



The Planning
Inspectorate

Report to Suffolk Coastal District Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO SUFFOLK COASTAL CORE STRATEGY
AND DEVELOPMENT MANAGEMENT POLICIES
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 8 May 2012

Examination hearings held between 23 October and 15 November 2012

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Abbreviations Used in this Report

AA	Appropriate Assessment
AAP	Area Action Plan
AONB	Area of Outstanding Natural Beauty
CIL	Community Infrastructure Levy
CS	Suffolk Coastal Core Strategy & Development Management Policies
DPD	Development Plan Document
EEFM	East of England Forecasting Model
EoEP	East of England Plan
GTAA	Gypsy and Traveller Accommodation Assessment
LDF	Local Development Framework
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
RS	Regional Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area

Non-Technical Summary

This report concludes that the Suffolk Coastal Core Strategy and Development Management Policies Development Plan Document provides an appropriate basis for the planning of the District, providing a number of modifications are made to the Plan. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. All of the modifications to address this were proposed by the Council, and I have recommended their inclusion after full consideration of the representations from other parties on these issues.

The modifications can be summarised as follows:

- Include a policy on the presumption in favour of sustainable development.
- Introduce a clear commitment to an early review of the Core Strategy to address full, objectively assessed housing needs;
- Clarify that the full, objectively assessed housing need for the District in the plan period at this point is 11,000 new dwellings;
- Amend plan to provide for at least 7,900 new homes in the plan period;
- Clarify that the phasing of housing development is linked to infrastructure provision;
- Introduce greater flexibility in the identification of housing sites;
- Exclude agricultural complexes from the definition of previously developed land;
- Clarify the essential infrastructure requirements of the plan;
- Clarify the approach to contributions to sports and play facilities;
- Clarify the mitigation measures necessary to safeguard European habitat sites;
- Amend policies for economic development so that they are less restrictive, in line with national policy;
- Amend policy on protection of employment sites to accord with national policy;
- Delete Martlesham Retail Park as a District Centre;
- Amend policies for development in the countryside to accord with national policy;
- Amend affordable housing totals to accord with revised overall housing provision;
- Amend approach towards travellers to accord with national policy;
- Clarify policy on Code for Sustainable Homes;
- Clarify approach to possible further nuclear reactor at Sizewell;
- Clarify approach to provision of public art; and
- Introduce a table showing Local Plan policies that would be superseded by the Core Strategy.

Introduction

1. This report contains my assessment of the Suffolk Coastal Core Strategy and Development Management Policies Development Plan Document (CS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the draft plan submitted in May 2012 which is the same as the document published for consultation in December 2011.
3. All references in this report to the 'Core Strategy' or 'CS' are to the whole Core Strategy and Development Management Policies document.
4. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
5. The main modifications that go to soundness have been subject to public consultation and, where necessary, Sustainability Appraisal (SA) and I have taken the consultation responses into account in writing this report.

Assessment of Duty to Co-operate

6. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
7. The Council has produced a Record of Co-operation which sets out an extensive list of topics on which there has been co-operation with other public bodies in the area. It is a member of the Haven Gateway Partnership and the Ipswich Policy Area Board which have provided the organisational arrangements for consideration of sub-regional and greater Ipswich issues. Some of these arrangements are changing, but the Board in particular will continue to play an important role in addressing strategic matters.
8. The Strategic Housing Land Availability Assessment (SHLAA), Strategic Housing Market Assessment (SHMA), Affordable Housing Site Viability Study and Gypsy and Traveller Accommodation Assessment (GTAA) are examples of key aspects of the evidence base produced jointly with neighbouring Councils. Green infrastructure, general infrastructure, water cycle and employment land review studies have been undertaken through the Haven Gateway Partnership.

9. Concerns raised by Ipswich Borough Council relating to retail development and travellers are matters of detail relevant to soundness considerations rather than indications of a failure to co-operate on strategic matters. The Council's projections of the objectively assessed housing needs for the District were not produced jointly with other Councils, but there have been no in principle objections from neighbouring local authorities or other prescribed organisations to the scale and distribution of development proposed in the Plan.
10. The legal duty requires that local planning authorities engage constructively, actively and on an ongoing basis with other prescribed organisations and have regard to their activities in the preparation of development plan documents in so far as they relate to strategic matters. The aim is to maximise the effectiveness with which these activities are undertaken. There are a significant number of examples of joint working and collaboration on strategic priorities. In the light of these considerations I conclude that the duty to co-operate has been met.

Assessment of Soundness

Preamble

11. After the consultation period on the pre-submission CS had concluded, the Government published the National Planning Policy Framework ('the Framework') and Planning Policy on Traveller Sites. The views of respondents on these matters were sought and have been taken into account in framing the main issues for the examination and in my conclusions in this report.
12. During the examination, but after the hearings had been concluded, the East of England Plan (EoEP) was revoked. The views of respondents on the implications of this for the CS were sought and have been taken into account. As the EoEP is no longer operative, the legal test of general conformity no longer applies. As such, whereas this was discussed during the course of the examination, it is no longer necessary to reach a conclusion on this matter in the report.

Main Issues

13. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified 12 main issues upon which the soundness of the Plan depends.

Issue 1 – Whether the spatial strategy is soundly based and justified, presenting a clear spatial vision for the District in accordance with national policy.

Spatial vision and objectives

14. The CS contains a vision and a number of strategic objectives. Subject to a main modification (**MM3 (part)**) proposed by the Council to the housing 'summary outcomes' as one of a series of changes that are considered in detail under Issue 2, these are appropriate to the District's character and needs.

Spatial strategy

15. The overall spatial strategy provides for development to be focused in the Eastern Ipswich Plan Area, at Felixstowe, Walton and the Trimley villages and shared between the Market Towns. It would be dispersed more thinly in other settlements. There is some concern that this strategy as expressed through the CS policies would not reflect the stated vision and objectives. In particular, it has been argued that a more dispersed pattern of growth would be more appropriate, particularly in meeting housing needs across the District. However, the SA has considered the strategy against social, economic and environmental objectives and has not shown adverse impacts that are so significant that the strategy as a whole would be unacceptable.

Reasonable alternatives and audit trail

16. A CS Vision and Objectives document was subject to public consultation in 2006, followed by Issues and Options in 2007. In 2008 there was a focused consultation on strategic housing locations through a Potential Directions for Strategic Housing Growth (Further Issues and Options) document. This was followed in late 2008 into 2009 by consultation on Preferred Options. In 2009 a specific consultation took place on a revised housing distribution. A consultation draft CS was published in 2010/11 with the formal consultation on the submission CS taking place in early 2012. The CS has therefore been in preparation for a considerable time with several rounds of consultation. The SA has been updated at various points in this process. It records the alternatives that were considered at the different stages.
17. The SA is an important part of the CS evidence base. Concerns have been raised with it; principally relating to the way that it has treated the consideration of alternatives. The European Directive 2001/42/EC (the 'SEA Directive') requires that an environmental report (such as an SA) should identify the likely significant effects on the environment of implementing a plan and reasonable alternatives.
18. Early in the examination I wrote to the Council asking whether in the context of recent case law, particularly *Save Historic Newmarket v Forest Heath District Council* [2011] EWHC 606, the SA adequately summarised the reasons that were given for rejecting alternatives at the time when they were ruled out and that those reasons were still valid. I also drew attention to other judgements in *Heard v Broadland District Council & Others* [2012] EWHC 344 and *Berkeley v Secretary of State for the Environment* [2000] UKHL 36, [2001] 2 AC 603 in so far as they related to the implications of the SEA Directive to the consideration of alternatives. In summary, the Council's response indicated that in its view the Directive requirements had been fulfilled and the implications of these judgements had been taken into account.
19. In terms of the overall amount of development, and housing in particular, the SA submitted with the CS did not include a range of growth options. However, the increased housing provision as a result of the main modifications, considered below under Issue 2, was subject to SA and public consultation. As the Council had indicated that in its view the objectively assessed housing needs related to a higher figure (see also Issue 2) this was also included as a rejected alternative in the updated SA. The updated SA was produced in

accordance with a systematic methodology and undertaken independently from the Council in the light of the available evidence. The results of that SA were reported back to a full Council meeting prior to the conclusion of my report. The different growth options were tested at the hearings and in written submissions and in that respect I consider that reasonable alternatives have been considered.

20. Prior to the examination there had been matters at issue between the Council and an objecting party (Waldringfield Parish Council and No Adastral New Town) which resulted in the Council being served with a claim for Judicial Review in March 2012. The claim sought to challenge the proposed submission CS on the basis that the SEA Directive had not been complied with, and specifically on the basis that the environmental impacts of alternative options were not taken into account when the Council decided to increase the size of the housing provision in the Eastern Ipswich Plan Area from 1,000 to 2,000 units in 2009/10. The parties agreed that the claim should be stayed pending the outcome of the examination.
21. The Potential Directions for Strategic Housing Growth consultation document in 2008 showed 5 indicative areas as options to accommodate 970 dwellings on the edge of Ipswich, including a 'half collar' of development (Option 4) around existing mainly commercial development at Martlesham. The Preferred Options document selected Option 4, with the area of search for housing being within the 'half collar'. In 2009 the housing provision was then increased to 2,000 dwellings in the updated Housing Distribution Preferred Option document.
22. The Council's initial decision to increase the housing provision at Martlesham was reached through an internal process involving the LDF Task Group, Cabinet and full Council. No SA was undertaken at that stage for alternative locations for 2,000 units as the other 4 options had already been appraised and rejected on the basis of 1,000 units. However, the Council indicates that an unpublished SA of the alternatives with 2,000 homes was produced in January 2010. In any event, the other locations were included in the SA that was published and consulted on in August 2011 and then in an updated form in November 2011.
23. There is no requirement under either the SEA Directive or the Regulations that an SA is produced at each and every stage of local plan preparation. Although the SA of the alternatives was not available to Councillors when the initial decision was made to support 2,000 dwellings at Martlesham, this was published at later stages and it was open to the Council to come to another view in the light of that information. Indeed in 2011 there was a motion before the full Council, which was lost, that would have led to reconsideration of the options. Consultation has taken place on an SA that included the alternatives, and the responses would have been taken into account before the CS was submitted for examination. In that respect, the SA of the alternatives in the Eastern Ipswich Plan Area was capable of influencing the CS content.
24. It is contended that a wider range of options should have been considered for the full 2,000 dwellings or for the 1,000 additional dwellings, including sites in other parts of the District. Alternatively, either all or part of the housing could have been spread across many sites in the District. However, the Council had

consulted on alternative strategies for the broad distribution of development between the different parts of the District in 2007. It had then selected as the preferred option the concentration of development in the Ipswich Policy Area and Felixstowe with a remaining number of houses spread over the market towns and larger villages. The reasons why the preferred option was pursued and the others rejected are set out in the SA.

25. The principle of identifying one, or at most two, strategic sites in each settlement was established in 2007 on the basis that a more dispersed approach would be unlikely to deliver comprehensive infrastructure requirements. The preparation of the CS had therefore involved a process of narrowing down possible options in the light of the evolving strategy. The SEA Directive and the Framework both require that reasonable alternatives are considered. This does not mean that it is necessary at each stage to go back to first principles in identifying and appraising options.
26. During the course of the examination a further High Court judgement *Cogent Land LLP v Rochford District Council* [2012] EWHC 2542 was issued. Relevant parties were given the opportunity to make written submissions on this and these have been taken into account in my report. The application of the judgement will depend on the facts of the case but, amongst other things, it concluded that it is possible for an addendum to an SA to cure defects that had occurred earlier in the process. Irrespective of whether or not the Council had erred at an earlier stage, the SAs accompanying the submitted CS and the main modifications have considered and evaluated reasonable alternatives.
27. There have been more general criticisms of the way the Council undertook consultation and reached key decisions on the emerging CS. Some of these relate to matters that do not fall within the jurisdiction of the examination and those have not been taken into consideration. In other respects, having regard to the details set out in the Regulation 27 Statement of Consultation the Council's approach to consultation overall accords with its Statement of Community Involvement (SCI) and has been appropriate. Overall, the CS has considered reasonable alternatives and there is an audit trail showing how the preferred strategy was arrived at.

Presumption in favour of sustainable development

28. The Council has proposed that the presumption in favour of sustainable development, which the Government regards as the 'golden thread' at the heart of the Framework, should be addressed directly by the inclusion in the CS of a national model policy. The inclusion of such a policy (SP1A) does not of itself ensure that the plan as a whole will promote the presumption. Other changes to the CS are considered elsewhere in this report but the inclusion of the policy provides a clear starting point within the development plan for consideration of planning applications in accordance with this key aim. The modification to achieve that **(MM2)** is therefore justified on the basis of ensuring that the plan is consistent with national policy.

Flexibility

29. While significant development is focused at Martlesham, other parts of the District are generally less specific in identifying locations where growth will

take place. In the context also of main modifications that are considered under Issue 2, there is adequate flexibility within the overall strategy.

30. In the light of all these considerations I consider that the spatial strategy has been positively prepared. I conclude that with the main modifications indicated it is soundly based and justified, presenting a clear spatial vision for the District in accordance with national policies.

Issue 2 – Whether the overall level of housing provision and its distribution are justified and appropriate.

Full, objectively assessed housing needs

31. In general terms the Framework requires that Local Plans should meet objectively assessed needs unless in doing so there would be significant adverse impacts or there would be specific policy restrictions. For housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area as far as consistent with other Framework policies.
32. The CS provides for up to 7,590 new homes (446 per annum) in the period 2010 to 2027. However, it was not clear from the submitted CS and evidence base as to what the Council considered to be the full, objectively assessed housing needs. Early in the examination the Council were asked for clarification and indicated that the appropriate figure was the planned provision of 7,590 dwellings. Paragraph 159 of the Framework also requires that, amongst other things, the Strategic Housing Market Assessment (SHMA) should assess full housing needs, identifying the scale of housing that meets household and population projections and caters for housing demand. The evidence base did not include this information in relation to the 7,590 figure, nor therefore any satisfactory explanation as to how the plan provision related to need. An Exploratory Meeting was held at which these matters were considered. The outcome was that the examination was suspended so that the Council could produce a paper showing the calculation behind the 7,590 new dwellings it had identified as the full and objectively assessed needs for the District.
33. The Council's Housing Topic Paper refers to the initial context for the CS housing provision provided by the now revoked EoEP and the evidence base that supported it. However, the Topic Paper goes on to indicate a change of approach. In 2010 the Council had commissioned Oxford Economics to provide updated forecasts of housing need. Using the East of England Forecasting Model (EEFM) this had resulted in a need for 11,000 extra dwellings during the plan period. The Council's position is now that this figure is the full, objectively assessed housing need for the District but that the plan should not provide for this scale of development at this stage.
34. There are other household projections, including those produced nationally by the Department for Communities and Local Government, but the EEFM is a well established forecasting model. While there are criticisms by some other parties of some of the assumptions made, it takes account of both national and local factors. A main area of concern is that not only the EEFM projection

but also the level and distribution of housing provision in the submitted plan are based on an over optimistic assessment of future economic prospects and therefore job-led growth. However, projections based on the continuation of current economic difficulties are not an appropriate basis on which to plan positively for the longer term. There is a need to support economic growth through the planning system and the assumptions used in the EEFM projection are reasonable in that context.

35. The Council states that it is working with neighbouring authorities to produce an update of the SHMA using a similar methodology and, while no new evidence was submitted, in its view the indications are that the Oxford Economics figure remains about right. On the available evidence at this point the 11,000 new dwellings should be taken as the full, objectively assessed housing need for the District between 2010 and 2027. The Council has proposed a main modification to clarify this (**MM3 (part)**) which is essential to the effectiveness of the plan.

Windfall development

36. In its Housing Topic Paper the Council has proposed modifications to the CS to increase the housing provision to at least 7,900 new homes (**MM3 (part)**, **MM4 (part)**, **MM5**, **MM6**, **MM18**, **MM53**). This would fall short of the level of need but remove the limit on new housing in the submitted plan, while the overall provision would then be equivalent to that in the former Regional Strategy (RS) over the plan period. It would be achieved by increasing the allowance for windfall development.
37. The District has had a high level of windfalls in the past. Having regard to the exclusion of garden land, the Council's allowance in its modification is significantly lower than this historic rate and relates only to the last 5 years of the plan period. It was argued that the detailed wording of the Framework only permits such an allowance to be included in the first 5 years. However, the Framework does not explicitly exclude windfalls from a particular period as in previous national policy. The Council's total windfall provision could reasonably be applied across the whole of the plan period at a much lower rate than in the past. There is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Setting to one side the shortfall in meeting needs, which I consider further below, the Council's revised windfall figure and the main modification are therefore justified in order for the plan to be effective.

Supply of housing land

38. The most recent Monitoring Report in 2011 shows that the District did not have a 5-year supply of housing land in terms of the former RS provision, which had been the appropriate basis on which to calculate the supply. This shows a 3.7 year supply and in 2010 it was 3.3 years. However, in the past there has been a good record of delivery with the former RS annual average house building rate being exceeded. As such, there has not been persistent under-delivery and the CS should seek to facilitate a supply of specific deliverable sites sufficient to provide 5 years worth of housing against the requirement with an additional buffer of 5%.

Phasing

39. Policy SP2 seeks to phase new homes in order to ensure a continuous supply of housing land but at a rate commensurate with employment growth and the provision of infrastructure. While the details of phasing in the plan are described as indicative, the CS also refers to maintaining a regular and consistent supply of housing over each of the phases of the plan.
40. Phasing can be justified where there is a clear link to the provision of essential infrastructure or services. The Council has proposed to modify the plan so that, in addition to removing any ceiling on development, amongst other things it also clarifies the position on phasing so that it is linked solely to infrastructure. This forms part of main modification **MM4** and is necessary for the CS to be effective in bringing forward housing land.

Distribution

41. The CS housing provision is distributed between different component parts of the District but not to individual settlements. Taking account of the main modifications proposed as a result of the changed windfall assumption, just over half of the new housing proposed would relate to the areas to the east of Ipswich and around Felixstowe. About one fifth would be shared between the Market Towns of Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge. The remainder would be distributed amongst Key and Local Service Centres and Other Villages.
42. In terms of development on the edge of Ipswich, the distribution would have been broadly compatible with the provision in the former RS as part of the Ipswich Policy Area. No sites are allocated in the CS but there is some general guidance as to where growth might take place. The most locationally specific proposal is for the 2,000 new homes to the east of the A12 at Martlesham to the south and east of Adastral Park. It is intended that detailed allocations will be made in subsequent Area Action Plans or a Site Allocations and Area Specific Policies Development Plan Document (DPD).
43. Options for the distribution of new housing have been considered under Issue 1. Significant new development should be focused in locations which are or can be made sustainable. The proposed distribution with the prominent role for development well related to the main centres would reflect the accessibility to jobs and services in different parts of the District and is justified on that basis.

