

# Initial Consultation Statement

Draft Housing in Clusters and Small Scale  
Development in the Countryside  
Supplementary Planning Document

June 2022



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# 1 Introduction

The draft Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document (SPD) will provide guidance on the application of the following policies:

- SCLP5.4 Housing in Clusters in the Countryside - Suffolk Coastal Local Plan (2020) and
- WLP8.7 Small Scale Residential Development in the Countryside - Waveney Local Plan (2019).

The document includes further guidance on how the individual criteria of each policy will be applied and how each of the relevant criteria are to be met for development to be considered acceptable. Guidance will also be provided on how policies SCLP5.4 and WLP8.7 relate to other policies in the Local Plans.

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 SPD being held between 17<sup>th</sup> June and 5<sup>th</sup> August (7 weeks). The statement outlines the initial consultation that has been undertaken to inform the preparation of the SPD.

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>.

## 2. Who was consulted?

Due to the nature of the issues to be addressed in the draft SPD, it was considered that the most effective way to engage with interested parties in the preparation of the draft SPD would be through workshops with visual aids.

The initial consultation was therefore undertaken using online workshops (via Microsoft Teams or Zoom) for specific groups or organisations to provide feedback on their experience of using the policies:

- Town and Parish Councils in East Suffolk (31<sup>st</sup> March 2022)
- Agents and developers working in East Suffolk (28<sup>th</sup> March 2022)
- East Suffolk Councillors (9<sup>th</sup> May 2022)

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<sup>1</sup> How to get Involved in Local Planning – Statement of Community Involvement (April 2021)

Discussion to inform the proposed content was also had with a meeting of the Planning Committee Chairs and Vice Chairs and with the Local Plan Working Group.

### 3. How were they consulted?

Invitations were sent to all Town and Parish Councils in East Suffolk and agents and developers registered on the East Suffolk Local Plan Mailing List. The number of representatives was limited to one per Town or Parish Council or one per organisation (agents & developers) to ensure all attending had the opportunity to express their views. Workshops were held via Microsoft Teams or Zoom. The number of attendees for each workshop were:

- Agents and Developers (28<sup>th</sup> March 2022) – 9 attendees
- Town and Parish Councils (31<sup>st</sup> March 2022) – 22 attendees

All East Suffolk Councillors were invited to a workshop session on Monday 9<sup>th</sup> May 2022 (6-8pm) held via Zoom. The workshop was attended by 16 Members.

The format of each workshop included an overview of each of the policies; the scope and timescales of the SPD followed by an interactive session in which questions, issues and suggestions for the SPD could be raised along with discussion around whether particular slides did or didn't show a cluster/settlement in the countryside and whether particular spaces are likely to be suitable. The Members workshop session outlined the feedback from the earlier workshops and sought further feedback on how the SPD could provide further guidance.

Appendix 1 provides a summary of the comments / issues raised through the workshops and how the comments have been taken into account in the drafting of the SPD. Appendix 2 lists the consultation bodies invited to the workshops. Appendix 3 provides the presentation slides used at the Town and Parish Workshop on 31 March 2022. Slides of a similar content were also used at the other workshops.

## Appendix 1: Initial Consultation Summary

The table below provides a summary of the main comments, issues and questions raised in the workshops, which session(s) the comment arose from and how these comments have informed the preparation of the draft SPD.

Summary of Comment	Workshop session	How comment has been taken into account
<b>Key areas for the guidance to address (Slide 7)</b>		
Is there any intention to review settlement boundaries?	Town and Parish Councils	The Settlement Boundaries have been determined by policies SCLP3.3 and WLP1.2 of the Local Plans. These can only be reviewed through a review of the Local Plans. The draft SPD does not have the remit to review the Settlement Boundaries.
Will the SPD elaborate on cumulative effects?	Town and Parish Councils	The draft SPD provides further guidance on all elements of SCLP5.4 and WLP8.7, including the parts of the policies referring to cumulative effects.
How soon does a property built within a cluster become part of the cluster?	Town and Parish Councils	Chapters 2 and 3 of the draft SPD outline the requirements for an area to be considered a 'Cluster' or a 'Settlement in the Countryside'. This includes paragraphs 2.9 and 3.8 which state that a development with planning permission will be considered part of such an area only if there is clear evidence that the permission will be implemented.
What criteria is used to define whether a dwelling is within a cluster or a settlement in the countryside?	Town and Parish Councils	Chapters 2 and 3 of the draft SPD outline the requirements for an area to be considered a 'Cluster' or a 'Settlement in the Countryside'. This includes further guidance on the various criteria outlined in both policies to determine whether a dwelling is within a 'cluster' or 'settlement in the countryside' and illustrations are used to show the circumstances where a dwelling could be considered to be part of a cluster or settlement in the countryside.
How will infrastructure be supported i.e. doctors surgeries, schools, social services. If all these clusters are increased there could be a huge cumulative increase in the population.	Town and Parish Councils Members	This draft SPD focusses on the application of policies SCLP5.4 and WLP8.7 and does not have the remit to determine how infrastructure will be provided. It should be noted that the quantum of development that will come forward through these policies, when compared to other policies and site allocations, is relatively small. Therefore, the

