

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8050 - 3619 - Main Modifications (MM1 to MM24) - i, ii, iii, iv

8050 Support

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Respondent: Kesgrave Town Council (Mrs Susan Clements)
[3619]

Agent: N/A

Full Text: I can confirm that the Town Council is comfortable that the Main Modifications are legally compliant, sound and robust and no changes are proposed. Please refer to Minute Number 9 and the Resolution agreed at the Town Council's Planning and Development Committee Meeting on the 7th November 2016 - the said Committee which has delegated powers. These Minutes will be noted by the full Town Council at its Meeting this evening - 14th November 2016.

Summary: I can confirm that the Town Council is comfortable that the Main Modifications are legally compliant, sound and robust and no changes are proposed. Please refer to Minute Number 9 and the Resolution agreed at the Town Council's Planning and Development Committee Meeting on the 7th November 2016 - the said Committee which has delegated powers. These Minutes will be noted by the full Town Council at its Meeting this evening - 14th November 2016.

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

Kesgrave Town Council 071116_Redacted.pdf

Microsoft Outlook - Memo Style.pdf

P Dev Comm Minutes 7th Nov. 2016.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8070 - 4558 - Main Modifications (MM1 to MM24) - None

8070Support

Main Modifications (MM1 to MM24)Main Modifications (MM1 to MM24)

Respondent: Anglian Water (Hannah Wilson) [4558]Agent: N/A

Full Text:Thank you for the opportunity to comment on the modifications. Anglian Water has considered the modifications and have no issues or concerns to raise in this regard.

Summary:Thank you for the opportunity to comment on the modifications. Anglian Water has considered the modifications and have no issues or concerns to raise in this regard.

Change to PlanN/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Yes	Not Specified	N/A

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8076 - 4557 - Main Modifications (MM1 to MM24) - None

8076 Support

Main Modifications (MM1 to MM24) Main Modifications (MM1 to MM24)

Respondent: Environment-Agency (Mr G Steel) [4557] Agent: N/A

Full Text: Sound & legally compliant

Summary: SSP19; Sound & legally compliant

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

- 2.131.pdf
- 2.134.pdf
- SSP5.pdf
- SSP8.pdf
- SSP11.pdf
- SSP19.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8090 - 514 - Main Modifications (MM1 to MM24) - None

8090 Support

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Respondent: Ipswich Borough Council (Mrs Sarah Barker) [514] **Agent:** N/A

Full Text: Thank you for consulting Ipswich Borough Council on the Suffolk Coastal District Council Local Plan Proposed Main Modifications.

In relation to the Site Allocations and Area Specific Policies Development Plan Document Proposed Main Modifications, we have no comments and note that the Proposed Main Modifications accord with the Statement of Common Ground signed on 2nd September 2016.

Summary: Thank you for consulting Ipswich Borough Council on the Suffolk Coastal District Council Local Plan Proposed Main Modifications.

In relation to the Site Allocations and Area Specific Policies Development Plan Document Proposed Main Modifications, we have no comments and note that the Proposed Main Modifications accord with the Statement of Common Ground signed on 2nd September 2016.

Change to Plan N/A

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

Not Specified

Duty to Cooperate?

Not Specified

Soundness Tests

N/A

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8095 - 2859 - Main Modifications (MM1 to MM24) - i

8095 Object

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Respondent: **Waldringfield Parish Council (Mr David Lines)**
[2859]

Agent: **N/A**

Full Text:

Comment 1

In our response to the pre-submission consultation, WPC said:

§1.15 "In 2009 BT submitted a revised outline planning application (ref C/09/0555) to the Council for housing, employment, related development and infrastructure in this location. Considerable negotiation and progress towards determining the application was made....."

This application is now considerably out of date - it needs significant changes in order to comply with the outcome of the External Examination of the Core Strategy (CS). In particular, it makes no mention of any of the cumulative mitigation measures that were offered by BT representatives in the External Examination and have subsequently been added to the CS. It therefore follows that in order to be compliant with the CS, the BT planning application would have to be significantly modified, so a new application would almost certainly be required. No change has been made to this paragraph, so our objection still stands. In particular, it should be made clear that the revised outline planning application (ref C/09/0555) is now defunct and needs to be replaced.