Previously developed land

44. National policy does not include a target for development on previously developed land, but encourages its use and indicates that locally appropriate targets may be set. Priority is given to the re-use of previously developed land in CS Policy SP1 but a nominal target of only 12% of new homes has been set in supporting text. However, the District has a generally rural character and there are few brownfield sites of any significance. While the priority could be reflected in site allocations in the subsequent DPDs, the target is realistic in this context. The Council has proposed a main modification to exclude agricultural complexes from the brownfield priority in Policy SP1 (**MM1**). This is necessary as they do not comprise previously

developed land as defined in the Framework, but in other respects the CS approach is consistent with national policy.

Overall conclusions

45. I do not doubt that the Council has positively prepared the plan in respect of housing provision. The CS has been evolving over many years with the starting point for testing housing need being the former RS. While that document has been revoked it is understandable that the CS would have been initially based upon its requirements and the evidence that supported it. With the main modifications proposed by the Council the overall CS housing provision and the share for the Ipswich Policy Area would have been in general conformity with the EoEP.
46. However, in terms of the Framework, the scale of housing provision proposed falls substantially short of the objectively assessed need. Even if the theoretical capacity of all the sites included in the Strategic Housing Land Availability Assessment (SHLAA), existing commitments, potential brownfield opportunities, allocations carried forward from the previous Local Plan and a windfall allowance were taken into account, the provision would still fall some way short of the 11,000 dwellings required. While there is no persuasive evidence before the examination that environmental, infrastructure or other factors might restrict this amount of development if any required mitigation could not be achieved, this would have to be assessed.
47. I have therefore considered carefully whether the examination should be suspended while the Council assesses options and brings forward proposed changes. Given the extent of the new work that would be necessary and the need for collaboration with other Councils, a lengthy suspension would be required during which other matters may emerge which would need to be addressed. In verbal evidence the Council indicated that were I to suspend the examination for these reasons they would be likely to withdraw the plan and I am satisfied that in the circumstances this would be the likely outcome. I have therefore considered whether this would be in the interests of achieving sustainable development and significantly boosting the supply of housing in the District.
48. Although 11,000 dwellings is the best available estimate of need at this point it has not been achieved as a result of collaborative working with neighbouring authorities. That work is underway with the SHMA update. However, neighbouring Councils have adopted Core Strategies that were in general conformity with the revoked EoEP and none have raised objections to the scale of housing proposed at Suffolk Coastal. It has not been suggested by other Councils that there is an unmet need from their area that should be addressed in Suffolk Coastal.
49. The Council commissioned the EEFM projections in 2010 after the Government had announced proposed changes to the planning regime. However, they looked only at the overall level of need and not at its distribution within the District. To avoid delay in having a plan in place the Council decided to proceed with the CS based on the distribution (and scale) of development already established, incorporating a proposal to review the housing requirements by 2015. This was predicated on the Council's view that there

would be sufficient land for the first 10 years of the plan but that if some key economic drivers and other factors change there would be time to review the plan to increase the housing numbers beyond that. The Council has proposed a series of modifications to the plan that clarify the review and give a more precise timescale, incorporating a commitment to it in Policy SP2. I have therefore considered whether an alternative to the suspension and likely withdrawal of the plan is for an early review.

50. Relevant policies for the supply of housing should not be considered up-to-date until the Council has demonstrated a 5-year supply of deliverable housing sites. However, in the absence of the CS, the Council would be reliant on an old-style Local Plan, adopted in 2006 with significant parts that are considerably older than that. It is a core planning principle of the Framework that planning should be genuinely plan-led.
51. While the land currently identified in the SHLAA and elsewhere would be insufficient to meet objectively assessed needs for the plan period as a whole there are still a substantial number of sites which potentially could come forward in the short to medium term and boost the land supply. If the proposal for a review were to be accepted, planning applications for housing would be considered in the context of an up to date suite of local development management policies that are consistent with the Framework, the CS settlement hierarchy and the locational guidance in the strategic policies. Where appropriate, they would be subject to environmental, habitat and infrastructure assessments. They would also be subject to the model policy that applies the national presumption in favour of sustainable development. Overall, the housing land supply would be improved while still ensuring sustainable outcomes. With the main modifications proposed the non-residential development management policies would provide appropriate guidance for other forms of development.
52. A review would enable additional land to be identified against updated objectively assessed housing needs, potentially to 2031, using information from the 2011 Census and incorporating more recent information on the performance of the local economy. A decision may have been made with regard to an additional nuclear power station at Sizewell, although the review should not be delayed to await this.
53. The Council has proposed modifications intended to bring greater flexibility to the identification of housing sites in the different settlements in the District (**MM24, MM26, MM27, MM28, MM29**). Taking these into account and with the main modifications that remove the ceiling on the amount of housing to be provided and clarify the approach to phasing, they would provide the necessary flexibility to assist in addressing housing needs and boosting the land supply in the initial part of the plan period. As such, I conclude that in this case having the CS in place at an early stage would support the achievement of sustainable development and bring forward sites to meet the housing needs of the area. An early review would be preferable to the alternative of suspension and likely withdrawal of the plan in terms of achieving the aims of the Framework taken as a whole. The main modifications that would set out the principles of the review are therefore necessary for the plan to be sound (**MM3 (part), MM4 (part), MM25 (part)**).

54. If the Council wishes to achieve a fully plan-led approach to new development it will be in its interests to undertake the review, which could be a partial exercise, as quickly as possible. In the mean time, the recommended modifications provide a minimum timescale within which it should commence.
55. In the context of all these considerations and with the main modifications that have been indicated, I conclude that the overall level of housing provision and its distribution are justified and appropriate.

Issue 3 – Whether the infrastructure requirements for the Core Strategy are soundly based and deliverable.

Critical infrastructure

56. Policy SP18 deals generally with infrastructure and there are other policies in the plan that deal either with specific types of provision or indicate requirements in relation to a particular part of the District. However, it was not clear which were the elements of infrastructure critical to the delivery of the CS. In its hearing statement the Council drew out from the evidence base those aspects that it considered critical. It has also proposed modifications to the CS that set out the infrastructure requirements, amongst other things showing the funding sources, costs and risks of non delivery. In part these also clarify the needs of both the Eastern Ipswich and Felixstowe areas. In this respect, these modifications (**MM22 (part)**, **MM23 (part)**, **MM52**) are necessary to the effectiveness of the plan. Subject to more detailed considerations, below, there is reasonable certainty that the overall infrastructure requirements of the development proposed, and in particular that needed in the early years of the plan, can be delivered.

Transport

57. The A14 Trunk Road provides an important link between the Port of Felixstowe and the national road network while the A12 is the strategic route running north-south through the District. The two routes combine on a single road to the south-east of Ipswich, which includes the Orwell Bridge, and carry significant local traffic. At times there is considerable congestion on these routes.
58. Neither the Highways Agency nor the County Council as local highway authority have objected to the CS. The impacts of the development proposed in the CS have been assessed in transport studies which conclude that, with improvements to junctions and measures to encourage or support alternatives to the use of the private car, the effect on these strategic routes could be accommodated. Having regard to the effect of these requirements on traffic on local roads, the studies provide an appropriate basis for the transport measures required. They would be funded through developer contributions or, in due course, the Community Infrastructure Levy (CIL). They are not abnormal requirements and are deliverable.

Water and waste water

59. The necessary upgrades to the Woodbridge Wastewater Treatment Works to facilitate development at Martlesham could be delivered in a timely manner through developer funding without an unacceptable effect on the viability of

the site. Anglian Water and the Environment Agency have reached agreement on a sustainable approach to constraints to development at Leiston arising from the effects of discharges from Leiston Sewage Treatment Works on a Habitats Directive site. This gives sufficient assurance that there is a reasonable prospect that the CS can be achieved in relation to the Leiston area. Although the District is in a dry part of the country, there is no overriding evidence that it is not possible to provide an adequate water supply for the development proposed.

Education

60. The critical additional education facilities identified include new primary and secondary school provision in the Eastern Ipswich Plan Area. The Martlesham development could provide land or proportionate funding that would make a significant contribution towards these requirements but there would still be a need for funding from other sources. Other developments within the area could make appropriate contributions through planning obligations or CIL. More detail on this would be appropriate to the subsequent DPDs but there is sufficient certainty at this stage to conclude that there is a reasonable prospect that the educational impacts of new development in the area could be addressed.
61. In other parts of the District the only other significant education concerns relate to primary provision at Saxmundham and Framlingham where the schools are at or close to capacity and cannot be easily enlarged. The CS does not make provision for significant new housing in those settlements and these matters could be appropriately addressed in detail in the proposed Site Allocations and Area Specific Policies DPD.

Crime

62. The Council has not carried out a Crime and Disorder Act Impact Assessment for the CS. However, while the Suffolk Constabulary raised concerns over the plan at an earlier stage they did not object to the submitted version. The reduction of crime and anti-social behaviour is used as an objective in the SA against which the various elements of the plan have been assessed. More detailed planning proposals in either subsequent DPDs or in planning applications would need to be considered in appropriate detail in accordance with the Act, including detailed plans for the Martlesham housing. The Council has therefore had due regard to its duty under this Act in terms of the likely effect of the CS on crime and disorder and its prevention.

Sport, recreation and open space

63. Policies SP16 and DM32 set out the approach to the provision of sport and play facilities while Policies SP17 and DM33 deal with green space and allotments. The CS does not specify local standards for all of these but there will be an opportunity for greater clarity on a needs basis in the subsequent area-based DPDs. The Council has proposed a modification to Policy DM32 to clarify the circumstances under which contributions to sport and play facilities would be sought (**MM50**). This is necessary in order to be consistent with the CIL Regulations.

Viability

64. The Framework indicates that the cumulative effects of standards and policies should not put the implementation of the plan at serious risk. The Council intends to proceed with a CIL charging schedule but this and any background viability evidence to it was not available at the time of the examination. However, infrastructure studies for the Ipswich eastern fringe and the Felixstowe area have demonstrated in strategic terms that the proposed development for those areas is achievable without significant concerns over deliverability.
65. Information provided in the context of a current, undetermined planning application for the strategic development location to the south and east of Adastral Park, Martlesham indicates that there is a reasonable prospect of this proposal being viable in the context of infrastructure and other requirements. In other parts of the District no specific evidence has been presented that would suggest that development overall would be at serious risk as a result of the CS.

Conclusions

66. Some main modifications are necessary to ensure that the CS requirements in terms of developer contributions towards infrastructure reflect the CIL Regulations and the Framework (**MM13, MM17**). Overall, there are no particularly unusual infrastructure requirements arising from the development proposed in the CS. I conclude that, with all the main modifications recorded above, they are soundly based and deliverable.

Issue 4 – Whether the Core Strategy makes appropriate provision for the protection of the natural environment.

67. The District has a rich variety of environmental assets including the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and protected habitat European sites - both Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). The CS has been subject to an Appropriate Assessment under the Habitats Regulations (AA) which concludes that the scale and distribution of housing development, both alone and in combination with development in Ipswich Borough, would result in an increase in visitors to a number of European sites. As such, it could not be ascertained that there would be no adverse effect upon the integrity of these sites.
68. The AA goes on to propose mitigation measures that it considers would reduce the impacts of additional housing to an insignificant level. These include a 1km separation of strategic allocations from European sites, improvements to convenient local green space for routine use, the provision of a new country park or similar high quality provision and the provision of wardening and visitor management measures. The AA provides acceptable justification for these requirements.
69. The Council has suggested some changes to the CS that make explicit or clarify the mitigation measures and approach to European sites. Those proposed to Policies SP20, SP21, DM27 and some supporting text (**MM16, MM19, MM20, MM21, MM22 (part), MM23 (part), MM47**) are main modifications necessary for the effectiveness of the plan. A statement of

common ground was agreed between the Council, Natural England, the Royal Society for the Protection of Birds, the Suffolk Wildlife Trust and the Deben Estuary Partnership that indicates that the main modifications proposed prior to the hearing when taken together would address representations made on the CS. The consultation main modifications differed from these in detail but, taking into account comments made by consultees, in their final form they maintain the thrust of the approach in the statement of common ground.

70. The main concerns identified in the AA relate to the potential impacts of residential development to the east of Ipswich on the Deben Estuary SPA and in the Felixstowe and Trimleys area on the Stour and Orwell Estuaries SPA. There are also concerns over impacts on the Sandlings SPA. Some studies from elsewhere, including the South Sandlings Visitor Survey 2010, support a distance of 1km as that within which people would be likely to walk to a European site. However, there are other studies which have shown longer distances. A local survey of visitors to the estuary undertaken in 2011 suggested that this may be the case here, but there are methodological problems with that report which limit its usefulness. The results of surveys of the existing situation will in any case partly depend on the current proximity of housing to the site and the ease by which it can be accessed on foot.
71. The proposed housing at Martlesham would be more than 1km from the Deben Estuary SPA with limited public footpath access between the site and the closest part of the estuary at Waldringfield. The purpose of the 1km distance is to prevent routine dog walking or recreational activity. Recognising that an estuary might be more attractive to walkers than some other destinations, with the other mitigation measures proposed the 1km distance is nonetheless appropriate to the circumstances here.
72. The CS provides less locational guidance in the Felixstowe area but for similar reasons the 1km separation distance proposed, in combination with other measures, would be an appropriate yardstick for identifying strategic allocations.
73. The Haven Gateway Green Infrastructure Strategy has shown in general terms the opportunities for additional green space provision in the south of the District. The Council has provided additional information on the existing and potential local green space in the Eastern Ipswich Plan Area and as part of main modification **MM22** it is proposed that the Martlesham housing development should make provision for and improve access to open space both on and off site. There is sufficient evidence that there would be opportunities to achieve this element of the mitigation required by the AA and that it would be deliverable.
74. It is clear from evidence submitted during the examination that the Foxhall Tip is very unlikely to be available as an option for a country park until beyond the plan period. However, the current planning application for the Martlesham housing development contains significant land for open space and this could address a substantial part of this requirement. There is also a proposal for a country park associated with development on the Ipswich Borough Council Northern Fringe, although only limited details of this were presented to the examination.

75. The Council has proposed modifications to the plan (**MM22 (part)**) which identify provision of a country park or similar high quality provision on the land to the south and east of Adastral Park, Martlesham. While the detailed calculations of the specific scale of provision and the types of facilities to be included are matters for an Area Action Plan or planning application, there is sufficient evidence that this element of the mitigation required by the AA can be achieved and is deliverable in phase with new housing development.
76. The provision of wardening and visitor management facilities would be funded through planning obligations or, in due course, through CIL. This aspect of the mitigation is therefore capable of being delivered.
77. There has been no persuasive evidence that overall the mitigation measures proposed would harm the viability of development. I conclude that with the main modifications proposed the CS makes appropriate provision for the protection of the natural environment.

Issue 5 – Whether the Core Strategy would help to sustain and strengthen the local economy.

78. The CS includes objectives that support the local economy generally, the rural economy and tourism. Having regard to the existing supply, Policy SP5 provides for at least 8.5ha of new employment land. This total and the job growth forecasts that support it are in part derived from studies or evidence available before the recent economic difficulties. Concern has been expressed that these are no longer justified. Amongst other things, attention is drawn to the possible effect of future competition on or uncertainty about some major employers such as Felixstowe Port or the BT centred telecommunications and IT activities at Martlesham.
79. The planning system should do everything it can to support sustainable economic growth. The economy of Suffolk Coastal has been reasonably robust compared with some other areas. Basing forecasts of the economy or job growth over a 15 year timescale on the experiences of the past few years and making cumulative pessimistic assumptions about the growth prospects of some sectors or individual businesses is not an appropriate basis for the CS. The plan must be positively prepared and be flexible enough to accommodate unanticipated needs. In that context the employment growth and land provision in the CS is justified.
80. The plan identifies three Strategic Employment Areas. These are Felixstowe Port, Martlesham Heath Business Campus (based around the ICT cluster centred on BT and Innovation Martlesham) and Ransomes Europark (as part of a wider employment corridor extending into Ipswich). It is in the nature of a Core Strategy that it will focus on strategic locations. Policy SP5 indicates that other employment areas will be identified in a subsequent DPD. This should ensure that appropriate provision for employment land is being made throughout the District and that there would not be an over concentration of job opportunities around Felixstowe and Ipswich. It would also ensure that there is an appropriate balance between employment and housing allocations.

81. As well as the Felixstowe South re-configuration works at the Port, Policy SP5 provides for additional sites for necessary port-related uses. The land requirement identified in the Felixstowe Port Logistics Study is very substantial and could potentially include sites outside the District. Sites for this have not been included in the CS but could be identified in a subsequent DPD. Policy SP5 makes it clear that any sites would be subject to conformity with the remainder of the strategy. This would include environmental policies and the CS provides adequate guidance overall in this respect.
82. The Framework attaches significant weight to the need to support economic growth through the planning system. In particular it supports the sustainable growth and expansion of all types of business and enterprise in rural areas. In this context, while some CS policies contain reasonable criteria against which to assess proposals, they are expressed in a negative or restrictive way which would not accord with these aims. A series of modifications suggested by the Council (**MM9**, **MM37**, **MM40**, **MM41**) would ensure that national policy would be complied with in this respect. Other main modifications while not explicitly about economic development include more positive wording to align with the aims of the Framework (**MM33**, **MM51**).
83. Policy DM10 deals with the protection of employment sites, indicating the circumstances in which this could take place. The policy gives marketing evidence as an example of the information that may be needed to support a planning application for a change of use. This would be agreed with the Council prior to submission of a planning application and would provide for a flexible approach to take account of the circumstances of the site. With a more positive wording as suggested by the Council's modification (**MM36**) the policy is appropriate in terms of the need to avoid long term protection of sites where there is no reasonable prospect of them being used for that purpose.
84. The wording of Policy DM29 on telecommunications is more restrictive in various respects than national policy. The Council's proposed modification (**MM48**) is necessary to ensure that it is consistent with the Framework.
85. With the main modifications identified above the CS would help to sustain and strengthen the local economy.

Issue 6 – Whether the Core Strategy provides a sound basis for retail development.

86. The CS defines a retail hierarchy comprising town centres, Martlesham Retail Park and District and Local Centres in Policy SP9. Based on an updated retail study the CS sets out the capacity for additional convenience and comparison goods retail floorspace in the different town centres. On the evidence submitted the amount of existing convenience floorspace in Leiston has been underestimated in the study, which would reduce the additional amount required. However, the figures are not incorporated in a CS policy and any significant proposals for convenience retailing would be considered against the need to support the viability and vitality of the town centre, with updated evidence as appropriate. The retail study floorspace estimates have been derived on a consistent basis and taken as a whole provide adequate guidance on future retail growth requirements for the District. Retail forecasts would need to be revisited as part of the proposed review of the plan.

