



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 of the Site Allocations and Area Specific Policies Development Plan Document and Felixstowe Peninsula Area Action Plan

The Plans were submitted for examination on 20 June 2016

The examination hearings were held between 30 August and 2 September 2016

File Ref: PINS/J3530/429/6 & 7

Abbreviations used in this report

| | |
|--------|---|
| AAP | Action Area Plan |
| AONB | Area of Outstanding Natural Beauty |
| AQMA | Air Quality Management Area |
| CIL | Community Infrastructure Levy |
| CS | Core strategy |
| DCLG | Department for Communities and Local Government |
| DtC | Duty to Co-operate |
| EIPA | Eastern Ipswich Policy Area |
| FPAAP | Felixstowe Peninsula Action Area Plan |
| ha | hectare |
| HE | Historic England |
| HLS | Housing Land Supply |
| HMA | Housing Market Area |
| HRA | Habitats Regulations Assessment |
| IBC | Ipswich Borough Council |
| IGS | Ipswich Garden Suburb |
| IPAB | Ipswich Policy Area Board |
| IPBA | Ipswich Policy Board Area |
| km | kilometre |
| LDS | Local Development Scheme |
| LP | Local Plan |
| MM | Main Modification |
| NE | Natural England |
| NPPF | National Planning Policy Framework |
| OAN | Objectively Assessed Need |
| PC | Parish Council |
| PPG | Planning Practice Guidance |
| SA | Sustainability Appraisal |
| SAASPD | Site Allocations and Area Specific Policies Development Plan Document |
| SoCG | Statement of Common Ground |
| SCI | Statement of Community Involvement |
| SHMA | Strategic Housing Market Assessment |

Non-Technical Summary

This report concludes that the Site Allocations and Area Specific Policies Development Plan Document and Felixstowe Peninsula Area Action Plan provide an appropriate basis for the planning of the Suffolk Coastal District, provided that a number of main modifications (MMs) are made to them. Suffolk Coastal District Council (the Council) has specifically requested me to recommend any MMs necessary to enable the Plans to be adopted.

The MMs all concern matters that were considered during the examination. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal (SA) of them. The MMs were subject to public consultation over a six-week period. I have recommended their inclusion in the plans after considering all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- A small increase in numbers of dwellings to be provided through the Felixstowe Peninsula Action Area Plan, provided as an update following a planning permission.
- Protection of heritage assets, in terms of managing the impacts of development on listed buildings and their settings ;
- The infrastructure requirements arising from the proposed development, such as drainage ; and
- Other site specific issues, such as the presence of heritage assets and pipelines.

Introduction

1. This report contains my assessment of the Site Allocations and Area Specific Policies Development Plan Document (SAASPD) and Felixstowe Peninsula Area Action Plan (FPAAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the plans' preparation has complied with the duty to co-operate. It then considers whether the plans are sound and whether they are compliant with the legal requirements. The National Planning Policy Framework (NPPF)(paragraph 182) makes it clear that in order to be sound, a development 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 planning authority has submitted what it considers to be sound plans. The SAASPD and FPAAP, submitted in June 2016, are the basis for my examination. They are the same documents as those published for consultation in April 2016.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any MMs necessary to rectify matters that make the plans unsound and thus incapable of being adopted. My report explains why the recommended MMs, which relate to matters that were considered during the examination, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, prefixed by the abbreviated plan name, and are set out in full in the Appendices.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out SA of them, where appropriate. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in each submitted local plan. In this case, the submission policies map comprises the set of plans included in the SAASPD and FPAAP and the separate inset map, Appendix 9, to the FPAAP.
6. Policy maps are not defined in statute as a development plan document and so I do not have the power to recommend MMs to them. However, a number of the published MMs to the plans' policies require further corresponding changes to be made to the policies maps.
7. These further changes to the policies maps were published for consultation alongside the MMs for the local plans.

8. When the plans are adopted, in order to comply with the legislation and give effect to the plans' policies, the Council will need to update the adopted policies map to include all the changes proposed in the local plans and the further changes published alongside the MMs.

Consultation

9. A number of representations were received during consultation on the submitted plans. Where these deal specifically with a site/area they have been taken into account under that issue. More general points were made about Parish Councils' (PCs) views not being representative of those of local people, but this is a local democratic matter, rather than a matter for this examination. Although not strictly a consultation matter, a few representations were made about the timing of the hearings, in August/September, when some people might have been on holiday and PCs would not be meeting. However, the Government considers that local plans should be put in place quickly and therefore it was important that the hearings took place as soon as possible. In any event, responses were received in time for the hearings from the relevant PCs.
10. The PCs of Aldringham and Kelsale-cum-Carlton have said that they were not consulted on later increases to housing allocations in their areas and some PCs were critical of the Council in not offering alternative dates for their one-to-one sessions if they could not attend. Nevertheless, the PCs have had the opportunity to make representations and attend the examination hearings to put their points of view on the submitted plans.

Habitats Regulations Assessment

11. Habitats Regulations Assessments (HRAs) of both the SAASPD and FPAAP were published in October 2015 and identified a total of three preferred policies across the two plans as having likely significant effects on European sites. The HRAs made recommendations to address the identified issues and further HRA was undertaken on both plans following amendments after the preferred options consultation. Further HRAs on both plans were undertaken and published in February 2016, which found no significant effect on European sites to be likely. The 2015 and 2016 reports both considered in-combination effects. Addenda to the February 2016 HRA reports, specific to policies SSP32 in the SAASPD and FPP22 in the FPAAP, were published in March 2016. These concluded there would be no likely significant effects from the submitted plans, either alone or in combination with other plans and projects. The MMs were also subject to HRA and again no significant effect was found. Natural England (NE) made no objections to any of these findings¹.
12. Representations were made that the HRAs should not have left certain sites subject to project-based HRA screening. This affects very few of the allocated sites/ policies in the plans and is indicated in the policies concerned. On these sites, screening would be necessary when the detail of the development in each case was known and the impacts of that development could be fully assessed. The Council is working with NE to prepare a Recreational Avoidance

¹ Document G-01

and Mitigation Strategy to be implemented during the planning application stage. However, the completion of that exercise is not necessary prior to the adoption of the plans, which have already been the subject of HRA.

13. As such I consider that the HRA carried out at the plan stage has been adequate and no MMs are required.

Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the plans' preparation.
15. The Council's Duty to Co-operate Statement² details their actions in respect of issues of strategic importance and localised cross-boundary matters affecting the plans. There has been close co-operation between the Council and Ipswich Borough Council (IBC) both with the development of Ipswich Garden Suburb (IGS), covered in a Statement of Common Ground (SoCG)³, and other projects. The SoCG covers the provision of an infrastructure and delivery framework which will support the payment of Community Infrastructure Levy (CIL) for projects which would cover the impacts of new development on both sides of the boundary. The Ipswich Policy Area Board (IPAB)⁴ covers all local authorities which share a boundary with Ipswich as well as Suffolk County Council. The IPAB is co-ordinating the review of local plans for the area, population modelling, the preparation of a new strategic housing market assessment (SHMA) and the collection and use of housing and employment land data. Joint working is continuing on these matters and will underpin the local plan review for Suffolk Coastal District.
16. The Duty to Co-operate Statement also lists other joint groups and public bodies and infrastructure providers who co-operated with preparation of the plans. In addition, the Council delivers its planning service in partnership with adjoining Waveney District Council, ensuring a close relationship between the Councils.
17. The Council has engaged constructively with other neighbouring authorities and the various bodies prescribed in the Regulations and I am not aware of any significant outstanding issues relating to strategic and cross-boundary matters. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on a continuous basis in the preparation of the plans and that the duty to co-operate has therefore been met.

Assessment of Soundness - cross-cutting issues

Main Issues

18. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified

² Document E-04

³ Document F-10b

⁴ Document C-01

seven cross-cutting main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness and legal compliance rather than responding to every point raised by representors. Nor have I referred to every proposed alternative allocation suggested by representors ("omission sites"), every potential site considered through the plan-making process or every suggested change to development boundaries or policies. The examination has covered all the policies in the plans and all the representations on them but this report focuses only on those policies and supporting text in the documents which are fundamental to their soundness.

Issue 1 – Whether the plans are consistent with the Core Strategy, cover all the necessary topics and time periods and are soundly based, having particular regard to the Council's proposals to review the local plan?

19. The policies in a local plan must be consistent with those of the adopted development plan⁵. In this case two plans are intended to deliver the strategy set out in the Council's adopted Core Strategy (CS)⁶ by allocating sites and providing more detailed policies for some areas. The submitted plans, together with the current and potential planning application at Adastral Park, Martlesham and windfalls, will complete the current phase of development to be implemented in accordance with the CS, in particular policy SP2, which guides housing numbers and distribution, discussed further below.
20. Since the adoption of the CS the Council has changed the Local Development Scheme⁷ (LDS) to replace the approach set out in policy SP20 from preparing an Action Area Plan (AAP) for Martlesham, Newbourne and Waldringfield with a planning application for the development area. There is already an extant planning application which has not been determined by the Council and it is likely that this will be replaced by a new application shortly. Waldringfield PC objects to this approach, mainly on the grounds that an AAP would have given more opportunity for local public engagement to assist in shaping the future development of the area. However, any planning application and masterplanning for the site would be the subject of public consultation, a neighbourhood plan is being prepared for Martlesham and other settlements are covered in the SAASPD. The Council has said at the hearings that the delivery of development in this area will be monitored and, if necessary, the former proposed AAP could be revived.
21. The Felixstowe peninsula is physically separated from the rest of the District, and incorporates the resort town of Felixstowe and its major port facility. The area is subject to a separate CS policy, SP21, which covers its development as a growth area for the District, balanced by protection for the Area of Outstanding Natural Beauty (AONB) and protected nature conservation areas, including European sites. The SAASPD mainly covers the market towns, other settlements and rural areas and I agree that this plan has a different role. As such, there are separate roles for each plan.

