

# Initial Consultation Statement

WLP2.14 Land North of Union Lane, Oulton  
Residential Development Brief

May 2021



# Contents

1 Introduction .....	3
2. Who was consulted?.....	3
3. How were they contacted?.....	4
Appendix 1 – Initial Consultation Responses.....	5

# 1 Introduction

The residential development briefs will highlight the considerations that any development on the site will need to respond to and will outline the Council's aims for each site without being prescriptive and allowing for innovative design. They will be considerations when a planning application is submitted for a site and planning applications will be expected to demonstrate how the principles outlined in the relevant residential development brief have been considered.

This Consultation Statement was produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the draft residential development brief for Land North of Union Lane (Policy WLP2.14) being held between 10<sup>th</sup> May and 21<sup>st</sup> June 2021.

The statement outlines the initial consultation that has been undertaken to inform the preparation of a template for the residential development briefs. The initial consultation took place between 5<sup>th</sup> June and 24<sup>th</sup> July 2020.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement<sup>1</sup>. While preparing the template East Suffolk Council consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

## 2. Who was consulted?

The following organisations and groups were consulted during the initial consultation:

- Individuals registered on the Local Plan and Related Documents Mailing List.
- Individuals and organisations registered on the Developers Forum Mailing List.
- Registered Landowners and Agents for allocated sites in the East Suffolk Council – Waveney Local Plan and East Suffolk Council – Suffolk Coastal Local Plan.
- Members of the public

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<sup>1</sup> [Statement of Community Involvement \(April 2021\)](#)

### 3. How were they contacted?

A seven-week initial targeted consultation based around the residential development briefs template took place between 5<sup>th</sup> June and 24<sup>th</sup> July 2020. The consultation was advertised using targeted emails and social media posts. Those on the Council's Local Plan and Related Documents Mailing List and the Developers Forum were contacted directly by email or letter.

Comments could be made on the document directly through the Council's website. Comments were also accepted via email and letter.

To focus the responses, the consultation asked the following questions:

- 1) Do you think residential development briefs will help facilitate high quality design?
  - a. If yes, why do you think this?
  - b. If no, why do you think this and what other design governance tool/s do you think would be more useful?
- 2) Do you think the draft residential development brief template provides the scope and detail needed to guide Pre-Application discussions and planning applications on allocated sites?
- 3) Are there any additional considerations that the draft residential development brief template could include?
- 4) Do you think the draft residential development brief template is easy to use and understand?
- 5) Do you think the balance between written and visual information is appropriate?
- 6) How do you think the document presentation could be improved?
- 7) Do you have views on when and how landowners and agents should be involved in the drafting process?

A summary of the comments received and the Council's response are set out in Appendix 1.

The consultation documents were made available on the East Suffolk Council website via the pages below:

[Residential Development Briefs Draft Template - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

Due to the social distancing restrictions and the national lockdown as the result of the Covid-19 pandemic, libraries and other public spaces were not accessible during the consultation period. Therefore, paper copies of documents could not be made available at these locations. Physical copies of documents were, however, sent out on request.

In total 15 individuals and organisations responded to the consultation. Between them they made 55 comments.

Full copies of the responses have been published on the Council's website at

[Responses to the Consultation - Residential Development Briefs Draft Template - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

## Appendix 1 – Initial Consultation

The table below lists the main issues raised in the consultation responses, the Council’s response and how they informed the preparation of the document.

<b>Respondent</b>	<b>Key Issues/Comments</b>	<b>East Suffolk Council Response</b>	<b>Action</b>
Suffolk County Council Public Rights of Way	Footpaths is a legally defined term. Under Movement of Development Considerations change ‘footpaths’ to ‘footways’ and ‘Rights of Way’ to ‘public access to the site’.	Agreed.	Changes made.
Suffolk County Council Public Rights of Way	Under Creating a Built Form replace ‘footpaths’ with ‘public rights of way’	Agreed.	Change made.
Suffolk County Council Public Rights of Way	Under Streets and Movement change ‘footpaths’ to ‘public access’.	Agreed.	Change made.
Suffolk County Council Public Rights of Way	On the Development Framework Map change ‘footpaths’ to ‘footways and public rights of way’.	Agreed.	Change made.
Suffolk County Council Public Rights of Way	The Template provides specific direction for sites and provides sufficient scope and detail for pre-application discussions.	Comments noted.	None.
Suffolk County Council Public Rights of Way	The Template could go further to prioritise car-free and accessible journeys to services and facilities, community and accessing the wider countryside.	Agreed.	The Movement and Streets and Movement sections will be rearranged to detail sustainable transport options before car access to show that these have a higher