Summary of Comment	Workshop session	How comment has been taken into account
		infrastructure to support development through these policies will likely be delivered through Community Infrastructure Levy.
How much weight is given to an SPD as opposed to policy when it comes to an appeal?	Town and Parish Councils	Once it is adopted, the draft SPD will be a material consideration in determining planning applications. The purpose of the draft SPD is to provide further guidance on the application of policies SCLP5.4 and WLP8.7, therefore the SPD will assist in the decision making regarding these policies. However, the reason for the decision must rely on the policies.
How does SCLP 5.4 relate to industrialisation of the countryside which may have more impact on the landscape character?	Town and Parish Councils	Chapter 6 of the draft SPD provides further guidance on how the potential impact on character should be considered in relation to policies SCLP5.4 and WLP8.7.
The SPD needs to set out how the policies relate to other policies in the Local Plans.	Developers/agents	Chapter 8 of the draft SPD provides guidance on how SCLP5.4 and WLP8.7 work alongside and relate to other policies in the Local Plans.
Question around how the conversion of buildings in the countryside relates to the policies.	Town and Parish Councils	Chapter 1 of the draft SPD explains that there are other policies relating to housing in the countryside such as conversions however this SPD is focused on policies SCLP5.4 and WLP8.7.
Illustrations are useful but to be fully effective must give interpretation to words: 'cluster', 'group', 'gap'.	Members	Following the feedback received during the various workshops, the illustrations have been prepared to make them relatively realistic and to provide representations of various elements of the policies. Annotations have been added to the illustrations to provide further clarity on the content of the draft SPD.
What defines meaningful and effective engagement?	Members	Chapter 7 of the draft SPD outlines the requirements for public engagement on relevant proposals, including what is meant by the community and how it should be demonstrated that planning impacts identified by the community have been addressed (under policy WLP8.7).
<b>What further guidance might assist in considering whether a group of buildings is in a cluster/Settlement in the Countryside? (Slides 9 – 11)</b>		
Do gardens have to be conjoined or can they have farmland between them to be a cluster?	Town and Parish Councils	Chapter 2 of the draft SPD outline the requirements for an area to be considered a 'Cluster'. This includes further guidance on the various criteria outlined in the policy to determine the appropriate areas, including how closely related dwellings need to be. Although WLP8.7 does not include such criteria, Chapter 3 of the draft SPD provides

Summary of Comment	Workshop session	How comment has been taken into account
		guidance on how dwellings might make up a settlement in the countryside. The draft SPD states and shows through illustrations that dwellings can be separated by small spaces such as gardens and driveways, and therefore do not need to be conjoined. However, extensive open areas such as agricultural fields are not appropriate.
The fundamental aim of the policy is for the infilling of clusters not extending clusters into the countryside. This needs to be maintained in the policy by reinforcement rather than weakening the policy.	Town and Parish Councils	(Note – although raised in this section the comment relates to the appropriateness of a site rather than the identification of a cluster or settlement in the countryside). Chapters 4 and 5 of the SPD outline the requirements for sites to be considered appropriate for development under the Local Plan policies. These chapters clearly state that sites should not extend further into the Countryside than the existing development. The illustrations in the SPD also provide guidance on this criterion.
It is dependent on scale	Members	The illustrations in Chapters 2 and 3 of the Draft SPD show features that are likely to exist in reality to provide an indication of scale, and provide an example of groups of dwellings that are considered to be close and those which are not.
Illustrations are useful but terms must give full interpretation to words such as 'cluster' and 'group'	Members	The use of annotations show where the illustrations are showing a 'cluster' or 'group'. 'Cluster' is also defined in Policy SCLP5.4.
SCLP5.4 – can a rural cluster have more than one gap?	Developers/agents	Paragraphs 4.6 and 5.3 of the draft SPD both state that areas can have more than one gap.
SCLP5.4 – is frontage relevant to cluster? For example, round the corner on a side road could also meet the definition. Policy needs clarifying what is considered adjacent to highways.	Developers/agents	Chapter 2 of the draft SPD outlines the requirements for an area to be considered a 'Cluster'. The text and the illustrations show that such an area must be made up of a continuous line of existing dwellings or a close group of dwellings, and that these areas must be adjacent to a highway.
What are the roles of roads and private drives?	Developers/agents	Highways are key features of 'Clusters' and potentially appropriate sites. The draft SPD shows that existing dwellings must be adjacent to a highway and provides a link to the Suffolk County Council website which defines highways.

Summary of Comment	Workshop session	How comment has been taken into account
SPD needs to define a 'close group' of dwellings i.e. how to define whether a particular dwelling is or isn't part of a close group (relevant to SCLP5.4).	Developers/agents	Chapter 2 of the draft SPD outlines the requirements for an area to be considered a 'Cluster'. This includes further guidance on what is meant by a 'close group' of dwellings and how the Council will consider these closely related or not. Illustrations have also been included in the draft SPD to interpret this.
'Adjacent on two sides' needs guidance.	Developers/agents	(Note – although raised in this section the comment relates to the appropriateness of a site rather than the identification of a cluster or settlement in the countryside). Chapters 4 and 5 of the draft SPD outline the requirements for sites to be considered appropriate for development under these policies. Both sections provide further guidance on how sites should be surrounded by development on two sides, as well as diagrams to demonstrate these principles.
<b>What further guidance might assist in considering whether a space is a 'gap'? (Slides 12 – 16)</b>		
Is there a maximum number of existing properties [to be considered as a cluster]. Example 4 shows 10 existing properties – if the potential gaps are developed this will become a settlement.	Town and Parish Councils	Chapters 2 and 3 of the draft SPD outline the requirements for an area to be considered a 'Cluster' and a 'Settlement in the Countryside'. Both sections outline that there is no maximum number of dwellings in either case.
If proposed dwellings are affordable homes would that influence whether permission is granted?	Town and Parish Councils	There are situations where policies on affordable housing in the countryside (SCLP11.5 and WLP8.6) could also be relevant alongside these policies. Chapter 8 of the draft SPD provides further guidance on how these policies will be applied in these situations.
Example 5 – if plot 2 was fully opposite the existing dwelling opposite what would be the view on extending a garden? If plot 2 has a sufficiently large garden to the south it could potentially open up another site on the opposite side of the road. There needs to be guidance on whether the existing residential properties should extend along the whole length of the proposed site.	Town and Parish Councils	Chapters 4 and 5 of the draft SPD outline the requirements for sites to be considered appropriate for development under these policies. Both chapters clearly state that sites must be completely surrounded by development on at least 2 sides. The illustration in the draft SPD also provide interpretation on this part of the policies.
Example 5 – if plots 3/4/5 and 6 were all dense woodland and considered a 'wildlife corridor' would they be treated differently?	Town and Parish Councils	Any proposals submitted relating to these policies must also meet the requirements of any other relevant policies in the Local Plans, including