Unsound, because it is not positively prepared, as it is not based upon the strategy in the Local Plan

Comment 2

In our response to the pre-submission consultation, WPC complained that insufficient clarity was provided concerning the production of the 'Masterplan', and its relationship to the outline planning application and the CS. Under Issue 2, question 12, the Inspector asked if the Martlesham, Newbourne and Waldringfield Area Action Plan (MN&WAAP) has now been abandoned and how are policies for that area to be delivered? In the discussion, SCDC stated that the MN&WAAP had been abandoned and that all aspects of Policy SP20 would now be delivered through a Masterplan. However, this is not specifically stated in the Main Modifications document. The only reference is in §1.15 which says only that "Any permission for development will require the production of a masterplan which will be subject to separate consultation and community input". It does not state that the masterplan will be required to deliver all aspects of SP20 and the MN&WAAP strategy as stated in the CS.

We suggest that the wording of §1.15 is changed to incorporate the following:

"Any permission for development will require the production of a masterplan, which will be subject to separate consultation and community input. The masterplan must comply fully with all aspects of SP20 as listed in the CS and as detailed in the strategy for the Martlesham, Newbourne and Waldringfield Area Action Plan."

We also suggest that the Core Strategy is changed to reflect this, as it currently refers to the Martlesham, Newbourne & Waldringfield Area Action Plan.

Unsound, because it is not positively prepared, as it is not based upon the strategy in the Local Plan

Comment 3

WPC's comments in Representation 7884 have been brushed aside. We pointed out that the Appropriate Assessment (AA) had stated that information on visitor numbers to the Deben SPA was sparse and that a visitor survey should be commissioned. There is no reference to this in the SAASP Main Modifications. We do not consider this satisfactory. It has been 8 years since we first argued that a visitor survey of the Deben Estuary SPA is needed, and still nothing has been done, despite an admission by SCDC that up-to-date information on visitor numbers is needed and is still non-existent.

In WPC's Representation we had suggested that "... the SAASP is changed to state that a visitor survey for the Deben SPA will be completed as part of the masterplan/BT revised planning application. This would provide baseline information against which any increase in visitor numbers and the associated increase in disturbance on the SPA from walkers and dog walkers can be monitored and appropriate action taken." SCDC's response was: "The level of detail requested is not appropriate in relation to paragraph 1.15. Any planning application will be required to comply with adopted policy SP20." (F-04, p13).

We do not accept that a simple statement that "a visitor survey for the Deben SPA should be completed as part of the masterplan/BT revised planning application" adds an extra 'level of detail', and we maintain that it should be included.

Unsound, because it is not positively prepared, as it is not based upon the strategy in the Local Plan. Our proposed changes would make the SAASP legally compliant and sound because (with appropriate changes to the CS) it would align it with the legally adopted Core Strategy, in particular with SP20.

Comment 4

Habitats Regulations Assessment addendum for Suffolk Coastal District Council's Site Allocations and Area Specific Policies post-Examination modifications

The HRA is relied upon as evidence in formulating the SAASP but it has been excluded from the consultation process. In our response to the pre-submission consultation, WPC made 3 points about the HRA, none of which have been addressed. In particular, there is still no clarity on the "new Country Park or similar high-quality provision". No details are provided about its location, size, facilities etc., and there is no detailed assessment of its mitigation capabilities. We suggest that in order to be legally compliant, the HRA should have been the subject of public consultation and suggest that such a consultation takes place and any consequential adjustments are made to the SAASP before adoption.

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8095 - 2859 - Main Modifications (MM1 to MM24) - i

8095 Object

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Unsound, because it is not positively prepared, as it does not adequately provide for mitigation for the in-combination affects of the housing specified in the CS.

Summary: It should be made clear that the revised outline planning application (ref C/09/0555) is now defunct and needs to be replaced.