87. Martlesham Retail Park is not currently shown on the Policies Map and the Council has not put forward a change to the Map to indicate its general extent. However, that shown in the Council's Site Specific Allocations Issues and Options document is an appropriate basis on which to consider whether the Park should be regarded as a centre, and more specifically, a District Centre in the retail hierarchy.
88. The Framework does not define a District Centre. However, the Retail Park does contain a number of the features in the definition in the former PPS4: Planning for Sustainable Economic Growth. There is a superstore and a number of retail units, petrol filling stations and a fast food outlet. Martlesham Parish Hall and Community Centre are on the edge of the area.
89. There are pedestrian and cycle links to the Park from nearby residential areas but, even so, it is separated from development at Martlesham Heath by the A12. There is an extensive commercial area between the Park and the proposed housing to the south and east of Adastral Park. While there are bus routes it is highly accessible by car from a roundabout on the A12. The retail units are grouped around surface car parks. Comparisons have been made to identified centres elsewhere but the Retail Park here has the characteristics of a car-based out of centre facility. The Framework indicates that, unless identified in a LP, existing out-of-centre developments do not constitute centres.
90. There is planning permission for some further retail development at the Park and, if it is not regarded as a centre, any additions to this would be subject to the impact on the viability and vitality of town centres, particularly Woodbridge. Such considerations would include the capacity of Woodbridge to accommodate new floorspace.
91. In the light of these considerations, the Martlesham Retail Park should not be regarded as a District Centre and the Council's modifications (**MM10, MM11**), which also introduce a list of the District Centres, are necessary for the plan to be justified in this regard. With these modifications I conclude that the CS provides a sound basis for retail development.

Issue 7 – Whether the strategy for the Eastern Ipswich Plan Area is soundly based and deliverable.

92. Policy SP20 sets out the strategy for the Eastern Ipswich Plan Area. It includes guidance on development in the Martlesham, Newbourne and Waldringfield Area Action Plan (AAP) as well as for the urban corridor of Kesgrave, Grange Farm, Martlesham and Rushmere St Andrew and the smaller settlements and countryside in the rest of the area.
93. The approach to the consideration of alternatives for the main location of growth within the Eastern Ipswich Plan Area has been considered under Issue 1. Policy SP20 identifies the planned direction of controlled growth eastwards from the A12 and to the south and east of Adastral Park – BT's ICT innovation and development centre. The Martlesham Heath Business Campus would include Adastral Park and seek to foster 'Innovation Martlesham' – a high-tech business cluster based on BT. The development of this initiative would be contained within the existing fenced area of Adastral Park and could

be accommodated without prejudice to the 2,000 homes proposed to the south and east.

94. The infrastructure requirements for the Eastern Ipswich Plan Area have been considered in general terms under Issues 3 and 4. They have been established in the evidence base but they are not set out in the CS. The Council's proposed main modifications **MM22** and **MM52**, in part, clarify the infrastructure needed, who will provide it, estimated costs and timescale for delivery. They are justified in order for the CS to be effective.
95. For the purposes of the CS it is only necessary to show that there is a reasonable prospect that the infrastructure impacts of the 2,000 proposed dwellings at Martlesham can be addressed. The evidence for the CS, taken with additional material provided in support of the planning application, shows that effects on highways and transport, water supply and foul water, electricity supply, open space, education and other services and infrastructure could be adequately mitigated as development progresses. Having regard also to the need to provide affordable housing, the costs of these measures would not be so significant that the development would be unviable.
96. Consideration must be given as to whether the strategy for the Plan Area is sufficiently flexible having regard to its dependence on the strategic location at Martlesham. In the context of the planning application a timeline has been prepared to show a projected rate of house building with the development completed by 2027. Although consideration of the application is not a matter for the examination, this does assist in illustrating how the location might be developed. The area of land is mostly part of an active sand and gravel quarry with planning permission. An initial stage of the housing development could be on land that is not directly affected by the mineral working but thereafter there are arrangements in place for the worked areas to be made available for housing in a phased programme.
97. The details of the minerals planning permission and the phasing programme demonstrate satisfactorily that the housing development is capable of being achieved in due course. However, for this to occur within the plan period it would require a consistently high rate of development and for all matters relating to the phasing with the mineral working to occur as planned. While appropriate buffers between the working quarry areas and new housing could be maintained there could still be marketing issues. There are also some uncertainties over whether the lead times prior to development commencing could be achieved. Nonetheless, as there is some land which is not directly affected by the mineral working, there is a reasonable prospect that some new housing would be deliverable in the first 5 years of the plan period so that it could contribute to the land supply at an early stage. In subsequent DPDs and in the review of the plan the Council would need to take a realistic view of the likely rate of development at Martlesham and identify other sites as appropriate in the light of further assessments.
98. It is the Council's intention to prepare further DPDs in which sites would be allocated. Other sites promoted during the examination are not of the same strategic significance as that at Martlesham. Proposals for further housing will be assessed in the light of my conclusions and main modifications as a result of Issue 2. In that context, it is not necessary for soundness for Policy SP20

to refer to additional sites.

99. There are local concerns that the Martlesham housing development would be perceived to have an overbearing effect on the nearby village of Waldringfield. However, I have seen no evidence that there would be any significant intervisibility between the village and the proposed development. They are separated by an area that is rural in character and mostly within the AONB, which has the highest status in terms of protection in relation to landscape and scenic beauty. The Martlesham development would be set in the context of the very large and prominent buildings already in place at the adjacent Adastral Park. An acceptable layout and design could be achieved with appropriate landscaping. In this context, the proposed development would not have an unacceptable overbearing relationship with Waldringfield.
100. My conclusion is that with the main modifications indicated the strategy for the Eastern Ipswich Plan Area is soundly based and deliverable.

Issue 8 – Whether the strategy for Felixstowe with Walton and the Trimley Villages is soundly based and deliverable.

101. The strategy for Felixstowe with Walton and the Trimley Villages is contained in Policy SP21. Although individual locations are not identified the strategy indicates that new housing will be over a mixture of sites immediately abutting existing built-up areas while as far as possible preserving prime agricultural land. It is intended that this will provide strategic guidance for the Felixstowe Peninsula AAP.
102. Six options for growth in the Felixstowe area were set out in the Further Issues and Options Document. In the light of consultation responses the Council identified an additional option of dispersal of growth which has been incorporated in the CS. There is concern that more emphasis should have been placed on previously developed land in the options. However, the Council's brownfield land study undertaken in 2010 identified a limited supply. There would be scope in the AAP to review this, including consideration of any new sites that had come forward since the study was undertaken. Overall a reasonable range of alternative growth options for the area have been considered, based on proportionate evidence. There is an audit trail showing how the preferred option was arrived at. As the strategy does not specify individual sites it provides an acceptable degree of flexibility.
103. Ahead of consideration of individual sites in the AAP, the dispersal of growth means that cumulative impacts on infrastructure and services will have to be taken into account at the CS stage. The Council's suggested modifications to Policy SP21 in part (**MM23**) and introduction of a new summary table of infrastructure (**MM52**) provide sufficient clarity over the requirements, which are justified in general terms by the evidence base. These are main modifications, necessary for the plan to be effective. The requirements are not so significant that the viability of the strategy for the area would be at serious risk.
104. Felixstowe is at the end of a peninsula with limited access by both road and rail. There is a reliance on the A14 to provide the strategic road link and I recognise the local concerns about congestion, particularly at the Orwell

Bridge. Some measures have already been introduced on the strategic route as a result of proposed expansion of the Port of Felixstowe. The evidence base transport studies provide satisfactory support for concluding that the scale of development proposed in Felixstowe is unlikely to give rise to strategic or local traffic implications that cannot be mitigated.

105. With the main modifications proposed I conclude that the strategy for Felixstowe with Walton and the Trimley Villages is soundly based and deliverable.

Issue 9 – Whether the settlement hierarchy and the strategies for the Market Towns, Villages and the Countryside are soundly based and deliverable.

Settlement hierarchy

106. The CS incorporates a settlement hierarchy of Major Centres, Towns, Key Service Centres, Local Service Centres and Other Villages with the rest of the District outside these settlements being defined as Countryside. The District has a diverse range of different settlements and the different categories are appropriate and justified.

107. The position of individual settlements in the hierarchy has been established through consideration of a series of factors, including size, level of facilities, role in relation to the locality and neighbouring communities and physical form. Representations have been made as to whether particular settlements have been categorised correctly. The hierarchy was subject to public consultation at the Preferred Options stage and some adjustments made then. The place of particular settlements reflects their potential for growth consistent with sustainability considerations and overall has been justified.

Market Towns, Key Service Centres and Local Service Centres

108. Policies SP22 to SP26 set out strategies for each of the Market Towns while Policy SP27 contains that for the Key and Local Service Centres. Table 4.2 of the CS also sets out in general terms the scale of development appropriate to each category of settlement. Alternative approaches to the settlement hierarchy were included in the Preferred Options consultation and these are recorded in the SA.

109. The strategies are not location specific but provide overall aims and guidance to steer the pattern of development which will be established in more detail in subsequent DPDs. However, in many cases they have an unduly negative approach to further housing development which would not accord with the conclusions on Issue 2. Some of the modifications listed under that Issue (**MM24, MM26, MM27, MM28, MM29**) are to these strategies and are necessary to ensure that they contribute to meeting the aims of the Framework in terms of meeting housing need while still taking account of the essential character of the settlements. The infrastructure requirements of the plan have been considered under Issue 3 and, in the light of the conclusions on that, there is a reasonable prospect that the strategies for these settlements are deliverable.

Countryside

110. In the context of the Framework policies relating to the countryside the Council has suggested modifications to Policies SP29, DM3 and DM13 (**MM30, MM32, MM38, MM39, MM49**). These relate to development in the countryside generally, the circumstances when new housing might be acceptable and proposals for the conversion and re-use of redundant buildings. In each case the modifications are necessary to ensure that the plan is consistent with national policy.
111. I conclude that subject to the above main modifications the settlement hierarchy and the strategies for the Market Towns, Villages and the Countryside are soundly based and deliverable.

Issue 10 – Whether the Core Strategy makes appropriate provision for affordable housing.

112. Policy DM2 requires that affordable housing should be provided where six or more additional housing units are proposed in Major Centres or Towns and where three or more additional units are proposed in Key and Local Service Centres. In those cases one in three units should be affordable housing.
113. The local thresholds for seeking affordable housing have been carried forward from existing policy in an alteration to the Suffolk Coastal Local Plan, adopted in 2006. There is no significant evidence that they would be inappropriate if retained in the CS.
114. The CS is based on the conclusion of a Local Housing Assessment in 2006 that 24% of all new housing should be affordable. To achieve this, the target of 1 in 3 dwellings in the plan reflects the fact that such housing would not be sought on smaller sites (only on sites of 6 or more additional units in Major Centres or Towns or 3 or more units in Key and Local Service Centres).
115. The Affordable Housing Site Viability Study (2009) considered a number of generic site types across the area and concluded not only that there was strong support for the 1 in 3 target but that a higher proportion might be considered. The housing market has been generally very weak since then and the national definition of affordable housing, now included in the Framework, has changed to include affordable rented housing. The Council has indicated that in its experience these factors have not affected the viability of the schemes coming forward. There are new ways in which affordable housing is being provided. Although the Study is now some years old, there were no persuasive reasons put forward that indicate that the Policy DM2 requirements would give rise to difficulties. In any event, the wording of the policy allows for flexibility in its application having regard to factors that include the economics of provision, which would allow negotiation on these matters in appropriate cases. In this context, and in the absence of any convincing evidence that residential development in general would be unviable, the proportion of affordable housing proposed is justified.
116. Policy DM2 allows for off site affordable housing provision in exceptional circumstances. The considerations that might result in affordable housing being provided on exception sites where development would not normally be permitted are set out in Policy DM1. The policy allows some market housing

on such sites, where they are community led and there is a local need, as an incentive for landowners to release their land. This approach is supported by the Framework.

117. Martlesham would provide a substantial element of the market and affordable housing provision in the District over the plan period. It was argued that a more dispersed distribution would be of greater assistance in meeting affordable housing needs across the District. However, there will be an opportunity in the subsequent DPDs to identify sites within settlements that might contribute affordable housing and the approach to exception sites in Policy DM1 will also assist in this regard.

118. The Council has suggested a modification so that the affordable housing figures in the plan are consistent with the revised overall housing provision. With this modification (**MM31**) I conclude that the CS makes appropriate provision for affordable housing.

Issue 11 – Whether the Core Strategy has adequately addressed the accommodation needs of the travelling community in accordance with national policy.

119. The strategy for meeting the accommodation needs of Travellers is set out in Policy SP4 with detailed criteria for site selection in a subsequent Site Specific Allocations Document or for the determination of planning applications for Traveller sites included in Policy DM9. However, the CS does not set pitch targets for gypsies and travellers and plot targets for travelling showpeople as required in the national Planning Policy for Traveller Sites.

120. The travelling community in the District mostly comprises a fairly stable population of New Travellers living in two main groups with rather different needs to more traditional gypsies and travellers. However, the District currently has no authorised pitches. The Council has suggested main modifications which refer to the need for 31 residential pitches District-wide and for 10 transit pitches between Ipswich and Felixstowe. These would reflect the level of existing need for residential pitches that had been set out in the revision to the EoEP (2009) but would not include any additional requirements going forward.

121. The Council intends to monitor needs through bi-annual caravan counts and updates to the 2007 Suffolk Cross-Boundary Gypsy and Traveller Accommodation Assessment (GTAA) which formed the basis for provision in the former RS. It has updated its LDS to include a Single Issue Site Allocations Development Plan Document in which sites will be identified and has put forward modifications to the CS to refer to this. This would enable the national policy requirement to identify a 5-year supply of sites throughout the plan period to be addressed. The results of monitoring would inform the Single Issue document in terms of the number of pitches required.

122. There is one long established travelling showpeople's site in the District and if necessary the Single Issue document can also take on board any additional needs identified through the GTAA update and the Council's monitoring arrangements.

123. The Council's suggested modifications to Policies SP4 and DM9 also include changes to the detailed criteria against which sites will be assessed that will align them with national policy. I conclude that with the main modifications (**MM7, MM8, MM34, MM35**) the CS will ensure that the accommodation needs of the travelling community will be identified and provision made to accord with the expectations of national policy.

Issue 12 – Whether the CS makes appropriate provision to address climate change, energy and sustainable construction and has justifiable policies in relation to design.

Climate change

124. The overall strategy towards climate change is contained in Policy SP12. Specific concerns were raised in relation to the effect climate change could have on agriculture and the need to protect the best and most versatile land. While there is no reference in SP12, Policy SP21 seeks to preserve prime agricultural land in the Felixstowe area and the CS is generally supportive of agriculture. With national policy in the Framework there is an appropriate context for considering development of agricultural land.

Sustainable construction

125. Policy DM24 sets out requirements for sustainable construction for residential and commercial development. Although there is an overlap here with other regulatory regimes and the Government is seeking to reduce the burden of regulation, the Framework accepts the possibility of local requirements for a building's sustainability as long as they are consistent with the Government's zero carbon buildings policy and nationally described standards are adopted. In principle therefore such a policy is acceptable.

126. For housing, the policy seeks to achieve set levels for the Code for Sustainable Homes once successive changes to the Building Regulations come into force. In the light of uncertainty over compliance with Code level 6, the Council has proposed a modification to the policy (**MM45**). The modification also removes reference to the non-residential requirements on the basis that they would offer little advantage to that proposed under revisions to the Building Regulations. The policy includes a reference to viability considerations and is supported generally in this regard by evidence in the Suffolk Coastal Renewable and Low Carbon Technical Study. With the modification the policy is justified and in accordance with national policy.

Sizewell

127. The National Policy Statement for Nuclear Power Generation has confirmed that Sizewell is one of a number of sites that are potentially suitable for accommodating new nuclear power provision. Although any decision on this matter would be taken separately by the Secretary of State, CS Policy SP13 sets out the Council's approach to this possibility. EDF Energy is currently working on a Development Consent Order application for a new nuclear power station. It has agreed a Statement of Common Ground with the Council that includes a number of modifications to the plan. Some of these are necessary

for the plan to be sound (**MM12, MM14, MM15, MM25 (part)**). Subject to these the CS makes appropriate provision for the possibility of a further nuclear reactor at Sizewell.

Design, public art and lighting

128. The Framework attaches great importance to the design of the built environment and indicates that by encouraging good design the impact of light pollution should be limited. In the context of the high quality environment and largely rural character of the District, the detailed approach to these matters in CS Policies DM21, DM22, DM23, DM25 and DM26 is justified in principle. As worded Policy DM25 requiring major developments to provide publicly accessible works of art would not accord with the requirements of Regulation 122 of the CIL Regulations. The Council's proposed modification (**MM46**) would rectify this. Similarly main modifications proposed to Policies DM21, DM22 and DM23 (**MM42, MM43, MM44**) are justified in order to align their aims with those of the Framework.
129. With the main modifications indicated, I conclude that the provisions in the CS for climate change, energy, sustainable construction and design are appropriate and justified.

Assessment of Legal Compliance

130. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. The Council's suggested modification (**MM54**) would introduce a new Appendix to the CS containing a list of superseded LP policies. The modification is necessary for the CS to comply with Regulation 8(5). With that modification I conclude that the Plan meets all the legal requirements.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS dated 16 November 2012 which sets out an expected adoption date of May 2013. This is acceptable in the light of the local circumstances of the time taken for the examination. The Core Strategy's content is compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	In the light of the conclusions on Issue 1, SA has been carried out and is adequate.