			priority. This sentiment is also highlighted in Local Plan policies.
Suffolk County Council Public Rights of Way	Illustrate best practice with real examples and local case studies to illustrate objectives and aims.	Comments noted. Examples will be considered on a case by case basis and used where they can clearly show the aims and ambitions that the Council has for a site.	None.
Environment Agency	Under Natural and Historic Environment section there needs to be clear guidance on where a flood risk assessment is needed.	Comments noted. Local Plan policies identify when a flood risk assessment will be needed for a site. This will be reflected in the Residential Development Briefs.	None.
Environment Agency	Under Natural and Historic Environment land contamination should also be identified.	Agreed.	Land contamination has been added to the Natural and Historic Environment section.
Environment Agency	Green corridors should be listed in the Streets and Movement section as well as the Landscape Integration section of the Development Framework.	Agreed.	The Streets and Movement section now refers to considering how green corridors could be integrated into the pedestrian network.
Environment Agency	The Landscape Integration section should also promote Biodiversity Net Gain.	Agreed.	Reference to the need to provide Biodiversity Net Gain has been added to the Landscape Integration section and will be considered as appropriate to the scale of the individual sites.
Wellington Ltd.	The document helps provide detailed requirements and opportunities for positive decision making.	Comments noted.	None.
Wellington Ltd.	Key considerations should include site contamination and drainage. Input	Comments noted and agreed.	Land contamination and drainage has been added to the Natural and Historic Environment section.

	from other departments would be helpful.		Contacts have been established with key stakeholders who can provide information on these issues for specific sites.
Nigel Doyle	There are alternative methods that would secure better places on allocated sites, such as Garden City Principles, Enquiry by Design, Parameter Plans and some of the suggestions from the Building Beautiful Places Report.	The Council will reflect the best practice available when creating the Residential Development Briefs. Where relevant, other studies and information will be included within the Briefs to ensure that the best and most up-to-date information is included and considered throughout the planning application process.	None.
Nigel Doyle	The Template would allow for past mistakes to be repeated, does not allow for community engagement and could allow mediocre schemes to be approved or innovative schemes to be dismissed.	The Residential Development Briefs Draft Template has been created to provide clarity on sites to ensure the best possible development whilst also not being prescriptive to allow for innovative design. Support for innovative design has also been included in Local Plan policies which planning applications will still be subject to. The Residential Development Briefs for individual sites will also be subject to public consultation before adoption.	None.
Nigel Doyle	Not clear how the document will promote Building for Life 12, sustainable construction, digital infrastructure and allotments.	These elements are covered by Local Plan policies which any planning application will be subject to. The Residential Development Briefs will help	None.

		show how these policy requirements can be delivered on specific sites.	
Nigel Doyle	No mention of Biodiversity Net Gain and biodiversity should be considered under following headings: distinctiveness, condition, strategic significance and habitat connectivity.	Comments noted and agreed.	Reference to the need to provide Biodiversity Net Gain has been added to the Landscape Integration section and will be considered as appropriate to the scale of the individual sites.
Nigel Doyle	The Template does not have any requirements for renewable energy, sustainable urban drainage systems and grey water harvesting, a clear definition of public and open spaces, a diversity of housing types and tenures, any long term management, communal recycling facilities and facilities for delivery drivers.	These elements are covered by Local Plan policies which any planning application will be subject to. The Residential Development Briefs will help show how these policy requirements can be delivered on specific sites.	None.
Historic England	Not clear how the Residential Development Briefs will fit into the development process. Need to be clear on who will commission the Briefs, the stakeholders who will be involved, the timescales involved, the extent of consultation and the adoption process. A paragraph outlining these issues is recommended.	Comments noted. The Council will lead the creation of the Residential Development Briefs and will involve key stakeholders dependent on the issues related to each site. The timescales for each Brief will be dependent on a number of factors and cannot be confirmed. Each Brief will be subject to the same period of consultation and adoption process of other Supplementary Planning Documents. A paragraph outlining this process is not considered to be necessary.	None. The process that will occur following the public consultation on site specific Residential Development Briefs will be clearly outlined during the public consultation stage.



