Suffolk Coastal Local Plan Examination

Note on proposed deletion of Policy SCLP11.9: Areas to be Protected from Development

1. This note responds to the Inspector’s post hearings letter dated 31st January 2020 and consideration that this policy should be deleted.

2. Areas to be Protected from Development have been identified across the plan area (the former Suffolk Coastal District) in the 1994 and 2001 Local Plans as well as included within the current Local Plan documents. The designations as seen on the Policies Maps are varied and include a variety of gaps, gardens and other spaces as well as areas to prevent coalescence between some settlements.

3. The Council considered the retention of these was justified based on public consultation responses to the Issues and Options document (Document A10) which supported the retention of these areas across the plan area. Based on the consultation responses the Council retained these designations within the Final Draft Plan as submitted.

4. The Inspector’s post hearings letter has suggested the deletion of these areas unless the Council wishes to prepare further evidence to justify the retention of the designations.

5. Preparation of evidence to justify these designations would be a complex and time consuming process which the Council considers would delay the progress of the Local Plan through the examination period. The Areas to be Protected from Development are varied across the plan area and cover a mixture of locations, settlements and ownerships and would require professional judgement that should be subject to public engagement and consultation. A review of these areas, would also provide the opportunity to consider additional areas following a criteria based approach to ensure consistency in approach across the plan area, or the area covered by East Suffolk Council.

6. At this stage, the Council consider that the most appropriate way forward is to accept the removal of the policy and the designations and make use of existing policies such as (not exhaustive):

   - Policy SCLP3.3: Settlement Boundaries,
   - Policy SCLP5.7: Infill and Garden Development,
   - Policy SCLP5.14: Extensions to Residential Curtilages,
   - SCLP8.2 Open Space,
   - SCLP10.1 Biodiversity and Geodiversity,
   - SCLP10.5 Settlement Coalescence,
   - SCLP11.1 Design Quality,
   - SCLP11.2 Residential Amenity,
   - SCLP11.3 Historic Environment,
• SCLP11.5 Conservation Areas,
• SCLP11.6 Non-Designated Heritage Assets.

7. Alongside the Local Plan policies, the Council can also use details within Conservation Area Appraisals, National Planning Policy Framework and the National Planning Practice Guidance to determine proposals.

8. The Council is aware of “made” Neighbourhood Plans within the plan area which have followed the Council’s established policy on Areas to be Protected from Development (such as Martlesham Neighbourhood Plan). The removal of the policy is not considered to have an impact on policies within Neighbourhood Plans because these have been subject to evidence gathering, public consultation, examination and referendum prior to being “made” and forming part of the Development Plan for the area.

9. To support current and future Neighbourhood Plans, the Council will continue to guide the local community towards the identification of Local Green Spaces in accordance with paragraph 99 of the National Planning Policy Framework.

10. In order to ensure that the continued production of the Local Plan covering the former Suffolk Coastal area is not delayed further, the Council accepts the Inspector’s judgement for Policy SCLP11.9: Areas to be Protected from Development and therefore will not be undertaking any further evidence on this matter.

11. In preparation for main modifications, the Council will remove Policy SCLP11.9: Areas to be Protected from Development, supporting text and cross references from the Final Draft Local Plan. The Policies Maps will also be amended to remove these areas.