolk County Council to the Final Draft Local Plan (Rep ID: 1072). This states that the impacts on the highway network outside of Ipswich are significant but of a scale which could reasonably be mitigated to an acceptable degree. The representation states that it is the impact on the junctions of the A12 and A14, within Highways England’s control, that could require a mixture of measures and where funding is less certain. The representation identifies that in principle, impacts within Ipswich could be mitigated largely by a Smarter Choices package of incentives and sustainable transport improvements to routes, infrastructure and services) enabling and encouraging significant modal shift. This would require a secure funding mechanism and commitment from the Ipswich Strategic Planning Area local planning authorities.

111. It is recognised that mitigation will involve a range of measures, and the focus should be on sustainable options to encourage sustained modal shift. Paragraph 102 of the National Planning Policy Framework (Document C1) requires opportunities to promote walking, cycling and public transport to be pursued, and this also takes forward local and national ambitions around healthy lifestyles.

112. In order to provide additional clarity in relation to the mitigation measures, East Suffolk Council and the County Council, along with Ipswich Borough Council, Babergh District Council and Mid Suffolk District Council, commissioned further work in relation to the transport modelling. Additional modelling has considered further the potential for modal shift (i.e. journeys undertaken by non-car modes and a reduction in single occupancy car trips) and has considered forecasts for both 2026 and 2036, in order to inform the phasing of mitigation
throughout the Plan period and delivery of mitigation by Highways England on the Strategic Road Network.

113. The additional modelling assessed a reduction in existing trips and future development trips in the highway network in Ipswich, focusing on the am and pm peak periods to address commuting. The trip adjustment considered the current level of trips by distance from Ipswich town centre and the nature of the trip, ie urban or rural. This work has shown that the adjustments in relation to modal shift reduce the number of junctions which exceed 85% capacity (in the AM or PM peak), and highway network links that exceed 100% capacity, however, there are still unacceptable residual impacts within Ipswich. This is set out in the ISPA Local Plan Modelling Forecasting Report (August 2019) (Document H31), and the associated ISPA Local Plan Modelling Methodology Report (August 2019) (Document H30).

114. A Technical Note relating to impacts on the Strategic Road Network (Document H32) accompanies the above reports and considers the potential for infrastructure improvements at the junctions on the A14 in addressing the capacity issues. The measures are those which have been put forward for funding under Highways England’s Roads Improvement Scheme 2; this funding decision is outstanding. The mitigation that would be provided by improvements at these junctions would need to be assessed as part of detailed design and include factors in addition to ISPA local plan growth.

115. Based upon the outputs above, in order to prioritise sustainable transport options and to ensure that significant impacts can be mitigated to an acceptable degree and that any severe impacts can be avoided, Suffolk County Council (in conjunction with the ISPA Local Planning Authorities) has undertaken further analysis of potential measures, costs and funding mechanisms. This identifies a phased minimum package of measures which will be needed. These include a ‘Smarter Choices’ approach, which would include working with businesses to address methods of travel; the introduction of a quality bus partnership; measures related to park and ride; and parking strategies, in addition to local junction improvements. Developer contributions will be required to fund the mitigation, in combination with other funding sources which become available. There is also a role for the Suffolk Local Transport Plan (Document H23) (which is currently being refreshed) in supporting the implementation of the required measures, although recognising that there is no guaranteed funding identified for this at this point in time. Alongside this, Highways England have made the authorities aware of measures which could be undertaken on the Strategic Road Network in order to manage traffic volumes to improve the operation of junctions and the network in the short term as described in the Statement of Common Ground between the Council, Suffolk County Council and Highways England.

116. An overview of the work described above, and the mitigation measures that will need to be pursued collectively, including the likely costs, was presented to the Ipswich Strategic Planning Area Board at its meeting on 22nd July 2019. The Draft Action Notes from the
meeting (appended to this statement) explain that the Board acknowledge there is a need to progress with the work to produce a mitigation strategy which would include the identification of appropriate funding sources and mechanisms across all ISPA authorities, with further detail to be discussed at future Board meetings.

117. In order to ensure that the Suffolk Coastal Local Plan contains the relevant mechanisms and policies to deliver the mitigation, a Statement of Common Ground has been agreed with Suffolk County Council. A further Statement of Common Ground has been agreed with Highways England which identifies that there are achievable measures which could be implemented on the Strategic Road Network.

118. The modifications SCLP7.1 are set out below. (Note that related modifications have also been agreed in relation to SCLP2.2 Strategic Infrastructure Priorities and SCLP12.18 Strategy for Communities Surrounding Ipswich).

**Changes to supporting text**

*Modification through insertion of new paragraph after paragraph 7.4:*

“In order to mitigate the cumulative impacts of growth in the Ipswich Strategic Planning Area on junctions and roads in and around Ipswich, and to promote healthy travel options, a package of transport measures has been identified to reduce vehicle movements. They include:

- Transport infrastructure to encourage and support sustainable modes of transport
- A Bus Quality Partnership
- A Smarter Choices programme
- Review of car parking and pricing strategies
- Review of park and ride strategy
- Junction improvements

Sustainable transport measures will therefore be expected to promote and deliver modal shift in a manner consistent with local strategies.”

*Add new sentence to end of paragraph 7.8:*

“Travel planning can offer good practice for meeting the requirements set out in this policy for maximising sustainable transport even on sites that do meet the thresholds for a full travel plan.”

**Changes to Policy**
Modification to Policy SCLP7.1:

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

Development will be supported where:

a) It will limit significant impacts on the highways network;

b) It is proportionate in scale to the existing transport network;

c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;

d) It is located close to, and provides safe pedestrian and cycle access to services and facilities;

e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;

f) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;

g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and

h) It will improve public transport in the rural areas of the District; and

i) The cumulative impact of new development will not create severe impacts on the existing transport network.

Development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth.

Opportunities to improve provision of or access to public transport, in particular within rural areas, will be supported.

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

h) New large scale employment sites;

i) Residential development of 80 or more dwellings; and

j) A development that when considered cumulatively with other developments, is likely to have a severe impact on the local community or local road network.
119. In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds a Transport Statement will be required for development of 50-80 dwellings and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. Non residential development will be considered on a case by case basis dependent on the volume of movements anticipated with the use proposed.”

Policy SCLP7.2: Parking Proposals and Standards

Question 4.22

Is the Policy justified in seeking compliance with the 2015 Suffolk Guidance for Parking, East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy given that these documents do not form part of the development plan and is the Policy consistent with paragraph 105 of the Framework in respect of local parking standards?

120. The Council is of the view that Policy SCLP7.2 is justified in seeking compliance with the 2015 Suffolk Guidance for Parking, East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy.

121. It is noted that the 2015 Suffolk Guidance for Parking (Document D33) was prepared using an evidence base which included local survey and census data and was consulted on for a defined period of time. The feedback from the said consultation informed the detail of the final document which was subsequently adopted by Suffolk County Council and the former Suffolk Coastal District Council, respectively. Both the East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy have been developed based on public consultation and to compliment the Suffolk Local Transport Plan (Document H23). Both documents are key to the management of parking across the District and to fulfil the aims of the Suffolk Local Transport Plan. In this regard, the policy is justified in making reference to these documents in order to ensure the aims of the Suffolk Local Transport Plan, which sets out the long term transport strategy for Suffolk, are achieved and to ensure the policy requirements are fulfilled in accordance with the aforementioned documents.

122. Added to this, the Whole Plan Viability Study (Appendix 1, Document 38) clearly demonstrates that the impact of Policy SCLP7.2 on viability is not ‘high’, and it assumes that any on-site parking costs will be covered through external costs allowances.