Habitats Regulations Assessment (HRA)	The HRA has been carried out and is adequate.
National Policy	The Core Strategy complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

131. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

132. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Suffolk Coastal Core Strategy and Development Management Policies Development Plan Document satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

M J Moore

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission Core Strategy & Development Management Policies and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	24	Policy SP1	<p><i>Amend bullet point (e) to:</i> “(e) give priority to re-using previously developed land and buildings; <u>in and around built-up areas</u>; including where appropriate former agricultural complexes, where possible ahead of Greenfield sites;”</p> <p><i>And Add Footnote:</i> <u>“Footnote: ‘Built-up areas’ in this context means settlements with physical limits boundaries.”</u></p>
MM2	24	New Model Policy	<i>Amend to add the ‘Model Policy’. See Annex C for the wording of the NPPF Model Policy, which is proposed to be inserted after Policy SP1 Sustainable Development.</i>
MM3	24 - 27	Paragraphs 3.19 – 3.35	<i>See Annex D for the replacement text and table for Paragraphs 3.19 – 3.35 and the accompanying tables</i>
MM4	27	Policy SP2	<i>See Annex E for the modifications to Policy SP2</i>
MM5	28	Table 3.2	<i>See Annex F for the modifications to Table 3.2</i>
MM6	29	Table 3.3	<i>See Annex G for the modifications to Table 3.3</i>
MM7	33	Paragraphs 3.56 - 3.61	<i>See Annex I for modifications to Paragraphs 3.56 – 3.61</i>
MM8	33	Policy SP4	<i>See Annex J for modifications to Policy SP4</i>

Ref	Page	Policy/ Paragraph	Main Modification
MM9	38	Policy SP8	<p><i>Amend Bullet points d and e:</i></p> <p>"d. The Heritage Coast. The environment is of national significance and the only development to be permitted will be <u>as such, development will be acceptable for conversions of existing individual buildings</u> conversions to tourist accommodation <u>where there is</u> to a high standard of design;"</p> <p>"e. The Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Development <u>in the form of</u> will be restricted to conversions, and improvements/minor extensions to existing facilities <u>and small scale new development in unexposed areas will be acceptable</u> within sustainable surroundings <u>locations</u> where landscape assessment shows these could be accommodated with no adverse impact;"</p>
MM10	39	Paragraph 3.92	<p><i>Amend paragraph to:</i></p> <p>"In addition, the population is served by substantial out of town <u>out-of-centre retail stores and centres areas</u> at Martlesham <u>(centred around the retail park at Beardmore Park)</u> and Purdis Farm. The fFurther development at these centres <u>areas</u> will be resisted where it would compete to the detriment of the viability of the <u>district's market towns and other identified neighbouring retail centres.</u>"</p>
MM11	40	Policy SP9	<p><i>Delete second bullet point, add list of district centres as additional paragraph below list, and add reference to Neighbourhood Plans to end of policy:</i></p> <p>"Martlesham Retail Park; and"</p> <p><u>"District Centres include:</u></p> <ul style="list-style-type: none"> ▪ <u>Cavendish Park, Felixstowe,</u> ▪ <u>Ropes Drive West, Kesgrave,</u> ▪ <u>The Square, Martlesham Heath,</u> ▪ <u>High Street, Walton (Felixstowe),</u> ▪ <u>The Hill, Wickham Market,</u> ▪ <u>Broadlands Way, Rushmere St</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>Andrew,</u> <u>and</u></p> <ul style="list-style-type: none"> ▪ <u>Sycamore Drive, Rendlesham.</u> <p>".....of Area Action Plans <u>or</u> <u>Neighbourhood Plans.</u>"</p>
MM12	42	Paragraph 3.107	<i>See Annex K for amendments to paragraph 3.107</i>
MM13	44	Policy SP11	<p><i>Amend third Paragraph:</i> "Where services and facilities are to be provided by means of developer contributions in association with new developments their timely provision <u>with will</u> be secured by means of conditions, of legal agreements: <u>and/or through the Community Infrastructure Levy (CIL) (once a charging schedule has been adopted)</u> "</p>
MM14	45	Paragraphs 3.121 - 3.123	<p><i>Amend to</i> 3.121 "The Government determined <u>has confirmed in publishing the National Policy Statements EN-1 and EN6</u> that new nuclear...."</p> <p>3.122 "The role....i.e. the planning inquiries <u>Examination</u> into new..."</p> <p>3.123 "Sizewell is one....it would be submitted to the Infrastructure Planning Commission <u>Planning Inspectorate</u> (or its successor body) under the Planning Act 2008; <u>with any decision being taken by the Secretary of State.</u> The Council....It is therefore appropriate for this Core Strategy to consider the local issues <u>(that would, for example, inform the Local Impact Report)</u> and how these issues should be assessed....."</p>
MM15	46	Policy SP13	<p><i>Amend to</i> "While recognizing that there will be disbenefits, were development to take</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>place, the Council has the opportunity to exploit maximise the potential benefits, notably in respect of: -</p> <p>(p) The long term implications for housing provision, both temporary (perhaps with opportunities to become available for local purchase – the “Olympic Village model”) – and permanent; and</p> <p>(q) To ensure that The benefits (including financial contributions) to be made are enjoyed by available to local communities.”</p>
MM16	54	Policy SP17	<p>Add additional sentence to end of policy “...development proposals. Developer contributions will be secured by means of conditions, legal agreements and/or through the Community Infrastructure Levy (CIL) (once a charging schedule has been adopted).”</p>
MM17	55	Policy SP18	<p>See Annex Y for modifications to SP18</p>
MM18	59	Policy SP19	<p>See Annex L for the modifications to Policy SP19.</p>
MM19	64	Paragraph 4.09	<p>Replace paragraph “<u>The southern part of the district borders the county town of Ipswich. The town is of regional importance and the largest centre in Suffolk, accounting for around 30% of all employment. The influence of Ipswich is not limited to the Ipswich Borough Council administrative boundary, but extends to adjoining parishes within neighbouring authorities and adds to the cumulative impact of development on the Orwell and Deben Estuaries, (a matter which both Ipswich and Suffolk Coastal have to consider in their Core Strategies). For planning purposes, the whole area is now referred to as the Eastern Ipswich</u>”</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>Plan Area (EIPA)"</u> The south eastern part of the district borders the county town of Ipswich, a regional centre including a port. It represents the largest employment centre in Suffolk, accounting for around 30% of all employment, and is of regional significance. In the RSS, Ipswich and by implication the Ipswich Policy Area, is identified as one of the Key Centres for Development and Change. Collectively, the scales of growth proposed within it by the various local authorities affected including Suffolk Coastal, Ipswich, Babergh and Mid-Suffolk remain significant reflecting the functional cross border relationships and the pull in particular that Ipswich exerts as a major employment and retail centre. The Ipswich Policy Area as a policy designation in the RSS will no longer exist, however that factual sphere of influence remains. Within Suffolk Coastal, this sphere of influence is also acknowledged to impact on all of the parishes which abut the Ipswich Borough boundary. For planning purposes, the whole area is now referred to as the Eastern Ipswich Plan Area."</p>
MM20	64	4.11	<p><i>Add reference to Foxhall and amend last sentence</i> ...employment location. <u>This area also contains Foxhall Tip. A restoration condition attached to the landfill operations at the tip will see its ultimate transformation to a country park.</u> Closer to..."</p>
MM21	64	Paragraph 4.13	<p><i>Amend</i> "Beyond this main urban core, the EIPA contains a variety of smaller settlements, and open countryside-, <u>and European designations along the estuaries.</u> These <u>smaller settlements</u> are identified....."</p>
MM22	68	SP20	<p><i>See Annex Q for the modifications to SP20.</i></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM23	72	SP21	<i>See Annex R for the modifications to SP21.</i>
MM24	74	Policy SP22	<p><i>Amend last two sentences of first paragraph of policy:</i> "...community. There will not be a need to allocate land for housing. Therefore, n New development <u>is anticipated to</u> will occur through the development of previously developed land including infilling."</p> <p><i>Amend last paragraph of policy:</i> "Given the constraints, Aldeburgh is not considered at this stage as one suitable to accommodate housing to meet the strategic needs of the district. Development will, therefore, is anticipated to occur within the defined physical limits or in accordance with other policies in the Core Strategy. Opportunities on previously developed land are minimal."</p>
MM25	76	Paragraph 4.65	<p><i>Amend 4th sentence</i> "The scale of new housing development will be re-assessed as part of the planned review <u>of the Core Strategy commencing by 2015</u>, having regard in particular to potential new employment opportunities associated with Sizewell.</p> <p><i>Amend last sentence of <u>Sizewell</u> paragraph to</i></p> <p>"...In particular, the Council is keen to ensure that should a new nuclear facility be provided at Sizewell, that it should bring with it a long term beneficial legacy for local people and the local economy not least in the form of housing and leisure facilities <u>benefits for local people and the local economy</u>"</p>
MM26	76	Policy SP24	<p><i>Amend third paragraph to:</i> "The unique circumstances of nuclear safeguarding limit <u>will influence</u> the future expansion of the town.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			Opportunities exist, however , for development within the physical limits of the town on previously developed land and also in part of Greenfield sites on the edge of the town. These will be considered as part of the Area Action Plan.
MM27	77	Policy SP25	<p><i>Amend bullet point (b)</i> “(b) enable limited appropriate new development in the form of new housing provision, with priority being given to affordable housing to meet local needs and in support of new employment opportunities;”</p> <p><i>Delete last paragraph</i> “An Area Action Plan will be prepared in association with Leiston.”</p>
MM28	78-79	Policy SP26	<p><i>Amend bullet point (b)</i> “(b) experiences limited appropriate growth on a range of sites across the town;”</p> <p><i>Amend penultimate paragraph beneath bullet point list:</i> “Further significant peripheral expansion of Woodbridge (and Melton) would be possible without a significant change in its character, or without key thresholds being breached. Although the supply of previously developed land is minimal, the preferred strategy for the future development of the town for the plan period is one of constraint <u>expansion of Woodbridge (and Melton) will be sympathetically considered having regard to the local character and key physical thresholds.</u>”</p>
MM29	80	Policy SP27	<p><i>Amend bullet point (b)</i> “Permit housing development within defined physical limits only, or where there is a proven local support in the form of small allocations of a scale appropriate to the size, location and characteristics of the particular community. An exception may be made in respect of affordable housing in accordance with policy DM1;”</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM30	82	Policy SP29	<p><i>Amend both paragraphs:</i> "The countryside <u>comprises</u> will be protected for its own sake. <u>an important economic, social and environmental asset within the district which it is important to sustain.</u></p> <p>The strategy in respect of new development outside the physical limits of those settlements defined as Major Centres, Towns, Key <u>and</u> Service Centres or Local Service Centres or in accordance with SP28 is that it will only be permitted in exceptional circumstances. <u>be limited to that which of necessity requires to be located there and accords with other relevant policies within the Core Strategy (e.g. SP7 or DM13); or would otherwise accord with the special circumstances outlined in paragraph 55 of National Planning Policy Framework.</u> Such circumstances are identified in specific Strategic Policies and Development Management Policies."</p>
MM31	87	Paragraphs 5.11 and 5.12	<p><i>Amend to read:</i> "5.11 The District Council commissioned a Local Housing Assessment, completed in July 2006, which identified the affordable housing need of the district as 24% of all new homes. Policies SP1, SP19, DM1 and SM2 provide the framework within which to provide the estimated 1,820 <u>1,896</u> affordable homes required over the period 2010 to 2027. The breakdown of these homes will be :</p> <ul style="list-style-type: none"> • 75% affordable rent; and • 25% other affordable. <p>Policy DM2 sets out how this can be achieved.</p> <p>5.12 Based on the proportions arising from the survey, the following targets will be set for affordable housing provision over the next 5 years (figures have been rounded) <u>plan period 2010 to 2027</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>1. 440 social units (19% of 2335)</p> <p>2. 120 intermediate units (5% of 2335)</p> <p>1. <u>1,422 affordable rented units (75% of 1,896)</u></p> <p>2. <u>474 other affordable (25% of 1,896)</u>"</p>
MM32	88	DM3	<i>See Annex M for the modifications to Policy DM3</i>
MM33	90	Policy DM6	<i>Amend first paragraph to: "...dependant, will only be permitted in the following....."</i>
MM34	92	Paragraphs 5.27 - 5.28	<p><i>Replace Paragraphs 5.27 and 5.28 with</i> <u>"Gypsies, Travellers and Travelling Showpeople</u></p> <p><u>5.27 Policy SP4 and its supporting text set out the Council's strategic approach to providing for the residential needs of gypsies, travellers and travelling showpeople within the District. It confirms the Council's commitment to working collaboratively with neighbouring authorities to secure additional transit provision somewhere between Ipswich and Felixstowe.</u></p> <p><u>5.28 The following policy sets out in more detail those matters which the Council will take into account when considering proposals for sites whether they be promoted by means of a planning application or in a Single Issue Site Specific Allocation DPD."</u></p>
MM35	92	DM9	<i>See Annex N for the modifications to Policy DM9</i>
MM36	93	DM10	<i>Amend first paragraph to: "...non-employment use will not be</i>

Ref	Page	Policy/ Paragraph	Main Modification
			granted unless if either: "
MM37	94	DM12	<p><i>Amend first sentence to:</i> "Proposals to expand or intensify existing employment sites will not be permitted where unless:</p> <p>(a) the scale of development would cause demonstrable harm...."</p>
MM38	95	Paragraph 5.35 and DM13	<p><i>Amend paragraph 5.35</i> "...In all cases the structure of the building will be an important consideration. In accordance with national policy PPS7 this policy sets out the criteria by which such proposals would be assessed. It is intended that..."</p> <p><i>Amend bullet points (ii) and (iii), delete bullet points (i), (iv) and (v) and renumber accordingly.</i></p> <p>(ii) the conversion reflects any architectural or historic interest of the original building which it is desirable to retain and would represent the optimal viable use of a heritage asset;</p> <p>(iii) it makes a useful contribution to the character of the countryside through its presence in the landscape or because of its contribution to a group of buildings and would lead to an enhancement to the immediate setting;</p>
MM39	97	DM16	<p><i>Amend bullet point (b)</i> "new buildings will not be permitted, except where: "</p>
MM40	98	DM17	<p><i>Amend first and second paragraph</i> "New touring caravans, camper vans and camping sites will not be allowed within the Heritage Coast, adjoining estuaries, within exposed parts of the AONB, or where they have a materially adverse impact on the landscape:</p> <p>- Elsewhere, new sites will only be</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>acceptable where:"</p> <p><i>Insert additional paragraph after first bullet point (d)</i></p> <p><u>"New touring caravan, camper van and camping sites will not be allowed within the Heritage Coast, adjoining estuaries, within exposed parts of the AONB, or where they have a materially adverse impact on the landscape."</u></p> <p><i>Amend sentence above second bullet point list:</i></p> <p>"Extensions to existing sites will only be acceptable where they:....."</p>
MM41	99	DM18	<p><i>Amend first and second paragraphs to:</i></p> <p>"In respect of sites for static holiday caravans, cabins, chalets and similar accommodation, <u>proposals for</u> new sites, extensions to existing sites, and intensification of use of existing sites (by infilling) will not be allowed within the Heritage Coast, adjoining estuaries, within exposed parts of the AONB or where they would have a materially adverse impact on the landscape.</p> <p>Elsewhere, such proposals will only <u>such proposals will</u> be acceptable where:....."</p> <p><i>Insert additional paragraph after bullet point list:</i></p> <p><u>"The above sites will not be allowed within the Heritage Coast, adjoining estuaries, within exposed parts of the AONB or where they would have a material adverse impact on the landscape."</u></p>
MM42	101	DM21	<p><i>Amend first paragraph to</i></p> <p>"Proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted. <u>Development will be expected to establish a strong sense of place, using street-scenes and buildings to</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>create attractive and comfortable places to live, work and visit.</u> <u>Accordingly,</u> development will only be permitted where the following criteria are met:"</p> <p><i>Amend last paragraph to:</i> "In considering residential development, the District Council will have regard to Supplementary Planning Documents that have been adopted, and will generally resist proposals that do not conform to that guidance."</p>
MM43	102	DM22	<p><i>Amend first paragraph to:</i> "Proposals should make provision for their functional requirements. Planning permission will only be granted for new development if the following criteria are met:"</p>
MM44	103	DM23	<p><i>Amend last paragraph to:</i> "Development will only be acceptable where it would not cause an unacceptable loss of amenity to adjoining or future occupiers of the development."</p>
MM45	104	DM24	<p><i>See Annex U for the proposed modifications to policy DM24</i></p>
MM46	105	DM25	<p><i>Amend first paragraph to read:</i> "When considering applications for major development the District Council will <u>require-seek</u> the provision of new publicly accessible works of art."</p>
MM47	106	DM27	<p><i>See Annex V for the proposed modifications to Policy DM27 and the accompanying text.</i></p>
MM48	108	DM29	<p><i>See Annex X for modifications to DM29</i></p>
MM49	109	DM30	<p><i>Amend first paragraph to:</i> "The redevelopment or change of use of key facilities within rural communities and local and district centres in urban areas will only be permitted where:..."</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><i>Amend second paragraph to:</i> "The partial redevelopment or change of use of a key facility will also only be permitted where this will not prejudice its viability or future operation, and subject to the other policies in the LDF."</p>
MM50	111	DM32	<p><i>Amend third Paragraph to:</i> "Planning permission will not be granted w Where the loss of the facility would result in a shortfall in provision or would exacerbate an already existing shortfall, unless an equivalent facility is must be provided in a location agreed with the District Council and secured by a planning obligation, or other legal agreement."</p> <p><i>Amend fourth Paragraph to:</i> "Proposals for new residential development will be expected to provide or contribute towards indoor and outdoor sport and play space, including equipment and maintenance, <u>where a local need has been identified. Contributions to off-site provision will be secured as part of the standard charges set in the Community Infrastructure Levy Charging Schedule, when adopted.</u>"</p>
MM51	111	DM33	<p><i>Amend second paragraph</i> "The Council will resist the loss of existing allotments to other uses unless suitable alternative allotments of equivalent size and quality are provided in the locality. The only exceptions to this policy will be where:..."</p>
MM52	117	Paragraph 6.34	<p><i>See Annex S for the proposed text and table, to be inserted after paragraph 6.34.</i></p>
MM53	144	APPENDIX C	<p><i>Appendix C is to be deleted with the exception of Table 7.6. Table 7.6 to be updated as set out in Annex W to reflect the position as at 31st March 2012 with Table title: "<u>Indicative Housing Trajectory 2001 – 2027</u>" and "<u>It</u></i></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>should be noted that within that trajectory, windfall is only assumed within the last 5 years of the plan as stated within paragraph 3.34. It is accepted that in practice such sites will occur throughout the whole plan period, with actual numbers identified in the Annual Monitoring Report in terms of completions or outstanding planning permissions.</u></p>
MM54	147	New Appendix	<p><i>The text for the proposed Appendix 'Schedule for Replacement of Saved Policies' can be found in Annex P</i></p>

ANNEX C – MM2 - NPPF Model Policy to be inserted

The following accompanying text and model policy is to be inserted on page 24 after Policy SP1 Sustainable Development:

Accompanying text:

"Policy SP1 sets the framework which has guided the development strategy for the district to 2027. The following policy sets out the Councils approach to the consideration of individual development proposals which accord with that strategy and 'the Framework'."

Policy:

"SP1A: Presumption in Favour of Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- **Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- **Specific policies in that Framework indicate that development should be restricted.³**

Footnote

³For example those policies relating to sites protected under the Birds and Habitats Directives (Framework paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Local Green Space; and Area of Outstanding Natural Beauty; Heritage Coast; designated heritage assets and locations at risk of flooding or coastal erosion.

Annex D – MM3 - Replacement text for Paragraphs 3.19 – 3.35 and accompanying tables

Paragraphs 3.19 – 3.35 are to be deleted and replaced with:

3.19 Summary Outcomes: Provision of at least 7,900 new homes across the District over the period 2010 to 2027. Provision in the form of allocations will be made sustainably and in accordance with the Settlement Hierarchy (Policy SP19 and accompanying Tables 4.1 and 4.2 and policies SP20 – SP29). Specific sites will be identified in the Site Specific Allocations Development Plan Documents which will follow the Core Strategy, including those in the form of Area Action Plans or Neighbourhood Plans. These will be supplemented by other small scale provision for example in the form of infill development, or in the form of rural exceptions in accordance with policy DM1 which can occur at any time. Overall, the provision of new homes will be related to employment, new and improved services, facilities, transport and other infrastructure or in support of an otherwise identified local housing need. An early review of the Core Strategy will be undertaken commencing by 2015 with the publication of an Issues and Options Report. This will identify an updated, evidenced, scale and distribution of housing and employment land to meet the needs of the district to 2031, taking advantage of the full 2011 Census information.

3.20 The focus for growth will be the major centres – notably the more urbanised area east of Ipswich and to a lesser extent the Felixstowe peninsula, both of which contain strategic employment sites of regional and national significance. Elsewhere new homes will be dispersed across the other market towns and smaller sustainable communities. New growth will be at levels appropriate to the size of the town or village, taking account of its function, character and environmental capacity.