⁵ Regulation 8(4) of the Town and Country Planning (Local Planning) Regulations 2012

⁶ Document D-05, adopted July 2013,

⁷ Document D-02, October 2015

22. The Council is committed to an early review of the local plan for the District as set out in the LDS, which is being pursued in alignment with the other IPBA plans, rolling forward the time period to 2036. This is important since the Council has not carried out a review to support housing land supply (HLS) as required in policy SP2 of the CS. Representations were made that, in the absence of such a review, the evidence base was so outdated that the plans should not continue. However, the submitted plans use the same timescale as in the CS and, although this is shorter than the desirable period of at least 15 years set in the NPPF, all the plans will be covered in the local plan review, ensuring an early review of both strategic and local policies. The Government's Planning Practice Guidance⁸ (PPG) states that most local plans require review within 5 years and that plans may be found sound conditional on a five year review. This is set out in the LDS and para 1.15 of each of the Plans.
23. Provision for gypsies, travellers and travelling showpeople has not been made in the plans. This is being covered by a Suffolk-wide approach led by Suffolk County Council, bringing forward 3x8 double pitch short stay sites across the County. Policies SP4 and DM9 of the CS provide sufficient detail on which to make decisions on such applications.
24. The plans set out policy areas for which updated and new Supplementary Planning Documents (SPD) and development briefs for sites SSP18 and SSP20 will be required. These are referenced in the relevant policies but none of these are matters which need to be examined as part of a development plan document. No saved policies from the 2001 Local Plan will remain on the adoption of these plans except where Neighbourhood Plans are proposed and they will make the decision on whether to continue to save any policies.
25. Therefore I conclude that the plans are consistent with the Core Strategy, cover all the necessary topics and time period and are soundly based, having particular regard to the Council's proposals to review the local plan.

Issue 2 - Whether the amount and distribution of housing is in accordance with the adopted CS and is effective and justified?

Housing requirement and Objectively Assessed Need (OAN)

26. The CS sets out the housing requirement for the District from 2010 to 2027 as being at least 7,900 dwellings, distributed in accordance with the settlement hierarchy, as set out in policy SP2. Table 1 in each of the plans set out how this will be split between the FPAAP and the combined total for SAASPD, the Adastral Park planning application and neighbourhood plans, together with a windfall allowance of 50 dwellings per year for the District. The combined total set out in the submitted plans and other development totals 8,620 dwellings.

⁸ PPG ID 12-028020140306

27. The Objectively Assessed Need (OAN) in the CS identified the need for 11,000 dwellings in Table 3.1, which is acknowledged by the Council not to have been assessed in accordance with the NPPF. The Inspector's report on the examination of the CS⁹, required a review of the CS by 2015 which would enable the identification of full OAN and proposals to ensure this was met, consistent with the NPPF. Instead, the Council has preferred to undertake the local plan review, which will roll forward policies and site allocations for the District up to 2036. Work has already started on the SHMA for the IPBA, which will feed into the review.
28. A number of representations have been made concerning the absence of a review of the CS and the delay to identifying an up-to-date OAN. However, the role for these lower tier plans is to implement the CS and in this case the relevant housing requirement figure for them to meet is at least 7,900 dwellings. The relevant case law on this matter is set out below. The plans, together with the strategic planning application at Adastral Park and windfalls, state in Table 1 that they would produce 8,620 dwellings. With the additional numbers introduced by MM1 in each plan to reflect a recent planning permission, 8,670 dwellings would be produced which more than meets the requirement in the CS.
29. As such, I conclude that the plans, along with the application at Adastral Park, windfalls and other development, will provide for the housing requirement set out in the CS. The local plan review will provide an up-to-date OAN in due course.

Supply and distribution of housing

Supply

30. The Council's view is that the allocated sites would come forward for development and policy SSP1 and FPP1 require new housing delivery to be in accordance with Table 2 in each plan, which sets out the spatial distribution of the housing development. Yields from each site in the plans have been informed on a site-by-site basis, taking local densities and the characteristics of each site into account, which I consider to be appropriate. Table 2 of the SAASPD includes allocations to be made through neighbourhood plans and at Adastral Park. The FPAAP is currently unsound in that it does not reflect accurately the amount of housing development in the plan area, following the grant of planning permission on part of site FFP8 in Trimley St Mary for a further 50 dwellings. Therefore a MM is required to correct this figure at various places in the document. **FPAAP MM1.**
31. The Council has produced three papers on 5-year HLS during the course of the examination, the latest of which¹⁰ gives 5.4 year supply with a 5% buffer and a 4.7 year supply with a 20% buffer. There was some discussion of the 5-year supply during the examination, mainly due to a recent appeal decision at Framlingham¹¹ where a 20% buffer was applied by the Inspector in that case

⁹ Document D-06

¹⁰ Document H-01

¹¹ APP/J3530/W/15/3011466

and an undersupply found. The Council dispute this finding, although it was not challenged and their view is that they are currently a 5% buffer authority. This is based on their latest housing land supply document and increased house building rates over 2014/15 and 2015/16, although this matter is disputed by objectors, based on delivery earlier in the decade.

32. Nevertheless, the issue in considering the plans is not whether they ensure a 5 year HLS but whether they make an appropriate contribution to meeting the CS housing requirement, an approach that has been supported by the Courts¹². The Plans also have to be consistent with the CS, as required by the Regulations¹³. In this case the plans meet the requirement of providing at least 7,900 dwellings and provide for up to 8,620 dwellings (8,670 in the MMs). The additional dwellings help to ensure delivery of the CS requirement and the approach of providing a variety of sites across the plans would allow for choice in the local area.
33. Whilst a number of other "omission" sites have been put forward and representations made that the allocation should be greater, a larger amount of housing has not been tested through the CS examination process and it will be for the local plan review to look at the needs of the area in terms of its OAN. As such, it is not necessary to allocate further sites at present. The exclusion of these sites from the plans does not prevent them from being brought forward as windfall sites, provided they are in sustainable locations where housing development is supported by policy.
34. The housing supply depends in part on a large planning application at Adastral Park for about 2,000 dwellings with a contribution of 1,575 in the plan period. The current application has been the subject of delays and is viewed as being outdated by Waldringfield PC. The SAASPD makes reference to the need for a masterplan to be produced for the site, which would, in any event, need to be in accordance with policy SP20 of the CS and therefore no MM is necessary to this effect. Whilst the PC has also sought changes to the CS in respect of Adastral Park, this is outside the scope of this exercise and needs to be examined as part of the local plan review. In addition, concerns have been raised that any new application might also take some time to deliver the necessary housing. The developer's trajectory for the site shows that delivery would start in 2018/19 and the Council has included 375 dwellings in the plan in the period to 2021, although others estimate that 150 dwellings would be a more appropriate estimate. Although the Council and developer are confident that 375 dwellings can be delivered, with no planning permission currently in place in my view that figure should be treated with caution. Nevertheless, the overprovision in the plans would allow for some slippage in the delivery programme. Supplies from other sources like windfalls will also help to maintain housing land supply in the District.

¹²Gladman Development Limited v Wokingham Borough Council [2014] EWHC 2320 (Admin) and Oxted Residential Land and Tandridge District Council Court of Appeal Document [2016] C1/2015/0851

¹³ Regulation 8(4) of the Town and Country Planning (Local Planning)(England) Regulations 2012

35. In summary, the plans will help to boost the supply of housing in the area but would not meet the previously-identified OAN in the CS. However, for the reasons given above, this does not mean that the plans should be found unsound, and there is good reason to complete this round of development plans quickly so that sites are released for development and Council resources can be used on the local plan review. I am satisfied that the plans, in conjunction with windfalls, neighbourhood plans and the Adastral Park scheme, will help to deliver the necessary HLS set out in the CS.

Distribution

36. The spatial distribution of the sites reflects the different character of the areas within the two plans. The CS sets out the spatial distribution for housing in the settlement hierarchy in policy SP19. The plans are consistent with the overall pattern of development in the policy, although the percentage of growth going to the towns and key and local service centres is increased, with a commensurate decrease in proposed development in the other villages and countryside, reflecting the direction of development to sustainable locations. Two large new planning permissions have been granted since the base date for the documents at Framlingham (163 units) and Woods Lane, Melton (180 units) both of which are in market towns in the SAASPD. The Framlingham site will be additional to the neighbourhood plan allocation and the Melton site would comply with policy SP26 of the CS, which covers development in the Greater Woodbridge area.
37. Therefore I conclude that the plans have considered both the supply and distribution of housing and are sound in this respect.