Summary of Comment	Workshop session	How comment has been taken into account
		any relating to biodiversity and landscape. This is stated in Chapter 8 of the draft SPD.
What if there is a feature such as a pond or tree in the gap?	Members	Any proposals submitted relating to these policies must also meet the requirements of any other relevant policies in the Local Plans, including any relating to biodiversity and landscape. This is stated in Chapter 8 of the draft SPD.
Infill should be defined	Members	The illustrations in the Draft SPD show sites that may be potentially suitable as infill under the terms of the policies.
What happens with curtilage is an important consideration. How does the nature/features of the curtilage affect the suitability of the site?	Developers/agents	Chapter 6 of the draft SPD provides guidance on considering the potential impact on character. Paragraph 6.10 makes specific reference to the settings of the new dwellings.
Cumulative impact isn't the same in both policies. The Waveney policy (WLP5.4) is worded so the cumulative effect only relates to up to 5 properties.	Developers/agents	Chapter 6 of the draft SPD provide guidance on considering the potential impact on character, which includes guidance on how cumulative impact will be considered for each policy. Paragraphs 6.23 – 6.26 of the draft SPD also provide guidance on how developments coming forward under WLP8.7 will be considered in relation to the strategy of the Local Plan.
How would a site with permission but not built be considered?	Developers/agents	Chapter 6 of the Draft SPD contains guidance on that consideration may be given to these if there is certainty that the site will be developed.
<b>What further guidance might assist in considering if a proposal will impact local character? (Slides 17 – 19)</b>		
Housing needs should be taken into account. A mix of house sizes are needed such as smaller housing to attract younger families who are unable to afford properties in the countryside and for those wishing to downsize. Policy is to meet the needs of the rural area. Big executive houses aren't needed, smaller properties are. Consider the purpose of the policy i.e. to support rural communities.	Town and Parish Councils	The draft SPD acknowledges that the purpose of policies SCLP5.4 and WLP8.7 includes supporting smaller rural communities to meet their housing needs and enable people to stay within their communities. Under SCLP5.4 housing needs should be specifically taken into account for proposals of 4 or 5 dwellings. Paragraphs 7.6 and 7.7 of the draft SPD highlight this. Policies SCLP5.4 and WLP8.7 in the Local Plans set out policy on housing mix and place a focus on smaller dwellings.
What about building an extra house in the large garden of a house that is in the cluster?	Town and Parish Councils	Chapters 4 and 5 of the draft SPD outline the requirements for sites to be considered appropriate for development under these policies. This could include a garden of an existing house if the site and proposal

Summary of Comment	Workshop session	How comment has been taken into account
		meets the requirements of SCLP5.4 or WLP8.7, as well as other policy requirements.
Sympathetic design rather than the size of the dwelling. Clusters are much better when there is variation within them, as were built years ago. It is really important that the materials are appropriate to the setting.	Town and Parish Councils	Chapter 6 of the draft SPD provides guidance on considering the potential impact on character. Page 24 specifically highlights considerations relating to the design of new dwellings.
Style, landscaping etc are important as is plot size. Defining character from plot size is only part of the consideration	Developers/agents Members	Following the feedback received during the various workshops, the illustrations have been prepared to make them more realistic and more detailed to provide more accurate representations of all elements of the policies. Annotations have been added to the illustrations to provide further clarity on the content of the draft SPD
Gaps can be an important feature in a Conservation Area.	Developers/agents	Chapter 6 of the draft SPD provide guidance on considering the potential impact on character. Page 25 specifically highlights considerations relating to Conservation Areas.
<b>Other questions and comments</b>		
How much input will the Parish Council have as to whether development in a cluster is acceptable?	Town and Parish Councils	Town and Parish Councils have the opportunity to comment on planning applications that are submitted within their areas. It is not considered necessary to provide further guidance on this in the SPD.
SCLP5.4 – the policy states the proposal is for up to 3 dwellings. Does that mean 1, or 2 or 3?	Developers/agents	Policies SCLP5.4 and WLP8.7 both cover scenarios where the creation of up to 5 dwellings could be appropriate. This means that proposals for either 1, 2, 3, 4 or 5 new dwellings could be proposed under these policies. However, in order to be permitted they would need to meet the criteria of the policies, as well as any others in the Local Plans. The guidance in Chapters 4 and 5 of the draft SPD acknowledges that different scales of sites may come forward, up to 5 dwellings.
SCLP5.4 – appears to be some confusion between the supporting text at para 5.25 with the relevant policy criterion.	Developers/agents	A footnote for paragraph 3.1 of the Draft SPD acknowledges an editing error in the Local Plan which means that paragraph 5.25 refers to criteria c), when it in fact relates to criteria b).
The policies state that the concerns of the community are addressed. Who is the community and what constitutes a concern?	Developers/agents	Chapter 7 of the draft SPD outlines the requirements for public engagement on relevant proposals, including what is meant by the community and how it should be demonstrated that planning impacts