123. Paragraph 105 of the NPPF requires policies setting local parking standards for residential and non-residential development to take into account a number of criteria. Paragraph 7.4 details local car ownership levels, paragraphs 7.12 and 7.13 highlight the need to ensure an adequate provision of space for charging plug-in and other ultra-low emission vehicles and
Policy SCLP7.2 itself refers to the level of parking provision being dependent on the location, type and intensity of use proposed. This is reinforced in the supporting documents referred to within the policy. In this respect, the Council is of the view that the policy is consistent with paragraph 105 in respect of local parking standards.

**Policy SCLP8.2: Open Space**

**Question 4.23**

*Is the Policy consistent with national policy which sets out circumstances when existing open space, sports and recreational buildings including playing fields may be built on as set out in paragraph 97 of the Framework?*

124. The Local Plan provides strong protection for existing open spaces and recreational facilities unless it can be clearly demonstrated that they are surplus to requirements, equivalent or better provision can be provided in a suitable location elsewhere, or the existing open space or facility will be enhanced in terms of community benefit.

125. Paragraph 97 of the National Planning Policy Framework seeks to ensure that existing open space, sport and recreation facilities are not built on. However, criteria a), b) and c) provide circumstances which may enable this redevelopment. In the case of Policy SCLP8.2, the requirements of paragraph 97 (a-c) are taken into account and expanded in the policy to provide the local circumstances under which the loss of open space may be permitted.

126. The Council consider that Policy SCLP8.2 is consistent with national policy in that the Local Plan provides the local context against which the provision of open space and recreational facilities are to be managed across the district over the plan period.

**Policy SCLP8.3: Allotments**

**Question 4.24**

*Would the Policy be effective and is it clearly written given the repetition between criteria a) and d)?*

127. The Council consider the repetition to be a typographical error and removing criteria d) would not undermine the effectiveness of the Policy. Delete “Or d) There is evidence to show that there is unlikely to be any future demand for allotments.” The purpose of the policy is to encourage new allotments and resist the loss of existing provision. Criteria a) of Policy SCLP8.3 requires evidence in respect of likely future demand and the Council consider this to be an effective approach.
128. The Council has provided details of the modification required to Policy SCLP8.3 in the table below.

Policy SCLP9.1: Low Carbon and Renewable Energy

Question 4.25

*The Policy supports low carbon and renewable energy developments (excepting wind energy) where they are in an area identified as suitable for renewable or low carbon energy. Where are areas suitable for renewable or low carbon energy defined?*

129. Paragraph 151 of the NPPF states that plans should have a positive strategy to promote renewable and low carbon energy development and should consider identifying suitable areas for such development.

130. Paragraph 152 of the NPPF states that local authorities should support community-led initiatives for renewable energy. This includes areas brought forward in Neighbourhood Plans and areas identified outside of what has been designated in Local Plans.

131. Paragraph 9.4 of the Final Draft Local Plan outlines that, due to national planning policy placing an emphasis on community support for renewable and low carbon energy development, the Council believes that Neighbourhood Plans are best placed to determine where this type of development should take place due to their ability to show local support through a referendum. This will also ensure that there is a commitment to delivering these developments from the local population.

132. The policy itself states that the Council will support Neighbourhood Plans in identifying areas for renewable and low carbon energy development which shows the Council's positive approach to this type of development. As Neighbourhood Plans also need to be in conformity with the Local Plan, this will ensure that any areas a Neighbourhood Plan may designate are suitable through their conformity with policies governing issues such as the landscape and the historic environment.

133. In the interests of clarity, the Council proposes the following modifications to the policy:

"The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed below: low carbon and renewable energy developments, with the exception of wind"
energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the following criteria:

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

Wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan. The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community led. In identifying suitable areas, consideration should be given to the criteria listed above:

The Council will support low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the above criteria.”

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

Question 4.26

Is it justified to require low carbon and renewable energy development to provide benefits to the surrounding community and is this consistent with national policy as set out in paragraphs 54 to 56 of the Framework in regard to the use of planning obligations and conditions?

134. Policy SCLP9.1 states that the Council will support low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or where they satisfy a number of criteria, including that they provide benefits to the surrounding community.

135. Criterion c) of this policy specifically refers to the provision of benefits to the surrounding community, and the Council is in agreement that this is not justified. The Inspector has questioned the consistency of this criterion with paragraphs 54 to 56 of the NPPF, and it is considered unreasonable on this basis to request benefits to the surrounding community as this would not be fairly related in scale and kind to the development, considering the
potential for different types of development proposals to come forward through this Policy. Thus, the Council proposes the following modification to delete criterion c) of this Policy:

“c) They provide benefits to the surrounding community; and”

Policy SCLP9.2: Sustainable Construction

Question 4.27

Is the requirement that all new developments over 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO2 emissions below the Target CO2 Emission Rate set out in the Building Regulations justified?

136. Policy SCLP9.2 requires all new development over 10 dwellings to achieve a 20% reduction in CO2 emissions below the Target CO2 Emission Rate. The Written Ministerial Statement from the 25th March 2015 clearly stated that Local Planning Authorities were permitted to set their own energy efficiency standards that exceed the Building Regulations energy requirements until such time as the amendments to the Planning & Energy Act were commenced through the 2015 Deregulation Bill. It was expected that this would occur in 2016 along with the introduction of the zero carbon homes policy. However, this was not introduced as expected and local authorities are still awaiting the amendments to the Planning & Energy Act. The Written Statement also confirmed that energy efficiency standards must be set by Local Planning Authorities at a level equivalent to Code for Sustainable Homes Level 4, which equates to around a 20% reduction in CO2 emissions below the Target CO2 Emission Rate set out in the Building Regulations (UK Green Building Council Policy Playbook Version 1.4, 2019).

137. As part of the Government’s summary response to the recently revised NPPF (Document C1), it was outlined that Local Planning Authorities can still set energy efficiency standards above Building Regulation standards. Added to this, the Government clarified that it is committed to meeting its climate change targets and that the energy efficiency of buildings has an important contribution to make in meeting these targets. The Government’s 25 year Environment Plan (Document H10) also seeks to explore ways in which design can contribute to environmental improvements and the Suffolk Climate Action Plan (Document H12) specifically seeks to reduce CO2 emissions across Suffolk.

138. The ambitions of the Government relating to the reduction of CO2 emissions are reflected in this policy in line with Paragraph 148 of the NPPF which requires the planning system to contribute to radical reductions in greenhouse gas emissions. In light of this and the aforementioned, the policy is considered to be justified in seeking a 20% reduction in CO2 emissions below the Target CO2 Emission Rate set out in the Building Regulations. Furthermore, the Whole Plan Viability Study (Appendix 1, Document D38) indicates that the Policy is viable, in that, viability will not be materially impacted by the policy requirements.
139. The Council intends to produce a Sustainable Construction Supplementary Planning Document, after the plan is adopted, to support this policy and to provide further advice to inform future development proposals.

Policy SCLP9.3: Coastal Change Management Area

Question 4.28
Is the Policy justified in seeking compliance with Shoreline Management Plans and/or endorsed Coastal Strategies given they are not part of the development plan?

140. The Council, as a Risk Management Authority, is responsible for the operation and maintenance of existing sea defences and the management of flood risk from the sea. As the Coastal Erosion Risk Management Authority, the Council is charged with carrying out coast protection work and preparing long-term Shoreline Management Plans. In this respect, the Council has cooperated with numerous other Risk Management Authorities to assist in the preparation of plans such as the Shoreline Management Plan (Document D27), the Alde & Ore Estuary Plan (Document H11) and the Deben Estuary Plan (Document D26), for example.

141. Although such plans or strategies are not part of the development plan process, they are integral to the Council’s function as a Risk Management Authority and therefore are referenced in this policy. For example, they provide evidence to inform coastal change policies in this plan which would not otherwise be justifiable.