We do not accept that a simple statement that "a visitor survey for the Deben SPA should be completed as part of the masterplan/BT revised planning application" adds an extra 'level of detail', and we maintain that it should be included. We suggest that in order to be legally compliant, the HRA should have been the subject of public consultation and suggest that such a consultation takes place and any consequential adjustments are made to the SAASP before adoption.

Change to Plan We suggest that the wording of §1.15 is changed to incorporate the following:
"Any permission for development will require the production of a masterplan, which will be subject to separate consultation and community input. The masterplan must comply fully with all aspects of SP20 as listed in the CS and as detailed in the strategy for the Martlesham, Newbourne and Waldringfield Area Action Plan."
We also suggest that the Core Strategy is changed to reflect this, as it currently refers to the Martlesham, Newbourne & Waldringfield Area Action Plan.

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	No	No	No	i

Attachments:
SAASP MM consultation response (final 28-11-16)_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8102 - 4189 - Main Modifications (MM1 to MM24) - iii, iv

8102 Object

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Respondent: Historic England (Debbie Mack) [4189]

Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Proposed Main Modifications and Additional Changes Oct - Nov 2016 and Site Allocations and Area Specific Policies Proposed Main Modifications and Additional Changes Oct - Nov 2016

Thank you for consulting us on the Proposed Main Modifications and Additional Changes to the Felixstowe Peninsula Area Action Plan and Site Allocations and Area Specific Policies. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the Proposed Main Modifications and Additional Changes.

We attach the 6 response forms and a continuation sheet and summarise our comments below:

FPAAP - MM12

FPP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)
Historic England welcomes this Main Modification.

FPAAP - MM14

FPP8: Land off Thurmans Lane, Trimley St Mary

Historic England welcomes the amendment to bullet point 8 but has concerns regarding this modification in respect of the dwelling capacity as set out in our response form.

FPAAP-AC25

Tourism and Sea Front Activities

Historic England welcomes this proposed modification.

SAASPD - MM12

Historic England welcomes this proposed modification which refers to preserving and enhancing the character of the conservation Area and listed buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary

In our previous responses to you we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. We advised that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings. We therefore welcome the amended bullet point 8 in FPAAP - MM14. However, Historic England is particularly concerned about the increase in proposed capacity of the site from 100 to 150 dwellings. As we advised in our e-mail to you dated 13th September, the eastern end of the site is the most sensitive in historic terms given the presence of the grade II listed 18th century farmhouse. To that end, we would be cautious and concerned about substantially increasing the number of dwellings indicated in the policy from 100 to 150 dwellings.

Continued on separate sheet

FPAAP - MM14 continued

FPP8: Land off Thurmans Lane, Trimley St Mary

It might be more appropriate to limit the capacity of the site to between 120 and 130 in recognition of the need to protect and enhance the setting of the grade II listed building. In addition, it may be helpful to add comment in the policy to the effect that the eastern end of the site closest to the listed building should be left open to provide a buffer and to help mitigate the impact of the development upon the setting of the asset.

As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. We consider that this dwelling capacity is not consistent with the NPPF (para 132) given that development of this scale on the site would lead to the harm of the setting of a heritage asset.

Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)" (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).

This clearly has implications for other proposed modifications including FPAAP-AC5, AC6, AC8, AC9 and AC10.

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8102 - 4189 - Main Modifications (MM1 to MM24) - iii, iv

8102 Object

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Thank you for consulting Historic England on the Sustainability Appraisal Report Addendums for Felixstowe Peninsula Area Action Plan and Site Allocations and Area Specific Policies October 2016.

We have no additional comments to make at this stage on the Main Modifications and Additional Changes to the Sustainability Appraisals.

Summary:

We note that no modifications are proposed to address our concerns regarding policy FPP4. Likewise, our concerns regarding lack of Historic Environment policies and a lack of a clear positive strategy for the Historic Environment and lack of policy or text to address the Felixstowe Conservation Area have not been addressed.

We note that no modifications are proposed to address our concerns regarding the lack of a policy relating to the Local List. Likewise, our concern relating to Policy SSP18, Westerfield regarding the need to keep the eastern end of the site open have not been addressed.