Historic England	Natural Environment and Historic Environment could have their own sections.	Natural and Historic Environment features will be given their own maps and pages if there is sufficient information to require it.	None.
Historic England	The Residential Development Briefs state that they replace the need for an Outline application. This is the stage where some key technical evidence is produced, such as archaeological surveys. Without this stage it is not clear when these will be produced. This evidence should precede the creation of the Briefs, or at an early stage as possible.	The Outline stage does provide an opportunity for key studies to be completed, however these can also be completed at later stages. Also, the Residential Development Briefs will provide a high level indicative plan that will be adaptable and allow for different and innovative designs, meaning it will also be able to accommodate any issues that arise throughout the application process.	The paragraph referring to Outline applications has been reworded to state that the Residential Development Briefs can allow applications for the relevant site to proceed straight to Full application.
Historic England	The Briefs should contain the most up-to-date evidence, including Historic Environment Records.	Agreed. The Council will always use the most up-to-date evidence available.	None.
Broads Authority	Overall, as very positive approach and should ensure sound urban design principles are adopted for each site, with local context being well considered.	Comments noted.	None.
Broads Authority	Where relevant, there needs to be consideration of the impact on the Broads and their setting. For sites near to the Broads, there should be consideration of the Broads Landscape Character Appraisal, Water Quality Risk Maps and SSSI Risk Maps.	Agreed.	Reference to the impact on the Broads and the referenced studies has been included in the Natural and Historic Environment section and will be included where relevant.

Broads Authority	Development Framework Map could be considered as a preferred design approach, rather than an indicative design showing key considerations, but this can be overcome.	Comments noted. The Development Framework Map will highlight key considerations, however it will be made clear that this is only indicative.	None.
Tuddenham St Martin Parish Council	The Residential Development Briefs should require provision for adequate parking and service vehicle access, access to catchment school, reducing social isolation and loneliness, environmental care and sustainable transport, helping people age well and traffic and road safety.	These elements are covered by Local Plan policies which any planning application will be subject to. The Residential Development Briefs will help show how these policy requirements can be delivered on specific sites.	None.
Grundisburgh and Culpho Parish Council	There are alternative methods that would secure better places on allocated sites, such as Garden City Principles, Enquiry by Design, Parameter Plans and some of the suggestions from the Building Beautiful Places Report.	The Council will reflect the best practice available when creating the Residential Development Briefs. Where relevant, other studies and information will be included within the Briefs to ensure that the best and most up-to-date information is included and considered throughout the planning application process.	None.
Grundisburgh and Culpho Parish Council	The Template would allow for past mistakes to be repeated, does not allow for community engagement and could allow mediocre schemes to be approved or innovative schemes to be dismissed.	The Residential Development Briefs Draft Template has been created to provide clarity on sites to ensure the best possible development whilst also not being prescriptive to allow for innovative design. Support for innovative design has also been included in Local Plan policies which planning applications will still be	None.