Relationship with neighbourhood plans

38. A number of neighbourhood plans are underway in the District, which have agreed housing requirements. Should these not progress to "made" status, along with any other allocations in the plans which do not progress, there is the opportunity to review them in the local plan review. In addition, where neighbourhood plans are still at an early stage they will be able to review allocations in these plans, which should help to overcome concerns raised that the plans were effectively preventing neighbourhood plans from making locally-informed choices about development in their areas.

Site selection and sustainability appraisal

39. The Council tested a wide range of sites through SA, in accordance with the broad distribution set out in CS policy SP2 and where a physical limits boundary had been drawn under policy SP19. The SA¹⁴ has been carried out to an accepted methodology and has examined alternative sites on a reasonable and consistent basis, although inevitably involving some degree of professional judgement.
40. Both policies FPP1 and SSP1 show a minor negative effect on SA objective 17, which covers the conservation and enhancement of biodiversity and

¹⁴ Documents E-08 and E-13

geodiversity. However, the SA process does not take into account the details of the development on site which would only come forward at planning application stage and the need for any mitigation. The Council has therefore given a conservative score to this objective. Although some local people have concerns about the impact on local wildlife due to the scale of proposed development, especially in the FPAAP, these are matters which can appropriately be taken into account when individual applications are determined. In addition, the emerging Recreational Avoidance and Mitigation Strategy will seek to provide green infrastructure which will both provide for public recreation and offer protection for wildlife sites.

41. Objectives have been set in the SA for such matters as improving the quality of residential areas, air quality, soil resources, the effects of traffic and the efficient patterns of movement. Although there are some significant losses in terms of good quality agricultural land in particular from some of the sites in the FPAAP, much of the land in this area is of good quality and this element has been assessed in coming to a view on the sustainability of these sites. The only site in the plans which has the potential to impact on an Air Quality Management Area (AQMA) would be SSP13 and a specific Air Quality Assessment will be required for this site, together with a mitigation appraisal to ensure that there would not be an adverse impact on Woodbridge AQMA. Representations have been made that the assessment in the SA fails to take into account impact of the cumulative growth on air quality in the area around Felixstowe and the Trimley villages. However, consultation has taken place on air quality with the Council's Environment Protection team and they have suggested air quality assessments for sites in the plans, where appropriate.
42. As such, I am satisfied that the plans have been prepared in accordance with SA and alternatives considered.

Conclusions on housing

43. Therefore I conclude that the plans' policies on the amount and distribution of housing are in accordance with the adopted CS and are effective and justified.

Issue 2 – Whether the plans' approach to the provision of affordable housing and housing for different groups is positively prepared, effective, justified and consistent with national policy?

44. The plans identify sites where affordable housing will be provided. However, the submitted plans do not take into account the latest Government guidance included in the Planning Practice Guide (PPG) on the definition and thresholds for affordable housing. This needs a main modification to correct the text and indicate the correct thresholds. **(SAASPD MM2 and FPAAP MM3)**
45. The submitted plans expect developers to get information from Local Housing Needs Surveys. However, the Council has suggested that the most pragmatic way forward is for developers to have an early discussion with the Council's housing department to ascertain an appropriate mix of units on each site, which requires a main modification. On some sites it has been suggested that bungalows should be provided as part of the housing mix. This follows suggestions from local people and consultees about housing need in the area

but would be a matter for detailed layouts and designs when planning applications come forward. **(SAASPD MM2 and FPAAP MM3)**

46. The plans indicate a mix of housing, in terms of size and tenure, in accordance with CS policy SP3, as shown in Table 3.6. The plans indicate that since 2010, generally larger dwellings have been built for the open market and 1-2 bedroom dwellings have been built as affordable housing. Specialist housing, such as that for C2 use as institutional housing, has not been taken into account in the CS housing requirement but will be examined as part of the local plan review. Similarly, other types of housing provision, like self-build, will also be examined as part of the local plan review and I see no need for modifications to these plans in this respect.
47. Therefore, I conclude that the plans' approach to the provision of affordable housing and housing for different groups is positively prepared, effective, justified and consistent with national policy.

Issue 3 – Whether the plans' policies on employment are consistent with the CS and national policy and provide an effective and justified basis for decision making.

48. CS policy SP5 requires the allocation of at least 8.5ha of new employment land, which represents a small increase in the overall amount of employment land, mainly in the form of extensions to existing sites. The distribution of employment land in the plans is in accordance with the settlement hierarchy in CS policy SP19 (Table 4.2). Further employment land will also come forward as part of the Adastral Park planning application.
49. Sites were examined on their individual merits, their current levels of activity and their potential for extension, in terms of sustainable travel and providing local employment opportunities. They have also been subject to SA. The largest site (SSP20) is at Ransomes Europark, the extension to which would encroach into the AONB. The site scored highly in the SA appraisal in terms of access (it is near an interchange on the A14) and public transport, providing employment opportunities for surrounding communities. The AONB Partnership has no objections to the allocation, provided that adequate mitigation can be made for any adverse impact on the natural beauty and special qualities of the AONB landscape to be examined through a development brief. This is set out in a SoCG¹⁵ with IBC, updated¹⁶ as part of the examination documents. Given its sustainability criteria, I consider that the development of the site would constitute the exceptional circumstances set out in paragraph 116 of the NPPF. Policy SSP20 also allows for the impacts to be moderated, as required by paragraph 116 of the NPPF. Therefore the allocation of the site would be in accordance with national policy.
50. Therefore I conclude that the plans' policies on employment are consistent with the CS and national policy and provide an effective and justified basis for decision making.

¹⁵ Document C-02

¹⁶ Document F-10b

Issue 4 – Whether the plans' policies on retail development are consistent with the CS and provide an effective and justified basis for decision making

51. The Council has taken into account updated information from the 2015 Retail Capacity Refresh¹⁷. New information was required since no substantive work had been carried out on retail since 2003, with only a minor update on floorspace change in 2009. The study shows a need for a modest increase in floorspace, but only in Saxmundham. New sites have not been allocated in the town, although policy SSP29 encourages new town centre uses there. The study also reflects changes in shopping patterns and the existing planning permissions at Felixstowe. In terms of district centres and local centres, the policies protect the role of these centres for a range of uses and facilities. Neighbourhood plans will provide for retail and town centre uses in Woodbridge, Leiston, Framlingham and Martlesham.
52. Therefore I conclude that the plans' policies on retail development are consistent with national policy, provide an update on the CS and provide an effective and justified basis for decision making.

Issue 5 - Are the physical limits boundaries to settlements justified, effective and positively prepared?

53. CS policy SP19 requires the updating of the physical limits boundaries and these have been reviewed in both plans, resulting in minor adjustments from previous plans. Whilst the full OAN and housing policies were not reviewed in accordance with policy SP2, the physical limit boundaries have been drawn up in accordance with policy SP19 of the adopted CS. In most cases the boundaries have allowed for space within the settlement for minor infill development and also incorporate sites of 5 or more houses where the principle of housing has been accepted by the Council. I consider that a consistent approach has been taken to the drawing of the boundaries, taking public consultation responses into account. Minor changes to the wording on development being "limited" outside physical boundary limits, rather than "restricted" do not dilute the strength of the CS policies which relate to these areas.
54. Although concerns have been raised that the physical limits boundaries potentially prevent sustainable development outside the boundaries, the Council has undertaken a review of available housing sites and allocated them having regard to the SA and other relevant evidence. This allows some certainty for local communities about development in the plan period. Windfall sites are not precluded from coming forward and they will be subject to policy SP1A of the CS in respect of sustainable development, alongside other adopted policies. MMs are required for the clarification of the text in respect of the purpose of policy SSP2 and FPP2 in directing development to sustainable locations in the settlement hierarchy and the countryside policies which seek to restrain development, subject to policies SP28 and SP29 of the CS.
(SAASPD MM1 and FPAAP MM2)

¹⁷ Document D-07

55. Any subsequent changes to the policy maps are covered above.
56. Therefore I conclude that the physical limits boundaries to settlements are justified, effective and positively prepared.

Issue 6 - Are the policies covering environment and historic heritage issues justified and positively prepared

Areas to be protected from development

57. The Council has said that there is no formal methodology for the identification of the "areas to be protected from development", covered in policies SSP39 and FPP28, but has reflected responses to the Issues and Options Report. Their identification has also helped to define some of the physical limits boundaries. However, they seem to me to be derived from a variety of policy areas – conservation, separation of settlements, or provide some form of other positive environmental benefit to a settlement, based on the previous 2001 Local Plan. CS policy SP15 requires these lower order plans to define such areas and therefore their inclusion in the plans is justified at this stage. However, such issues could be covered by criteria-based strategic policies as part of the local plan review.

Conservation and enjoyment of the historic environment

58. The NPPF provides policies for the protection of heritage assets and for conserving and enhancing the historic environment and the submitted plans provide policies to protect historic parks and gardens (SSP37 and FPP25) and other policies (SSP39 and FPP28) protect areas from development, which are in some cases important to protect the setting of conservation areas. However, there is little in either the CS or the submitted plans to create a positive strategy for the historic environment. Historic England (HE) objects to the plans on this basis.
59. The Council recognises that this is an area which should be addressed and developed at a strategic level through the local plan review, particularly where there are "at risk" conservation areas. As a strategic policy area it is not appropriate to cover it in these lower order plans. In addition, HE objects to the lack of a specific policy on the local listing of heritage assets. This is covered in the reasoned justification in sections 7.14 -7.16 of the SAASPD and sections 7.15-7.17 of FPAAP, where the need is acknowledged. These sections also refer to the Council's published criteria for the designation of non-heritage assets under policies SP15 and DM21, and so there is already some coverage of the issues raised, although the Council will expand these areas in the local plan review.
60. Therefore, I conclude that the plans' policies covering environment and historic heritage are justified and positively prepared.