Change to Plan

Appear at exam?

Not Specified

Legal?

Yes

Sound?

No

Duty to Cooperate?

Yes

Soundness Tests

iii, iv

Attachments:

_HERef_Places - S_L275037_Redacted.pdf

16.11.28 CONCASE Letter HERef_PL00020745_275021__Redacted.pdf

16.11.23 Main-Mods-Form FPAAP MM14_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8104 - 551 - Main Modifications (MM1 to MM24) - i, ii, iii, iv

8104 Object

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Respondent: Hopkins Homes [551]

Agent: Armstrong Rigg Planning (Mr Geoff Armstrong) [3897]

Full Text: Suffolk Coastal District Council Site Allocations and Area Specific Policies Local Plan
Main Modifications Consultation

I refer to the above and am pleased to enclose brief representations on behalf of our client Hopkins Homes.

Hopkins Homes have maintained an active involvement in the preparation of the Plan from the outset and appeared at the Examination Hearing Sessions in August 2016. Despite the extensive representations made and evidence provided from Hopkins Homes and others, it is disappointing to note that no significant changes have been made in response to the fundamental objections made throughout that:

☐ The Plan is not considered to be legally compliant and is therefore unsound in the absence of an agreed habitat protection strategy (which is still under preparation) to ensure that potential adverse impacts on European designated sites can be adequately mitigated. This remains a significant legal failing and the Plan should not proceed until there is certainty that appropriate habitat mitigation for the development required over the Plan period can be provided; and

☐ The Plan is not considered to be legally compliant and is therefore unsound as it fails to take account of the full, objectively assessed housing needs of the District and would therefore fail to boost significantly the supply of housing. The Plan should allocate additional sites such as those promoted by Hopkins Homes to ensure that there is a continual supply of suitable and available housing land. In its current form, the Plan will prevent the delivery of sustainable development contrary to the requirements of national planning guidance

Whilst it is noted that modifications have been made to the Physical Limits Boundaries SSP2 Paragraphs 2.16 - 2.21 (Mod Ref: SAASPD - MM1) following evidence presented at the relevant Hearing session by Hopkins Homes, these are not considered sufficient to provide the necessary flexibility to allow sustainable development to take place on the edge of settlements which will enable the national objective of boosting significantly the supply of housing to be met and to adapt to changing circumstances over the Plan period as required by paragraph 14 of the NPPF.

The following paragraph should therefore be added as a Main Modification, as requested in a submission made to the Inspector following the Examination:

2.21 When assessing proposals for new residential development outside but adjoining the physical limits boundaries of the Major Centres, Towns, Key and Local Service Centres where the relevant policies are out of date by reason of the Council being unable to demonstrate the requisite five-year supply of housing land, a positive approach will be taken reflecting the presumption in favour of sustainable development contained in the National Planning Policy Framework and Policy SP1A of the Core Strategy. The presumption in favour of sustainable development will also apply where a proposed housing scheme is demonstrated to meet a proven local need appropriate to the particular community. In these circumstances, the Council will grant permission unless material considerations indicate otherwise taking into account whether (1) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF (or its successor) taken as a whole and (2) specific policies in that Framework indicate that development should be restricted.

As stated continually throughout previous representations, the emerging Plan is considered to be unsound in that it has not been positively prepared, is ineffective and unjustified and further modifications should be incorporated to rectify these failings.

We trust the above will be taken into account as the preparation of the Plan progresses.