142. Reference in the policy focuses on consistency with these plans or strategies and does not explicitly require compliance; therefore the policy is justified in seeking consistency with Shoreline Management Plans and/or endorsed Coastal Strategies.

SCLP9.5: Flood Risk

Question 4.29
Has the preparation of the Plan taken a sequential, risk-based approach to the location of development as per national policy set out in the Framework?

143. 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.
144. Section 4.1.1 of the Strategic Flood Risk Assessment clearly sets out how the Sequential Test is applied. This approach was used by the Council in both the Strategic Housing & Economic Land Availability Assessment (Document D10) and the Sustainability Appraisal (Document A3) which focussed on identifying sites for development and appraising proposed policies in the Local Plan.

145. Paragraph 2.22 and Appendix H of the Strategic Housing & Employment Land Availability Assessment (Document D10) demonstrate how the Council applied the parameters of the Sequential Test against proposed development sites. Based on this and other considerations, the Council allocated land for development in the Local Plan. The Sustainability Appraisal then further determined if the allocated sites were at risk of flooding, therefore additionally applying the parameters of the Sequential Test.

146. This resulted in the majority of land being allocated within Flood Zone 1, which demonstrates that there is sufficient developable land in the District. Where allocations include land within Flood Zone 2 or 3, criteria has been included within the policy to ensure that the land within Flood Zone 2 or 3 is appropriately developed and that any mitigation measures are informed by a site-specific Flood Risk Assessment, in line with the sequential risk-based approach required by the NPPF. The Sustainability Appraisal (Appendix B, Document A3) shows that the majority of allocations are located in Flood Zone 1 and, as such, are considered developable. It is also worth noting that the Environment Agency, as the relevant Flood Risk Management Authority, have not raised any objections to proposed allocations within the Local Plan on the basis of flood risk.

147. On this basis, it is considered that the Council has comprehensively applied a sequential, risk-based approach to the location of development in the making of the Local Plan.

SCLP9.7: Holistic Water Management

Question 4.30
Is the requirement for phasing of development justified?

148. The recently revised Planning Practice Guidance clearly states that “The timescales for works to be carried out by the sewerage company do not always fit with development needs. In such cases, local planning authorities will want to consider how new development can be phased, for example so it is not occupied until any necessary improvements to the public sewage system have been carried out.”. This demonstrates that the phasing requirement is consistent with national policy and therefore, justified.

149. Paragraph 149 of the NPPF requires plans to take a proactive approach to mitigating and adapting to climate change, taking account of long-term implications for water supply, amongst other issues. This policy is taking a proactive approach to the implementation of
holistic water management principles by requiring phasing of development, where needed, to ensure the delivery of water and water recycling infrastructure. The Water Cycle Study (Document D24) shows that the Environment Agency recognises Suffolk Coastal as an area of ‘serious water stress’ and, as such, water resources need to be sustainably managed. Furthermore, the Water Cycle Study promotes reduction of water use at source through measures such as grey water recycling and rainwater harvesting, as the options for the development of new sources of water in this water stressed region are highly limited. Such measures are supported by both water companies in their representations (Rep ID: 674 & Rep ID: 866) as they result in a reduction of household water consumption. Added to this, the Council has recently committed to declaring a Climate Emergency (Document H22), to battle climate change issues such as this.

150. It is not envisaged that the phasing element of this policy will be implemented against all developments as, for example, smaller developments may not be required to be phased to allow water and water recycling infrastructure to be in place. In recognition of this, the policy refers to the phasing requirement ‘where needed’.

151. The Whole Plan Viability Study (Appendix 1, Document D38) considered this policy to be viable, taking into account the requirement for phasing of development, therefore it is considered justified and appropriate to require phasing of development, where needed, as part of this policy.

SCLP10.1: Biodiversity and Geodiversity

Question 4.31

Is the statement that Recreational Avoidance and Mitigation Strategy will include a requirement for developers to make financial contributions towards the provision of strategic mitigation consistent with national policy as set out in paragraph 34 of the Framework? Has the effect of any such contribution been assessed in terms of viability?

152. Impacts on European protected sites from recreation were identified through the Habitats Regulations Assessment carried out during the production of the Core Strategy and Development Policies (Document F1), and mitigation is being taken forward through the implementation of a Recreation Avoidance and Mitigation Strategy (RAMS) (Document H19). This approach delivers against the statutory requirements of the Conservation of Habitats and Species Regulations 2017, as amended, and the parent European Directives.

153. At the time of drafting policy SCLP10.1 the RAMS document was yet to be published and therefore it was accurate to use the word ‘will’ within the policy. The RAMS document has
now been published as is being used in the determination of planning applications. The following modification is therefore proposed in order to reflect the latest position:

“The strategy will include a requirement for developers to make financial contributions towards the provision of strategic mitigation within defined zones”

154. The Whole Plan Viability Study (Document D38) has taken into account the financial contribution required under the Recreational Avoidance and Mitigation Strategy. The Recreational Avoidance and Mitigation Strategy (RAMS) outlines a contribution of between £0 and £321.22 per dwelling across the district. As the majority of the Suffolk Coastal local plan area is within Zone B and will require a contribution of £321.22 per dwelling this figure has been used throughout the Whole Plan Viability Study (Document D38).

155. Table 5-11 of the Whole Plan Viability Study (Document D38, pages 42-45) details the approach to appraisal build cost assumptions for RAMS. Appendix 4 – Residential appraisals of the study, also clearly shows that RAMS contributions have been included within the assessments.

156. The Council is confident that the effect of financial contributions required for RAMS have been fully taken into account in terms of viability. The RAMS contribution is a relatively small cost per dwelling and as demonstrated by the Whole Plan Viability Study (Document D38) does not undermine the viability of the Local Plan.

**SCLP10.3: Environmental Quality**

**Question 4.32**

*Given the requirements of the Habitats Regulations, would the Policy be effective in regard to impacts on European designated wildlife sites?*

157. Policy SCLP10.1 sets out the Council’s commitment to maintaining environmental quality across the whole district. The policy isn’t specifically intended to protect European designated wildlife sites as this is covered in policy SCLP10.1.

158. The Habitats Regulation Assessment of the Final Draft Local Plan (Document A4) did not identify any likely significant effects on European designated wildlife as a result of this policy. The HRA did recommend a number of actions in relation to air quality and water quality and quantity. These are addressed in the monitoring framework which contains reference to the need to liaise with water companies, Natural England and the Environment Agency (page 481) and in policy SCLP3.5 which contains reference to the timely provision of water infrastructure (para 6 of policy). Page 481 of the Plan also contains reference to gathering data on air quality at protected European sites to inform future Local Plan reviews.
159. Natural England have stated in their representation (Rep ID: 743) that the points arising from the Habitats Regulations Assessment of the Final Draft Local Plan (Document A4) in relation to risks to designated sites from traffic emissions and due to water quantity and water quality issues should be referred to in this section of the Plan. A Statement of Common Ground with Natural England and a modification has been agreed in order to address this:

New paragraph after paragraph 10.26:

“The Habitats Regulations Assessment of the Local Plan has identified the potential for emissions from vehicles and impacts on water quality and water quantity to have an effect on European protected sites, and has made recommendations in relation to monitoring as referred to in the Monitoring Framework in Appendix C. Where necessary, potential effects on European protected sites would need to be considered through the Habitats Regulations Assessment process.”

SCLP10.4: Landscape Character

Question 4.33

Is the Policy consistent with national policy in respect of Areas of Outstanding Natural Beauty and Heritage Coasts as set out in the Framework in paragraphs 172 and 173?

