

# Suffolk Coastal First Draft Local Plan

Consultation 20<sup>th</sup> July to 14<sup>th</sup> September 2018

## Frequently Asked Questions

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# First Draft Local Plan

## What is the First Draft Local Plan?

The Local Plan sets out the level of growth which needs to be planned for in Suffolk Coastal over the period to 2036 and identifies where this should be located and how it should be delivered. It also sets out planning policies which the Council will use to determine planning applications. The Council is currently consulting on the new Local Plan, and the consultation provides the opportunity to comment on the draft strategy, policies and site allocations.

### Find out more:

View the [First Draft Local Plan summary leaflet](#) and the full First Draft Local Plan document and supporting documents on the Council's [website](#).

## What is being proposed and where?

The First Draft Local Plan sets out an ambitious strategy to grow the local economy, improve infrastructure and widen the choice of homes. It makes provision for land to support housing and economic growth in Suffolk Coastal for the period 2016 to 2036. In addition to a variety of locations already with planning permission or allocated in existing planning policy documents, the First Draft Local Plan proposes a spatial strategy for new homes and employment land. The spatial strategy guides growth to Felixstowe and Saxmundham, whilst also proposing growth in a number of rural locations. Provision of land for employment development is concentrated close to the A14 on the Felixstowe Peninsula and at the Seven Hills junction of the A12 and A14. New employment areas provide a flexible supply of land for key sectors of the local economy such as businesses related to the Port of Felixstowe and growth in professional and business services.

**Find out more:** View the [First Draft Local Plan summary leaflet](#) and the full First Draft Local Plan document and supporting documents on the Council's [website](#).

## Are the proposals backed up by information and evidence, and can I view this?

The First Draft Local Plan is based upon evidence, and alternative approaches and sites have been considered. Supporting evidence base documents are available to view on the Council's website. The evidence base comprises various studies and assessments including in relation to assessments of economic and housing needs, environment (such as flood risk) and transport.

An Issues and Options consultation was undertaken in 2017, and the comments received have been considered in the production of the First Draft Local Plan. The Council has published an Analysis of Responses to Issues and Options Consultation.

**Find out more:** The evidence base and the Analysis of Responses to the Issues and Options Consultation are available to view on the [First Draft Local Plan webpages](#).

## Why doesn't the Plan cover Waveney?

A separate Waveney Local Plan is currently being produced. On the creation of the East Suffolk Council, Local Plans relating to the current Suffolk Coastal District will still apply to that area, and likewise with Waveney.

The Strategic Housing Market Assessment (Peter Brett Associates, 2017) assessed the extent of Housing Market Areas (HMAs), following national guidance. The Functional Economic Area (FEA) has been defined through the Employment Land Needs Assessment. These assessments conclude that Suffolk Coastal forms an HMA / FEA with Ipswich, Babergh and Mid Suffolk, recognising the strong functional links these areas have. One of the key determinants is travel to work areas and the Ipswich HMA/FEA has a relatively high level of self containment in this respect (85% of commuting trips from within the HMA are to destinations in the HMA / 79% of trips to the HMA are from within the HMA – the benchmark is 75%). Waveney was concluded to form its own HMA / FEA.

### Find out more:

[Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 1 \(Peter Brett Associates, 2017\)](#)

Information on the new Waveney Local Plan can be viewed at [www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/new-waveney-local-plan/](http://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/new-waveney-local-plan/)

Further information on the creation of the East Suffolk Council can be viewed at [www.eastsuffolk.gov.uk/yourcouncil/new-single-council/](http://www.eastsuffolk.gov.uk/yourcouncil/new-single-council/)

## I can't see my village mentioned, is the Local Plan relevant to me?

The Local Plan covers the whole of the District. Other than the site and area specific policies, the policies would apply to planning applications submitted in any part of the District.

The draft settlement hierarchy (draft policy SCLP3.3) categorises settlements based on the services and facilities contained in those settlements. Development could come forward in Settlement Boundaries in accordance with relevant policies, including those in chapters 4 and 5.

For those settlements not specifically identified in the settlement hierarchy, and which are therefore in the countryside, draft policy SCLP5.3 sets out the circumstances within which housing development would be supported in the countryside.

The First Draft Local Plan does not propose site allocations in every Large Village and Small Village. The Site Selection Topic Paper explains the approach to identifying proposed sites.