<b>Summary of Comment</b>	<b>Workshop session</b>	<b>How comment has been taken into account</b>
I would prefer a legitimate planning concern.		identified by the community have been addressed (under policy WLP8.7).
The SPD could show features that are in / could be in the cluster and those not appropriate to be within the cluster.	Developers/agents	The draft SPD includes a number of diagrams that highlight the features and characteristics that would be considered as part of 'Clusters' and 'Settlements in the Countryside'. The draft SPD also highlights what would not be considered part of such areas, such as isolated dwellings in the Countryside.
<b>General comments on the diagrams within the presentation(s)</b>		
Diagrams are overly simplistic e.g. roads are straight, existing properties are on same/similar sized plots, need more variation of house types e.g. not just detached properties, boundaries shown are too neat.	Parishes Developers/agents Members	Following the feedback received during the various workshops, the illustrations have been prepared to include a number of features and to portray various elements of the policies.
Need for scale / references to distances between buildings.	Town and Parish Councils Members	Following the feedback received during the various workshops, the illustrations have been prepared to make them relatively realistic and to provide representations of various elements of the policies. Annotations have been added to the illustrations to provide further clarity on the content of the draft SPD. Realistic measurements and sizes have been used for all elements of the illustrations, such as the roads and building sizes, to ensure the scale of the illustrations is appropriate.
Examples need to show the cluster's relationship with the surrounding area.	Town and Parish Councils Members	The illustrations in the draft SPD include the use of inset maps to show the surrounding area to provide context to the clusters.
Need to identify which is the main elevation of the existing properties as some may not front onto the highway.	Members	The illustrations in the draft SPD demonstrate the orientation of buildings.
Do other Council's guidance use illustrative top down diagrams or do they use 3D?	Members	The illustrations in the draft SPD are in 3D, with those showing a wider view in 2D.

## Appendix 2: Initial Consultation Bodies

The following organisations and groups were invited to attend online workshops at the initial consultation stage:

- Town and Parish Councils in East Suffolk (145 no.)<sup>2</sup>
- Agents and Developers working in East Suffolk (198 no.)<sup>3</sup>
- East Suffolk Councillors (55 no.)

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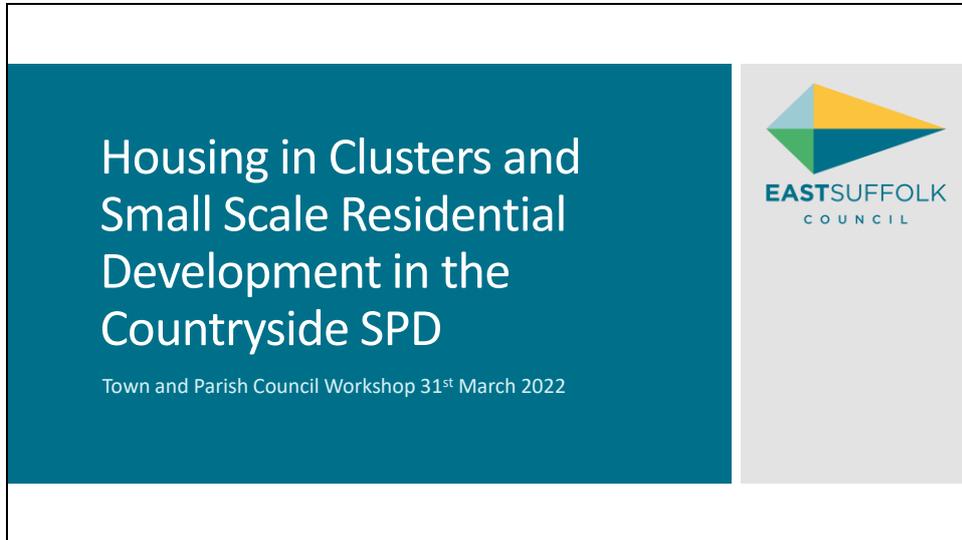
<sup>2</sup> There are 146 Town Councils and Parish Councils/Meetings in East Suffolk, however Covehithe Parish Meeting does not currently have a correspondent.

<sup>3</sup> 194 individuals/organisations from the Local Plan Mailing List identified as planning agents, developers etc. A further four agents were invited as currently working within East Suffolk.