3.21 In addition, across the rural areas, the introduction of the rural cluster policy DM4, the introduction of one in three market housing in policy DM1, and the acceptance of the subdivision of larger dwellings where this would meet a local need in policy DM3, will provide some further small scale opportunities for new housing provision.

Housing Numbers – Assessing Need and Supply

3.22 The number of new homes to be provided over the period to 2027 has been determined at the local level. It is in essence a two stage process, which involves

- 1) an objective assessment of future housing needs based on modelled projections of demographic and socio-economic data.**
- 2) Secondly policy judgements are applied to identify the available supply of housing, taking account of environmental constraints**

3.23 Linked to this, the Strategic Housing Land Availability Assessment (SHLAA) provides specific details in relation to the availability of potential housing sites (i.e. housing land supply). The Strategic Housing Market

Assessment (SHMA) provides additional information in relation to the types of homes which are needed based on the characteristics of population and affordability.

Table 3.1 Assessing housing need.

<u>Stage 1 – identify objectively assessed need</u>	<u>a)</u>	<u>Identify changes within the population – including births, deaths, migration in and out of the area, household size and make-up; age structure</u>	<u>Modelling work originally undertaken in support of the former EoEP; confirmed 10,200 new homes needed for the period 2001-21. The projected residual need requirements for Suffolk Coastal is 7,900 from 2010 – 2027.</u> <u>Updated in 2010 by Oxford Economics forecast modelling; Identified 11,000 new homes needed for the period 2010-27 .</u>
	<u>b)</u>	<u>Identify and understand what is happening with the local economy and the impact on it of decisions taken at national and international level</u>	
	<u>c)</u>	<u>Combine data to provide forecast of number of new dwellings likely to be required (objectively assessed housing need)</u>	
<u>Stage 2 – identifying available supply</u>	<u>d)</u>	<u>Identify land suitable for housing</u>	<u>Including SHLAA sites identified in 2010, total suitable supply could amount to around 10,370 dwellings (from all sources). New call for sites will be made prior to work on the site specific allocations development</u>

			<u>plan documents.</u>
	<u>e)</u>	<u>Apply judgements in relation to identified patterns of sustainable development in accordance with the core planning principles identified in the Framework and test capacity of sites to accommodate new dwellings against objectively assessed need</u>	<u>Taking into account current constrained supply, the CS proposed housing figure is at least 7,900 new dwellings between 2010 and 2027. A review of the CS will commence by 2015 to consider and identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need as part of evidenced need for the district to 2031. Note: the former EoEP required about 3,200 new dwellings in the IPA area by 2021. The Council remains committed to ensuring that this will be achieved.</u>

3.24 The Core Strategy has evolved over a number of years. The starting point for assessing housing need was originally the work completed and

tested in support of the former EoEP with which the Core Strategy was previously required to conform and with which, the Council were fully in support. The former EoEP document identified new housing and job provision and also the necessary level of infrastructure to support it. Whilst that document has now been revoked, its contents and the evidence which supports it remains the common basis on which to take forward strategic planning in the short to medium term under the "duty to co-operate".

3.25 The former EoEP required the Council to plan for a minimum of some 10,200 new homes in Suffolk Coastal over the period 2001-2021. This provision was split between the Ipswich Policy Area (IPA) (around 3,200 new homes) and the rest of the district (7,000 new homes). The IPA designation recognizes that not all of the objectively assessed housing need for Ipswich can be accommodated within its administrative boundaries.

3.26 A housing distribution strategy was determined to meet this level of need and finally agreed by the Council in March 2010. The former EoEP annual requirement of 510 homes per year was rolled forward beyond 2021 to enable the Council to identify a 15 year housing land supply within this Core Strategy. A continuation of the 510 per year results in an overall requirement (from 2010 to 2027) of some 8,670 new homes. A good record of housing delivery over the period from 2001 had however exceeded requirements and by 2010 (the base date for this Core Strategy) the residual annual rate of completions to meet that identified need had dropped to 465 per annum.

3.27 In response to changes to the planning regime announced in 2010, the Council took the opportunity to update and review its housing requirements. New, updated forecasts were commissioned from Oxford Economics (OE). That forecast model identified a total housing need for the district for the period 2010 to 2027 of some 11,000 new homes (610 per annum). The projection also includes an element for vacant and second homes based on historic trends. It is this figure (11,000), which is taken to represent the current full, objectively assessed housing need as required by paragraph 159 of the Framework.

3.28 Critically, this review looked only at housing numbers. It did not involve any change to the housing distribution previously agreed which had been drawn up on the principles of sustainable development and sustainable communities. A dwelling led approach has therefore then been applied to that objectively assessed need, based on the supply of land identified as being suitable and available over the plan period and which accords with the housing distribution agreed in 2010. To do otherwise would have required a fundamental review of the Core Strategy at that stage and further delays to the adoption of the Core Strategy contrary to government advice. The adopted approach to the supply and distribution of land for new homes is therefore accompanied by a commitment to commence a review of the plan by 2015. The proposed review will begin with the publication of an 'Issues and Options' document and look to identify land to meet the acknowledged shortfall in provision

compared to assessed need as well as any additional need arising by extending the plan period to 2031. This review date may be brought forward if this makes sense under "duty to co-operate". Table 3.2 shows that the strategy can deliver at least 7,900 new homes over the 17 year plan period.

Table 3.2 Calculating housing supply available

<u>(a) Outstanding planning permissions deemed deliverable as at April 2010 (discounted by 10%)</u>	<u>1,480</u>
<u>(b) Identified brownfield potential (sites within existing physical limits boundaries)</u>	<u>230</u>
<u>(c) Outstanding housing allocations from previous Local Plan</u>	<u>80</u>
<u>(d) Estimated windfall (unidentifiable supply)</u>	<u>850</u>
<u>(e) SHLAA theoretical capacity</u>	<u>7,730</u>
<u>(f) Total available housing supply (2010 – 2027) (a + b + c + d + e)</u>	<u>10,370</u>

3.29 This dual strategy (constrained allocations + plan review) represents a pragmatic but nonetheless positive and properly planned approach to housing delivery in support of projected economic growth. This also includes a commitment to continuing to meet the former EoEP identified housing need for the Suffolk Coastal section of the IPA.

3.30 In the longer term, a review will enable sufficient additional land to be identified against updated objectively assessed housing needs for the period to 2031. Those needs will have been re-assessed using information from the Census 2011 and updated information regarding performance of the local economy, particularly those sectors which have been identified as being of national significance. It is likely for example, that a decision will have been made with regard to any additional new nuclear development at Sizewell at that point.

3.31 Critically, it will enable the scales of new development (housing and employment) to be planned for on a wider strategic level under the "duty to co-operate" following the dismantling of the regional tier of policy making. Not least, specific consideration will need to be given at this stage to the capacity or otherwise of the strategic road network, work which will need to be done in conjunction with neighbouring authorities. The long term direction for housing growth or areas of search will need to be directed to those which provide the best opportunity to support the growing sectors of the economy, and would help to secure new or improved transport infrastructure. Longer term strategic decisions in relation to the capacity of the A14 Orwell Bridge will be an important factor in this regard (see policy SP10). Individual and cumulative impact of development on the districts Natura 2000 sites which are of international importance for their nature conservation interest will also continue to require a wider strategic approach to future levels of development.

3.32 It will be noted that windfall is expected to provide a significant contribution towards overall housing provision. In a district as varied and as geographically large as Suffolk Coastal, this type of generally small, incremental provision is to be expected. Historic evidence confirms that this is the case. Typically, (but not exclusively) these types of sites in Suffolk Coastal are re-development of single large residential plots at a higher density; conversions of other types of building to residential use; or the sub-division of larger premises into a smaller number of flats.

****In the short term however, between adoption of the Core Strategy and the adoption of the subsequent site allocations document (2015), larger housing sites will need to be brought forward to achieve a five year housing land supply. These sites also technically comprise "windfall" but will still be expected to accord with the principles, scale and distribution of development set out in this Core Strategy. In essence, they are sites which, but for timing, would have been allocated in the normal way.**

3.33 The role of the Core Strategy is to set the principles which will guide future development in terms of scale and broad location. It is the role of the site allocations development plan documents, which will follow the adoption of the Core Strategy, to allocate individual sites. The housing numbers and distribution are however made in the confidence that there is a sufficient supply of deliverable or developable land for additional allocations to be made if more flexibility is required. Monitoring will also reveal whether targets have, or are likely to be met and inform the review regarding the need for further allocations.

Annex E – MM4– Modifications to Policy SP2

Amend Policy SP2 to:

*"Strategic Policy SP2 – Housing Numbers **and Distribution***

The Core Strategy will make provision for the creation of up to 7,590 **at least 7,900** new homes across the district in the period 2010 to 2027 as set out in ~~Table 3.1~~ **Table 3.2**.

Land for new homes will be distributed in accordance with the ~~principle of a~~ settlement hierarchy (policy SP19) **which is** itself drawn up on the principles of sustainable development **and sustainable communities**.

New homes **identified by means of specific allocations** will be phased ~~in order to ensure a continuous supply of housing land,~~ but at a rate commensurate with ~~anticipated employment growth and the provision of any necessary new and improved infrastructure provision.~~ **For those areas where nature conservation issues are screened as important, phasing will also need to accord with agreed mitigation.**

Further provision of new homes is expected to come forward across the plan period by means of **windfall provision. This is likely to include small scale infill, conversions, or redevelopment of sites at a higher density; or by means of other** small scale community led schemes for example new Community Right to Build **or other rural exception provision**. These types of scheme do not require specific allocation through the LDF **(local plan)** but **still** have the potential to provide a mix of affordable and open market housing. It is anticipated that this unidentified housing supply, could, amount to around 50 homes per year ~~but as a new initiative will be closely monitored.~~

An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with policies in the National Planning Policy Framework."

Annex F – MM5– Modifications to Table 3.2

Amend the figures in table 3.2 as per (and re-number table):

Table 3.3 – Proposed housing distribution across the district 2010 to 2027

From : 2010 - 2027	Eastern Ipswich Plan Area	Felixstow e Walton & the Trimleys	Market Towns	Key & Local Service Centres	Rest of District	TOTAL
Outstanding planning permissions (discounted by 10%)	220	290	430	440	100	1,480
Identified previously developed land	0	30	150	50	-	230
Outstanding housing allocations from previous local plan	0	0	0	80	-	80
Small Windfall <u>(unidentified provision)*</u>	Included in total to right	Included in total to right	Included in total to right	Included in total to right	540 <u>Included in total to right</u>	540 <u>850</u>
New housing allocations	2,100	1,440	940	780	-	5,260
Total	2,320 (136 p.a.)	1,760 (103 p.a.)	1,520 (89 p.a.)	1,350 (79 p.a.)	640 <u>100</u> (37 p.a.)	7,590 (446 p.a.) <u>7,900</u> <u>(465</u> <u>p.a)</u>
% of new dwellings total	31% <u>29%</u>	23% <u>22%</u>	20% <u>19%</u>	18% <u>17%</u>	8% <u>-</u>	100%**

* Note: ~~Windfall numbers are included only for the third phase in accordance with national planning guidance. Windfall sites may occur in all settlement types including those classified as Other Villages and Countryside but the locations and timings cannot be predicted.~~ **Some additional provision may come forward in the period to the adoption of a relevant site specific allocations document, which will be considered having regard to the policies in the NPPF, and other specific policies in this Core Strategy.**

**** Due to rounding figures may not total 100%**

Annex G – MM6 - Modifications to Table 3.3

Amend the figures in table 3.3 to (and re-number table):

Table 3.4 – Percentage increase of existing housing stock from the Core Strategy

Area	Existing Housing Stock April 2010		Identified New Housing			Totals 2027 (existing stock + new housing)	
	Units	%	Units	% of new housing	Per annum	Units	% of total housing stock
Eastern Ipswich Plan Area	12,185	21%	2,320	31% <u>29%</u>	136	14,505	22%
Felixstowe Walton & the Trimleys	13,763	24%	1,760	23% <u>22%</u>	104	15,523	24%
Market Towns	11,789	20%	1,520	20% <u>19%</u>	89	13,309	20%
Key & Local Service Centres	16,771	29%	1,350	18% <u>17%</u>	79	18,121	28% <u>27%</u>
Other Villages and Countryside	3,503	6%	640 <u>100</u>	8% =	38 =	4,143 <u>3,603</u>	6% <u>5%</u>
<u>District Windfall</u>	=	=	<u>850</u>	=	=	<u>850</u>	=
District Total	58,011	100%	7,590 <u>7,900</u>	100%	446 <u>465</u>	65,601 <u>65,911</u>	100%

Note: due to rounding figures may not add up to 100%

Annex I – MM7 - Replacement Paragraphs 3.56 – 3.61

Delete paragraphs 3.56 to 3.61 inclusive and replace with new headings and text.

"Gypsies, Travellers and Travelling showpeople

Travellers

3.56 Gypsies and travellers are recognised as having particular housing needs. National policy Planning for Traveller Sites (2012) defines gypsies and travellers as follows:

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such."

3.57 Suffolk Coastal is home to a small population of gypsies and travellers. The majority of these are New Travellers who are recognised as sub-group within this wider category. New Travellers do not share the same strong cultural heritage as more "traditional" gypsy and traveller groups but may be more specifically described as follows:

"New Travellers" started to take to the road approximately 30 years ago. Most New Travellers are from the settled community, although some children may have been born New Travellers. There are different reasons why people choose this lifestyle, including: feeling alienated from the modern, materialistic society; leaving care or being homeless and /or unemployed; or for environmental reasons."

3.58 Suffolk Coastal is and has been home to a relatively stable population of New Travellers living in two main groups. In this respect, the situation within Suffolk Coastal is unique within the Eastern Region. The groups have existed here for the best part of 20 years or so and for most New Travellers it is a lifestyle choice. All the Travellers currently reside on unauthorised encampments.

3.59 Government policy is that Councils should work with the gypsies and travellers to eliminate the need for unauthorised encampments. Suffolk Coastal is committed to achieving this. The heterogeneous nature of the New Traveller groups and their lifestyle choice pose their own challenges when looking to identify suitable and appropriate sites.

3.60 The former regional planning document Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England – A revision to the Regional Spatial Strategy for the East of England (July 2009) (RSS July 2009 document) was revoked on 3rd January

2013. It identified a need for some 31 permanent residential pitches to be provided over the period 2006-11 (6 for Gypsies 25 for new Travellers). It also identified a need for some 20 transit pitches across Suffolk of which some should be located within the Ipswich to Felixstowe area.

- 3.61 The evidence which sits behind these figures is the 2007 Suffolk Cross-Boundary Gypsy and Traveller Accommodation Assessment (GTAA), which looked at need across the administrative areas of Mid-Suffolk, Babergh, Waveney and Suffolk Coastal District Councils and Ipswich Borough. As a minimum, the Council is committed to looking to provide the 31 residential pitches identified for this district. It will do this in conjunction with local landowners and the New Travellers themselves. The Council is also committed to working with its neighbouring authority to bring forward an appropriate level of transit provision.
- 3.62 Initial discussions have been held with the local Traveller community to begin to establish what type of residential site they would be prepared to use and the maximum number of pitches they considered manageable. The conclusion of these discussions was that to meet current identified need some 3-4 sites each capable of accommodating a maximum of 6 to 10 pitches but allowing for rotational movement within and between the sites would be a good basis for further discussion on the identification of sites. Provision of sites could come forward by means of individual planning applications or through the allocation of sites.
- 3.63 Looking forward, the nature and make-up of the groups is also such that it is very difficult to predict future needs, unlike for more "traditional" gypsy and traveller groups. The annual caravan counts and regular updates to the GTAA are considered to be the most reliable local guide, and will be used as a key indicator, when monitoring the plan.
- 3.64 For the small number of gypsies identified in the GTAA, it is expected that individual households will approach the Council direct with regard to meeting their needs.

Travelling Showpeople

- 3.65 National policy defines Travelling Showpeople as follows:

"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers."

- 3.66 Suffolk Coastal is home to one long established site for Travelling Showpeople Any increase in plot provision is likely to arise from this

site. Any such requirement could be dealt with by means of a planning application.

Annex J – MM8– Modifications to Policy SP4

Amend policy to:

~~"See glossary for definition of gypsies and travellers~~

The Council recognises and accepts the need to pro-actively look to address **will look to** meet the **immediate** needs of gypsies, travellers and travelling showpeople who commonly reside within the district as identified in the **2007 GTAA and former RSS July 2009 document (policies H3 and H4)**. ~~GTAA and bi-annual caravan counts.~~ **This comprises 31 residential pitches (district wide). An additional need has been identified for 10 transit site pitches (between Ipswich and Felixstowe). Any future needs will be monitored by means of the bi-annual caravan counts and evidenced through updates to the 2007 Suffolk Cross-Boundary Gypsy and Traveller Accommodation Assessment (GTAA) (or such other mechanisms as may replace it). Sites will be identified by means of a Single Issue Site Allocations Development Plan Document unless earlier provision can be secured by means of a planning application(s). In all cases, when assessing the suitability of sites in rural or semi-rural settings, the Council will ensure that the scale of such sites does not dominate the nearest settled community.**

The Council's strategy for addressing the **identified** needs **of gypsies and travellers as identified in the GTAA is:** ~~of gypsies, travellers and travelling showpeople as identified in the GTAA is:~~

- To liaise directly with the "new traveller" groups themselves on their needs and how they might be met;
- To maintain discussions with the local parish councils currently affected by illegal/unauthorised encampments **or unauthorised developments:**
- To discuss potential approaches to the issue with local landowners such as the Forestry Authority;
- To work with adjacent authorities to identify a suitable site for transit use; and
- To assess proposals for new encampments against criteria set out in Development Management Policy DM9.

In respect of Travelling Showpeople, the Council will liaise directly with The Showmen's Guild and the owners and occupiers of the one site within the district. If a need for increased provision can be demonstrated, land for Travelling Showpeople may be made in the Site Allocations and Area Specific **Gypsies, Travellers and Travelling Showpeople Site Specific Allocations** Policies Development Plan Document but is more likely to be provided by means of a planning application made in accordance with other relevant policies within the Core Strategy.