Summary:

The Plan is not considered to be legally compliant and is therefore unsound in the absence of an agreed habitat protection strategy (which is still under preparation) to ensure that potential adverse impacts on European designated sites can be adequately mitigated. The Plan fails to take account of the full, objectively assessed housing needs of the District and would therefore fail to boost significantly the supply of housing. The Plan should allocate additional sites such as those promoted by Hopkins Homes to ensure that there is a continual supply of suitable and available housing land.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	No	No	No	i, ii, iii, iv

Attachments:

L0005 - reps to Main Modifications_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8105 - 1203 - Main Modifications (MM1 to MM24) - None

8105 Object

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Respondent: Mr Bryan Howard [1203]

Agent: N/A

Full Text: To the inspector.
When I attended the public meeting back in August, I genuinely thought you had taken account of the problems I have endured over the past number of years. Boundary's moved without any notification, and a perfectly good site being completely ignored.
However I was dumbfounded when I discovered you too had seen fit to ignore the situation. Where do I obtain justice for the wrong doing of the council and past councillors. I have written numerous times to Suffolk Coastal, always put off, fobbed off really, when I approach them about it, there's always a further meeting months ahead, when the matter could be resolved.
In the last six months I have been lead to believe that you would deal with the matter on my behalf. To add insult to injury, builders do not seem to have any such problems, 20 houses outside village canopy, no environmental issues, damn the poor neighbours, garages turned into 3 or 4 bedroom houses on flood plains no problem!!!
Yet when a perfectly sound plot is offered, every conceivable objection is used, especially boundary limits. You have to admit from my perspective the whole business reeks.
In conclusion I would appreciate a proper response to my complaint especially as my previous letters have not received any responses in writing.
I won't get any satisfaction from any one in Suffolk Coastal you are my last chance.

Summary: In the last six months I have been lead to believe that you would deal with the matter on my behalf. To add insult to injury, builders do not seem to have any such problems, 20 houses outside village canopy, no environmental issues, damn the poor neighbours, garages turned into 3 or 4 bedroom houses on flood plains no problem!!!
Yet when a perfectly sound plot is offered, every conceivable objection is used, especially boundary limits. You have to admit from my perspective the whole business reeks.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:
B Howard 281116_Redacted.pdf
B Howard supporting documents 281116_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8115 - 2442 - Main Modifications (MM1 to MM24) - None

8115 Support

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Respondent: Suffolk County Council (James Cutting) [2442]

Agent: N/A

Full Text: Site Allocations and Area Specific Policies Development Plan Document - Main Modifications

Thank you for consulting Suffolk County Council on the modifications to the Site Allocations and Area Specific Policies Development Plan Document. The County Council does not object to the proposed modifications. The following comments are offered in relation to those main modifications which are relevant to the County Council's service responsibilities and policy objectives.

Main Modifications

MM13

Suffolk County Council supports the reference to the role of Westerfield and implications raising due to its proximity to Ipswich. The county council is currently recording where local pupils are going to school and will continue to monitor education provision and capacity matters, especially regarding the new development in Ipswich Garden Suburb. The identified need for additional contributions towards infrastructure provision where necessary recognised through any planning application is welcomed.

MM19 -21

SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Additional Changes

AC6-AC7 and AC09

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

Summary:

I trust that the above is of assistance.

Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

Change to Plan

N/A

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

Not Specified

Duty to Cooperate?

Not Specified

Soundness Tests

N/A

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8132 - 3775 - Main Modifications (MM1 to MM24) - ii

8132 Object

Main Modifications (MM1 to MM24)

Main Modifications (MM1 to MM24)

Respondent: Mr Anthony Hardy [3775]

Agent: N/A

Full Text: Local Plan Main Modifications Consultation
17 October to 28 November 2016

We are disappointed that the Schedule of Main Modifications and Additional Changes for Site Allocations and Area Specific Policies does not propose any modification to Policy SSP12, the land west of Garden Square, Rendlesham.

This land has had an indicative capacity for 75 dwellings from 1996 to March 2014, reference:

- * The Bentwaters Redevelopment Strategy Report of November 1996, which was the basis of the outline planning permission C96/1422 of February 1997.
- * The New Rendlesham Master Plan, adopted in April 2003.
- * The SHLAA of November 2010.

In the SHLAA of March 2014 the indicative capacity was reduced to 50 dwellings, and the Proposed Submission Document of April 2016 continues with the reduced capacity, attributing this to the minimum distance for the cordon sanitaire ... and ... any layout issues linked to the alignment of the sewers.