Issue 7 – Whether the plans make adequate and appropriate provision for infrastructure, taking into account its impact on viability, to ensure the effective delivery of their policies

61. In terms of infrastructure for the development set out in the plan, the individual and cumulative infrastructure needs for the housing development have been taken into account in the delivery and monitoring framework in each document. In addition, consultation has taken place with the relevant consultees to ensure that proper provision has been made for the proposed development. CS policy SP18 covers infrastructure charges and the Council adopted a CIL Charging Schedule in July 2015. Whilst there have been some representations about the use of tariffs and their payment on completion of development rather than commencement, these relate to the system of CIL, rather than the policies in the submitted plans and no MMs are necessary as a result.
62. There will be increased traffic both on local roads and the strategic highway network, including the Orwell Bridge, as a result of the development included in the plans. The traffic modelling, which I consider to be robust and appropriate, has taken into account additional residential development since the CS and its impact on the road network, despite other types of development not being included. Subject to any necessary road/ junction improvements following further work on mitigation measures for the development proposals in the FPAAP¹⁸, none of the statutory consultees, including Highways England and the local highway authority, have any objections to the plans. The infrastructure needs for each development, including highway elements, have been addressed in each site allocation policy.
63. There are constraints in the area in respect of education facilities, which will be the subject of s106 contributions or CIL. There are a number of places in which new or expanded schools will be required and this is made clear in the plans. There are particular concerns about the need for a new primary school in the FPAAP area, since other schools in and around Felixstowe and the Trimleys have constraints on expansion. Four sites in the area (FPP5, FPP6, FPP7 and FPP8) have been identified to contribute to the scheme for a new school, and, although a site has not yet been identified, it could potentially be delivered on one of the larger sites. There is a need for further agreement between the education authority and the Council for the funding of the primary school and its implementation on the chosen location. The MMs make it clear where provision of on-site early years education is required.
64. As already stated, there is a need to increase the housing numbers by 50 on site FPP8 in FPAAP to reflect an existing planning permission. However, this has given rise to concerns that this would have knock on effects for infrastructure and the County Council and others object to these numbers being included in the totals, since they say that the infrastructure needs are based on the original figures. Nevertheless, they reflect the up-to-date situation and represent only a small increase in the overall numbers. (**FPAAP MM1, MM4, MM5, MM6, MM9, MM11, MM13, MM20, MM21 and MM22**).
65. Capacity at the waste water treatment works at Gedgrave and Framlingham is limited but the SAASPD requires the checking of capacity for the housing sites using these works and for sites FPP3, FPP5, FPP6, FPP10 and FPP12 in the

¹⁸ Document D-19

FPAAP, when applications are submitted. MMs are required to these policies for various developments to ensure that sufficient waste water capacity is, or will be, made available for them. In addition, surface water from development sites will need to be managed in accordance with the surface water hierarchy. For some sites a drainage strategy will need to be approved before planning permission can be granted and MMs are required in this respect in order to ensure that the policies are effective. Consultation with Anglian Water and the Environment Agency has confirmed that, with the MMs in place, the plans satisfactorily cover the issues of water supply and drainage. **(SAASPD MM4, MM5, MM6, MM7, MM8, MM9, MM10, MM12, MM15, MM16 and MM17. FPAAP MM7, MM11, MM12, MM15, MM16 and MM18)**

66. The plans reflect the need for green infrastructure, with the river valleys, AONBs and Special Landscape Areas being protected. These will be examined at the County level during the local plan review. At a more local level, on the bigger housing sites, open space will be required and more specific provision will be made on the northern edge of Ipswich, where there is a deficit of accessible greenspace, through policy SSP35. Main modifications are required to ensure the provision of car parking and public access to this area. **(SAASPD MM 21)**

Viability

67. A viability study¹⁹ has been undertaken as part of the development of the plans, which informed the preferred options, through information from locally available sources and developers. Some remodelling has taken place with increased densities on some housing sites although densities generally remain low on the allocated sites. With the revised densities in place, the residential sites are all viable. Commercial sites are likely to be more sensitive to market forces in coming forward for development but the study concluded that they were also viable.
68. Therefore, I conclude that the plans make adequate and appropriate provision for infrastructure, taking into account its impact on viability, to ensure the effective delivery of their policies.

Assessment of Soundness – Specific Issues in the SAASPD

Overview and main issues

69. I have already covered the cross-cutting matters in relation to the two plans and concluded that there is no compelling justification to plan for more housing to meet the OAN and that the overall spatial distribution of development is appropriate and justified.
70. The opening section on housing and Table 2 of the SAASPD lists the housing allocations, together with some commentary. Each site allocation policy sets out criteria for its development. There are a number of cases where MMs are

¹⁹ Document D-15

needed to the criteria in the policies following on from the examination and these are dealt with below, unless dealt with generically in the section on infrastructure, above.

Specific policies

71. Policies SSP3 (Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh) and SSP11 (Land north of Mill Close, Orford). These policies require MMs following changes to Government policy on affordable housing, with an additional bullet point requiring a financial contribution towards affordable housing. A Phase 1 ecological survey has been carried out on the site which showed that there were no bats present and therefore the bat survey required by the policy would not be necessary. However, the Council has not made a MM to delete this requirement. Although the policy does not now show the up-to-date position, this is a minor matter which can be resolved when a planning application is submitted for the site. **(SAASPD MM3 and MM10)**
72. Policy SSP4 (Land to the east of Aldeburgh Road, Aldringham). Aldringham PC objects to the inclusion of this site and have particular concerns about its size, which would represent a considerable increase in the size of the village. It is also outside the former physical boundary limits to the settlement. However, Aldringham is a local service centre in the settlement hierarchy, to which the CS has allocated growth. Although this site was allocated late on in the process, local people have had the chance to comment on it through representations and the hearings. The area has neighbourhood planning status but this was only achieved in May 2016 and therefore policies for that area were included in the plan, since its designation was close to the submission of the plans. The site has also been subject to SA and subject to the criteria listed, I am satisfied that it would represent sustainable development and should be included in the local plan as a contribution to overall housing supply.
73. Policy SSP6 (Land adjacent to Corner Cottages, Main Road, Benhall). Objections have been made to the allocation of the site, in respect of highway alignment and speed concerns on the B1121. However, the highway authority has no objections to the allocation of the site on these grounds and, having visited the area, I consider that no change to the plan is necessary as a result.
74. Policy SSP12 (Land west of Garden Square, Rendlesham). The policy shows an overall decrease in housing numbers on the site from that previously indicated, in order that the implications of some significant constraints on the site can be assessed. Further work is necessary to determine its full capacity in respect of the need for a "cordon sanitaire" due to the odour issues from the adjacent water recycling works and other constraints. At this stage I consider that an approximate figure of 50 dwellings on the unconstrained land area for the capacity of the site is appropriate. The housing numbers also take into account greenspace provision in accordance with the Rendlesham Neighbourhood Plan. Whilst objections have been raised to the figure of 50 dwellings in the MMs as being too low, there might be scope for increasing the number of dwellings, which are approximate in the plan, on the site when the layout has been determined through the submission of a planning application.

75. Policy SSP13 (Land east of Redwald Road, Rendlesham). The site is close to the Woodbridge AQMA. In order to assess the cumulative impact on the AQMA and any necessary mitigation, a further bullet point is needed to the policy, requiring an air quality assessment. **(SAASPD MM11)**
76. Policy SSP15 (Land opposite The Sorrel Horse, The Street, Shottisham). The site is in a sensitive location being within the AONB, on the edge of a Conservation Area and close to listed buildings. The village is a local service centre and there is a need for the site in terms of meeting local housing demand and for a village car park, which cannot be met elsewhere. As such, I consider that there is an exceptional need for the development to take place in the AONB, and would meet the relevant test in paragraph 116 of the NPPF. The policy provides for mitigation for any detriment to landscape quality, should that be necessary. The policy wording also needs to be changed to reflect the Council's duties in respect of the Conservation Area and listed buildings and to allow for a financial contribution towards affordable housing, rather than on-site provision on this smaller site. **(SAASPD MM12)**
77. Westerfield – Policies SSP17(Land south of Lower Road, Westerfield), SSP18 (Land at Old Station Works, Main Road, Westerfield) and SSP35 (Land off Westerfield Road and Lower Road, Westerfield (Ipswich Garden Suburb)). Westerfield is on the northern edge of Ipswich, close to an important growth area, IGS. The section needs to be updated in respect of the size of and relationship to IGS and the infrastructure and its funding to deliver the scheme. Details of the provision of the country park under SSP35 and the access to it need to be included in the policy. Other bullet points need to be added in a MM to cover the treatment of development around Mill Farm, which is a listed building, and potentially an archaeological investigation, depending on the nature of the works. **(SAASPD MM13 and MM21)**. Site SSP17 is intended to be a smaller development of about 20 dwellings around a new village green. At this stage I consider that the level of development is appropriate and no main modification is necessary to the policy. Site SSP18 sets out criteria concerning the historic environment which will need to be taken into account to prevent an adverse impact on nearby listed buildings.
78. Sizewell. As one of the larger employers in the District, an update to the text is necessary through a MM on a potential new nuclear power station at the site and the decommissioning of Sizewell A, for soundness. **(SAASPD MM14)**
79. Policy SSP23 (Former airfield, Debach). The policy covers the Debach employment site. A MM to the policy is required to clarify how requirements on the investigation of contaminated land and the assessment and protection of heritage assets should be applied. **(SAASPD MM17)**
80. Policy SSP24 (Bentwaters Park, Rendlesham). The site is a significant employment area, with an existing planning permission which includes many conditions to control the development of the site, including traffic. A MM is required to clarify the circumstances in which new employment uses will be allowed, which is supported by the owners of the site. Although Eyke PC has said that the MM would mean that the existing conditions would be lost, the MM's wording says that the Council will only permit new employment uses when they comply with the conditions on the existing planning permission.