		subject to. The Residential Development Briefs for individual sites will also be subject to public consultation before adoption.	
Grundisburgh and Culpho Parish Council	Not clear how the document will promote Building for Life 12, sustainable construction, digital infrastructure and allotments.	These elements are covered by Local Plan policies which any planning application will be subject to. The Residential Development Briefs will help show how these policy requirements can be delivered on specific sites.	None.
Grundisburgh and Culpho Parish Council	No mention of Biodiversity Net Gain and biodiversity should be considered under following headings: distinctiveness, condition, strategic significance and habitat connectivity.	Comments noted and agreed.	Reference to the need to provide Biodiversity Net Gain has been added to the Landscape Integration section and will be considered as appropriate to the scale of the individual sites.
Grundisburgh and Culpho Parish Council	The Template does not have any requirements for renewable energy, sustainable urban drainage systems and grey water harvesting, a clear definition of public and open spaces, a diversity of housing types and tenures, any long term management, communal recycling facilities and facilities for delivery drivers.	These issues are either already covered by Local Plan policies or are additional requirements that would not be appropriate for inclusion within the Residential Development Briefs.	None.
Suffolk Wildlife Trust	Under Natural and Historic Environment section should include requirement for consideration of key ecological networks.	Comments noted. The Council does not have sufficient data on ecological networks across the District at present to include this as a consideration. Site specific information will be included from studies where relevant. If	None.

		information on ecological networks does become available during the creation of the Residential Development Briefs this will be included.	
Suffolk Wildlife Trust	Landscape Integration should include a requirement for measurable Biodiversity Net Gain.	Comments noted and agreed.	Reference to the need to provide Biodiversity Net Gain has been added to the Landscape Integration section and will be considered as appropriate to the scale of the individual sites.
Westerfield Parish Council	Local Parish Councils should have the opportunity to contribute from an early stage.	Parish and Town Councils will have the opportunity to contribute to the Residential Development Briefs along with the local community.	None.
Suffolk County Council	Concern over the removal of the need for an Outline application due to this stage being associated with specific site evaluations. Need to identify what site assessments are needed as these could have knock-on effects on the layout.	The Outline stage does provide an opportunity for key studies to be completed, however these can also be completed at later stages. Also, the Residential Development Briefs will provide a high level indicative plan that will be adaptable and allow for different and innovative designs, meaning it will also be able to accommodate any issues that arise throughout the application process.	The paragraph referring to Outline applications has been reworded to state that the Residential Development Briefs can allow applications for the relevant site to proceed straight to Full application.
Suffolk County Council	There is no reference to climate change. There are a number of relevant considerations including water stress, coastal management, reducing carbon emissions etc.	Issues relating to climate change have been addressed in Local Plan policies which any planning application will still be subject to. Where relevant, site specific issues related to climate change will be referenced.	None.

Suffolk County Council	It would be useful for the Residential Development Briefs to reference how development could enhance public health and provided basic information on the health and wellbeing of existing communities. Many of the topics are addressed in Local Plan policies and these should be reflected.	The Residential Development Briefs will make reference to relevant Local Plan policies and highlight when these should be considered. Other public health benefits such as green infrastructure will also be considered through the creation of the residential Development Briefs. Contacts have also been established with the Suffolk County Council Public Health department who will be able to comment on individual sites.	Considerations that could improve public health, such as promoting walking and cycling, have been reorganised to be placed above other considerations. Other features such as green infrastructure will also be considered for their public health benefits.
Suffolk County Council	Welcome reference to Historic Environment Records and archaeological potential.	Comments noted.	None.
Suffolk County Council	There needs to be a more holistic consideration of water, not just flooding. Watercourses and ditches could be mapped and flooding from all sources should be highlighted. Ensuring space for water should be given greater emphasis in the Development Framework section. Suffolk County Council supports multifunctional SuDS but their long-term maintenance needs to be considered.	Comments noted. Features such as ditches will be identified at the site visit stage of creating the Residential Development Briefs. They will also be identified on relevant maps within the Briefs. Contacts have been established with key stakeholders who will be able to comment on drainage and other water issues to ensure these are fully integrated into the Briefs.	None.
Suffolk County Council	Priority should be given to sustainable transport modes.	Agreed. Local Plan policies also highlight the importance of these modes and will be referenced within the Residential Development Briefs.	The Movement and Streets and Movement sections will be rearranged to detail sustainable transport options before car access to