New site allocations for housing and employment and mixed uses are identified in the following locations: Benhall, Brandeston, Bucklesham, Campsea Ashe, Charsfield, Darsham, Dennington, Eyke, Grundisburgh, Kettleburgh, Kirton, Levington, Otley, Nacton, Pettistree (adjoining Wickham Market), Sutton, Trimley St Martin, Tuddenham, Westleton and Wivesham

The new Local Plan also carries forward site allocations in:

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Aldeburgh, Aldringham, Debach, Dennington, Felixstowe, Kelsale cum Carlton, Levington, Nacton Heath, Orford, Parham, Rendlesham, Saxmundham, Shottisham, Trimley St Martin, Westerfield, Wickham Market, Wixnesham.

**Find out more:**

[Site Selection Topic Paper](#)

### **Have the environmental, social and economic effects of the First Draft Local Plan been considered?**

Sustainability appraisal has been used to assess the draft policies and allocations for likely positive or negative effects on the environment, economy and social issues. Alternatives have also been tested.

**Find out more:** Sustainability appraisal interim report on the First Draft Local Plan webpage:

[www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/first-draft-local-plan/](http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/first-draft-local-plan/).

### **How does the Local Plan relate to Neighbourhood Plans?**

Neighbourhood Plans were introduced through the Localism Act 2011 and enable communities to produce their own planning policies and to allocate sites for development.

Neighbourhood Plans have to be produced in accordance with legislation and, prior to going through a referendum, are subject to an Examination undertaken by an independent Examiner. Neighbourhood Plans must be in conformity with the strategic policies of the Local Plan.

A neighbourhood plan will become part of the statutory development plan once it has been ‘made’ by the planning authority and applications for planning permission will be determined in accordance with that plan alongside the adopted Local Plan.

There are currently seven ‘made’ Neighbourhood Plans in Suffolk Coastal, with a further 11 Neighbourhood Areas designated:

Aldringham cum Thorpe	Neighbourhood area approved
Bredfield	Neighbourhood area approved
Earl Soham	Neighbourhood area approved
Easton	Neighbourhood area approved
Framlingham	Neighbourhood Plan made 23 March 2017
Great Bealings	Neighbourhood Plan made 23 March 2017
Kelsale-cum-Carlton	Neighbourhood area approved
Kesgrave	Neighbourhood area approved
Leiston	Neighbourhood Plan made 23 March 2017
Martlesham	Neighbourhood Plan made 17 July 2018
Melton	Neighbourhood Plan made 25 January 2018
Playford	Neighbourhood area approved

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Rendlesham	Neighbourhood Plan made 8 January 2015
Saxmundham	Neighbourhood area approved
Trimley St Mary	Neighbourhood area approved
Wenhaston with Mells Hamlet	Neighbourhood Plan made 17 July 2018
Wickham Market	Neighbourhood area approved
Woodbridge	Neighbourhood area approved

National Planning Practice Guidance states that where a Neighbourhood Plan is brought forward before an up-to-date Local Plan is in place the neighbourhood planning group and the local planning authority should discuss and aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging Local Plan and the adopted development plan to produce complementary neighbourhood and Local Plans and to minimise any potential conflicts. If policies in a Neighbourhood Plan conflict with policies in a Local Plan, the more recent plan will take precedence.

Draft policy SCLP12.1 in the First Draft Local Plan sets out the proposed approach for areas which currently have a Neighbourhood area approved. The policy includes an indicative minimum number of dwellings for areas with a Neighbourhood Area approved and provides an opportunity for these to be planned for through the production or review of Neighbourhood Plans. A number of other draft policies in the First Draft Local Plan also identify topics that Neighbourhood Plans may wish to address.

**Find out more:** The Council's neighbourhood planning webpages can be viewed at [www.eastsuffolk.gov.uk/planning/neighbourhood-planning/](http://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/)

## Economy

### Why allocate more land than is identified as needed in the evidence?

The economic evidence contained in the Economic Area Sector Needs Assessment (Lichfields, 2017) indicates a land requirement of 14.4ha for the period 2014 - 2036. This forecast is based on trends and the current requirements. It is considered that the relatively small amount of land could be found by extending existing sites or conversion / reuse of existing buildings. However, the Local Plan seeks to be ambitious and promote economic growth in specific sectors to ensure that the main economic drivers are supported with comprehensive land requirements to meet their specific needs.

### How does the Plan support the economy in parts of the District where allocations are not proposed?

Other policies have been prepared to further facilitate economic activity across the district. The Council is seeking to promote a wider range of economic activity and provide greater flexibility (where appropriate) for economic activity to come forward on existing employment sites across the district. The Council is seeking to support economic enterprises through policies to promote activity and meet the ever changing demands of the markets and sectors that are found in Suffolk Coastal. Criteria based policies which can be applied to other locations such as farms and existing sites that provide employment.