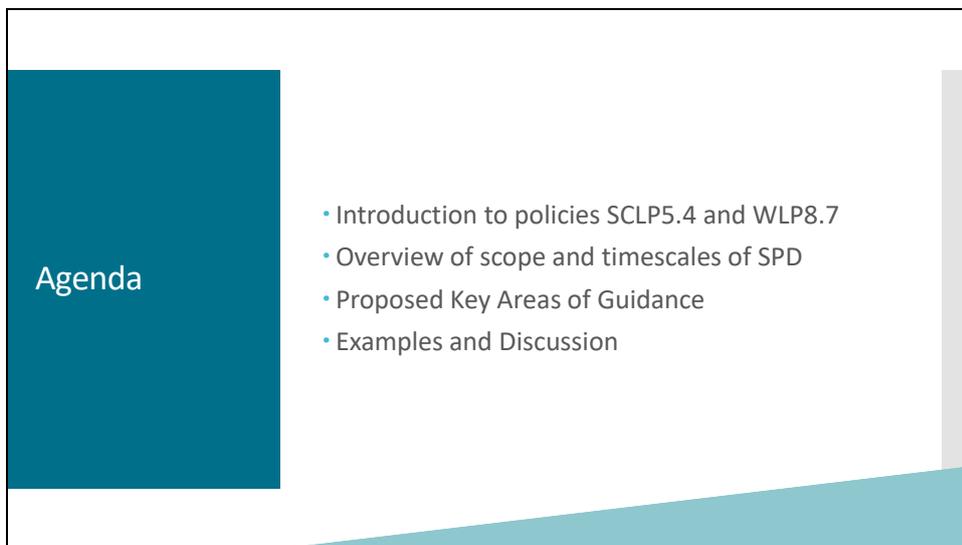
## Appendix 3: Initial Consultation Workshop Presentation

Presentation slides from the Town and Parish Workshop held 31 March 2022.

### Slide 1



### Slide 2



Slide 3

SCLP5.4 –  
Housing in  
Clusters in the  
Countryside

**Policy SCLP5.4: Housing in Clusters in the Countryside**

Proposals for new dwellings within 'clusters' in the countryside will be supported where:

- a) The proposal is for up to three dwellings within a cluster of five or more dwellings;
- Or
- The proposal is for up to five dwellings within a cluster of at least ten existing dwellings which is well related to a Major Centre, Town, Large Village or Small Village;
- And
- b) The development consists of infilling within a continuous built up frontage, is in a clearly identifiable gap within an existing cluster, or is otherwise located adjacent to existing development on two sides;
- c) The development does not represent an extension of the built up area into the surrounding countryside beyond the existing extent of the built up area surrounding, or adjacent to, the site; and
- d) It would not cause undue harm to the character and appearance of the cluster or, result in any harmful visual intrusion into the surrounding landscape.

Where more than three dwellings are proposed under criterion b) above, applicants must be able to demonstrate that meaningful and effective community engagement has taken place in the development of the scheme and that the mix of dwellings proposed would meet locally identified needs.

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. Consideration will also need to be given to the features of Landscape Character Areas in accordance with Policy SCLP10.4.

The cumulative impact of proposals will be a consideration in relation to the criteria above.

A 'cluster' in the context of this policy:

- Consists of a continuous line of existing dwellings or a close group of existing dwellings adjacent to an existing highway; and
- Contains 5 or more dwellings.

Slide 4

WLP8.7 – Small  
Scale  
Residential  
Development  
in the  
Countryside

**Policy WLP8.7 – Small Scale Residential Development in the Countryside**

Small scale residential development in the Countryside of up to three dwellings will be permitted where:

- The site constitutes a clearly identifiable gap within a built up area of a settlement within the Countryside;
- There are existing residential properties on two sides of the site; and
- The development does not extend further into the undeveloped Countryside than the existing extent of the built up area surrounding the site.

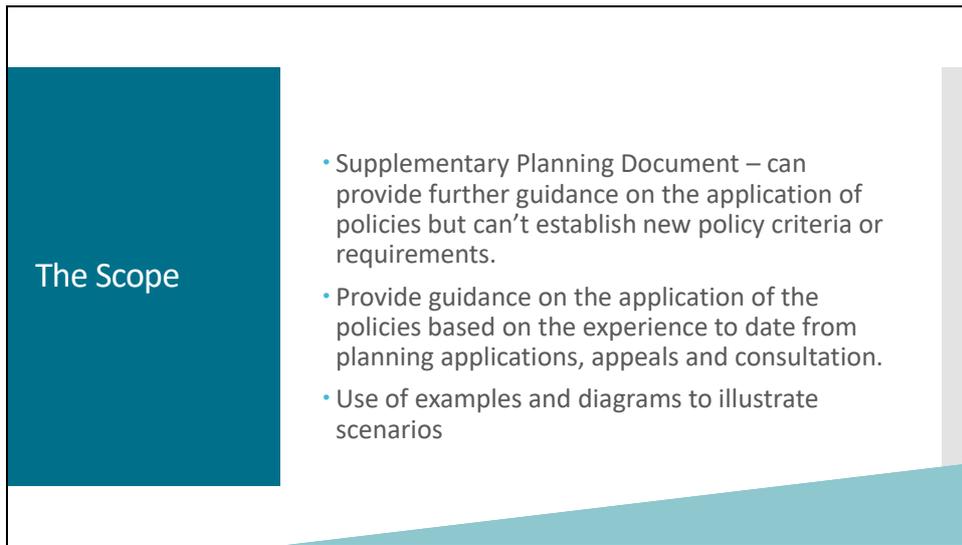
Small scale residential development in the Countryside of up to and including five dwellings will also be permitted where:

- There is clear and demonstrable local support;
- The scheme demonstrates meaningful and robust consultation with the Parish Council, local community and other stakeholders;
- Following consultation, it can be demonstrated that any planning impacts identified by the local community have been fully addressed and therefore the scheme is supported by the community;
- The site is adjacent or within the built up area of the settlement within the Countryside; and
- The scheme when considered cumulatively with other developments in the Countryside would not result in a level of development which would be contrary to the strategy outlined in Policies WLP1.1 and WLP7.1.

