Hearing Statement from Harry Brightwell on the Examination of the Suffolk Coastal Local Plan regarding Matter 1 as identified below:

**Matter 1**
Whether all Statutory and Regulatory requirements have been met.

**Sustainability Appraisal (SA)**

**Matter 1.2**
Is the SA adequate.

The SA does not comply with the National Planning Policy Framework (NP) as shown below (eg NP 155). Compliance, if at all appears superficial.

Some examples below are based upon the Sustainability Appraisal (SA) in relation to SCLP12.67 Land of Keightley Way (site 135), used to demonstrate that the SA is not adequate.

**Planning and flood risk**

**NP 155.** Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. *(Alternative sites, (preferred by Parish Council and villagers) are available.)*

**NP 158.** Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. *(Reasonable alternative sites, (preferred by Parish Council and villagers) are available.)*

A development condition of SCLP 12.67 is “e) A site-specific Flood Risk Assessment will be required, and any necessary mitigation provided.” which clearly demonstrates an unnecessary risk.

**Promoting sustainable transport**

**NP 102.** c) opportunities to promote ….. public transport use are identified and pursued;

**SA Item 7**  Bus stop less than 400 metres away is a table top exercise which does not take into account specific difficulties and dangers involved in getting to the public transport.

**NP 108.** In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
b) safe and suitable access to the site can be achieved for all users; and *(No assessment has been made for Public transport users, especially those with a disability to get to the site and preferred sites that achieve this are available)*

**NP 110.** Within this context, applications for development should: b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; *(No assessment has been made for Public transport users, especially those with a disability to get to and from the site and preferred sites by Parish Council and villagers that achieve this are available)*

c) create places that are safe, *(No assessment has been made on the impact of creating a large estate in a village that has traditionally expanded by small developments that are known to be more neighbourly and safe. Preferred sites by Parish Council and villagers that achieve this are available)*

**Matter 1.3**
Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?

The SA has not been undertaken on the basis of a consistent methodology and the SA is not robust. Comparison of two sites are given to illustrate the inconsistency and inaccuracies in scoring which surely means decision makers were not presented with accurate info on which to make decisions.

The two sites in Tuddenham used are: SCLP 12.67 Land of Keightley Way, site 135; and the Parish Council and villagers preferred site at Fynn Valley Farm, site 1155.

See page 1349 for site 1155 and see page 628 for site 135 SCLP12.67 Land of Keightley Way.
item 6
site 1155 has no flood implications and is awarded a “0” and white colour
whereas SCLP12.67 identified as a risk of flooding on part of land and requires a Site Specific Flood Risk Assessment is awarded “+” and green colour.

NB National Planning Policy Framework (extract below) is not complied with as alternative site 1155 is available.

Planning and flood risk
NP 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

NP 158 Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

Item 11
1155 not considered to be at risk of flooding and awarded a “+” colour green.
whereas SCLP12.67 requires a Site Specific Flood Risk Assessment is also awarded “+” and colour green.

Item 14
1155 states “Part of site in conservation area” and awarded “-” colour red. Site is not in a Conservation Area. Should be “0” and colour white same as SCLP12.67.

Item 15
1155 states “Site within SLA and conservation area” and awarded “-” colour red. Site is not in a conservation and difficult to establish from info provided if in SLA.

However site SCLP12.67 would also be in a SLA but states “Indicator unlikely to be affected. The policy does require the retention of existing trees and hedgerows on the site” and awarded “0” and colour white.

NB Site 1155 also has trees and hedges around the site. The preference was also for bungalows.

Further examples can be provided where assessment is not robust, if required.

Matter 1.4
Has the SA taken into account reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

The SA has not taken into account reasonable alternatives and insufficient reasoning has been given for the rejection of alternatives. To demonstrate this the two sites in Tuddenham are used: SCLP 12.67 Land of Keightley Way, site 135; and the Parish Council and villagers preferred site at Fynn Valley Farm, site 1155.

Alternative sites have not been rejected, in fact they have been identified as suitable.

The reason given to reject alternative sites which the Council SA has shown are suitable is: “site 135 is the preferred site as it provides an opportunity to enhance access to the recreation ground.”

This is insufficient reasoning for reasons below:

Stating the location of a development restricts all other developments that are not next to a playing field. This is surely a spurious and unfair and eliminates all other areas for development even if they better deliver against the NP.

The playing field is owned by the Parish Council and they have not requested “enhanced access to the playing field” as a strategic objective but they have requested alternative sites as fitting with the village strategy and plan.

Can see nowhere in the NP where access to playing field is a consideration or indeed that it should override all other policies in the Framework.

Even if enhanced access was the prime consideration then looking at the NP:

NP 91 Planning policies and decisions should aim to achieve healthy, inclusive and safe places.
When considering latest research, creating an enhanced access, which could lead to two points of entry if Parish Council or villagers using the current access object, is likely to lead to a more dangerous playing field for children escaping, being abducted etc.

Latest research ifor info:
https://www.mdpi.com/1660-4601/12/6/6423/htm

What is the Relationship between Risky Outdoor Play and Health in Children? A Systematic Review

“Safety concerns, such as injury or abduction, represent one of the main reasons for limiting children’s risky outdoor play ... Children with opportunities for disappearing/getting lost had increased physical activity and social health ...” Conclusions ....... “the evidence suggests overall positive effects of risky outdoor play on a variety of health indicators and behaviours in children aged 3-12 years. Specifically, play where children can disappear/get lost and risky play supportive environments were positively associated with physical activity and social health, and negatively associated with sedentary behaviour”

The Plan is therefore unjustified as it has not taken into account the reasonable alternatives based upon correct evidence.

Matter 1.8
Has the Council complied with the requirements of sec 19(3) of the 2004 act with regard to conducting consultation in accordance with the Statement of Community Involvement?

The Council has not complied with this requirement as below:

The National Framework Policy states:

NP 16. Plans should: a) be prepared with the objective of contributing to the achievement of sustainable development 10; b) be prepared positively, in a way that is aspirational but deliverable; c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

Representations made by Parish Council and villagers and better and supported alternatives have been ignored so Policy is not consistent with National Policy.

The Councils “Policy on Engagement” which on page 3 shows “Give local Residents a voice”; “Local residents issues are resolved”; “Improves decision making process”; “Encourages community spirit and co-operation”.

The Local and residents issues have not been resolved as is evident by the representations made by villagers and the Parish Council even though solutions have been put forward.

Parish Council representatives met with Planners and received assurances that additional sites that better met Tuddenham needs and requirements could be put forward for consideration and their benefits would be assessed and considered with an open mind to look at new ways of delivering a strategy for Tuddenham.

Planners were reminded that Tuddenham had already undertaken preliminary work on producing a village plan and this had been previously submitted to Planners but now obviously ignored.

The Council have therefore clearly not delivered in accordance with its Policy on Engagement it has been a consultation in name only.
Matter 1.9
Are the policies of the plan designed to secure that the development and use of land re climate change.

The policies have not been acted upon, as below:

SCLP12.67 Land of Keightley Way (site 135) requires "e) A site-specific Flood Risk Assessment will be required, and any necessary mitigation provided."

Climate change is affecting rain fall so heavy down pours are creating more surface water. **NP 155.** Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. (Alternative sites, (preferred by Parish Council and villagers) are available.)

Extra car users coming from Keightley Way will increase traffic fumes pollution caused by inevitable queing on single track roads; and queing where parking reduces road width to a single lane.