160. Policy SCLP10.4 has been prepared in accordance with the National Planning Policy Framework (Document C1) and the Council’s landscape evidence base (Documents D20, D21, D22).

161. Paragraphs 172 and 173 of the National Planning Policy Framework outline the approach that should be taken to the Areas of Outstanding Natural Beauty and the Heritage Coast, both of which are found within the geographic area covered by the Final Draft Local Plan (Document A1).

162. Paragraph 172 of the NPPF recognises the national level of protection afforded to AONBs and states that great weight should be given to conserving and enhancing landscape and scenic beauty in these areas which (along with National Parks and the Broads) have the highest status of protection in relation to these issues and that the scale and extent of development within these areas should be limited.

163. Throughout the Local Plan the significance of the AONB is recognised. The Vision set out in the Final Draft Local Plan (Document A1, page 23) refers to protecting, maintaining and enhancing the Suffolk Coast and Heaths AONB, and a number of policies set out an approach specific to proposals in the AONB, for example Policy SCLP6.3 Tourism Development within
the AONB and Heritage Coast and Policy SCLP5.4 Housing in Clusters in the Countryside which requires particular care to be taken in the AONB.

164. The Council acknowledges that a representation was received from the Suffolk Coast and Heaths AONB Team (Rep ID: 232) which states that a separate policy for development within AONB landscapes should be included as the policy conflates two issues; landscape character and the AONB. The Council and the Suffolk County Council AONB Team have agreed to support a modification through a Statement of Common Ground, as set out below, which would clarify the approach to be taken within the AONB in recognition of its status as a national designation.

“10.33 The protection, conservation and enhancement of the landscape and setting of the Suffolk Coast and Heaths AONB and its setting is also an important influence within the plan area. Incorporating extensive landscapes in the District from the River Blyth Estuary in the north to landscapes around the River Orwell and River Deben Estuaries in the south, the AONB also extends beyond the District to the north and south.”

Paragraph 3 of Policy SCLP10.4, plus insertion of new paragraph:

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

Development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, that cannot be adequately mitigated. Development within the Area of Outstanding Natural Beauty, or within its setting, will be informed by landscape and visual impact assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts.”

165. In relation to the Heritage Coast, paragraph 173 of the NPPF states that within Heritage Coast, which is not within another designated area, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. The Heritage Coast within the Suffolk Coastal area is entirely within the AONB and for this reason Policy SCLP10.4 does not include separate Policy for the Heritage Coast and is therefore consistent with the NPPF. However, for clarity the Council would support a modification through the inclusion of supporting text in paragraph 10.32 to explain the significance of Heritage Coast in relation to the policy, as set out below.
“10.32 Areas of Outstanding Natural Beauty (AONB) are national landscape designations afforded the highest protection for their landscape and scenic quality. Protection of the Suffolk Coast and Heaths relates not only to the land within this AONB, but also to its setting. In line with national policy great weight is attributed to conserving and enhancing the landscape and scenic beauty in the AONB and the conservation and enhancement of wildlife and cultural heritage are important considerations. A large part of the AONB is also identified as Suffolk Heritage Coast. The AONB Management Plan explains that the Heritage Coast purpose includes objectives for conserving the environmental health and biodiversity of inshore waters and beaches, and to extend opportunities for recreational education, sport and tourist activities that draw on, and are consistent with, the conservation of their heritage features.”

166. For further clarity in relation to designated landscapes within the Suffolk Coastal area, the Council would also support a modification to paragraph 10.29 to clarify that river valleys and estuaries themselves are not designated areas (albeit that in some instances they are within designated areas). This is set out below.

“10.29 The landscape of the District is varied but characterised by areas which have important landscape designations such as the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, Heritage Coast, and Historic Parks and Gardens. River Valleys and Estuaries. Previous Local Plan documents included a county wide approach in the form of Special Landscape Areas (SLA) which originated from the Suffolk Structure Plan. The SLA designations primarily identified the river valleys and tributaries as areas with special landscape attributes that are particularly vulnerable to change.”

**Question 4.34**

*Are the requirements for development to protect and enhance tranquillity justified?*

167. The requirements for development to protect and enhance tranquillity are justified for inclusion within the Local Plan.

168. Paragraph 180(b) of the National Planning Policy Framework (Document C1) requires consideration to be given to the protection of tranquil areas which have remained relatively undisturbed.

169. The Deben Estuary Plan (Document D26) outlines the importance of tranquil areas and the sense of peace and tranquillity throughout the estuary. The Deben Estuary Plan was informed by consultation responses which provided an “almost unanimous view that the peace and tranquillity of the Deben Estuary was highly valued” (paragraph 3.1.18, page 40 of Document D26). The strong level of consultation responses promoted the Deben Estuary
Partnership to define areas of tranquillity as seen on the page found on page 41 of the Estuary Plan.

170. The Suffolk Coast and Heaths AONB Management Plan (Document D25) also includes the concept of tranquillity and dark skies throughout. This reflects the consultation responses received from the AONB unit at First Draft Local Plan stage. The Final Draft Local Plan (Document A1) along with previous iterations has taken the AONB Management Plan into account and reflected the aims and objectives of these plans accordingly.

171. Consultation responses to earlier stages of the Local Plan also identified that tranquillity and dark skies are an important factor across Suffolk Coastal and is something that should be included within the Local Plan to ensure that issues are not forgotten when proposals are submitted. Over the plan period, the Council expect that proposals may come forward within these sensitive locations where opportunities to enhance the tranquillity can be taken.

172. Based on the requirements in the National Planning Policy Framework, the Deben Estuary Plan and the AONB Management Plan, alongside consultation responses which highlight this requirement the Council consider that Policy SCLP10.4 is justified.

**SCLP11.1: Design Quality**

**Question 4.35**

*Have the viability implications for residential development of the Building For Life 12 requirement been assessed and is the requirement justified?*

173. The viability implications of the Policy (SCLP11.1) have been assessed through the Whole Plan Viability Study (Document D38). In this regard, Appendix 1 of the Whole Plan Viability Study (Document D38) states that the Policy (SCLP11.1) will have a ‘Low’ impact on viability of development coming forward, including the Garden Neighbourhoods, and that the associated costs of compliance with the Policy (SCLP11.1) have been assumed to be covered through general build costs allowance.

174. The requirement to perform positively against the Building for Life 12 guidelines (Document H26) is justified for a number of reasons. Firstly, paragraph 129 of the Framework states that Local Planning Authorities should make appropriate use of tools to enhance the design quality of development, within which reference is made to Building for Life 12 (Document H26) as an example of a tool that could be used to enhance design quality. Thus, in this respect the Policy is consistent with national policy and is therefore justified.

175. Moreover, throughout the community engagement stages of Plan making much emphasis has been placed on ensuring development is site specific and locally distinctive. Building for Life
12 guidelines (Document H26) provide design guidance, which if used properly will aid the delivery of high quality and locally distinctive places.

176. It is important to note that there may be situations whereby positive outcomes against certain categories of the Building for Life 12 guidelines (Document H26) cannot be achieved. In these scenarios, the applicant will need to demonstrate why exceptional circumstances justify the conclusion that certain categories cannot be met.

177. For the reasons stated above the inclusion of the Building for Life 12 guidelines (Document H26) within the Policy (SCLP11.1) is justified.

**Question 4.36**

Is criterion h) clear?

178. Criterion h) makes sense but could be clearer and more concise. The Council would support the following modification to criterion h): “Provide highway layouts with well integrated car parking and landscaping which create a high quality public realm, and avoiding the perception of a car dominated environment. In doing so, proposals will be expected to prioritise safe and convenient pedestrian and cycle movement, and that encourage the use of pedestrian, cycle and other sustainable modes as the most attractive modes of sustainable travel.”