For all small scale development in the Countryside the design of the scheme will need to respect and reflect the character of the settlement and existing built up frontage including:

- Housing density is reflective of the density in the village and surrounding built up area; and
- The ratio of the building footprint to the plot area is consistent with existing properties nearby which characterise the village.

Slide 5



The Scope

- Supplementary Planning Document – can provide further guidance on the application of policies but can't establish new policy criteria or requirements.
- Provide guidance on the application of the policies based on the experience to date from planning applications, appeals and consultation.
- Use of examples and diagrams to illustrate scenarios

Slide 6



Timescales

- Initial consultation with Developers and Town and Parish Councils – Early Spring 2022
- Public consultation – Summer 2022
- Adoption – Autumn 2022

## Slide 7

**Key Areas for the Guidance to Address**

- Some key areas have been identified, such as:
  - What is a 'Cluster'/Countryside settlement?
  - What is a 'Gap'?
  - Relationship with Settlement Boundaries and the Countryside.
  - Relationship with highways and non-residential uses.
  - What is expected from 'meaningful and effective engagement' (SCLP5.4) and 'meaningful and robust consultation' (WLP8.7)?
  - Consideration of impact on local character and landscape.
  - Relationships with other policies, e.g. Strategy for [Newbourne](#) (SCLP11.9) and other Countryside policies.
- Are there any key areas of guidance it would be useful to include?

## Slide 8

**Discussion and Examples**

- On the following slides we have some diagrams that have been drafted.
- The purpose of this part of today's workshop is to look at these examples and seek your feedback on how the SPD might provide guidance on these matters.

Slide 9

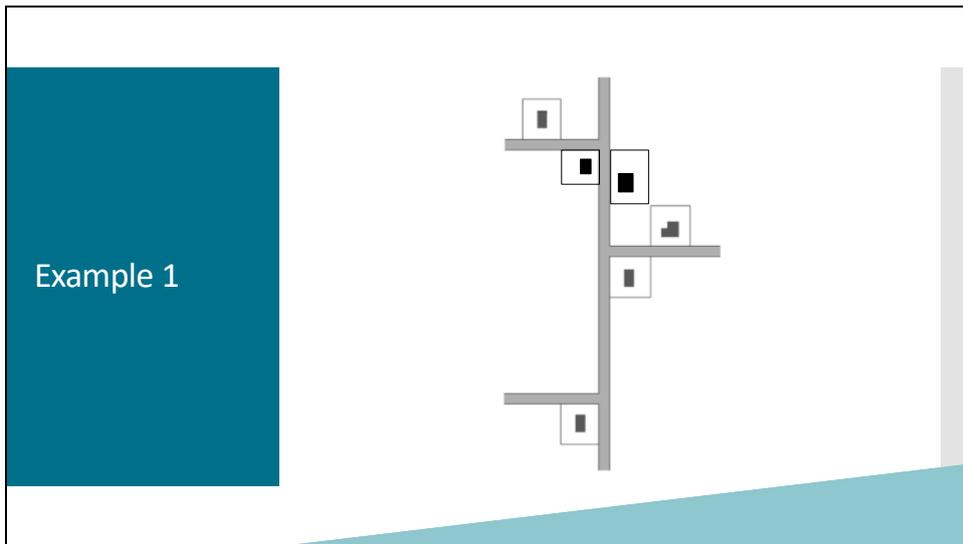
Question

What further guidance might assist in considering whether a group of buildings is a cluster/countryside settlement?