~~In respect of Gypsies, the GTAA confirmed that owner occupation or private site provision was the preferred choice for the six households identified. Future provision is therefore expected to come forward by means of individual planning applications which will need to accord with other relevant policies in the Core Strategy including DM9."~~

Annex K – MM12 - Modifications to Paragraph 3.107

Amend paragraph 3.107 to:

"The A12 is a key route running north south through the district, connecting the rural areas with the primary road network and the rest of the country. It is essential to the local economy within and beyond Suffolk Coastal district, linked to opportunities associated with the energy industry and the Low Carbon Energy Corridor which is developing between Sizewell and Lowestoft and as a tourist route. However, journey times are hampered by stretches of single carriageway and reduced speed limits north of Woodbridge. In order to maintain quality of life for those residents living alongside the route however, reduced speed limits are necessary. ~~Discussions are currently underway with EDF, owners of land identified for a possible new nuclear station at Sizewell, regarding the provision of a by-pass or other solution~~ **The Council recognises community aspirations for a four villages by-pass or other solution for the villages of** Farnham, Little Glemham, Marlesford, and Stratford St Andrew ~~(known colloquially as "the 4 village by-pass")~~ **to improve a stretch of the A12 which is** where the road is particularly narrow and twisting with buildings located very close to the road line. ~~In regard to the~~ **The** impact of major development upon this stretch of the A12, **will be carefully assessed by the Council.** ~~In particular any impacts associated with the planned nuclear power station development at Sizewell which will be carefully~~ **similarly** assessed in the light of Government policy, a by-pass or alternative solution(s) will be negotiated with the developer" **line with policies set out in NPS-EN1 and NPS-EN6"**

Annex L – MM18– Modifications to Policy SP19

Amend Policy SP19 to:

“Strategic Policy SP19 – Settlement Policy

The identification of a Settlement Hierarchy is a key tool with which the Council will achieve its Vision for the district in ~~2026~~ **2027** meeting the **scales of** development requirements as set out in this Core Strategy whilst maintaining and enhancing the quality of the built, natural, **historic**, social and cultural environments in a manner which accords with the nationally defined principles of sustainable development and sustainable communities.

The Settlement Hierarchy as set out below and amplified in accompanying policies SP20 to SP29 as well as Tables 4.1 and 4.2 will be used in determining the scale of development appropriate to a particular location:

Settlement Type	Description	Proportion of Total Proposed Housing Growth
Major Centre	Sub-regional centre for commercial and social facilities.	54% <u>51%</u>
Eastern Ipswich Plan Area		(31 <u>29%</u>)
Felixstowe Walton & the Trimley villages		(23 <u>22%</u>)
Towns	Focal point for employment, shopping and community facilities. A T transport hub.	20% <u>19%</u>
Key Service Centres	Settlements which provide an extensive range of specified facilities.	18% <u>17%</u>
Local Service Centres	Settlements providing a smaller range of facilities than key service centres.	
Other Villages	Settlements with few or minimal facilities.	8%
Countryside	The area outside the settlements above, including the hamlets and small groups of dwellings that are dispersed across the district.	<u>Minimal</u>

Annex M – MM32 - Modifications to Policy DM3

Policy DM3 amended to read:

"New housing will firstly and primarily be directed to, and integrated within, the settlements for which physical limits boundaries have been defined or in accordance with SP19. In the interests of ~~protecting~~ **safeguarding** the countryside ~~for its own sake~~ **as set out in policy SP29** as well as meeting sustainable objectives, new housing in the countryside will be ~~strictly controlled and limited to~~ **allowed where it comprises** :

- ~~(a) Workers' dwellings for agricultural, forestry and other rural-based enterprises which satisfy the criteria set out in Annex A of national policy PPS7;~~
- (a) Replacement dwellings on a one to one basis where they are no more visually intrusive in the countryside than the building to be replaced;
- (b) The sub-division of an existing larger dwelling where this would meet a local need;
- (c) Affordable housing on 'exception' sites in accordance with policy DM1;
- (d) Conversions of existing buildings subject to certain controls (Policy DM13); ~~and~~
- (e) Minor infilling within clusters of dwellings well related to existing sustainable settlements (Policy DM4); or
- (f) **Development which would otherwise accord with the special circumstances outlined in paragraph 55 of National Planning Policy Framework.**

~~Housing will not be permitted in the Countryside where there is no proven functional need for it to be there. This would include houseboats and dwellings related to such uses as equestrian activities, farm shops, and golf courses.~~

Particular care will be taken in respect of residential annexes to ensure that, through design and/or planning conditions, annexes are not able to be separated from the main building in order to create a separate dwelling.

Accommodation for Gypsies, Travellers and Travelling Showpersons may be permitted in accordance with policies SP4 and DM9."

Annex N – MM35 – Modifications to Policy DM9

Policy DM9 amended to:

"The district is home to a number of Gypsies and Travellers and Travelling Showpeople with specific housing needs. ~~as identified in the GTAA and the bi-annual caravan counts.~~ **By far the biggest identified need is in relation to New Travellers.** However, there are **currently** no authorised Gypsy or Traveller sites within the district. In order to address this issue, new sites, whether promoted by the gypsies and **new** traveller communities **themselves**, by **other** individuals ~~gypsies or travellers or by the District Council through its Site Specific Allocations or Area Action Plan documents,~~ proposals **its single issue site specific allocations development plan document.** Proposals will be assessed against **having regard to** the following:

Personal criteria:

- The proposed occupants meet the definition of a ~~Gypsy or Traveller,~~ and **gypsy, traveller or new traveller as set out in paragraphs 3.56 to 3.57; and**
- The ~~occupants can prove a local connection e.g. work, family, children's education~~
- **Other personal circumstances of the applicant e.g. work, children's education; health.**

Site specific criteria -

~~Firstly, in relation to permanent (residential) pitch(es):~~

For permanent residential pitch(es):

- The site is well related to a Major Centre, Town, Key or Local Service Centre **(see SP19)**. Where the requirement for a site is linked to the education or health needs of the applicant or their dependant(s), sites should be directed to those towns or service centres where these facilities are provided;
- The site is capable of being provided with mains water and adequate sewage/waste disposal provision (including ~~provision for~~ the storage of waste prior to disposal);
- The site is acceptable in terms of highway safety;
- The site is designed so as to minimise visual impact on the surrounding area;
- The site is so designed as to minimise any impact on nature conservation interests within or adjoining it;
- The site is not liable to flooding;
- No industrial, retail, commercial, or commercial storage activities will take place on the site apart from storage required in relation to a travelling circus **or show;**
- That the scale and range of uses proposed within the site are acceptable in terms of their impact on any existing neighbouring uses; and
- **Where it is intended that a site should be self-managed by the occupants, the capacity of the site** Individual sites should not normally exceed **6 10** pitches.

~~Secondly, in relation to transit sites, in addition to the above:~~

Transit Sites

In addition to the criteria listed above:

- The site is well related to the primary road network.

In the case of transit sites there will be a planning condition to ensure that the length of stay for each caravan will be no longer than 28 days with no return to the site within 3 months.

Footnote: a definition of gypsies, ~~and~~ travellers **and travelling showpeople** can be found in the ~~glossary~~ **text accompanying Policy Policy SP4.**"

Annex P – MM54– Proposed Appendix D

The following is proposed to be inserted as "Appendix D – Schedule for Replacement of Saved Policies"

The schedule is produced to comply with Regulation 13(5) of the Town & County Planning (Local Development) (England) Regulations 2004 (as amended) and sets out which Local Plan Saved Policies are proposed to be superseded or abandoned upon adoption of the Core Strategy & Development Management Policies document.

Policies to be superseded

The following Local Plan Saved Policies from the Suffolk Coastal Local Plan (incorporating the First and Second Alterations) are proposed to be superseded upon the formal adoption of the Core Strategy & Development Management Policies document:

<u>SAVED POLICY NO.</u>	<u>SAVED POLICY TITLE</u>	<u>REPLACEMENT POLICY NO.</u>
<u>AP8</u>	<u>Countryside protection</u>	<u>SP19, SP28, SP29</u>
<u>AP9</u>	<u>Countryside – extensions to commercial activities</u>	<u>SP1, SP7, DM21</u>
<u>AP12</u>	<u>Areas of Outstanding Natural Beauty</u>	<u>SP8, SP14, SP15, DM17, DM18, DM21, DM29,</u>
<u>AP14</u>	<u>Wildlife habitats</u>	<u>SP12, SP14, SP15, DM27</u>
<u>AP15</u>	<u>Designated areas and habitats</u>	<u>SP12, SP14, SP15, DM27</u>
<u>AP16</u>	<u>Local Nature Reserves</u>	<u>SP12, SP14, SP15, DM27</u>
<u>AP17</u>	<u>Trees, hedgerows and woodlands</u>	<u>SP15, DM27</u>
<u>AP19</u>	<u>Design</u>	<u>DM21, DM22</u>
<u>AP20</u>	<u>Design for people with disabilities</u>	<u>DM21, DM22</u>
<u>AP21</u>	<u>Design in areas of high landscape value</u>	<u>DM21, DM22</u>
<u>AP22</u>	<u>Shopfronts</u>	<u>DM21</u>
<u>AP23</u>	<u>Advertisements</u>	<u>DM21</u>
<u>AP25</u>	<u>General policy of restraint - housing</u>	<u>SP19, SP22 – SP26</u>
<u>AP26</u>	<u>Development in towns</u>	<u>SP19, SP22 – SP26</u>
<u>AP27</u>	<u>Development in villages</u>	<u>SP19, SP27, SP28</u>
<u>AP29</u>	<u>Residential curtilages</u>	<u>DM8</u>
<u>AP30</u>	<u>New housing in the countryside</u>	<u>SP29, SP30, DM1, DM3, DM4</u>
<u>AP32</u>	<u>New dwellings for agricultural workers</u>	<u>DM3</u>

<u>AP34</u>	<u>Replacement and extension of dwellings in the countryside</u>	<u>DM2, DM21, DM22, DM23</u>
<u>AP36</u>	<u>House type and size</u>	<u>SP3</u>
<u>AP37A</u>	<u>Affordable Housing on exception sites</u>	<u>SP3, DM1</u>
<u>AP38A</u>	<u>Affordable Housing on residential sites</u>	<u>SP3, DM2</u>
<u>AP39</u>	<u>Residential amenity</u>	<u>DM7, DM23</u>
<u>AP40</u>	<u>Provision of amenity open space</u>	<u>SP16, SP17, DM32</u>
<u>AP42</u>	<u>Conversion of houses to multiple occupancy / flats</u>	<u>DM5</u>
<u>AP43</u>	<u>Self contained residential annexes</u>	<u>DM6</u>
<u>AP44</u>	<u>Residential caravans</u>	<u>SP4, DM9</u>
<u>AP46</u>	<u>New employment uses</u>	<u>SP5, SP6, SP7</u>
<u>AP48</u>	<u>Expansion of existing employment uses</u>	<u>DM12, DM23</u>
<u>AP49</u>	<u>Intensification of employment use in primarily residential areas</u>	<u>DM12, DM23</u>
<u>AP50</u>	<u>Protection of employment sites</u>	<u>DM10</u>
<u>AP52</u>	<u>New employment areas</u>	<u>SP5, SP7, DM13</u>
<u>AP53</u>	<u>Offices</u>	<u>SP5, SP7, DM13</u>
<u>AP54</u>	<u>Warehousing & storage</u>	<u>DM11</u>
<u>AP55</u>	<u>Retail strategy</u>	<u>SP9</u>
<u>AP60</u>	<u>Local shopping facilities</u>	<u>SP9</u>
<u>AP62</u>	<u>Retention of key facilities</u>	<u>DM30</u>
<u>AP63</u>	<u>Countryside retailing</u>	<u>DM16</u>
<u>AP64</u>	<u>Garden centres</u>	<u>DM16</u>
<u>AP65</u>	<u>Farm shops</u>	<u>DM16</u>
<u>AP66</u>	<u>Tourism</u>	<u>SP8</u>
<u>AP68</u>	<u>Large scale food production</u>	<u>DM15</u>
<u>AP69</u>	<u>Central grain stores</u>	<u>DM15</u>
<u>AP70</u>	<u>Farm diversification</u>	<u>DM14</u>
<u>AP71</u>	<u>Alternative uses for buildings in the countryside</u>	<u>DM13</u>
<u>AP72</u>	<u>Conversions in the countryside: general considerations</u>	<u>DM13</u>
<u>AP73</u>	<u>Re-use/adaptation of rural buildings for employment use</u>	<u>DM13</u>
<u>AP74</u>	<u>Historic barns</u>	<u>DM13</u>

<u>AP75</u>	<u>Conversions to residential use</u>	<u>DM13</u>
<u>AP77</u>	<u>Improvements to the A12</u>	<u>SP10</u>
<u>AP80</u>	<u>Car parking standards</u>	<u>DM19</u>
<u>AP81</u>	<u>Cycle routes</u>	<u>DM20</u>
<u>AP82</u>	<u>Provision for cyclists</u>	<u>DM20</u>
<u>AP83</u>	<u>Provision for pedestrians</u>	<u>DM20</u>
<u>AP84</u>	<u>Rail services</u>	<u>SP11</u>
<u>AP85</u>	<u>Bus services</u>	<u>SP11</u>
<u>AP86</u>	<u>Interchange facilities</u>	<u>SP11</u>
<u>AP87</u>	<u>Village services and facilities</u>	<u>DM30</u>
<u>AP88</u>	<u>Redundant public buildings</u>	<u>DM31</u>
<u>AP89</u>	<u>Telecommunications installations</u>	<u>DM29</u>
<u>AP92</u>	<u>Areas at risk from flooding</u>	<u>DM28</u>
<u>AP95</u>	<u>Coastal instability</u>	<u>SP30</u>
<u>AP96</u>	<u>Sea defences</u>	<u>SP30</u>
<u>AP97</u>	<u>Light pollution</u>	<u>DM26</u>
<u>AP98</u>	<u>Renewable energy</u>	<u>SP12</u>
<u>AP99</u>	<u>Conservation of energy</u>	<u>DM24</u>
<u>AP101</u>	<u>Sports facilities</u>	<u>SP16, DM32</u>
<u>AP102</u>	<u>Provision of outdoor playing space</u>	<u>DM32</u>
<u>AP103</u>	<u>Provision of outdoor playing space: new residential developments</u>	<u>DM32</u>
<u>AP104</u>	<u>Loss of playing pitches or other sports grounds</u>	<u>DM32, SP16</u>
<u>AP105</u>	<u>Allotments</u>	<u>DM33</u>
<u>AP106</u>	<u>Informal recreation facilities</u>	<u>SP16, SP17, SP29</u>
<u>AP109</u>	<u>Recreational development in the countryside</u>	<u>SP16, SP17, SP29</u>
<u>AP110</u>	<u>Motor sports</u>	<u>SP29</u>
<u>AP111</u>	<u>Touring caravan and camping sites</u>	<u>DCM17</u>
<u>AP112</u>	<u>Sites for static holiday caravans, cabins & chalets</u>	<u>DCM18</u>
<u>AP113</u>	<u>Horse and equestrian activities</u>	<u>SP29</u>
<u>AP114</u>	<u>Golf courses, driving ranges & other facilities</u>	<u>SP29</u>
<u>AP115</u>	<u>Marinas and other developments</u>	<u>SP30</u>
<u>AP116</u>	<u>Land based water related activities</u>	<u>SP30</u>
<u>AP117</u>	<u>Planning obligations</u>	<u>SP18</u>

Policies to be abandoned

The following "Saved Policies" from the Suffolk Coastal Local Plan (incorporating the First and Second Alterations) are considered to no longer be required and are proposed to be abandoned upon the formal adoption of the Core Strategy & Development Management Policies document.

<u>SAVED POLICY NO.</u>	<u>SAVED POLICY TITLE</u>	<u>EXISTING POLICIES</u>
<u>AP3</u>	<u>Conservation area-demolition</u>	• <u>NPPF: Section 12</u>
<u>AP5</u>	<u>Listed Building Consent</u>	
<u>AP7</u>	<u>Development of archaeological sites</u>	• <u>NPPF: Section 12</u>
<u>AP11</u>	<u>Agricultural and commercial woodlands</u>	• <u>NPPF: Section 11</u>
<u>AP24</u>	<u>Street furniture</u>	• <u>Not required</u>
<u>AP31</u>	<u>New country houses</u>	• <u>NPPF: Paragraph 55</u>
<u>AP35</u>	<u>Houseboats</u>	• <u>Site Specific policies for Felixstowe Ferry & Woodbridge</u>
<u>AP57</u>	<u>Town centres – residential accommodation</u>	• <u>Site Specific Sites & Policies Document</u> • <u>NPPF: Paragraph 23</u>
<u>AP58</u>	<u>Town centres – car parking</u>	• <u>To be covered under Site Specific Sites & Policies Document</u>
<u>AP61</u>	<u>Proposals for new development</u>	• <u>NPPF: Paragraph 24</u>
<u>AP90</u>	<u>Overhead power lines / electricity supply lines</u>	• <u>SP12, SP13, SP15 & SP29</u> • <u>NPPF: Section 5</u>
<u>AP91</u>	<u>Hazardous developments</u>	• <u>Circular 04/2000</u>
<u>AP93</u>	<u>Sewage disposal</u>	• <u>NPPF: Paragraph 120</u>
<u>AP94</u>	<u>Surface water and aquifer protection</u>	• <u>NPPF: Section 11</u>
<u>AP100</u>	<u>Materials reclamation facilities</u>	• <u>County Council's Waste Plan</u>
<u>AP107</u>	<u>Footpaths and bridleways</u>	• <u>Protected under separate legislation</u>

Remaining Saved Policies

The following policies are proposed to remain 'saved' until replacement by other development plan documents such as the Site Specific & Allocations document etc.