**Find out more:**

Economic evidence documents can be viewed on the First Draft Local Plan evidence base webpage at [www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/suffolk-coastal-local-plan-evidence-base/](http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/suffolk-coastal-local-plan-evidence-base/).

## Housing

### Why do we need more housing?

Taking an ambitious approach towards housing delivery will help to boost the supply of housing, increase the mix of housing available, support economic growth and help to sustain rural communities.

The population of Suffolk Coastal District is predicted to continue to grow over the period to 2036. In addition, households in Suffolk Coastal are getting smaller, which in itself leads to the need for more housing. In Suffolk Coastal District the average household size in 2001 was 2.31, and this reduced to 2.27 in 2011, as reported in [Part 2 of the Strategic Housing Market Assessment](#).

Further, house prices in Suffolk Coastal are higher than average, and there is a need therefore to provide more affordable housing. The Strategic Housing Market Assessment identifies a need for 94 new affordable dwellings per year.

The population of elderly people in Suffolk Coastal is growing significantly. The Strategic Housing Market Assessment highlights that within the Ipswich Housing Market Area the population of those aged over 65 is projected to increase by 57.8% between 2014 and 2036. The East Suffolk Housing Strategy recognises that there are an increasing number of older people living in housing that is too large or is not suited to their mobility needs. The provision of new housing can therefore help to increase the choice and mix of housing available.

#### Find out more:

[Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 2 \(Peter Brett Associates, 2017\)](#)

## Proposed Site Allocations

### What are site allocations?

‘Allocation’ is the process of identifying individual sites for new housing or other types of development such as employment. The First Draft Local Plan contains maps showing the proposed allocations. Once a site is allocated for housing, its development becomes policy in the final version of the Local Plan and is therefore acceptable in principle. Planning permission is still required prior to a site being developed.

### How have site allocations been selected?

The Council is proposing a strategy which focuses growth on Saxmundham and Felixstowe as well as directing housing growth to the rural parts of the District.

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The Council has published a Topic Paper as part of the consultation which sets out how the sites have been selected.

Appendix I of the First Draft Local Plan sets out the reasons for selecting sites and for alternative sites being discounted.

**Find out more:**

[First Draft Local Plan – Appendix I](#)

[Site Selection Topic Paper](#)

[Draft Strategic Housing and Employment Land Availability Assessment](#) (Draft SHELAA)

### **Can alternative sites be suggested?**

At this stage the Council can still consider alternative sites. New sites, or changes to sites, can be submitted during the First Draft Local Plan consultation.

## **Land at Innocence Farm (Policy SCLP12.30)**

### **Why is it needed and what alternative sites have been considered?**

The Port of Felixstowe Growth and Development Needs Study was commissioned in response to representations received during the Issues and Options consultation from the Port of Felixstowe outlining the limited land availability for port related operations in the district.

The Port of Felixstowe study considered 10 sites on land that had been submitted to the Council. These sites were all in Suffolk Coastal as feedback from the Port industry suggested that sites needed to be Felixstowe side of the Orwell Bridge.

The amount of land that is unused is limited on sites close to the Port. Small scale opportunities exist and all of these are allocated for employment and could come forward subject to land owner aspirations and deliverability. Existing sites however are relatively small and are unlikely to support the Port over the plan period and into the future.

The land at Innocence Farm has been identified as potential for allocation due to the proximity to the port and the A14, relatively flat topography, availability and also as it provides the scale of opportunity to comprehensively meet the needs of the Port and related businesses over the plan period and into the future.

**Find out more:**

[Port of Felixstowe Growth and Development Needs Study \(Lichfields, July 2018\)](#)



### **What uses are likely to come forward?**

At this stage, the Local Plan is flexible on the type of uses that might come forward on this site and it will be up to the landowners and the Port related businesses to deliver the uses required. Draft policy SCLP12.30 is clear that uses will need to be specifically related to the Port and the wider operations of the sector, such as lorry parking, warehousing or logistics. Over the plan period, the type of uses will be expected to come forward to meet the demands of the port related sector. The land will not be made available for employment uses such as offices, retail or other commercial activities.

### **What about the effect of Brexit?**

The evidence considers the impact of Brexit, but this is uncertain and therefore difficult to model and predict accurately. The study acknowledges Brexit but also identifies that a significant amount of trade is from Asia and will be unaffected by decisions relating to the European Union. The study seeks to maintain the market share (approximately 40%) that the Port of Felixstowe currently experiences regardless of decisions over Brexit and future trade deals.

### **How will the site be accessed?**

Draft policy SCLP12.30 is clear that access in both an easterly and westerly direction needs to be created to the satisfaction of both Suffolk County Council and Highways England.