			show that these have a higher priority. This sentiment is also highlighted in Local Plan policies.
Suffolk County Council	It should be highlighted when a site is within the Minerals Consultation Area or within 250m of a facility safeguarded by the Suffolk Minerals and Waste Local Plan.	Agreed.	These considerations have been added to the Natural and Historic Environment section.
Suffolk County Council	Natural and Historic Environment section could be separated.	Natural and Historic Environment features will be given their own maps and pages if there is sufficient information to require it.	None.
Suffolk County Council	Suffolk County Council and other statutory consultees should be involved from an early stage.	Agreed. Suffolk County Council and other stakeholders will be involved during the creation of the Residential Development Briefs where this is considered necessary.	None.
Persimmon	The Residential Development Briefs are a way of providing certainty and are easy to use. They will inform the approach to layouts and highlight the Councils ambitions.	Comments noted.	None.
Persimmon	Who will be responsible for creating the brief? What are the timescales? How will sites be prioritised? Is there a particular view on contemporary design?	The Council will lead the creation of the Residential Development Briefs and will involve key stakeholders dependent on the issues related to each site. The timescales and priority of each Brief will be dependent on a number of factors and cannot be confirmed at this time. Each Brief will be subject to the same	None.

		<p>period of consultation and adoption process of other Supplementary Planning Documents. The design of schemes will be considered on a case by case basis, however the Residential Development Briefs have been designed to ensure innovative design is not inhibited.</p>	
Persimmon	<p>What would the Councils position be if an application was submitted?</p>	<p>The Residential Development Briefs are intended to help focus the pre-application process. The Council will encourage landowners, agents and developers to work with us to develop Briefs for sites in order to provide certainty and clarity in the planning application process.</p>	<p>None.</p>
Persimmon	<p>Landowners should be involved early in the process. Expectations should be realistic, and the Residential Development Briefs should not be prescriptive.</p>	<p>Landowners and agents will be involved during the drafting of the Residential Development Briefs. The Briefs have been designed to ensure that they are not prescriptive and still allow for innovative and good design.</p>	<p>None.</p>
Pigeon Investment Management	<p>Will Residential Development Briefs be required for sites that require masterplans to be developed?</p>	<p>Some sites allocated in the Local Plans are at a scale where they will require masterplans to be agreed before an application can be approved. This is stated in the relevant Local Plan policies. Residential Development Briefs will not be created for these sites due to the requirement for a masterplan.</p>	<p>None.</p>

<p>Pigeon Investment Management</p>	<p>Will Residential Development Briefs be created for sites where planning applications are being submitted at the time?</p>	<p>The Residential Development Briefs are intended to help focus the pre-application process. If a planning application has advanced before a Brief can be created, the creation of a Brief would likely slow down the planning process. A Brief would therefore not be created.</p>	<p>None.</p>
<p>Pigeon Investment Management</p>	<p>Residential Development Briefs should not be created for sites of more than 200 dwellings.</p>	<p>The Council will consider the need for Residential Development Briefs on a site by site basis. There will be no strict threshold on the size of the sites that will be considered, however any site that specifies a masterplan is required for a planning application within the Local Plan will not have a Brief created for them.</p>	<p>None.</p>
<p>Pigeon Investment Management</p>	<p>A full list of sites and timetables should be released.</p>	<p>The priority given to sites to create a Residential Development Brief is dependent on a number of factors and is likely to change over time. A full list of sites will not be released in order to provide flexibility and allow the Council to respond to the circumstances at the time. However landowners, developers and agents will be contacted at the beginning of the creation process for Briefs associated with their sites so they can be involved in the creation process.</p>	<p>None.</p>



Ipswich and East Suffolk CCG	Sites of more than 250 dwellings should be supported by a Health Impact Assessment.	Comments noted.	None.
Ipswich and East Suffolk CCG	The Council should consult with key stakeholders and infrastructure providers from an early stage.	The Council will consult with key stakeholder relevant to the location and scale of the site as early as possible during the drafting process.	None.
Peasenhall Parish Council	Approve of the creation of Residential Development Briefs and encourage participation by the community during their development.	The local community will have the opportunity to contribute to the Residential Development Briefs through public consultation.	None.
Peasenhall Parish Council	Recommends the inclusion of a carbon neutral policy.	Issues relating to climate change have been addressed in Local Plan policies which any planning application will still be subject to. Where relevant, site specific issues related to climate change will be referenced.	None.