179. This wording has been agreed with Suffolk County Council in a Statement of Common Ground.

**Policy SCLP11.2: Residential Amenity**

**Question 4.37**

Would the Policy be effective in securing adequate living conditions for future occupiers of new development?

180. The Policy (SCLP11.2) is intended to secure adequate living conditions for occupiers of new development and neighbouring or future occupiers of development in the vicinity through consideration of all aspects that could adversely affect the living conditions of such occupiers. The Policy (SCLP11.2) takes account of the likely effects of pollution on health and living conditions, as detailed in paragraph 180 of the NPPF. However, as currently worded the final sentence of the Policy requires a modification to ensure occupiers of development proposals are appropriately considered. The Council would support the following modification in this respect: “Development will not cause an unacceptable loss of amenity to future occupiers of new development and neighbouring existing or future occupiers of development in the vicinity.”
Policy SCLP11.4: Listed Buildings

Question 4.38

Is the Policy consistent with national policy as set out in paragraph 190 of the Framework in regard to the setting of a listed building?

181. The intention behind the Policy (SCLP11.4) was with the understanding that the setting does not hold a separate significance to that of the Listed Building, but the Council understands based on Historic England’s representation (Rep ID: 1058) that the wording is unclear in this respect. Thus, the Council would support a modification to address this issue and is engaging with Historic England to enter into a Statement of Common Ground in this respect.

182. All other aspects of the Policy (SCLP11.4) make appropriate consideration of the affect proposals have on the significance of a Listed Building and its setting.

Policy SCLP11.5: Conservation Areas

Question 4.39

The Policy states that proposals for demolition of buildings in a conservation area will only be permitted in defined circumstances. Are the listed criteria consistent with paragraphs 195 and 196 of the Framework and are they justified?

183. A Conservation Area is a designated heritage asset. Paragraph 195 of the NPPF sets out policy in relation to the consideration of proposals that would result in substantial harm to a designated heritage asset. Paragraph 196 of the NPPF sets out policy in relation to the consideration of proposals that would result in less than substantial harm to a designated heritage asset.

184. The criteria f) – h) set out under Policy SCLP11.5 provide a basis for assessing proposals which involve the loss of buildings in Conservation Areas, which may result in either substantial or less than substantial harm to the designated heritage asset, by setting out the considerations that would need to be demonstrated by an applicant. Proposals involving the loss of a Listed Building (either within or outside of a Conservation Area) would be considered under the NPPF.

185. The Council acknowledges however that the Policy could be clearer that the criteria are intended to be factors that need to be demonstrated, and that would be applied alongside the policy set out in the NPPF. The Council would support modifications in this respect and through its engagement with Historic England on a Statement of Common Ground will look to agree amended wording.
Policy SCLP11.6: Non-Designated Heritage Assets

Question 4.40

In respect of proposals which would result in the loss of a non-designated heritage asset, is the Policy consistent with national policy as set out in paragraph 197 of the Framework in terms of the significance of a building?

186. Paragraph 197 of the NPPF states that ‘In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’

187. The criteria in Policy SCLP11.6 set out the considerations that would be expected to be demonstrated where a proposal would involve the loss of a non-designated heritage asset. The criteria would assist the Council in undertaking the balanced judgement required by the NPPF, by providing a means to consider whether there are circumstances under which it may not be desirable to retain the asset. This consideration would be weighed against the significance of the asset, under the policy set out in paragraph 197 of the NPPF.

188. However, in order clarify that consideration of the significance of a non-designated heritage asset should comprise a balanced judgement alongside the scale of any harm or loss to a non-designated heritage asset the Council would support a modification and is engaging with Historic England to enter into a Statement of Common Ground in this respect.

Policy SCLP11.9: Areas to be Protected from Development

Question 4.41

What is the justification for the specific areas to be protected from development as shown on the Policies map?

189. The Council consider the policy to be justified and sound. Areas to be protected from development are a long established policy within the former Suffolk Coastal Area and been part of the 2001 Local Plan (Policy AP28) as well as the 1994 Local Plan (Policy LP28). The designations were also shown on the Policies Maps associated with these plans and many of the areas identified in the 1994 and 2001 Local Plan still remain in the First Draft Local Plan. These areas have been identified by the Council and the local community for the contribution they make to the setting or character of the settlement in their undeveloped form.
190. In some parts of the District, such as Trimley St Martin and Trimley St Mary the Areas to be Protected from Development help to maintain the separation between settlements which protects the individual character of areas. These areas often provide a visual separation and help to resist settlement coalescence even where public access to an area may be limited to the Public Rights of Way Network.

191. Public consultation responses to the Issues and Options document (Document A10) identified the importance of these areas to the local community and this further justified their retention as Policy SCLP11.9.

Question 4.42

Is the Policy clear in respect of what development in the designated areas would be ‘severely restricted to’ and would it be effective?

192. Policy SCLP11.9 is clear and is effective. It is an existing policy within the Felixstowe Peninsula Area Action Plan (Document F3) and the Site Allocations and Area Specific Policies Development Plan Document (Document F2) and is therefore considered to be effective in resisting development in these areas.

193. The areas have been identified because of their contribution to the character of an area and to ensure that settlement coalescence is not compromised. In that light, the wording “severely restricted” is considered to be appropriate. The policy takes a strong position with regards to how a decision maker should deal with applications in these designations. Severely restricting development in these areas will ensure that only proposals justified in exceptional circumstances and where they do not have a detrimental impact on the designation.

194. Proposals which are intended to contribute to the area and are considered to be sympathetic to the Area to be Protected from Development may be acceptable where they maintain the character of the area. The policy does not completely prohibit development within these areas as there may be specific instances under which a proposal can make a positive contribution to the area designated.

195. Experience from the long standing policy approach seen in the former Suffolk Coastal District shows that instances where development within an Area to be Protected from Development is considered to be acceptable are rare. Therefore the policy is considered to be clear and effective.
## Suggested Modifications