Therefore the policy keeps the controls in place, and the MM would ensure that the policy complied with local and national policy. **(SAASPD MM18)**

81. Policies SSP26 (Levington Park, Levington) and SSP27 Riverside Industrial Estate, Border Cot Lane, Wickham Market). MMs to these policies are necessary to ensure that archaeological investigations are carried out prior to development, depending on the nature of any groundworks, which provides clarity to the policies, and is supported by the County Council. In addition, a modification is required to Policy SSP37 to update the name of HE. **(SAASPD MM19, 20 and 22)**
82. Policy SSP40 (Newbourne former Land Settlement Association Holdings). Newbourne is a unique settlement within the area, having been set up as a scheme under the Land Settlement Association. More details are required of the unique features which still need protection under this plan, until the long-term future of the settlement can be reviewed as part of the local plan review and therefore MMs are needed to the policy and its justification. **(SAASPD MM23 and 24)**

Assessment of Soundness – Specific Issues in the FPAAP

Introduction

83. The opening section on housing and Table 2 of FPAAP lists the housing allocations, together with some commentary. Each site allocation policy sets out criteria for its development. There are a number of cases where MMs are needed to the criteria following the examination and these are dealt with below, unless dealt with generically in the section on infrastructure, above. In response to representations, the Council has made minor changes (in the Additional Changes) to the text to indicate their view on likely population change in the Plan area, informed by the 2011 Census and have included some further text on the scale of development in the Trimley villages, the growth for which was identified in the CS.

Specific policies

84. Policy FPP1(New Housing Delivery 2015-2027). Policy FPP1 includes the proposed numbers of dwellings for the site. However, a recent planning application has shown that a further 50 dwellings could be accommodated on the site. A MM is required to show the amended numbers of dwellings in Trimley St Mary and the plan area as a whole. In addition, policy FPP8 needs to reflect the change in the numbers of dwellings. **(FPAAP MM1 and MM14)**
85. National Grid. National Grid has objected to the lack of inclusion of information on their apparatus which might constrain development on sites FPP4 (Land north of Walton High Street, Felixstowe) and FPP12 (Land at Haven Exchange, Felixstowe). MMs are needed to these policies, together with an introductory paragraph to include the relevant information in the plan. **(FPAAP MM8, MM10, MM17 and MM18)**

86. Policy FPP4 . At the hearing the timing of the move for the Rifle Club and the criteria for any alternative location was discussed. The form of wording has been agreed with the relevant parties and a MM is required to ensure the continued activity of the Rifle Club during the move. Although there have been objections to the wording of the policy in terms of accessibility of the replacement facility, the Rifle Club have already said that the proposed new site is in the optimum available location, although it accepts that it will not be as accessible as the former site, which was exceptional in terms of its location.
87. Objection has been made by the owner of site FPP4 to the provision of on-site early years education, since they consider that this matter ought to be reviewed at planning application stage, when the latest evidence will be available. However, the County Council, which has requested the change, would be consulted on any planning application coming forward on the need for educational provision at that time and would be able to advise on the up-to-date need. As such, no change is necessary to the MM. **(FPAAP MM9)**
88. Policy FPP6 (Land opposite the Hand in Hand Public House, Trimley St Martin). A new bullet point is required in the policy to cover the need to protect the setting of the listed buildings at the Hand in Hand public house opposite the site, required by HE. I consider that this is necessary for the soundness of the plan. Although certain of the development criteria on this and other sites have been disputed by objectors, they represent the views of consultees on what would be required when putting together planning applications for the sites. **(FPAAP MM12)**
89. Policy FFP8 (Land south of Thurmans Lane, Trimley St Mary). A new bullet point is required in the policy to cover the protection of the setting of Mill Farmhouse, a listed building. This site now has approvals in the form of two separate applications for 150 units, rather than the 100 shown in the submitted plan and so a MM is needed to show the up-to-date situation. I consider that this is necessary for the soundness of the plan. Although HE objects to the increased numbers on the site, the Council has said that the applications on the site have had regard to sensitivity in terms of the listed buildings near its eastern end. **(FPAAP MM14)**
90. Policy FPP24 (Holiday Accommodation). The policy covers the provision of holiday accommodation. The MM would encourage such accommodation to come forward in other areas of the peninsula, as well as sea front and town centre locations, where they meet other criteria set in the policy, supporting economic growth and necessary for the soundness of the plan. **(FPAAP MM19)**
91. Infrastructure framework. Consequential MMs are required as a result of the changes to MM9, 11 and 13 to correct the infrastructure requirements for these developments. **(FPAAP MM20, 21 and 22)**

Assessment of Legal Compliance

92. My examination of the compliance of the plans with the legal requirements is summarised in the table below. I conclude that the plans meet them all.

| LEGAL REQUIREMENTS | |
|---|---|
| Local Development Scheme (LDS) | The Site Allocations and Area Specific Policies Development Plan Document and Felixstowe Peninsula Area Action Plan have been prepared in accordance with the Council's LDS, dated October 2015. |
| Statement of Community Involvement (SCI) and relevant regulations | The SCI was adopted in September 2014. Consultation on the plans and the MMs has complied with its requirements. |
| Sustainability Appraisal (SA) | SA has been carried out and is adequate. |
| Habitats Regulations Assessment (HRA) | HRA was carried out at preferred options stage in October 2015. Further HRA, including specific policies, was carried out prior to submission in February/ March 2016 and on the MMs for each plan. As a result of the HRAs carried out Appropriate Assessment is not required for the plans. |
| National Policy | The plans comply with national policy except where indicated and MMs are recommended. |
| 2004 Act (as amended) and 2012 Regulations. | The plans comply with the Act and the Regulations. |

Overall Conclusion and Recommendation

93. The plans have a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of them as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

94. The Council has requested that I recommend MMs to make the plans sound and capable of adoption. I conclude that, with the recommended MMs set out in the Appendices, the Site Allocations and Area Specific Policies Development Plan Document and Felixstowe Peninsula Area Action Plan satisfy the requirements of Section 20(5) of the 2004 Act and meet the criteria for soundness in the NPPF.

E A Hill

Inspector

This report is accompanied by Appendices containing the Main Modifications for each plan.

APPENDIX 1

SITE ALLOCATIONS AND AREA SPECIFIC POLICIES DOCUMENT MAIN MODIFICATIONS SCHEDULE

Key to the schedule:

- Proposed new text is shown underlined and deleted text is shown ~~struck through~~. New **policy wording** is shown bold and underlined.

Main Modifications

| Mod Ref | Page in Submission Version | Policy/ Paragraph/ Settlement | Modification |
|-----------------|-----------------------------------|--------------------------------------|---|
| SAASPD - MM1 | 22 | Paragraphs 2.16 - 2.21 | <p><i>Amend paragraphs to read:</i></p> <p>2.16 Physical limits boundaries are applied to all settlements identified as sustainable in the Core Strategy under policy SP19 Settlement Hierarchy (Major Centres to Local Service Centres). It is to these settlements that new development is directed first and foremost (Core Strategy policy SP1). <u>Physical limits boundaries are therefore an important policy for the supply of housing. In order to implement Core Strategy policies SP19 and SP2 and Site Allocations and Area Specific policy SSP1, physical limits boundaries have been re-drafted to incorporate sites of 5 or more units where the principle of housing has been accepted and new housing allocations. These sites and the revised physical limits boundaries are shown on the Inset Maps.</u></p> <p>2.17 No change</p> <p>2.18 Physical limits boundaries are an important planning too which fulfil a number of roles, not least in relation to the supply of housing as <u>They are a policy line on the map which is used to define the main built area(s) of a settlement including any scope for growth over the plan period (to2027).</u> They should not be read as necessarily defining the full extent of a settlement as may be perceived by the local community. For example an open space on the edge of a settlement <u>or small</u></p> |