<u>SAVED POLICY NO.</u>	<u>SAVED POLICY TITLE</u>
<u>AP1</u>	<u>Conservation area - control of development & enhancement</u>
<u>AP4</u>	<u>Historic parks and gardens</u>
<u>AP13</u>	<u>Special Landscape Areas</u>
<u>AP28</u>	<u>Areas to be protection from development</u>
<u>AP51</u>	<u>General employment areas</u>
<u>AP56</u>	<u>Town centres</u>
<u>AP59</u>	<u>District centres</u>
<u>AP118</u>	<u>Development in Blyth area villages</u>
<u>AP119</u>	<u>Parham air field</u>
<u>AP122</u>	<u>Sizewell Gap</u>
<u>AP123</u>	<u>Coastal instability - Dunwich</u>
<u>AP124</u>	<u>Aldeburgh - new housing</u>
<u>AP125</u>	<u>Aldeburgh - Garret Era Area</u>
<u>AP128</u>	<u>Aldeburgh - enhancement of town centre</u>
<u>AP129</u>	<u>Aldeburgh - High Street</u>
<u>AP130</u>	<u>Aldeburgh - pedestrian priority</u>
<u>AP132</u>	<u>Aldeburgh - Brickworks jetty</u>
<u>AP134</u>	<u>Framlingham - New Road and college playing fields</u>
<u>AP137</u>	<u>Framlingham - general employment areas</u>
<u>AP138</u>	<u>Framlingham - land between Fairfield and Station Road</u>
<u>AP139</u>	<u>Framlingham - car parking</u>
<u>AP142</u>	<u>Leiston - Eastlands industrial estate</u>
<u>AP145</u>	<u>Leiston - Abbey Road</u>
<u>AP146</u>	<u>Leiston - town centre car parks</u>
<u>AP147</u>	<u>Leiston - town centre environmental improvements</u>
<u>AP148</u>	<u>Saxmundham - land east of river Fromus</u>
<u>AP150</u>	<u>Saxmundham - Carlton Park industrial park, Kelsale</u>
<u>AP151</u>	<u>Saxmundham - Rendham Road</u>
<u>AP153</u>	<u>Saxmundham - enhancement scheme east and west of High Street</u>
<u>AP155</u>	<u>Saxmundham - non-shopping uses in High Street</u>
<u>AP156</u>	<u>Saxmundham - new retail development</u>
<u>AP157</u>	<u>Deben Peninsula - residential development in villages</u>
<u>AP158</u>	<u>Deben Peninsula - Woodbridge base</u>
<u>AP159</u>	<u>Rendlesham - general principles</u>
<u>AP160</u>	<u>Rendlesham - creation of new community</u>
<u>AP161</u>	<u>Rendlesham - former technical base</u>
<u>AP162</u>	<u>Deben Peninsula - enhancement schemes</u>
<u>AP164</u>	<u>Deben Peninsula - coastal instability Bawdsey Manor</u>
<u>AP165</u>	<u>Deben Peninsula - East Lane Bawdsey</u>

<u>AP166</u>	<u>Deben Peninsula - Snape Maltings</u>
<u>AP167</u>	<u>Felixstowe Peninsula - development in villages</u>
<u>AP168</u>	<u>Newbourne - former land association holdings</u>
<u>AP169</u>	<u>Felixstowe Peninsula - Levington Park</u>
<u>AP170</u>	<u>Felixstowe - restraint</u>
<u>AP171</u>	<u>Felixstowe Peninsula - separation of town from Trimleys</u>
<u>AP172</u>	<u>Felixstowe Peninsula - protection of AONB</u>
<u>AP173</u>	<u>Felixstowe - port development</u>
<u>AP175</u>	<u>Felixstowe - Carr Road</u>
<u>AP176</u>	<u>Felixstowe - Clickett Hill</u>
<u>AP178</u>	<u>Felixstowe - bus station</u>
<u>AP179</u>	<u>Felixstowe town centre - shopping area</u>
<u>AP180</u>	<u>Felixstowe town centre - offices</u>
<u>AP181</u>	<u>Felixstowe town centre - Highfield Road</u>
<u>AP182</u>	<u>Felixstowe town centre - pedestrian priority</u>
<u>AP183</u>	<u>Felixstowe - reduction of through traffic Hamilton Road</u>
<u>AP184</u>	<u>Felixstowe - town centre rear servicing</u>
<u>AP186</u>	<u>Felixstowe - enhancement scheme</u>
<u>AP188</u>	<u>Felixstowe - beach huts</u>
<u>AP190</u>	<u>Felixstowe - car parking Felixstowe Ferry</u>
<u>AP191</u>	<u>Felixstowe - houseboats Felixstowe Ferry</u>
<u>AP193</u>	<u>Felixstowe - Clifflands car park</u>
<u>AP194</u>	<u>Felixstowe - Cobbolds point</u>
<u>AP195</u>	<u>Felixstowe - encouragement of holiday accommodation</u>
<u>AP196</u>	<u>Felixstowe - Cliff Gardens</u>
<u>AP198</u>	<u>Felixstowe - Undercliff Road West</u>
<u>AP199</u>	<u>Felixstowe - Convalescent Hill</u>
<u>AP200</u>	<u>Felixstowe - Sea Road promenade</u>
<u>AP201</u>	<u>Felixstowe - Sea Road frontages</u>
<u>AP202</u>	<u>Felixstowe - south seafront</u>
<u>AP206</u>	<u>Felixstowe - Landguard Fort</u>
<u>AP207</u>	<u>Felixstowe - land around and adjacent to Landguard Fort</u>
<u>AP208</u>	<u>Felixstowe - urban fringe</u>
<u>AP209</u>	<u>Grundisburgh area - development in villages</u>
<u>AP210</u>	<u>Grundisburgh area - Debach airfield</u>
<u>AP211</u>	<u>Ipswich Fringe - development in villages</u>
<u>AP212</u>	<u>Ipswich Fringe - open character of land between settlements</u>
<u>AP213</u>	<u>Ipswich Fringe - Sandy Lane Martlesham</u>
<u>AP214</u>	<u>Ipswich Fringe - Ipswich Road/Sandy Lane Martlesham</u>
<u>AP215</u>	<u>Ipswich Fringe - Nacton Heath</u>
<u>AP216</u>	<u>Ipswich Fringe - Martlesham Heath industrial area</u>
<u>AP217</u>	<u>Ipswich Fringe - BT laboratories, Martlesham</u>
<u>AP218</u>	<u>Ipswich Fringe - employment land at Grange Farm, Kesgrave</u>
<u>AP219</u>	<u>Ipswich Fringe - Grange Farm/Kesgrave</u>
<u>AP220</u>	<u>Ipswich Fringe - warehousing/haulage depots on the Ipswich Fringe</u>

<u>AP222</u>	<u>Ipswich Fringe - A1214 park & ride</u>
<u>AP225</u>	<u>Ipswich Fringe - Foxhall Road woods</u>
<u>AP226</u>	<u>Ipswich Fringe - Foxhall Stadium</u>
<u>AP227</u>	<u>Ipswich Fringe - Suffolk show ground, Purdis Farm</u>
<u>AP228</u>	<u>Ipswich Fringe - open spaces near Rushmere Street</u>
<u>AP229</u>	<u>Ipswich Fringe - the priory area, Nacton</u>
<u>AP230</u>	<u>Woodbridge - development in villages</u>
<u>AP232</u>	<u>Wickham Market - central area</u>
<u>AP235</u>	<u>St Audrey's hospital - development framework</u>
<u>AP236</u>	<u>Woodbridge & Melton - restraint</u>
<u>AP237</u>	<u>Melton - protection of tree cover</u>
<u>AP238</u>	<u>Woodbridge garden centre - Ipswich Road</u>
<u>AP240</u>	<u>Woodbridge & Melton - development to the west of the A12</u>
<u>AP241</u>	<u>Woodbridge & Melton - houseboats</u>
<u>AP242</u>	<u>Melton - Wilford Bridge employment area</u>
<u>AP243</u>	<u>Melton - employment area off Melton Hill</u>
<u>AP244</u>	<u>Melton - Deben Mill</u>
<u>AP245</u>	<u>Woodbridge - Limekiln Quay & Ferry Quay employment area</u>
<u>AP247</u>	<u>Woodbridge - environmental enhancement riverside</u>
<u>AP249</u>	<u>Woodbridge & Melton - retention of riverside qualities</u>
<u>AP250</u>	<u>Woodbridge - riverside recreation area</u>
<u>AP252</u>	<u>Woodbridge - new yacht harbours / marinas</u>
<u>AP255</u>	<u>Woodbridge - retailing</u>
<u>AP256</u>	<u>Woodbridge - New Street/Oak Lane car park</u>
<u>AP257</u>	<u>Woodbridge - prime shopping area</u>
<u>AP258</u>	<u>Woodbridge - Church Street / Market Hill</u>
<u>AP259</u>	<u>Woodbridge town centre - loss of residential accommodation</u>
<u>AP260</u>	<u>Woodbridge town centre - enhancement</u>
<u>AP262</u>	<u>Woodbridge town centre - potential service areas</u>
<u>AP263</u>	<u>Woodbridge town centre - traffic management</u>

Annex Q: MM22 - Modifications to SP20

Policy SP20 amended to read:

"The Strategic approach to development in the Eastern Ipswich Plan Area can be divided into 3 sections – the area to be covered by the Martlesham, **Newbourne & Waldringfield** Area Action Plan; the main urban corridor of Kesgrave, Grange Farm, Martlesham and Rushmere St Andrew; and the smaller settlements and countryside which surround these core areas.

The strategy for the Martlesham, **Newbourne & Waldringfield** Area Action Plan is one:

- i) that contains well-planned, sustainable new housing on a mix of size, type and tenure linked to existing and proposed employment;
- ii) where the planned direction of controlled growth is eastwards of the A12 to the south and east of Adastral Park;
- iii) where opportunities for new employment provision will have been maximised, with major national and international companies sitting alongside smaller ones, particularly those associated with the strategically important hi-tech business at BT;
- iv) where the Martlesham Heath Business Campus including Adastral Park has been designated a Strategic Employment Area;
- v) where development has been phased and scaled to ensure that new or upgraded transport, utility and other social and community provision is provided in advance of, or parallel to, new housing and employment provision;
- vi) that has created its own distinctive identity with smaller readily distinguishable villages, neighbourhoods and communities within the larger area;
- vii) where public transport provision and foot and cycle paths have been upgraded and promoted to minimise the need to use private motor vehicles to access employment, schools and other key facilities;
- viii) where priority has been given to creating a safe and attractive environment, including the provision of advanced planting and landscaping to create new settlement boundaries that blend with the surrounding landscape **and contribute to biodiversity and the ecological network;**
- ix) that includes the retention of designated Sandlings areas on the edge of Ipswich because of their historic and biodiversity interests;
- x) that preserves and enhances environmentally sensitive locations within the Eastern Ipswich Plan Area and its surroundings; and
- xi) that maximises opportunities to achieve access to green space, including the countryside.
- xii) **the Council will require further proposals to be supported by an Appropriate Assessment to meet the requirements of the Habitats Regulations. If the results of the Appropriate Assessment show that part of the Strategy cannot be delivered without adverse impacts on designated European sites which cannot be mitigated, then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect on the integrity of a designated European nature conservation site.**

The transport and community infrastructure studies completed 2009 provide the background evidence to work with service providers and others to secure the necessary transport and other infrastructure to serve the proposed employment and housing. The November 2011 Appropriate Assessment and the mitigation measures it contains (section 7.2 and Table 10) will provide the basis for more detailed project level assessments associated with the Area Action Plan and planning application proposals and associated cumulative impacts. Those measures will be required to reflect the objectives set which include the creation of alternative opportunities for countryside recreation for existing and future residents as a preferred alternative to visiting European nature conservation sites; improved visitor infrastructure including wardening; and monitoring to quantify reductions in visitor harm achieved by mitigation projects.

Specifically, on land to the south and east of Adastral Park, strategic open space in the form of a country park or similar high quality provision will be required to mitigate the impact of development at this site and the wider cumulative impact of residential development on the relevant designated European nature conservation sites.

Infrastructure needs to be accorded priority include:

- (a) Provision of and increased access to open space both on and off-site to meet the mitigation measures outlined in the November 2011 Appropriate Assessment. This includes enhanced wardening and monitoring of visitor impacts upon designated European nature conservation sites;
- (b) Improvements to the water supply network;
- (c) Upgrades to the waste water treatment (foul sewage) network;
- (d) Provision of strategic drainage to manage surface water drainage within the site;
- (e) Education facilities to meet identified pre-school; primary and secondary needs within the development area;
- (f) Health centre;
- (g) Measures to manage impact on the local road network including improvements to the A12 between its junction with the A1214 and Seven Hills Interchange; to the A1214 and the Foxhall Road corridor;
- (h) Improved public transport provision including links to Ipswich, Woodbridge and Felixstowe;
- (i) Improvements to the public rights of way network, including pedestrian and cycle links;
- (j) Adequate electricity supply including an element of decentralised energy provision.

In addition, the Council will require:-

- (k) Indoor sports provision;
- (l) Outdoor play space;
- (m) Community Hall;
- (n) On-site recycling facilities;
- (o) Library provision;
- (p) Allotments;
- (q) High speed broadband.

The phasing of development across the site will be influenced by the need to complete permitted mineral extraction.

The strategy for the urban corridor is for completion of existing long-standing housing allocations and other small scale development opportunities within the defined built up area. In particular, it is recognised that due to the significant levels of growth which have occurred over the past 10 or so years that communities have the opportunity to settle and mature. Developments which offer the opportunity to support this broad approach will be supported.

Ransomes Europark, a strategic cross-boundary employment site is located within this area. Support is provided under policy SP5 for an extension of this business park into the district.

For the remainder of the area, policies SP28 and SP29 will apply. This part of the plan area is also important for the provision of green infrastructure. ~~The Foxhall Tip is due to be restored to a country park towards the end of the plan period, adding to a number of other green infrastructure opportunities nearby.~~ Opportunities to build on this type of provision to secure an improved network of green spaces around the more urban area will be supported **and will be considered as part of the overall mitigation measures referred to above.**

The A14 is an important route on the European map because of its links to the Port. However, there are issues around the capacity of the road around Ipswich, particularly the Orwell Bridge, and the Council will work with adjoining authorities and the highway agencies to consider the options in respect of improving capacity and flow. Off-site Port related activities should be located on or well related to this route. "

Annex R: MM23 - Modifications to SP21

Policy SP21 amended to read:

"The strategy for Felixstowe will be to reverse the recent trends towards a population imbalance, threats to local services and a decline in the fortunes of the town in order to enable it to fulfil its role as a major centre. It will be integrated with the objectives of 'Felixstowe and Trimleys Futures' a partnership aimed at social, economic and environmental regeneration of Felixstowe and the Trimleys.

The aim will be to achieve a thriving seaside town and port, attractive to residents of all ages, and welcoming to visitors who wish to experience the town's beautiful coastal location, proud Edwardian heritage, vibrant and diverse retail offer, café-culture and healthy outdoor lifestyle.

The Strategy, therefore, will seek to expand the local employment base to provide a wider range and choice of employment type and site together with enhanced education and skills, alongside that provided by an expanded port function. The regeneration of the resort area will be enabled to boost its appeal as a tourist destination and address issues of deprivation, particularly at the southern end (see also SP6 and SP8).

Expansion of the retail, service and other facilities available within the town centre will be supported to meet the needs of the whole population both resident and visitor.

Overall the Strategy will seek to expand the tourism role in terms of services, facilities and accommodation, building on the qualities and facilities offered by the town of Felixstowe, and creating strong links between the seafront and town centre areas. Regeneration and environmental projects will be contained within an Area Action Plan, itself to be the subject of public consultation. Implementation will be through partnership working with the public and private sectors.

Additional housing will be created. In the short to medium term this will represent organic and evolutionary growth in the Felixstowe and Trimleys area over a mixture of sites immediately abutting existing built up areas, whilst preserving as far as possible prime agricultural land for essential food production. This will provide a scale and range of housing to meet the needs of the existing and future populations as well as to create a more sustainable balance between housing and employment, thereby providing an opportunity to reduce commuting. **The 2009 Community Infrastructure Study and the 2011 Appropriate Assessment provide the background evidence in relation to anticipated future social and community infrastructure needs and appropriate mitigation required in relation to the potential environmental impact of new development on sites of European importance, namely the Deben and Orwell estuaries. At the more detailed site specific and planning application stages, mitigation measures identified may require contributions to strategic open space provision identified in policy SP20.**

The constraints and opportunities posed by the location at the end of a peninsula with limited access via road and rail are recognised, as are the proximity of

international and national nature conservation designations, national landscape designations, the risk from tidal flooding, a quality historic core and many attractive neighbourhoods.

The strategy for a dispersed pattern of future development means that it is the cumulative impact rather than the impact of individual development schemes which is likely to be critical and which will drive the need for developer contributions. This may include the need to re-locate existing facilities where this is logical and would result in an improved level of service overall.

Infrastructure needs **identified in the supporting evidence base**, to be accorded a priority include:

(a) Improvements to the operation of the strategic (A14 / A12) and local road network

- A significant **Further** improvements to the Dock Spur roundabout;
- Improved access to the Dock from Felixstowe; Walton and the Trimley villages
- Good access from any proposed housing site to the town centre of Felixstowe
- **consideration to be given to the provision of a new link road between Candlet Road and Trimley High Road as part of a strategic approach to improving the capacity of the local road network**

(b) Investment in new secondary school provision.

(c) Investment in appropriate healthcare facilities

(d) Realising opportunities to achieve **enhance** access to green space including the countryside **across the wider Felixstowe and Ipswich areas; also including enhanced wardening and monitoring of visitor impacts upon designated European nature conservation sites**

(e) Provision of adequate water, electricity and sewers

In addition, the Council will ~~looking to provide~~ **require**: -

(f) significant improvement, expansion and retention of sports and leisure facilities

(g) allotments to meet a growing demand

(h) increased cemetery provision

(i) maximum opportunities for more use of the rail line by the community following its dualling as part of the Felixstowe South Reconfiguration

(j) additional primary school places if required

On-going monitoring will also be undertaken to identify and secure such further investment as may be necessary for flood and sea defences. "

Annex S: MM52 - Wording and Table to be inserted after paragraph 6.34

In addition to the recommended modifications to policies SP20 and SP21, the Council is recommending the inclusion of the following summary table and introductory paragraph for inclusion in CS chapter 6 Implementation and Monitoring after paragraph 6.34.