<table>
<thead>
<tr>
<th>Modification No.</th>
<th>Paragraph / Policy</th>
<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
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</thead>
<tbody>
<tr>
<td>4.1</td>
<td>Chapter 1 (Key Issues)</td>
<td>Amend second bullet of the Biodiversity section of the Key Issues to read: “Need to ensure that areas of biodiversity value are protected and enhanced, and that net gains for biodiversity are delivered.”</td>
<td>To reflect national policy in relation to biodiversity net gain</td>
<td>Natural England Rep ID: 417</td>
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<tr>
<td>4.2</td>
<td>Paragraph 5.25 (MIQ4.2)</td>
<td>Amend paragraph 5.25 to read: “A ‘close group’ of dwellings adjacent to an existing highway, is one where the dwellings are considered to be adjacent to each other, and not separated by extensive open areas. There may, for example, be garden space or other buildings between dwellings however separation by fields or open land would not constitute a close group. Criterion (c) in Policy SCLP5.4 sets out policy regarding the characteristics of the location of sites in relation to surrounding development. In considering whether a proposal would be acceptable under criterion (c), adjacent development on two sides can include circumstances where the site is separated from existing development by the highway. The adjacent development on two sides must extend along the entirety of the proposed site.”</td>
<td>To add further clarity to the definition of ‘close group’</td>
<td>Tiley-Nunn, Ian Rep ID: 488</td>
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<tr>
<td>4.3</td>
<td>Policy</td>
<td>Amend paragraph 3 of SCLP5.4 to read:</td>
<td>To clarify how the policy would be</td>
<td>Suffolk County</td>
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<td>Modification No.</td>
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<td>SCLP5.4</td>
<td>“Particular care will be exercised in sensitive locations such as within or in the setting of Conservation Areas, and the Area of Outstanding Natural Beauty, and special qualities and Consideration will also need to be given to the features of Landscape Character Areas in accordance with Policy SCLP10.4.”</td>
<td>applied in terms of the AONB.</td>
<td>Council AONB Team Rep ID: 203</td>
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<td>4.4</td>
<td>Paragraph 5.60 (MIQ 4.10) Amend paragraph 5.60 to read: “The Strategic Housing Market Assessment update carried out in 2018 identifies that of the total housing need across the District 10.4% should be for social rent / affordable rent, 6.3% should be for shared ownership and 4.1% should be for Starter Homes / discounted home ownership. In recognition that market schemes below 10 dwellings will not need to provide affordable housing, it is appropriate that the proportion required on sites of ten or more dwellings makes a greater contribution to the overall District wide need. The National Planning Policy Framework requirement for 10% of homes on major development to be for affordable home ownership will be considered alongside the conclusions of the Strategic Housing Market Assessment and other evidence of local need on a case by case basis.”</td>
<td>For consistency in relation to use of 2014-based household projections in calculating housing need</td>
<td>N/A</td>
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<td>4.5</td>
<td>Paragraph Amend paragraph 5.61 to read:</td>
<td>For consistency in relation to use</td>
<td>N/A</td>
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<tr>
<td>5.61 MIQ 4.10</td>
<td>“The Strategic Housing Market Assessment, included some analysis of Starter Homes and discounted market housing to identify their potential role in meeting housing needs. The Strategic Housing Market Assessment concluded that these tenures would most likely be suitable for those who currently reside in the private rental sector and concluded that there would be an indicative demand for 642390 dwellings in these tenures. The provision of Starter Homes and discounted home ownership should not therefore be made at the expense of shared ownership and social / affordable rent. Further, as Starter Homes are not required to remain as such in perpetuity, policy needs to consider the longer term appropriateness of market housing in locations where Starter Homes are supported.”</td>
<td>of 2014-based household projections in calculating housing need</td>
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<td>4.6 Policy SCLP5.12 MIQ 4.12</td>
<td>Amend criterion b) of SCLP5.12 to read: “Provision can be made for sufficient parking and where the dwelling is, or can be made to be, accessible to public transport services and main employment and service centres on foot and by cycle; and, or the dwelling is served by good public transport or walking/cycling links which connect the dwelling to main employment and service centres, and”</td>
<td>To clarify the relationship between levels of parking and access to sustainable modes of travel</td>
<td>Suffolk County Council Rep ID: 1077</td>
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<td>4.7 Policy</td>
<td>Amend paragraph 5.81 to read:</td>
<td>To clarify the roles of</td>
<td>Natural England</td>
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<td>4.8</td>
<td>Policy SCLP6.2 (MIQ 4.15)</td>
<td>“Where necessary, applications for new destinations or the redevelopment or extension/intensification of destinations will need to be subject to screening under the Habitats Regulations Assessment. Any destinations which would result in significant adverse effects on European sites which could not be appropriately mitigated will not be permitted”</td>
<td>To clarify the requirements under the Habitats Regulations</td>
<td>N/A</td>
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<td>4.9</td>
<td>Policy SCLP6.4</td>
<td>Amend criterion c) of the SCLP6.4 to read: “Avoids, prevents or minimises adverse impacts on the natural environment and on local landscape character;”</td>
<td>To reflect the potential for uses to have an impact on landscape character</td>
<td>Suffolk County Council AONB Team Rep ID: 207</td>
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<td>4.10</td>
<td>Policy SCLP6.5</td>
<td>Amend the penultimate paragraph of SCLP6.5 to read: “Tourist accommodation comprising permanent buildings will</td>
<td>To provide greater clarity in respect of permanent tourism</td>
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<td>(MIQ 4.17)</td>
<td>only be permitted:</td>
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<td>- Within the Settlement Boundaries;</td>
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<td>- Through the conversion of buildings of permanent structure where they lie outside the Settlement Boundary;</td>
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<td>- On medium and large scale sites where commercial, recreational or entertainment facilities are provided on site; or</td>
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<td>- Where such development forms part of a comprehensive landscape creation master plan which supports wider landscape and ecological gain.”</td>
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<td>4.11</td>
<td>Policy SCLP6.5 (MIQ 4.18)</td>
<td>Amend the last paragraph of SCLP6.5 to read:</td>
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<td>“New tourist accommodation will be restricted by means of planning conditions which permit holiday use only, restricted to a continuous period of 56 days by one person or persons within one calendar year restricts the period the accommodation can be occupied plus required a register of all lettings, to be made available at all times.”</td>
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<td>4.12</td>
<td>Paragraph 7.4 (MIQ4.21)</td>
<td>Insert new paragraph after 7.4:</td>
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<td>“In order to mitigate the cumulative impacts of growth in the Ipswich Strategic Planning Area on junctions and roads in and</td>
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<td>around Ipswich, and to promote healthy travel options, a package of transport measures has been identified to reduce vehicle movements. They include:</td>
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<td>- Transport infrastructure to encourage and support sustainable modes of transport</td>
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<td>- A Bus Quality Partnership</td>
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<td>- A Smarter Choices programme</td>
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<td>- Review of car parking and pricing strategies</td>
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<td>- Review of park and ride strategy</td>
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<td>- Junction improvements</td>
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<td>Sustainable transport measures will therefore be expected to promote and deliver modal shift in a manner consistent with local strategies. “</td>
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<td>4.13</td>
<td>Paragraph 7.8 (MIQ4.21)</td>
<td>Add new paragraph after paragraph 7.8 to read: “Travel planning can offer good practice for meeting the requirements set out in this policy for maximising sustainable transport even on sites that do meet the thresholds for a full</td>
<td>To reflect approach to delivery of transport mitigation measures in the ISPA.</td>
<td>Suffolk County Council Rep ID: 1072</td>
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<td>Modification No.</td>
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<td>4.14</td>
<td>Policy SCLP7.1 (MIQ4.21)</td>
<td>Amend SCLP7.1 to read: “Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities. Development will be supported where: a) It will limit significant impacts on the highways network; b) It is proportionate in scale to the existing transport network; c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken; d) It is located close to, and provides safe pedestrian and cycle access to services and facilities; e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking; f) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way</td>
<td>To reflect approach to delivery of transport mitigation measures in the ISPA.</td>
<td>Suffolk County Council Rep ID: 1072</td>
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<td>network;</td>
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<td>e) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and</td>
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<td>f) It will improve public transport in the rural areas of the District; and</td>
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<td>g) The cumulative impact of new development will not create severe impacts on the existing transport network.</td>
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<td>Development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth.</td>
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<td>Opportunities to improve provision of or access to public transport, in particular within rural areas, will be supported.</td>
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<td>Proposals for new development that would have significant transport implications should be accompanied by a Travel Plan. A Travel Plan will be required for proposals for: New large scale employment sites; Residential development of 80 or more dwellings; and A development that when considered cumulatively with other developments, is likely to have a severe impact on the local</td>
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<td>Modification No.</td>
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<tr>
<td>4.15</td>
<td>Policy SCLP8.3 (MIQ 4.24)</td>
<td>Delete criterion d): “Or (d There is evidence to show that there is unlikely to be any future demand for allotments.”</td>
<td>Criteria (a and (d are considered to be a repetition</td>
<td>Kelsale-cum-Carlton Parish Council Rep ID: 1276</td>
</tr>
<tr>
<td>4.16</td>
<td>Paragraph 9.8</td>
<td>Amend the last sentence of paragraph 9.8 to read: “Although generally encouraged, proposals will need to ensure they do not adversely affect the high quality landscape, natural beauty and special qualities of the Suffolk Coast and Heaths AONB, wildlife populations or habitats and avoid noise pollution across the District.”</td>
<td>To reflect that schemes may have an impact on the AONB</td>
<td>Suffolk County Council AONB Team Rep ID: 220</td>
</tr>
<tr>
<td>4.17</td>
<td>Policy</td>
<td>Amend SCLP9.1 to read:</td>
<td>In the interests of clarity</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Modification No. | Paragraph / Policy | Change | Reason | Related Representation
--- | --- | --- | --- | ---
SCLP9.1 | | “The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed below: low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the following criteria:

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

Wind energy schemes must be located in an area identified as...
<table>
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<tr>
<th>Modification No.</th>
<th>Paragraph / Policy</th>
<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
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<td>suitable for renewable or low carbon energy in a Neighbourhood Plan. The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed above: The Council will support low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the above criteria.”</td>
<td>To reflect that schemes may have an impact on the AONB</td>
<td>Suffolk County Council AONB Team Rep ID: 220</td>
</tr>
<tr>
<td>4.18</td>
<td>Policy SCLP9.1</td>
<td>Amend criterion d) to read: “They are complementary to the existing environment without causing any significant adverse impacts, particularly relating to the residential amenity, landscape and visual impact, the natural beauty and special qualities of the AONB, transport, flora and fauna, noise and air quality, unless those impacts can be appropriately mitigated.”</td>
<td>To reflect the lack of justification for this criterion</td>
<td>N/A</td>
</tr>
<tr>
<td>4.19</td>
<td>Policy SCLP9.1</td>
<td>Delete criterion c) of SCLP9.1: “c) They provide benefits to the surrounding community; and”</td>
<td>To reflect the lack of justification for this criterion</td>
<td>N/A</td>
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<td></td>
<td>(MIQ4.26)</td>
<td>Amend the last sentence in the second paragraph of SCLP9.5</td>
<td>For clarity</td>
<td>Anglian Water</td>
</tr>
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<td>Modification No.</td>
<td>Paragraph / Policy</td>
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<td>Reason</td>
<td>Related Representation</td>
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<td>4.21</td>
<td>Final sentence of policy SCLP10.1 (MIQ4.31)</td>
<td>Amend the final sentence of SCLP10.1 to read: “The strategy will include a requirement for developers to make financial contributions towards the provision of strategic mitigation within defined zones”</td>
<td>To reflect that the RAMS document has now been published.</td>
<td>N/A</td>
</tr>
<tr>
<td>4.22</td>
<td>New paragraph after paragraph 10.26 (MIQ4.32)</td>
<td>Add new paragraph after paragraph 10.26 to read: “The Habitats Regulations Assessment of the Local Plan has identified the potential for emissions from vehicles and impacts on water quality and water quantity to have an effect on European protected sites, and has made recommendations in relation to monitoring as referred to in the Monitoring Framework in Appendix C. Where necessary, potential effects on European protected sites would need to be considered through the Habitats Regulations Assessment process.”</td>
<td>To address points arising from the Habitats Regulations Assessment of the Final Draft Local Plan</td>
<td>Natural England Rep ID: 743</td>
</tr>
</tbody>
</table>

Modification No. 4.21: SCLP9.5 to read:

“This should address as a minimum: finished floor levels; safe access and egress; an emergency flood plan; identification and provision of surface water exceedance routes; flood resilience/resistance measures; any increase in built or surfaced area; and any impact on flooding elsewhere, including sewer flooding.”

Services Ltd Rep ID: 782
<table>
<thead>
<tr>
<th>Modification No.</th>
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<th>Reason</th>
<th>Related Representation</th>
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<tr>
<td>4.23</td>
<td>Paragraph 10.29 (MIQ4.33)</td>
<td>Amend paragraph 10.29 to read: “The landscape of the District is varied but characterised by areas which have important landscape designations such as the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, Heritage Coast, and Historic Parks and Gardens, River Valleys and Estuaries. Previous Local Plan documents included a county wide approach in the form of Special Landscape Areas (SLA) which originated from the Suffolk Structure Plan. The SLA designations primarily identified the river valleys and tributaries as areas with special landscape attributes that are particularly vulnerable to change.”</td>
<td>To provide clarity in relation to designated areas</td>
<td>N/A</td>
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<tr>
<td>4.24</td>
<td>Paragraph 10.32 (MIQ4.33)</td>
<td>Amend paragraph 10.32 to read: “Areas of Outstanding Natural Beauty (AONB) are national landscape designations afforded the highest protection for their landscape and scenic quality. Protection of the Suffolk Coast and Heaths relates not only to the land within this AONB, but also to its setting. In line with national policy great weight is attributed to conserving and enhancing the landscape and scenic beauty in the AONB and the conservation and enhancement of wildlife and cultural heritage are important considerations. A large part of the AONB is also identified as Suffolk Heritage Coast. The AONB</td>
<td>To explain the Heritage Coast designation</td>
<td>N/A</td>
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<td>Modification No.</td>
<td>Paragraph / Policy</td>
<td>Change</td>
<td>Reason</td>
<td>Related Representation</td>
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<td>Management Plan explains that the Heritage Coast purpose includes objectives for conserving the environmental health and biodiversity of inshore waters and beaches, and to extend opportunities for recreational education, sport and tourist activities that draw on, and are consistent with, the conservation of their heritage features.”</td>
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<td>4.25</td>
<td>Paragraph 10.33</td>
<td>Amend paragraph 10.33 to read: “The protection, conservation and enhancement of the landscape and setting of the Suffolk Coast and Heaths AONB and its setting is also an important influence within the plan area. Incorporating extensive landscapes in the District from the River Blyth Estuary in the north to landscapes around the River Orwell and River Deben Estuaries in the south, the AONB also extends beyond the District to the north and south.”</td>
<td>To provide clarity in relation to the setting of the AONB.</td>
<td>Suffolk County Council AONB Team Rep ID: 232</td>
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<tr>
<td></td>
<td>(MIQ4.33)</td>
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<tr>
<td>4.26</td>
<td>Policy SCLP10.4</td>
<td>Amend paragraph 3 of SCLP10.4 and add a new paragraph to read: “Development will not be permitted where it will have a significant adverse impact on rural river valleys, historic park and gardens, coastal, estuary, heathland and other very sensitive landscapes. Conserving and enhancing the landscape and scenic beauty of the AONB is of particular importance. Proposals for development will be required to secure the</td>
<td>To clarify the policy approach for the AONB.</td>
<td>Suffolk County Council AONB Team Rep ID: 232</td>
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<td>(Para 3)</td>
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<td></td>
<td>(MIQ4.33)</td>
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<td>Paragraph / Policy</td>
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<td>4.27</td>
<td>Policy SCLP11.1 (MIQ4.36)</td>
<td>Amend criterion h) of SCLP11.1 to read: “Provide highway layouts with well integrated car parking and landscaping which create a high quality public realm, and avoiding the perception of a car dominated environment. In doing so, proposals will be expected to prioritise safe and convenient pedestrian and cycle movement, and that encourage and the use of pedestrian, cycle and other sustainable modes as the most attractive modes of sustainable travel;”</td>
<td>For clarity</td>
<td>N/A</td>
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</table>

preservation and appropriate restoration or enhancement of natural, historic or man made features across the District as identified in the Landscape Character Assessment, Settlement Sensitivity Assessment and successor landscape evidence. Development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, that cannot be adequately mitigated. Development within the Area of Outstanding Natural Beauty, or within its setting, will be informed by landscape and visual impact assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts.”
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<tr>
<th>Modification No.</th>
<th>Paragraph / Policy</th>
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<th>Related Representation</th>
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<tr>
<td>4.28</td>
<td>Policy SCLP11.2 (MIQ4.37)</td>
<td>Amend the last sentence of SCLP11.2 to read: “Development will not cause an unacceptable loss of amenity to future occupiers of new development and neighbouring existing or future occupiers of development in the vicinity.”</td>
<td>To secure the living conditions of all residents.</td>
<td>N/A</td>
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## Action Notes