| Mod Ref | Page in Submission Version | Policy/ Paragraph/ Settlement | Modification |
|--------------|----------------------------|-----------------------------------|---|
| | | | <p><u>clusters of houses</u> may have been excluded.</p> <p>2.19 No change</p> <p>2.20 Outside of the physical limits boundary, opportunities for <u>housing development</u> are considerably more <u>restricted limited</u> as countryside policies of restraint will apply (Core Strategy policies SP28 and SP29). <u>More limited opportunities for housing in the countryside do however exist through Core Strategy policies DM1, DM3, DM4, DM6 and DM9.</u></p> <p>2.21 In recognition of the fact that physical limits boundaries denote where development is acceptable in principle they have been drawn to include sites for which there is a current planning permission and new sites allocated through this Site Allocations Document. Those sites with permission for 5 or more dwellings are shown on the Inset Maps.</p> |
| SAASPD – MM2 | 24 | Paragraph 2.27 and new paragraphs | <p><i>Amend paragraph 2.27 and add new paragraph:</i></p> <p>“The Core Strategy also outlines the Council’s affordable housing policies which this document will adhere to, <u>but subject to latest government policy in terms of how affordable housing is defined and the threshold levels at which affordable housing provision will be required.</u></p> <p><u>The Site Allocations and Area Specific Policies Local Plan updates the Core Strategy to reflect the new government affordable housing policy (National Planning Policy Guidance para 031- Ref ID 23b-031-20160519) whereby:</u></p> <p><u>a) affordable housing contributions will not be sought from schemes of 10 units or less and which have a maximum combined gross floorspace of no more than 1,000sqm;</u></p> |

| Mod Ref | Page in Submission Version | Policy/ Paragraph/ Settlement | Modification |
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| | | | <p><u>b) In designated rural areas, which in the case of Suffolk Coastal District Council is identified as its Areas of Outstanding Natural Beauty, the Council will apply a lower threshold and will seek affordable housing and tariff style contributions from developments of between 6 to 10 units in the form of cash payments. Cash payments are commuted until after the completion of the units within the development.</u></p> <p>The provision of affordable housing is a key priority for the this Council and is necessary in order to achieve its stated objective 3 in the Core Strategy “<u>To provide for the full range of types and locations of new homes to meet the needs of existing and future residents</u>” At the national level, the government has re-defined and widened the definition of affordable housing. This includes the provision of starter homes. and the government and this document needs to ensure that it can respond in a flexible manner to any changes at national level. The introduction of Starter Homes (<u>once Regulations are issued by Central Government</u>), across the sites in this document will be encouraged to ensure that everybody has the opportunity to access suitable residential accommodation to meet their needs. The identified priority continues to be for the provision of smaller one and two bedroomed units. The Council will expect that the exact mix of units on each site is informed by appropriate Local Housing Needs Surveys. <u>mix of affordable housing including any starter homes provision proposed for any specific scheme is informed by up to date evidence of need. This evidence can be provided through early discussion with the Council’s Housing section.</u></p> |
| SAASPD – MM3 | 27 | Policy SSP3 Aldeburgh | <p><i>Add new bullet point:</i> <u>A financial contribution will be sought towards affordable housing provision.</u></p> |

| Mod Ref | Page in Submission Version | Policy/ Paragraph/ Settlement | Modification |
|---------------|----------------------------|----------------------------------|--|
| SAASPD – MM4 | 29 | Policy SSP4 Aldringham | <i>Amend bullet point 8</i> <u>Improve the capacity of the sSurface water disposal must be network in accordance with the water management hierarchy;</u> |
| SAASPD – MM5 | 30/31 | Policy SSP5 Badingham | <i>Add new bullet point to SSP5</i> <u>Prior to permission being granted, developers should demonstrate that there is adequate capacity at WRC (Framlingham) or that capacity can be made available.</u> |
| SAASPD – MM6 | 32 | Policy SSP6 Benhall | <i>Amend bullet point 5</i> <u>The need to increase the sSurface water network capacity disposal must be in accordance with the water management hierarchy; and</u> |
| SAASPD – MM7 | 36 | Policy SSP8 Dennington | <i>Amend bullet point 6</i> <u>The need to increase the capacity of the surface water network Surface water disposal must be in accordance with the water management hierarchy.</u> <i>Add new bullet point</i> <u>Prior to permission being granted, developers should demonstrate that there is adequate capacity at WRC (Framlingham) or that capacity can be made available</u> |
| SAASPD – MM8 | 38 | Policy SSP9 Hacheston | <i>Amend final bullet point to read:</i> <u>As required, to increase the capacity of the surface water network in accordance Surface water disposal must be in accordance with the water management hierarchy.</u> |
| SAASPD – MM9 | 40 | Policy SSP10 Kelsale cum Carlton | <i>Add bullet point</i> <u>Surface water disposal must be in accordance with the water management hierarchy.</u> |
| SAASPD – MM10 | 42 | Policy SSP11 Orford | <i>Amend bullet point 4:</i> <u>Provision of affordable housing. A financial contribution will be sought towards affordable housing provision;</u> |

| Mod Ref | Page in Submission Version | Policy/ Paragraph/ Settlement | Modification |
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| | | | <p><i>Amend bullet point 7</i> Developers will need to demonstrate there is adequate capacity in the foul sewerage network and WRC (Gedgrave) or that capacity can be made available; and</p> <p><i>Amend final bullet point</i> The need to increase the capacity of the sSurface water disposal network must be in accordance with the water management hierarchy.</p> |
| SAASPD – MM11 | 47 | Policy SSP13 Rendlesham | <p><i>Add paragraph to end of policy</i> <u>'In addition, the air quality impacts of traffic from cumulative development at Melton crossroads and the Air Quality Management Area declared in Woodbridge will need to be investigated in the form of an Air Quality Assessment, together with a mitigation appraisal.'</u></p> |
| SAASPD – MM12 | 52 | Policy SSP15 Shottisham | <p><i>Amend first bullet point to read:</i> The design and layout should be of high quality, responding to the sites location in an Area of Outstanding Natural Beauty; the sites relationship with the Conservation Area and being sympathetic to the setting of nearby listed buildings and <u>preserving and enhancing the character and setting of the Conservation Area, and listed buildings;</u></p> <p><i>Amend 2nd bullet point to read</i> Provision of affordable and smaller open market housing. <u>A financial contribution will be sought towards affordable housing provision.</u></p> <p><i>Amend final bullet point</i> Developers will need to address a significant off-site sewerage requirement to provide foul water connections. Risks posed by septicity of pumped connection will need to be addressed. <u>A foul drainage strategy will need to be</u></p> |

| Mod Ref | Page in Submission Version | Policy/ Paragraph/ Settlement | Modification |
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| | | | <u>approved and implemented prior to the development connecting to the sewerage system.</u> |
| SAASPD - MM13 | 54/55 | Paragraphs 2.126 & 2.127 Westerfield | <p><i>Amend and add to paragraphs to read:</i> <u>Westerfield is a Local Service Centre, located close to the outskirts of Ipswich, and with a train railway station is one of the more sustainable locations within the district. It is reasonable to assume that residents from this part of the district already make use of the social and community infrastructure that the county town can provide. The location of the district/ borough boundary in this location is of limited relevance to how people live their daily lives. Primary school pupils for example, may attend schools within Ipswich Borough or at the neighbouring village of Witesham within Suffolk Coastal district.</u></p> <p><u>The village is located close to Ipswich's main growth area, Ipswich Garden Suburb, which will provide for approximately 3,500 homes around 2,700 new together with associated social, community and physical infrastructure provision. When built, these facilities will also be accessible to the people of Westerfield. Similarly, the residents of the garden suburb will be expected to make use of Westerfield railway station. It will be important to ensure that opportunities to improve pedestrian and cycle links between the village and the new development are maximised. Opportunities to improve Westerfield Station will also need to be investigated as development progresses and will include looking to identify land for car parking for the railway station which is currently lacking.</u></p> <p>The provision of a country park is an important element of the Ipswich Garden Suburb development required to mitigate the impact of the new development <u>from the IGS and sites beyond the IGS in both Ipswich Borough Council and Suffolk</u></p> |

| Mod Ref | Page in Submission Version | Policy/ Paragraph/ Settlement | Modification |
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| | | | <p><u>Coastal district areas</u> on nearby sites designated as being of international importance for their nature conservation interest (e.g. Orwell and Deben estuaries European sites). <u>Part of the land required for the provision of the country park (including a car park to serve the country park) is located within Suffolk Coastal. These two parcels of land are allocated for public open space under policy SSP35. This will help maintain the separate identity of Westerfield from the new development.</u></p> <p><u>Given the clear linkages and relationship between Westerfield (and Witnesham) and the new development in Ipswich Garden Suburb, the Council will consider requests for contributions from the Suffolk Coastal District Council CIL pot and recognises the need to contribute towards infrastructure provision where necessary as identified through any planning application. A separate infrastructure and delivery framework mechanism is to be agreed with Ipswich Borough Council for the Ipswich Garden Suburb development given that the new built development is to be provided wholly within their administrative boundary. This framework is expected to provide more detail in relation to costs of infrastructure which can support funding requests to the CIL pot for the impact of new developments in Suffolk Coastal on infrastructure such as the Ipswich Garden Suburb country park and Westerfield railway station. In commenting on proposals for the Ipswich Garden Suburb as they have evolved, Suffolk Coastal District has emphasised the importance for Westerfield and its community to retain its separate identity. The location of the country park element which crosses into Suffolk Coastal District will ensure this physical separation (see policy SSP35).</u></p> |
| SAASPD | 61 | New | <i>New paragraph</i> |