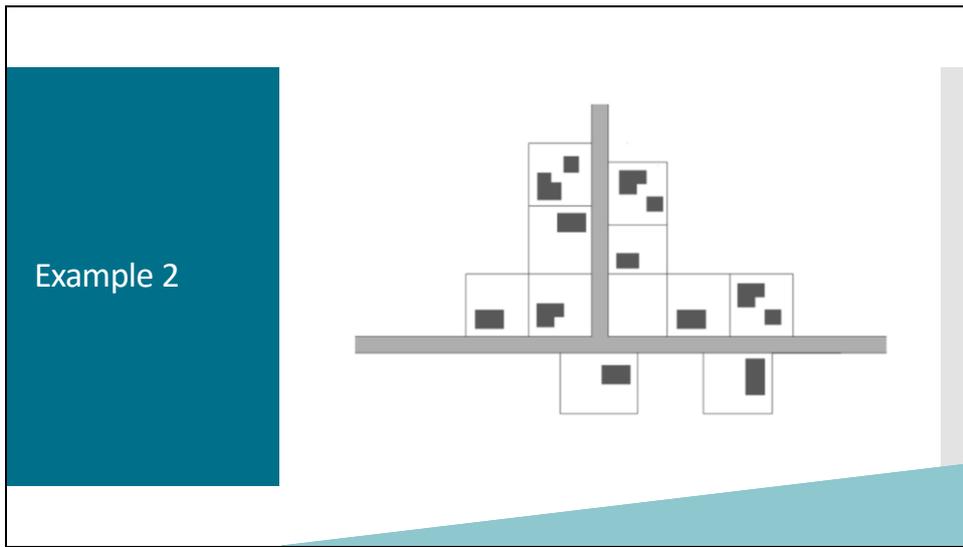


Slide 10

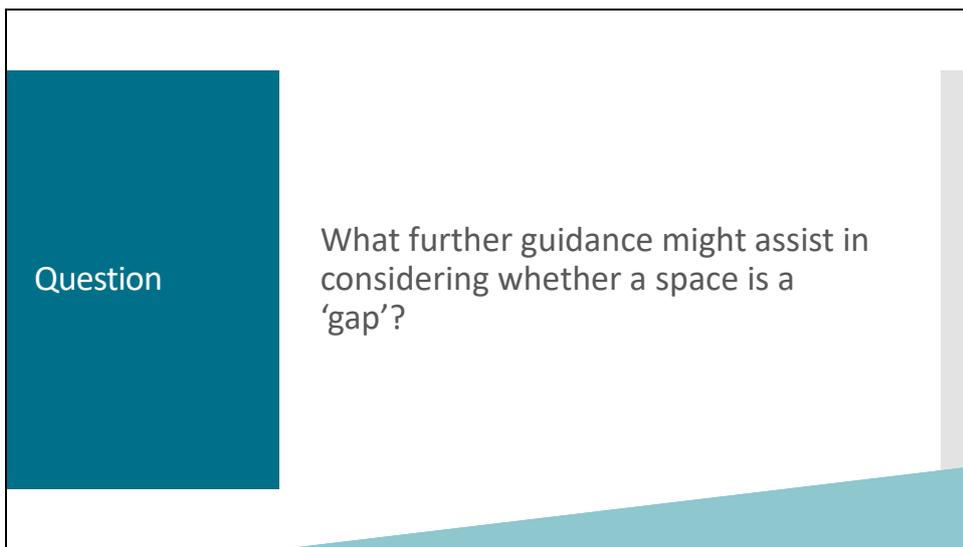
Example 1



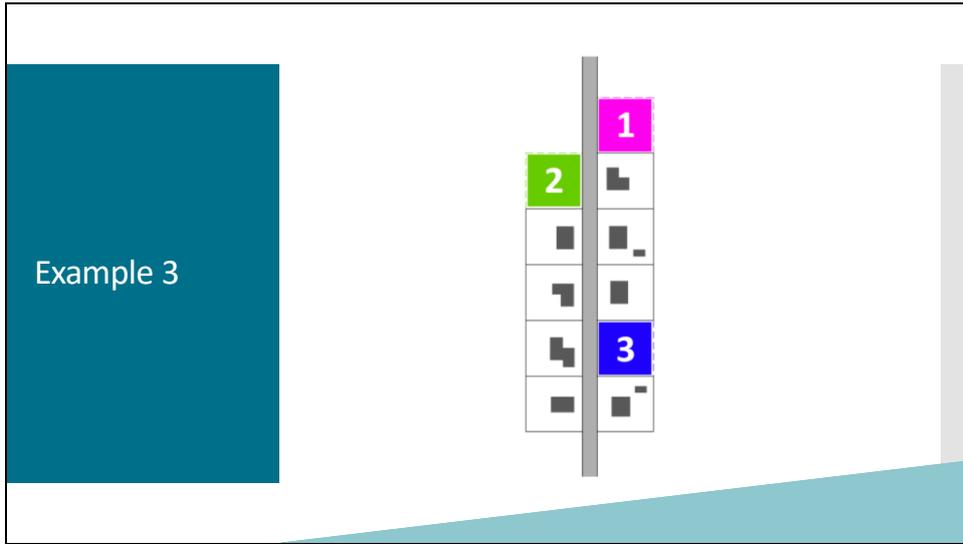
Slide 11



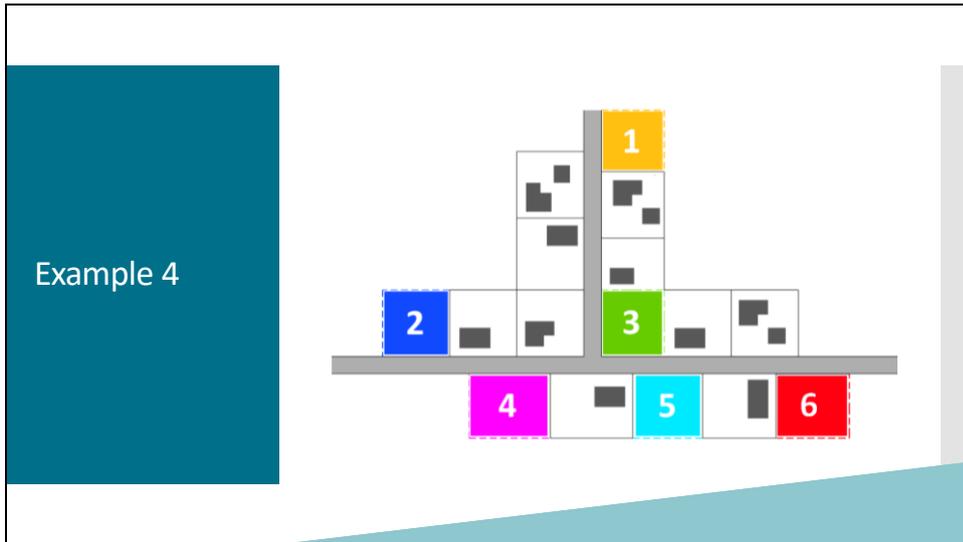
Slide 12



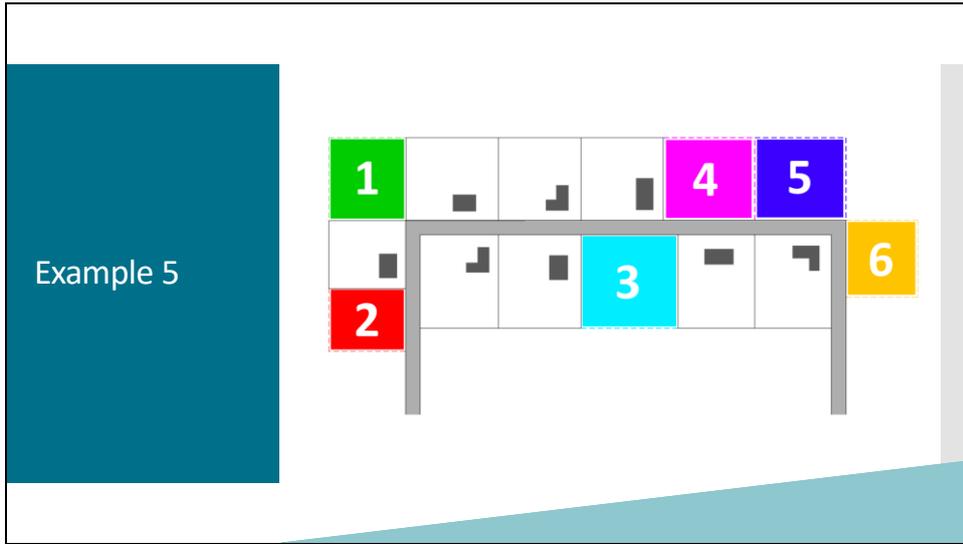
Slide 13