<table>
<thead>
<tr>
<th>Meeting</th>
<th>Ipswich Strategic Planning Area Board</th>
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<tbody>
<tr>
<td>Date</td>
<td>Monday 22(^{nd}) July 2019</td>
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<tr>
<td>Time</td>
<td>17:00</td>
</tr>
<tr>
<td>Location</td>
<td>Orwell Room, Ipswich Borough Council, Grafton House</td>
</tr>
</tbody>
</table>
| Attendees                | Cllr Paul West (Suffolk County Council) (Cllr PW)  
                            | Cllr Carole Jones (Ipswich Borough Council) (Cllr CJ)  
                            | Cllr David Ritchie (East Suffolk Council) (Cllr DRI)  
                            | Cllr Clive Arthey (Babergh District Council) (Cllr CA)  
                            | Cllr David Burn (Mid Suffolk District Council) (Cllr DB)  
                            | James Cutting (Suffolk County Council) (JC)  
                            | Suzanne Buck (Suffolk County Council) (SB)  
                            | Sally Minns (Ipswich Borough Council) (SM)  
                            | Carlos Hone (Ipswich Borough Council) (CH)  
                            | Robert Hobbs (Babergh Mid Suffolk) (RH)  
                            | Philip Ridley (East Suffolk Council) (PR)  
                            | Desi Reed (East Suffolk Council) (DRe)  
                            | Andrea McMillan (East Suffolk Council) (AM)  
                            | Isaac Plummer (East Suffolk Council) (IP)  |

### Distribution
- Attendees, Tom Barker, Robert Feakes, Graeme Mateer, Martyn Fulcher, Mark Edgerley
- Tom Barker (Babergh Mid Suffolk) (TB)

### Item 1.0
- **Apologies for absence**
- Robert Feakes (Suffolk County Council) (RF)
- Graeme Mateer (Suffolk County Council) (GM)
- Martyn Fulcher (Ipswich Borough Council) (MF)
- Mark Edgerley (East Suffolk Council) (ME)
<table>
<thead>
<tr>
<th>2.0</th>
<th><strong>Action Notes from March Board meetings</strong></th>
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<tbody>
<tr>
<td>2.1</td>
<td>All in agreement that action notes were accurate.</td>
</tr>
<tr>
<td></td>
<td>Draft ISPA Board Action Notes 13\textsuperscript{th} March 2019</td>
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<tr>
<td></td>
<td>Draft ISPA Board Action Notes 20\textsuperscript{th} March 2019</td>
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<tr>
<th>3.0</th>
<th><strong>Terms of Reference</strong></th>
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<tbody>
<tr>
<td>3.1</td>
<td>AM took ISPA Board members through the updates proposed to the Terms of Reference since the March 2019 ISPA Board meeting. AM highlighted the following updates: Replacing ‘Suffolk Coastal District Council’ with ‘East Suffolk Council’ throughout the document.</td>
</tr>
<tr>
<td>3.2</td>
<td>Secretariat role will be undertaken by East Suffolk Council. The Secretariat role will be reviewed at 31\textsuperscript{st} March 2021.</td>
</tr>
<tr>
<td>3.3</td>
<td>Notes from the ISPA Board meetings will continue to be published on the ISPA webpage.</td>
</tr>
<tr>
<td>3.4</td>
<td>CJ explained that the Terms of Reference acts as important evidence of an up to date agreement across the ISPA.</td>
</tr>
<tr>
<td>3.5</td>
<td>Discussion was had around including set times for officer meetings prior to ISPA Board meetings in the Terms of Reference, however the Board agreed that this was not necessary.</td>
</tr>
<tr>
<td>3.6</td>
<td>The revised Terms of Reference were agreed.</td>
</tr>
<tr>
<td></td>
<td>Draft Revised Terms of Reference (July 2019)</td>
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<thead>
<tr>
<th>4.0</th>
<th><strong>Local Plan updates</strong></th>
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<tr>
<td>4.1</td>
<td>RH informed that the Babergh and Mid Suffolk Joint Local Plan Preferred Options (Regulation 18) is currently out for consultation. The consultation will run for 10 weeks, closing at 4pm Monday 30\textsuperscript{th} September 2019.</td>
</tr>
<tr>
<td>4.2</td>
<td>SM informed the Ipswich Final Draft Local Plan (Regulation 19) will go to full council on 3/9/19 followed by a consultation. IBC are aiming to submit document to PINS in March 2020.</td>
</tr>
<tr>
<td>4.3</td>
<td>DRe informed that the Suffolk Coastal Local Plan was submitted for examination on 29/3/19. Hearing statements are currently being prepared ahead of the hearing sessions that will run between 20/8/19 and 20/9/19.</td>
</tr>
</tbody>
</table>
Phillip Lewis has been appointed as the Inspector for the examination.

JC informed that Suffolk County Council are waiting for the Inspector’s report for the Suffolk Minerals and Waste Plan. A period of consultation on modifications will then follow.

Cllr CJ raised a question around the alignment of each authority’s progress with their Local Plans. DRe explained that although the timetables were not fully aligned, the authorities are aligned in terms of production of evidence and addressing cross boundary matters.

### Transport Assessment and Mitigation

**5.1** SB presented an overview to the Board of the work that Suffolk County Council have been undertaking around transport modelling and mitigation through modal shift, junction improvements and other measures. SB covered the following points:

- The need for additional work to provide clarification on the identification of mitigation measures to address the impacts of growth on the capacity of the highways network has been identified, to take forward the conclusions of earlier transport modelling, particularly in relation to impacts of growth on junction capacity in and around Ipswich.

- The further work focuses on modelling the potential outcomes from a realistic modal shift, and considers the impacts on the network in both 2026 and 2036.

- The results show that with modal shift adjustments applied, there are still anticipated to be junctions and links at or over capacity, which is likely to increase in the period 2026 – 2036, and that, therefore, a more significant change is needed in relation to mitigation to reduce the volumes of vehicle traffic on the network in and around Ipswich.

- SB outlined the anticipated measures that would be needed to address peak hour congestion from commuting, as a package of measures. The measures discussed include: a
‘smarter choices’ approach, which would include working with businesses to address methods of travel; the introduction of a quality bus partnership, parking strategies to discourage commuter parking including greater park and ride patronage.

5.6 It is estimated cost of implementing the measures could be around £25 million. Discussion was had around the role of developer contributions and other potential funding sources.

5.7 In terms of the A14, it was reported that Highways England could potentially look to introduce measures to manage traffic flows through its “minor” fund, of up to £20 million.

5.8 Members and officers had further discussion around the outputs of the transport mitigation work, in order to further understanding around how the potential costs of mitigation have been calculated and to understand how an apportionment of the impacts is identified. It was considered that Infrastructure Delivery Plans would play a role in the funding of mitigation projects. There was discussion around how implementation of the strategy would be monitored and it was agreed that this would need to be integral to the delivery of a strategy.

5.9 There was an acknowledgement from attendees that there is a need to progress with the work to produce a mitigation strategy which would include the identification of appropriate funding sources. A paper containing further detail would be circulated to Members and would be discussed further at a future Board meeting.

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<th>6.</th>
<th>Date of future meetings</th>
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<tr>
<td>6.1</td>
<td>SM expressed an interest in holding the next board meeting in September, after the Suffolk Coastal Local Plan examination has concluded.</td>
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</table>

7. AOB – Nothing raised