| Mod Ref | Page in Submission Version | Policy/ Paragraph/ Settlement | Modification |
|---------------|----------------------------|--------------------------------|---|
| - MM14 | | paragraph below paragraph 3.04 | <u>The Sizewell nuclear complex is also a significant local employer and will continue to be so regardless of any decision at national level on the provision of a new nuclear power station on the site. The work associated with the decommissioning of Sizewell A will continue throughout the duration of the plan period.</u> |
| SAASPD - MM15 | 66 | Policy SSP21 Parham | <i>Add new bullet point</i> <u>A drainage strategy is approved and implemented before development proceeds.</u> |
| SAASPD - MM16 | 67 | Policy SSP22 Parham | <i>Add new bullet point</i> <u>A drainage strategy is approved and implemented before development proceeds.</u> |
| SAASPD - MM17 | 69 | Policy SSP23 Debach | <i>Amend bullet points 3,4 and 5 and add new bullet point as follows:</i> <i>Amend 3rd bullet point</i> <u>Where necessary investigation of potential contamination at the site has been undertaken prior to submission of any relevant planning application.</u> <i>Amend 4th bullet point to read</i> <u>"Where necessary adequate sewage treatment facilities are provided;</u> <i>Amend bullet point 5 to read</i> <u>Where appropriate, If required measures have been taken to assess and manage any heritage assets on the site.</u> <i>Add new bullet point</i> <u>Where necessary a drainage strategy is approved and implemented before development proceeds.</u> |
| SAASPD - MM18 | 71 | Policy SSP24 Rendlesham | <i>Amend policy to read:</i> Bentwaters Park as identified on the Policies Map covers an area of some 390 hectares. It contains a wide range of traditional and unusual (sui generis) employment uses which make use of the great variety of building sizes and types |

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| | | | <p><u>and infrastructure</u> available on the site. The building types are reflective of its former use as a military airfield. The Council is keen to ensure that this site remains a vibrant employment site. but that it does so within the identified constraints as set out in the agreed comprehensive plan for the site (planning application ref C/10/3239). <u>Accordingly the Council will permit new employment uses where they will not breach site, environmental and highway constraints identified and conditioned in the planning permission C/10/3239 approved 11/12/2015 but that it does so within the identified constraints as set out in the agreed comprehensive plan for the site (planning application ref C/10/3239).</u> Outside of those limits new employment uses will be permitted where they are supported by robust evidence which confirms that their individual and cumulative impacts are acceptable. In both circumstances, proposals should conform to local and national planning policy particularly with regard to the environmental designations on and in close proximity to the site.</p> |
| SAASPD – MM19 | 73 | Policy SSP26 Levington | <p><i>Amend policy to read:</i> Levington Park as identified capacity can be made available. <u>An archaeological investigation may be required depending on the nature of the groundworks.</u></p> |
| SAASPD – MM20 | 75 | Policy SSP27 Wickham Market | <p><i>Add new bullet point</i> <u>An archaeological investigation may be required depending on the nature of the groundworks.</u></p> |
| SAASPD – MM21 | 101 | Policy SSP35 Westerfield | <p><i>Amend policy to read:</i> Two parcels of land as shown on the Policies Map are designated as public open space. This land is intended to form part of the country park (minimum of 24.5ha total) required to be provided in association with the new Ipswich Garden Suburb the built area for which is located within the administrative boundary of</p> |

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| | | | <p>Ipswich Borough Council. The detailed scheme for the country park as it relates to Suffolk Coastal district will be expected to: <u>provide Safeguard existing pedestrian and cycle access points and provide suitable links to the existing public rights of way network;</u> <u>Make provision for a car park to serve the country park within that parcel of land fronting Westerfield Road;</u> <u>Make suitable provision for the provision of any necessary maintenance tracks and access points;</u> Provide for that part of the country park which lies within Suffolk Coastal district, detailed boundary treatments and be able will also be required to demonstrate that the residential amenity of dwellings which abut the boundary of the <u>country park and the public rights of way has been safeguarded;</u> Sensitive treatment will also need to be given to Mill Farm <u>which is a listed building and its setting. which is a listed building. An archaeological investigation may be required dependent on the nature of the groundworks involved.</u></p> |
| SAASPD – MM22 | 108 | Policy SSP37 | <p><i>Amend policy to read:</i> <u>Within the plan area.....interest compiled by English Heritage Historic England and have the status as Designated Heritage Assets:..."</u></p> |
| SAASPD – MM23 | 112/113 | Paragraph 7.26 and new paragraph Newbourne | <p>Newbourne as a settlement is defined as an Other Village in the Core Strategy policy SP19 Settlement Hierarchy and as such opportunities for new development are very limited. However, that part of Newbourne which comprises former Land Settlement Association Holdings is a unique area within the district. <u>The Land Settlement Association was set up in 1934 as an experimental scheme to provide unemployed workers from depressed industrial areas with</u></p> |

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| | | | <p><u>employment on the land. The scheme and its legacy can still be seen in the number of large regular shaped plots, some of which still contain commercial scale greenhouses. The cottages provided with the plots were of standard design.</u></p> <p>To retain this character, it is important to continue to control changes which may occur through the replacement, or enlargement of dwellings. The Council has previously produced Supplementary Planning Guidance containing design guidelines to help in this regard. This guidance will be reviewed and re-issued in support of this policy.</p> <p><u>It is clear not all of the land plots are still used as originally envisaged and that a debate needs to be had with regard to their long term future, but this debate needs to be held in the context of the long term future of Newbourne as a whole. This is outside the remit of this Site Allocations Document, but will be picked up and addressed through the Local Plan Review.</u></p> |
| SAASPD – MM24 | 113 | Policy SSP40 Newbourne | <p><i>Amend policy to read:</i> The District Council will encourage the retention in horticultural or agricultural use of those parts of the former Land Settlement Association holdings shown on the policies Map, not <u>currently</u> used or required in connection with the residential curtilages, taking account of any physical features which currently mark garden limits. The erection of new dwellings, or extensions to existing dwellings or ancillary residential development which would result in a major change of character of the former holdings (where they are fundamentally contrary to the design guidelines contained in Supplementary Planning Document 12.1) will be resisted.</p> |

APPENDIX 2

FELIXSTOWE PENINSULA AREA ACTION PLAN MAIN MODIFICATIONS SCHEDULE

Key to the schedule:

- Proposed new text is shown underlined and deleted text is shown ~~struck through~~. New **policy wording** is shown bold and underlined.

Main Modifications

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| FPAAP – MM1 | 23 | Policy FPP1 | <p><i>Amend policy to read:</i> Trimley St Mary 100 <u>150</u> Total 1,120 <u>1,170</u></p> |
| FPAAP – MM2 | 24 | Paragraphs 3.24 – 3.29 | <p><i>Amend paragraphs to read:</i> 3.24 Physical limits boundaries are applied to all settlements identified as sustainable in the Core Strategy under policy SP19 Settlement Hierarchy (Major Centres to Local Service Centres). It is to these settlements that new development is directed first and foremost (Core Strategy policy SP1 Sustainable Development). <u>Physical limits boundaries are therefore an important policy for the supply of housing. In order to implement Core Strategy policies SP19 and SP2 and Felixstowe Peninsula Area Action Plan Policy FPP1, physical limits boundaries have been re-drafted to incorporate sites of 5 or more units where the principle of housing has been accepted and new housing allocations. These sites and the revised physical limits boundaries are shown on the Inset Maps.</u></p> <p>3.25 No change</p> <p>3.26 Physical limits boundaries are an important planning tool which fulfil a number of roles, not least in relation to the supply of housing as They are a policy line on the map which is used to define the main built area(s) of a settlement <u>including any scope for growth over the plan period (to 2027).</u> They should not be read as necessarily defining the full extent of a settlement as may be perceived by the local community. For example an open</p> |

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| | | | <p>space on the edge of a settlement <u>or small clusters of houses</u> may have been excluded.</p> <p>3.27 No change</p> <p>3.28 Outside of the physical limits boundary, opportunities for <u>housing</u> development are considerably more restricted <u>limited</u> as countryside policies of restraint will apply (Core Strategy policies SP28 and SP29). <u>More limited opportunities for housing in the countryside do however exist through Core Strategy Policies DM1, DM3, DM4, DM6 and DM9.</u></p> <p>3.29 In recognition of the fact that physical limits boundaries denote where development is acceptable in principle they have been drawn to include sites for which there is a current planning permission and new sites allocated through this AAP. Those sites with permission for 5 or more dwellings are shown on the Inset Maps and detailed in Appendix 3 and 4.</p> |
| FPAAP – MM3 | 26 | Paragraph 3.35 and new paragraph | <p><i>Amend paragraph 3.35 and add new paragraph:</i></p> <p>The Core Strategy also outlines the Council’s affordable housing policies which this document will adhere to, <u>but subject to latest government policy in terms of how affordable housing is defined and the threshold levels at which affordable housing provision will be required.</u></p> <p><u>The Felixstowe Peninsula Area Action Plan updates the Core Strategy to reflect the new government affordable housing policy (National Planning Policy Guidance para 031-Ref ID 23b-031-20160519) whereby:</u></p> <p><u>a) affordable housing contributions will not be sought from schemes of 10 units or less and which have a maximum combined gross floorspace of no more than 1,000 sqm;</u></p> <p><u>b) in designated rural areas, which in the case of Suffolk Coastal District Council is identified as its Areas of Outstanding Natural Beauty,</u></p> |