6. The following table summarises the identified key infrastructure requirements necessary to deliver the development strategy set out in the Core Strategy. It provides a broad indication of significant risks and mitigation.**

Table * **Infrastructure identified as necessary for the delivery of the Core Strategy**

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
EASTERN IPSWICH PLAN AREA							
Education							
Pre-school	Delivery of strategic residential development . Phased provision linked to number of new homes	Education authority/ developer	£8m	Suffolk County Council / Developer	Short term		
Primary School					Short & medium term	Overcrowding – travel elsewhere. Lack of community cohesion – increased traffic	Amend phasing of new development. Ensure commitment of education provider. S106 protocol recently agreed
Secondary			£25m		Short, medium & long term	Overcrowding – bus elsewhere – lack of community cohesion – increased traffic	Amend phasing of new development. Ensure commitment of education provider. S106 protocol recently agreed. Proposed location agreed with education provider

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
Open Space							
On-site green space including for dog walking; Improvements to rights of way; contributions to monitoring and wardening	Delivery of strategic residential development – mitigating impacts of new development on Natura 2000 sites	Developer Suffolk Coastal District Council Suffolk County Council		Developer – in kind and financial contributions	Expected targets short, medium and long term	Agreed mitigation measures not provided or monitoring of mitigation measures shows more needed	Review plan to identify alternative location for development. Review mitigation measures and agree what else required and secure means to achieve it
Healthcare							
Health centre	Delivery of strategic residential development	Health authority	£1.32m	Health authority / developer	Medium term	Existing facilities become overstretched. Level of service to existing residents worse. New residents	Agree with health care providers optimum time for new provision and commitment to provision. Amend phasing of development

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
						unable to register with local GP	
Road Network							
Junction improvements to A12; improvements to Foxhall Road and A1214 corridors	Delivery of strategic residential and employment development	Highways Agency/ Suffolk County Council / Developer / Public transport providers	£13.75m	Developer	Short, medium and long term	Local and strategic road networks unable to cope with increased levels of traffic particularly at peak time. Possible adverse impact on functioning of port	Agree phasing of new development with highway authorities. Secure legal agreement to ensure funding etc available for work to be completed as necessary. Review plan
Travel planning							
Investment in public transport							
Improved foot and cycle path provision							
Waste water							
Woodbridge Sewage	Delivery of strategic	Anglian Water /	Significant	Anglian Water / Developer	Short / medium	Upgrades cannot be	Review plan

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
Treatment Works investment, upgrade and consent increases required – also upgrade and extension to sewer network	residential and employment development	Developer			term	achieved as envisaged	
On-site Drainage							
Strategic approach to deal with surface water – use of Sustainable Urban Drainage systems etc	Delivery of strategic residential and employment development Protection of neighbouring areas of	Developer / Suffolk County Council / Anglian Water		Developer	Short/ medium/ long term	Suitable solution cannot be found to meet proposed scales of development	Review scale and phasing of development

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
	nature conservation interest						
FELIXSTOWE / WALTON & TRIMLEY VILLAGES							
Education							
Secondary – opening single new secondary school as replacement for two existing <u>schools. The site <u>has</u></u> sufficient space for potential longer term expansion	Delivery of residential development – skills base for future employment	Suffolk County Council	Committed	Suffolk County Council	Short term	Insufficient additional land included within new school site to allow for extension to meet full long term requirements	Agree with education provider means by which long term requirements can be met. Ensure information factored into new build scheme from the start
Open Space							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
Improved access to and enhanced provision of open space	Delivery of strategic residential development – mitigating impacts of new development on Natura 2000 sites	Developer Suffolk Coastal District Council Suffolk County Council		Developer – in kind and financial contribution	Short, medium and long term	Impact of development greater than anticipated. Monitoring of mitigation measures agreed shows additional mitigation required.	Review of plan if impact of development cannot be adequately mitigated. Agree and secure additional mitigation measures
Healthcare							
Health centre – new provision in more appropriate location	Delivery of residential development	Health authority	Committed	Health Authority	Short term	Other existing health care facilities become over-stretched. New residents unable to register with local GP	Early discussion with health care providers to agree long term strategy for health care provision. Note current resolution to grant planning permission for new

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
							healthcentre
Road network							
Felixstowe – traffic management and cycle route improvements	Delivery of residential and employment development	Suffolk County Council	£450k	Suffolk County Council	Short term	New measures insufficient to mitigate impacts of proposed scale of new development	Secure additional funding from developers/re-prioritise CIL spending. Agree with highway authority additional improvements. New link road between Candlet Road and Trimley High Road may be one such solution.
Rail network							
Felixstowe to Nuneaton Rail improvements including	Delivery of strategic employment linked to	Network Rail	Committed	Network Rail Department for Transport Developer	Short, medium and long term	Work agreed as part of improvement to docks takes	Review of plan and forecasts which sit behind it

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
Ipswich Chord; Felixstowe Branch Line Trimley to Levington double tracking	Felixstowe Port. Increased rail capacity also helps enable delivery of strategic residential and employment development utilising A14.					longer than anticipated. Pressure on strategic road network increases – delays etc	
REST OF DISTRICT							
Road network							
A12 – four villages improvements	Key north/south route through district	Developer	Will depend on improvements agreed	Developer	Medium / long term	Funding cannot be secured.	Continue to lobby for funding. Possible CIL contribution
Operation Stack	Management issue for vehicles	Suffolk County Council		Suffolk County Council	Medium / long term	-	-

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
	using Felixstowe Docks. Transport and logistics is employment sector of sub-national and national importance			Developer Department for Transport			
A14 Copdock major improvement	Continuing improvement to strategic route network and traffic movements both north-south and east-west	Highways Agency		Department for Transport	Long term	Improvement does not go ahead or is re-phased to later date	Review of plan and scale and location of development. Cross boundary matter.

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
Rail network							
Beccles Loop	Location of loop is outside of district but will facilitate full hourly service on east coast line. Hourly service offers realistic alternative to people using A12.	Network Rail	Committed	Network Rail	Hourly service commenced December 2012	-	-
Leiston passenger rail service re-instatement	Offers alternative to people using local	Network Rail Developer		Network Rail Developer	Medium / long term	Existing situation remains. Increased	Work with developers and service providers to secure provision.

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
	and strategic road network.					traffic on local and strategic road network	Identify as local priority if new nuclear provision agreed at Sizewell
Waste Water							
Benhall – Saxmundham – potential need for increased discharge consent or alternative treatments	Delivery of housing and employment within the catchment area	Anglian Water		Anglian Water Developer	Medium / long term	Timing of improvements may delay proposed housing and employment delivery	Possible review of plan (site specific rather than Core Strategy) in relation to potential phasing of development in this location.
Leiston – Sewage Treatment Works – some investment required to reduce impact of flooding from	Delivery of housing and employment within the catchment	Anglian Water		Anglian Water Developer	Medium / long term	Timing of improvements may delay proposed housing and employment delivery	Possible review of plan in relation to phasing of new development in this location. Potential for further improvements and upgrades linked to

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
combined sewer overflows							possible new nuclear provision.
Melton – Sewage Treatment Works – some upgrade or expansion may be required dependent on levels of development consented	Delivery of housing and employment	Anglian Water Developer		Anglian Water Developer	Medium / long term	As above	Possible review of plan in relation to phasing of new development in this location.
Water Supply							
Range of activities proposed by Anglian Water Services and Essex and Suffolk Water to maintain	Delivery of housing and employment	Anglian Water Services Essex and Suffolk Water		Anglian Water Services Essex and Suffolk Water	Short/ medium and long term	Water companies do not complete schemes agreed to anticipated timings.	Review of plan and to phasing of new housing and employment development

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body/ Bodies	Estimated Cost	Funding Sources (committed or likely)	Completion target (short/ medium or long term)	Risks	Mitigation
supply							

Annex U: MM45 - Modifications to Policy DM24

Policy DM24 amended to read:

DM24 – Sustainable Construction

The Council will expect all new developments, including redevelopment and refurbishment of existing buildings, to use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care in order to reduce emissions linked to changes to the climate and take into account the effects of climate change.

In order to satisfy this, residential developments should:

~~a) In the case of housing, Meet at least the following full Code for Sustainable Homes (CSH) star levels once successive updates to Part L of the Building Regulations come into force:~~

- ~~(i) in 2010 – Code level 3~~
- ~~(ii) in 2013 – Code level 4~~
- ~~(iii) in 2016 – Code level 5~~

~~b) In the case of B1, B2 and B8 uses, meet at least the following percentage CO2 reductions of the Building Emission Rate compared to the Target Emission Rate (as defined in the Building Regulations) once successive updates to Part L of the Building Regulations has come into force:~~

- ~~(i) in 2010 – 25% reduction~~
- ~~(ii) in 2013 – 44% reduction~~
- ~~(iii) in 2016 – zero carbon~~

Proposals for development should demonstrate an active consideration of the Suffolk Coastal Renewable & Low Carbon Technical Study and in particular, the Energy Opportunities Plan (EOP). ~~The EOP shows areas where there is potential for developments to meet a higher level of the Code for Sustainable Homes.~~ The Site Specific Allocations and Area Action Plan Development Plan Documents will set out any further requirements necessary in these areas.

As evidence of compliance, the Council will require the submission of an interim CSH Code for Sustainable Homes certificates prior to development commencement, or design stage BREAM certificates as appropriate. A final CSH certificate of compliance will be required to be submitted upon development completion. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market as a result of direct additional costs for sustainable

standards, the Council will be prepared to consider detailed information on the viability of a particular scheme, where justified, to reduce the building standard rating requirement.

It is proposed to develop supplementary guidance to assist developers in incorporating ~~renewable energy supplies~~ **sustainable construction** within their development plans.

Annex V: MM47 - Proposed modifications to Policy DM27

Supporting text to Policy DM27 amended to read:

- 5.70 A significant part of the district is within internationally and nationally designated **environmental** sites which are centred along the river estuaries and coastal areas. By their nature such areas are particularly sensitive to development and, therefore, careful consideration should be given when assessing new proposals. **Consideration should be given to the European Birds or Habitats Directives as to whether "screening" of impacts and an Appropriate Assessment is required.** In accordance with national policy guidance, the strongest level of protection is given to these areas **and the presumption in favour of sustainable development therefore does not apply to development proposals requiring appropriate assessment under European Birds or Habitats Directives (paragraph 119).** At the same time, it is also recognised that sometimes certain types of development could in fact improve wildlife habitats.
- 5.71 ~~The rapid changes and rate of development in recent years have had a significant impact on the quantity and range of habitats. Sites of international importance which include Ramsar sites and SSSI's are protected under statutory protection, (under the "EU Habitats Regulations") and will be identified on the Proposals Map.~~ **Sites of European importance, which include Special Areas of Conservation (SAC's) and Special Protection Areas (SPA's) are statutorily protected under the Conservation of Habitats and Species Regulations 2012 (based on EU directives), and wetlands of global importance (Ramsar sites) are protected by Government policy to apply the same level of protection as to European sites. Sites of Special Scientific Interest (SSSI's), of national importance, are protected under the Wildlife and Countryside Act 1981 (as amended). The district also contains sites of local importance including County Wildlife Sites (CWS's) designated by the Suffolk County Wildlife Sites panel, Local Nature Reserves (LNR's) designated by Local Authorities, and Regionally Important Geological Sites (RIG's) designated by GeoSuffolk. Considerable weight is given to protecting these designated sites.**
- 5.72 **Plans or projects which may have a likely significant effect(s) on a European site will require appropriate assessment under Reg. 61 of the Conservation of Habitats and Species Regulations 2010 (as amended). Accordingly, local authorities can only consent plans or projects where it can be ascertained that they will have no adverse effect on the integrity of a European site. In exceptional circumstances, where there are no alternative solutions, a plan or project may meet the tests of**

Imperative Reasons of Overriding Public Interest (IROPI), which then requires demonstration that appropriate compensation will be provided to ensure that the integrity of the Natura 2000 network is not compromised. Given the rigour of these tests, the presumption is that plans or projects that could adversely affect Natura 2000 sites will not be approved. In practice, schemes which qualify for IROPI are extremely rare and are very unlikely to fall under the Council's remit for decision making.

- 5.73 ~~At the more local level, given the overall quality of the districts environment it is still considered important to give consideration to habitats and species outside designated sites, including those species protected by law.~~ In order to protect nature conservation, it will also be important to protect habitats outside designated sites and to protect particular species, such as those which are rare or protected. Suffolk Biodiversity Action Plan priority species and habitats as defined by Suffolk Biodiversity Partnership, and other species protected by law will be protected from harmful development. Where there is reason to suspect the presence of nature conservation interests, applications for development should be accompanied by a survey and assessment of their value, in accordance with local biodiversity validation requirements. If present, the proposal must be sensitive to, and make provision for, their needs.
- 5.74 ~~In order to safeguard nature conservation it will be important to seek to protect key sites complemented by a general presumption against development which would be to the detriment of other important sites and habitats.~~

Policy DM27 amended and with footnote to read:

~~"Development will not be permitted where there is an unacceptable impact on biodiversity and geodiversity having regard to the following:~~

- ~~(a) The status and designation of sites, habitats and species;~~
- ~~(b) The need to avoid the loss and fragmentation of important sites and habitats; and~~
- ~~(c) The impact and effectiveness of any mitigation measures proposed to minimize and/or protect sites, habitats and species. Mitigation measures that encourage biodiversity will be looked upon favourably.~~

All development proposals should:

- protect the biodiversity and geodiversity value of land and buildings and minimise fragmentation of habitats;
- maximise opportunities for restoration, enhancement and connection of natural habitats; and

- incorporate beneficial biodiversity conservation features where appropriate.

Development proposals that would cause a direct or indirect adverse effect (alone or combined with other plans or projects) to the integrity of internationally and nationally designated environmental sites or other designated areas, priority habitats or protected/priority species will not be permitted unless:

- prevention, mitigation and, where appropriate, compensation measures are provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of the development⁽¹⁾; or
- with regard to internationally designated sites that the exceptional requirements of Reg. 62 of the Conservation of Habitats and Species Regulations 2010 (as amended) relating to the absence of alternative solutions and Imperative Reasons of Overriding Public Interest have been met.

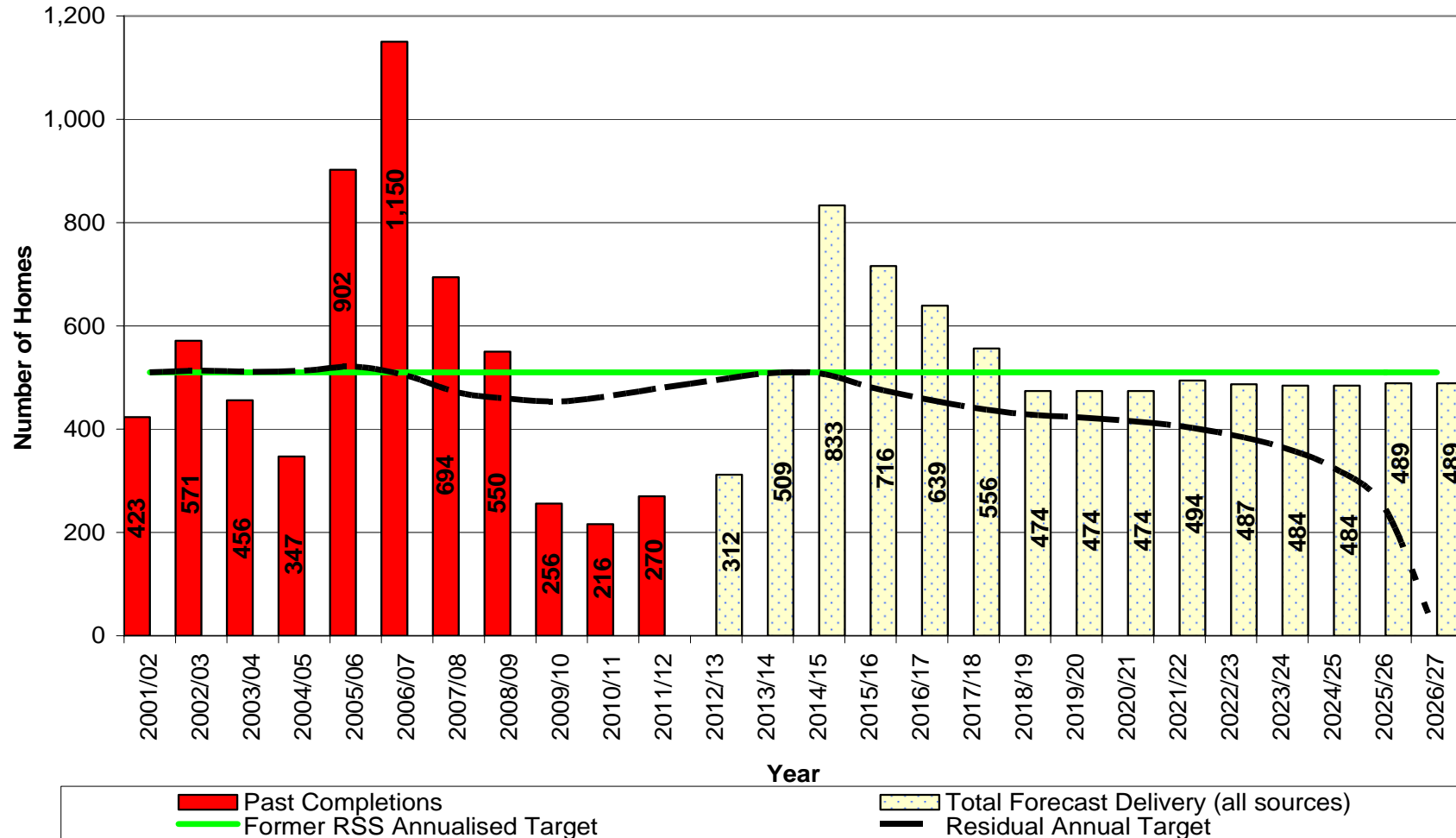
~~Where development is permitted, the retention of replacement of important sites and habitats will be sought through conditions or legal agreement. Opportunities will also be taken to create and enhance wildlife corridors and networks.~~

Improved site management and increased public access to sites will be encouraged where appropriate.

⁽¹⁾Footnote: If the result of the Appropriate Assessment is that part of the Core Strategy cannot be delivered without adverse impacts on a European site which cannot be appropriately mitigated then planning permission will only be granted for a level and location of development for which it can be concluded that there will be no adverse impact on the integrity of the site even if this level is below that indicated in the Core Strategy."

Annex W: MM53 - Replacement Appendix C

Appendix C - Indicative Housing Trajectory 2001 – 2027



It should be noted that within that trajectory, windfall is only assumed within the last 5 years of the plan as stated within paragraph 3.34. It is accepted that in practice such sites will occur throughout the whole plan period, with actual numbers identified in the Annual Monitoring Report in terms completions or outstanding planning permissions.

Annex X: MM48 - Proposed modifications to Policy DM29

Amend Policy:

"Proposals for telecommunications installations, including masts, antennae, dishes and other apparatus, will ~~only~~ be permitted where they comply with the following criteria:

- (a) the siting and external appearance of all installations, including any location or landscaping requirements, shall be designed to minimise the impact of the development on its surroundings while respecting the need for operating efficiency, and the technical and legal constraints placed on operators;
- (b) any antennae proposed for erection on buildings shall, so far as is practicable, be sited and designed to minimise their impact on the external appearance of the building; and
- (c) applications shall be supported by evidence to demonstrate that the possibility of erecting antennae on an existing building, mast or other structure has been fully explored and that there are no better alternative locations.

In sensitive locations ~~more stringent controls will be exercised~~ **the Council will expect, as far as possible, a sympathetic approach which may include camouflaging equipment and structures.** These sensitive locations include Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest, Conservation Areas, Special Landscape Areas, Historic Parklands, other areas with special designations, and those near listed buildings or within the settings of listed buildings or scheduled monuments. ~~Proposals will be permitted only where they meet the above criteria and are supported by evidence to demonstrate~~

- ~~(i) that they would meet an essential need, for example by providing an essential link to national services; and~~
- ~~(ii) that there are no suitable alternative sites in less sensitive locations.~~

If approved, a condition would be imposed to ensure that the land is restored to its former condition within a specific period of the use being discontinued and in accordance with an approved scheme of works."

Annex Y: MM17 - Proposed modifications to Policy SP18

Retain first and second paragraphs of original policy. Replace the third paragraph. Amend the wording of the fourth paragraph and relocate the last paragraph above the fourth paragraph.

"The infrastructure required in order to service and deliver new development must be in place or provided **at the required** in phase with **of** the development.

Generally, the Council will seek to identify needs and deficiencies in public, voluntary and commercial service provision and seek new approaches to meet those needs and address deficiencies. This will entail the provision of funding from local and national government sources as well as the private sector.

~~A strategy will be developed whereby developer contributions (normally through legal agreements) are sought for the services and facilities considered to be the highest priority, and for which alternative sources of funding are the most difficult to find~~

Pending the introduction of a Community Infrastructure Levy (CIL), an approach will be taken whereby developer contributions, commensurate with the scale and impact of the development proposed, are sought for services and facilities considered to be the highest priority and for which alternative sources of funding are the most difficult to find. Once introduced, CIL will become the primary means of securing off-site contributions.

In respect of specific proposals such as housing allocations, the necessary infrastructure will be identified and costs estimated in order that its provision can be tied into and phased with the development itself, and a means of transferring costs to the developer created where alternative sources of funding are not available.

Infrastructure prioritisation will be contained within Supplementary Planning Documentation **and a CIL Infrastructure List (Regulation 123 list).**"