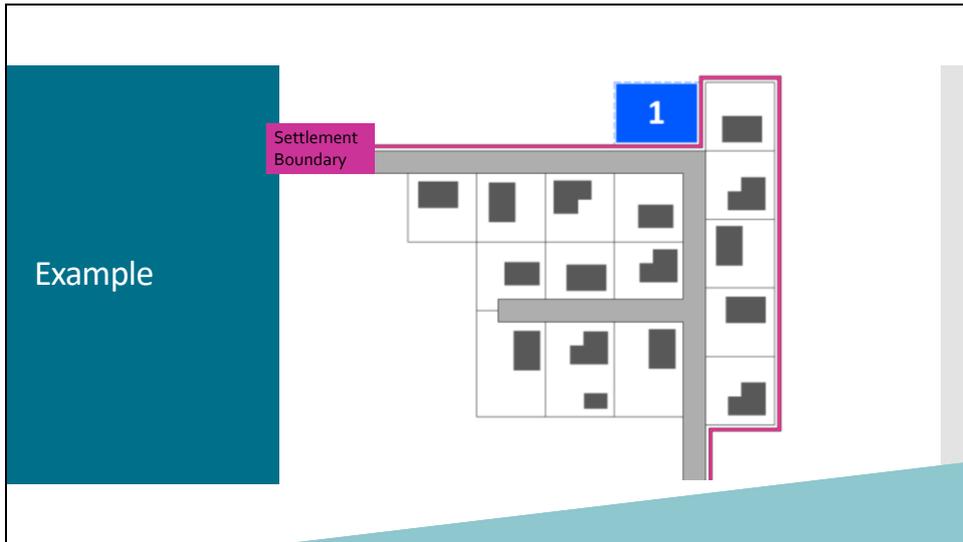
Slide 14



Slide 15



Slide 16



Slide 17

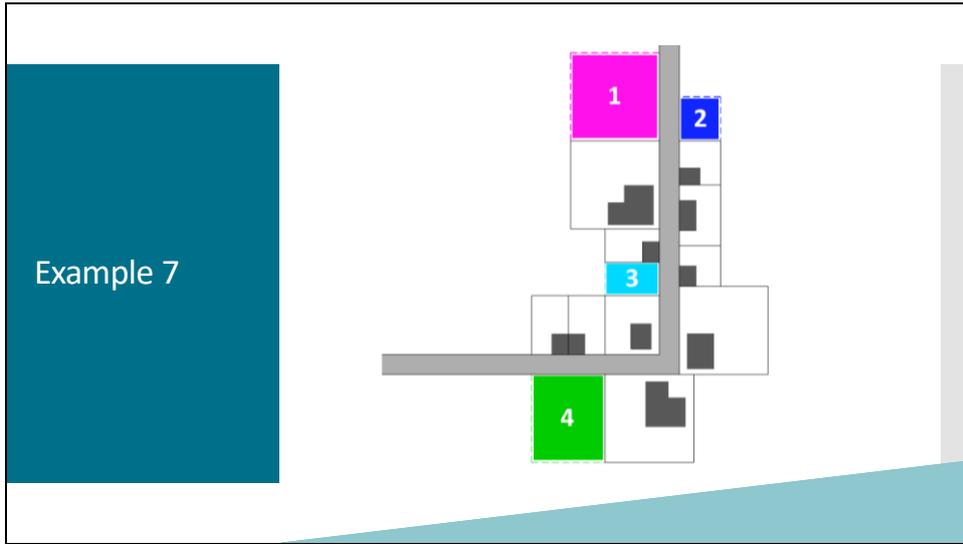
Question

What further guidance might assist in considering if a proposal will impact local character?

Slide 18

Example 6

Slide 19



Slide 20