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| | | | <p><u>the Council will apply a lower threshold and will seek affordable housing and tariff style contributions from developments of between 6 to 10 units in the form of cash payments. Cash payments are commuted until after the completion of the units within the development.</u></p> <p><u>The provision of affordable housing is a key priority for the this Council and is necessary in order to achieve its stated objective 3 in the Core Strategy "To provide for the full range of types and locations of new homes to meet the needs of existing and future residents" At the national level, the government has re-defined and widened the definition of affordable housing. This includes the provision of starter homes. and the government and this document needs to ensure that it can respond in a flexible manner to any changes at national level. The introduction of Starter Homes (once Regulations are issued by Central Government), across the sites in this document will be encouraged to ensure that everybody has the opportunity to access suitable residential accommodation to meet their needs. The identified priority continues to be for the provision of smaller one and two bedroomed units. The Council will expect that the exact mix of units on each site is informed by appropriate Local Housing Needs Surveys. mix of affordable housing including any starter homes provision proposed for any specific scheme is informed by up to date evidence of need. This evidence can be provided through early discussion with the Council's Housing section.</u></p> |
| FPAAP – MM4 | 27 | New paragraph after 3.38 | <p><u>Add new paragraph:</u> <u>Core Strategy Objective 1 seeks to deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development. The provision of education facilities, including for early years, alongside new development is a vital component to achieving sustainable development as outlined in Core Strategy Policy SP1 and SP18 with respect to infrastructure provision and developer</u></p> |

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| | | | <p><u>contributions. The Core Strategy established the policy for dispersed development within the Felixstowe Peninsula and the relationship to the provision of infrastructure and resultant developer contributions with regard to mitigating cumulative impacts is outlined in Core Strategy Policy SP21. Developments proposed where there is a lack of spaces in existing early years settings and schools will be expected to contribute to the cost of new provision through planning obligations.</u></p> |
| FPAAP – MM5 | 27 | Paragraph 3.40 | <p><i>Amend paragraph to read:</i> Suffolk County Council has have identified a need to establish at least one additional facility setting (likely to be for 40 places) for early years education to meet the increasing demand brought about through national changes and new housing delivery from sites that are not large enough to justify an on-site standalone setting but add to the cumulative need for a new facility; these being for the following allocations: FPP3, FPP6 and FPP8. The most appropriate provision would be alongside a new primary school when delivered. <u>Further on-site provision for new settings (for at least 32 places) will be needed on allocations: FPP4, FPP5 and FPP7. Whilst the size of development on land north of Conway Close and Swallow Close (FPP5) does not, by itself justify a standalone setting, the lack of places in the vicinity and additional permitted housing (in that location) means that on-site provision is necessary.</u></p> |
| FPAAP – MM6 | 27 | Paragraph 3.45 | <p><i>Amend paragraph to read:</i> At this stage, it is not possible to allocate the land for the new primary school as part of the AAP, but the Council will continue to work closely with Suffolk County Council and landowners across the Felixstowe Peninsula to ensure that potential sites across the Felixstowe Peninsula are explored and a site identified. <u>In the meantime, proportionate developer contributions to costs of land and construction will be required, in line with policies in the Core Strategy, to mitigate the impact of developments on the demand for early years and primary places where insufficient capacity is available. The most</u></p> |

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| | | | <u>recent forecasts (2015) show that during the plan period Kingsfleet Primary, Trimley St Martin Primary and Trimley St Mary Primary Schools do not have available capacity.</u> |
| FPAAP – MM7 | 30 | Policy FPP3 Felixstowe | <i>Amend bullet point 6 to read:</i> “Improving the capacity of the foul sewerage network <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</u> |
| FPAAP – MM8 | 33 | New paragraph to be added after paragraph 3.73 Walton Felixstowe | <i>Add new paragraph:</i> <u>National Grid have identified that the site is in close proximity to IP/HP (intermediate pressure pipelines and high pressure pipelines) gas distribution apparatus which any future development will need to take into account. National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which affect their assets to ensure the continued safe operation of existing sites and equipment.</u> |
| FPAAP – MM9 | 33/34 | Policy FPP4 Walton, Felixstowe | <i>Amend bullet point 1 to read:</i> <u>Any alternative venue for the Rifle Club to be the equivalent (or greater) in terms of quantity and quality and accessibility in comparison to the existing facility, should be secured ahead of the use of the existing facility ceasing, to allow for redevelopment. and provided ahead of the site being redeveloped</u> <i>Insert new bullet point:</i> <u>Provision of on-site early years setting</u> |
| FPAAP – MM10 | 33/34 | Policy FPP4 Walton, Felixstowe | <i>Insert new bullet point:</i> <u>Consideration of the IP / HP apparatus crossing the site.</u> |

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| FPAAP – MM11 | 36 | Policy FPP5 Felixstowe | <p><i>Amend bullet point 9 to read:</i> Improving the capacity of the foul sewerage network <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity,</u></p> <p><i>Insert new bullet point:</i> <u>Provision of on-site early years setting</u></p> |
| FPAAP – MM12 | 38/39 | Policy FPP6 Trimley St Martin | <p><i>Amend bullet point 10 to read:</i> Improving the capacity of the foul sewerage network <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity,</u></p> <p><i>Insert new bullet point:</i> <u>Development will need to be high quality and sympathetic to the setting of the area and existing Listed Buildings</u></p> |
| FPAAP – MM13 | 41 | Policy FPP7 Trimley St Martin | <p><i>Insert new bullet point:</i> <u>Provision of on-site early years setting</u></p> |
| FPAAP – MM14 | 43 | Policy FPP8 Trimley St Mary | <p><i>Amend policy introduction to read:</i> 4.47ha of land, south of Thurmans Lane, Trimley St Mary, as shown on the Policies Map, is identified for approximately 100 150 residential units.</p> <p><i>Amend bullet point 8 to read:</i> <u>Development will need to be high quality and sympathetic to the setting of Mill Farmhouse.</u></p> |
| FPAAP – MM15 | 50 | Policy FPP10 Felixstowe | <p><i>Amend bullet point 5 to read:</i> Improving the capacity of the foul sewerage network <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.</u></p> |
| FPAAP – MM16 | 51/52 | Policy FPP11 Felixstowe | <p><i>Amend bullet point 5 to read:</i> Improving the capacity of the foul sewerage network <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.</u></p> |
| FPAAP | 53 | New | <p><i>Add new paragraph:</i></p> |

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| - MM17 | | paragraph after 4.29 | <u>National Grid have identified that the site is in close proximity to IP/HP (intermediate pressure pipelines and high pressure pipelines) gas distribution apparatus which any future development will need to take into account. National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which affect their assets to ensure the continued safe operation of existing sites and equipment.</u> |
| FPAAP - MM18 | 53 | Policy FPP12 Felixstowe | <p><i>Amend bullet point 6 to read:</i> Improving the capacity of the foul sewerage network <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity,</u></p> <p><i>Add new bullet point:</i> <u>Consideration of the IP / HP apparatus crossing the site.</u></p> |
| FPAAP - MM19 | 79 | Policy FPP24 | <p><i>Amend policy to read:</i> <u>Proposals will normally be expected in sea front locations but may also be welcomed in other locations across the Felixstowe Peninsula such as the town centre...</u></p> |
| FPAAP - MM20 | 99 | Infrastructure Framework | <p><i>Insert new row:</i> <u>Site(s): FPP4 – Land north of Walton High Street</u> Infrastructure Requirement: <u>On-site early years setting.</u> Responsible Agencies: <u>Developer, Suffolk County Council.</u> Infrastructure Classification: <u>Critical.</u> Indicative Phasing: <u>At the time of site development.</u> Risk: <u>Insufficient capacity for early years education is provided.</u> Contingency/Mitigation: <u>Work closely with Suffolk County Council to consider opportunities. Allocate a site as part of the early aligned/joint Local Plan Review.</u> Indicative Sources of Funding: <u>CIL, Suffolk County Council, Private.</u></p> |
| FPAAP - | 99 | Infrastructure Framework | <p><i>Insert new row:</i> <u>Site(s): FPP5 – Land north of Conway Close</u></p> |

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| MM21 | | Framework | <p><u>and Swallow Close</u> Infrastructure Requirement: <u>On-site early years setting.</u> Responsible Agencies: <u>Developer, Suffolk County Council.</u> Infrastructure Classification: <u>Critical.</u> Indicative Phasing: <u>At the time of site development.</u> Risk: <u>Insufficient capacity for early years education is provided.</u> Contingency/Mitigation: <u>Work closely with Suffolk County Council to consider opportunities. Allocate a site as part of the early aligned/joint Local Plan Review.</u> Indicative Sources of Funding: <u>CIL, Suffolk County Council, Private.</u></p> |
| FPAAP – MM22 | 99 | Infrastructure Framework | <p><i>Insert new row:</i> Site(s): <u>FPP7 – Land off Howlett Way</u> Infrastructure Requirement: <u>On-site early years setting.</u> Responsible Agencies: <u>Developer, Suffolk County Council.</u> Infrastructure Classification: <u>Critical.</u> Indicative Phasing: <u>At the time of site development.</u> Risk: <u>Insufficient capacity for early years education is provided.</u> Contingency/Mitigation: <u>Work closely with Suffolk County Council to consider opportunities. Allocate a site as part of the early aligned/joint Local Plan Review.</u> Indicative Sources of Funding: <u>CIL, Suffolk County Council, Private.</u></p> |