### **What about the impact on landscape and neighbouring communities?**

Draft policy SCLP12.30 is clear that significant landscaping is required to reduce the impact of the operations that take place on this site over the plan period. Landscaping and careful consideration of lighting, noise and traffic movements will all need to be addressed at the planning application stage. By allocating the large site, the Council is confident that landscape mitigation can be introduced on a strategic and comprehensive scale to minimise the impact of the proposed allocation.

## **North Felixstowe Garden Neighbourhood (Policy SCLP12.3)**

### **What is a Garden Neighbourhood?**

The principles of garden communities are well established on a larger scale and many examples of best practice are found around the country. Opportunity exists through land allocations to follow these principles as Garden Neighbourhoods for Suffolk Coastal which provide generous provision of green spaces, range of local facilities including schools, shops, meeting places and other community spaces alongside opportunities for recreation, walking and cycling.

### **What will the impact on roads be?**

The Council has commissioned WSP to undertake transport modelling, using the Suffolk transport model developed by Suffolk County Council (see infrastructure section below).

Two scenarios for land to the north of Felixstowe were tested – an additional 800 dwellings or an additional 1500 dwellings (on top of the permitted 560 on land to the north of Candlet Road).

The transport modelling concludes that the development is assumed to contribute to increased congestion at Dock Spur roundabout and within Felixstowe. Further transport modelling will be undertaken as the plan progresses.

**Find out more:**

[Local Plan Transport Modelling – Methodology Report](#)

[Local Plan Transport Modelling – Forecasting Report Volume 1 Suffolk Coastal and Ipswich](#)

### **What will the impact on schools and health be?**

The Garden Neighbourhood will incorporate a new primary school, as set out in draft policy SCLP12.3 and the Infrastructure Delivery Framework (contained in Section 14 of the First Draft Local Plan).

The Infrastructure Delivery Framework also shows that improvements to local health services would be expected to be provided.

### **South Saxmundham Garden Neighbourhood (Policy SCLP12.26)**

#### **What is a Garden Neighbourhood?**

The principles of garden communities are well established on a larger scale and many examples of best practice are found around the country. Opportunity exists through land allocations to follow these principles as Garden Neighbourhoods for Suffolk Coastal which provide generous provision of green spaces, range of local facilities including schools, shops, meeting places and other community spaces alongside opportunities for recreation, walking and cycling.

#### **Why can't growth for Saxmundham be addressed through the Saxmundham Neighbourhood Plan?**

As the proposed Local Plan strategy is based on the delivery of a strategic scale of development in Saxmundham, it is appropriate for the Local Plan rather than the Neighbourhood Plan to plan for this growth. The Neighbourhood Plan would not be able to consider District wide alternatives, and non-allocation of this level of growth in Saxmundham would undermine the proposed Local Plan strategy. The Neighbourhood Plan may still choose to make small scale allocations or to set policies covering other planning issues.

#### **What will the impact on roads be?**

The Council has commissioned WSP to undertake transport modelling, using the Suffolk transport model developed by Suffolk County Council (see infrastructure section below).

Two scenarios were considered for Saxmundham – 800 dwellings to the south of Saxmundham or a split between the south (550 dwellings) and the east (250 dwellings). The modelling concludes that no junctions within Saxmundham and the surrounding area are showing as being close to or over capacity. However, some potential congestion is identified at the A12 / Kiln Lane junction in relation to the proposed allocation. Further transport modelling will be undertaken as the plan progresses.

**Find out more:**

[Local Plan Transport Modelling – Methodology Report](#)

[Local Plan Transport Modelling – Forecasting Report Volume 1 Suffolk Coastal and Ipswich](#)

## **What will the impact on schools and health facilities be?**

The Garden Neighbourhood is proposed as a mixed use development which would include provision of a new primary school. The Infrastructure Delivery Framework in Section 14 of the First Draft Local Plan shows that improvements to local health services are expected to be provided.

# **Infrastructure**

## **Will infrastructure be able to support the new homes and employment sites?**

New development in the Local Plan will need to be supported by new and improved infrastructure. Infrastructure includes schools, health facilities like doctors surgeries, transport, leisure, community facilities and networks of public open space, parks, footpaths and cycle routes known as 'green infrastructure'.

The Council has worked with infrastructure providers to identify infrastructure requirements to support the development proposed in the First Draft Local Plan. Details of the infrastructure requirements are contained in the Infrastructure Delivery Framework in Section 14 of the First Draft Local Plan.

Larger developments will often provide some infrastructure on site. The proposals for the South Saxmundham Garden Neighbourhood and the North Felixstowe Garden Neighbourhood include provision of infrastructure on-site.

The Council has a Community Infrastructure Levy in place which requires developers to make a financial contribution towards new and improved infrastructure.

### **Find out more:**

More information on the Community Infrastructure Levy can be viewed at [www.eastsuffolk.gov.uk/planning/community-infrastructure-levy/](http://www.eastsuffolk.gov.uk/planning/community-infrastructure-levy/)

## **How will the roads cope with the growth and development that is proposed?**

The Council has commissioned WSP to undertake modelling of the effect of new developments on the road network. The model uses the Suffolk County Transport Model which was developed by WSP for Suffolk County Council.

At this stage the modelling has been used to identify the areas which are likely to experience issues without any additional growth and to test Local Plan scenarios. The scenarios have considered different levels of growth to the north of Felixstowe and at Innocence Farm, and different options for locations of growth in Saxmundham. For rural areas, the scenarios tested different levels of growth close to the A12 and around Ipswich. Officers have worked with Suffolk County Council as Highways Authority in interpreting and analysing the results. The modelling indicates that in the rural parts of the District growth proposed is unlikely to have a significant effect on the functioning of the transport network.

Further transport modelling will be undertaken as the production of the Local Plan progresses.

**Find out more:**

[Local Plan Transport Modelling – Methodology Report \(WSP, 2018\)](#)

[Local Plan Transport Modelling – Forecasting Report Volume 1 Suffolk Coastal and Ipswich \(WSP, 2018\)](#)

### **What about the Ipswich Northern Route?**

Suffolk County Council published an Ipswich Northern Route study in January 2017 which examined three potential route options. This proposed strategy of the Local Plan does not focus growth on Ipswich and it is anticipated that the next review of the Local Plan will examine route options and associated options for growth in more detail.

**Find out more:**

[Working Draft Statement of Common Ground for the Ipswich Strategic Planning Area \(July 2018\)](#)

### **Is the proposed development of Sizewell C Nuclear Power Station taken into account?**

The potential new Sizewell C nuclear power station, associated development to support its construction and operation and effects and proposed mitigation will be decided at a national level as a Nationally Significant Infrastructure Project. However, as one of the biggest development and construction programmes faced by the Council and its communities in generations, it is considered that it should be developed alongside the overall policy framework for the District to enable the impacts and benefits to be managed, including addressing the issues of cumulative impact and outcomes of other large scale project. The First Draft Local Plan contains draft policy SCLP3.5 which sets out the criteria against which the Council would consider major energy infrastructure projects in its role as either determining body or as a consultee.

**Find out more:**

Further details about the proposed Sizewell C Nuclear Power Station can be viewed on the Council's website at [www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/](http://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/)

## **Environment**

### **Why are you proposing to remove Special Landscape Areas and how will local landscapes be protected?**

Special Landscape Area designations originated from past Suffolk County Structure Plans. Rather than defining particular areas of land, a landscape character assessment approach is proposed to inform policy making and planning decisions, as set out under draft policy SCLP10.3. New evidence in the Landscape Character Assessment (July 2018) supports an approach which recognises all landscapes and helps understand the character and local distinctiveness of the landscape. It identifies the special qualities and features that give an area a sense of place and need to be protected.

Find out more:

[Suffolk Coastal District Landscape Character Assessment \(Alison Farmer Associates, July 2018\)](#)

## Commenting on the Plan

### How do I comment on the First Draft Local Plan?

An Interactive version of the First Draft Local Plan and interactive mapping are available to view online on the [First Draft Local Plan webpages](#), and comments can be submitted directly through this.

Alternatively, comments can be submitted by email to [suffolkcoastallocalplan@eastssuffolk.gov.uk](mailto:suffolkcoastallocalplan@eastssuffolk.gov.uk) or by post to Planning Policy, Suffolk Coastal District Council, East Suffolk House, Station Road, Melton, Woodbridge, IP12 1RT. A [comments form](#) is available to download on the website.

Comments must be received by 5pm on Friday 14<sup>th</sup> September 2018.

### Will there be a further stage of consultation?

Yes. The next stage of consultation will be on the Final Draft Local Plan and will be carried out in Winter 2018/19. At this stage, consultation will be more formal and we will be seeking representations relating to whether legal and procedural requirements have been met and on the 'soundness' of the plan (i.e. whether the plan is positively prepared, justified, effective and consistent with national policy).

### What happens next?

The timetable for the next stages of production of the Local Plan is:

- Winter 2018/19: Proposed Submission Plan (final draft plan) published for consultation.
- March 2019: Submission of plan for Examination by the Planning Inspectorate.
- June 2019: Examination hearings.
- November/December 2019: Adoption of plan by the Council.