As part of the online consultation on the Proposed Submission Document, Miss Laura Townes of Persimmon Homes made a representation (no. 7901) to say that they had been in discussion with Anglian Water. Persimmon produced a plan with a nett developable area of 3.2 ha, which could accommodate approximately 100 dwellings at 30 dwellings per ha. Persimmon provided good evidence to support this, and argued for the indicative capacity to be revised upwards from 50 dwellings to up to approximately 100 dwellings.

In the Examination in Public of 1 September 2016 I spoke in favour of Persimmon's representation. There may be other constraints to the number of dwellings, but the two constraints mentioned in the Proposed Submission Document of April 2016 do not justify a reduced capacity of 50 dwellings.

Summary:

We are disappointed that the Schedule of Main Modifications and Additional Changes for Site Allocations and Area Specific Policies does not propose any modification to Policy SSP12, the land west of Garden Square, Rendlesham.

In the Examination in Public of 1 September 2016 I spoke in favour of Persimmon's representation. There may be other constraints to the number of dwellings, but the two constraints mentioned in the Proposed Submission Document of April 2016 do not justify a reduced capacity of 50 dwellings.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	No	Yes	ii

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8064 - 2742 - MM1 - None

8064 Object

Main Modifications (MM1 to MM24)

MM1

Respondent: Michael & Barbara Shout [2742]

Agent: STAG (Mr Ian Cowan) [312]

Full Text: Consultation Response By Ian Cowan To "Site Allocations And Area Specific Policies - Main Modifications And Additional Changes" Document

Summary: According to Abraham Lincoln: "You can fool some of the people all of the time." It is to be hoped that Planning Inspector Hill will not ignore credible evidence presented by myself on behalf of Mike and Barbara Shout at various sessions of the recent Independent Planning Inquiry. If evidence that does not suit the purposes of SCDC is discarded, Abraham Lincoln's aphorism will rightly be applied. Therefore, it is to be hoped that Inspector Hill ignores and amends some of their Main Modifications and recognises our very genuine concerns, as described below.

Important Note: The following major matters given in evidence by the writer on behalf of Mike and Barbara Shout have not been addressed by any of SCDC's Main Modifications, and are still outstanding -

1. There is no evidence to support the claim that at least 1,760 new houses are needed on the Felixstowe Peninsula.
2. In fact, evidence from the 2011 Census confirms that houses already built or in the pipeline are more than enough to satisfy the Peninsula's needs for the foreseeable future.
3. Worryingly, SCDC have failed to address various very important Creeping Baseline issues, including: (a) traffic congestion (b) education, social and medical needs (c) dangerously deteriorating air quality (d) various infrastructure requirements.

Soundness: Failure to address these material matters will mean that SCDC's Site Allocations And Area Specific Policies - Main Modifications And Additional Changes Document is unsound.

Physical Limits Boundaries: The following additional wording has been inserted by SCDC at Paragraph 2.16: "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 redrafted 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. " This is reinforced at amended Paragraph 2.20: "Outside of the physical limits boundary, opportunities for housing development are considerably more restricted limited as countryside policies of restraint will apply (Core Strategy policies SP28 and SP29)." It is further reinforced by Paragraph 2.20:

"Outside of the physical limits boundary, opportunities for housing development are considerably more restricted limited as countryside policies of restraint will apply (Core Strategy policies SP28 and SP29)."

Comment: Regrettably, Physical Limits Boundary constraints were cynically ignored at the Planning Committee Meeting of 5 September 2016 with regards to the approval of Application DC/16/1919/FUL for 69 houses on farmland adjacent to Seamark Nunn off High Road, Trimley St Martin. If SCDC Officers and Members blithely ignore pre-existing Local Development Plan requirements, when they all know there is no need for these houses, there is no guarantee that the amended requirements will be honoured and housing numbers limits adhered to, to the detriment of food producing farmland. At the recent Independent Planning Inquiry, Inspector Hill was reminded by me of the fact that SCDC had already blatantly ignored firm promises to update the housing needs evidence base, including taking account of the 2011 Census, which conclusively showed that the population of Felixstowe and the Trimley Villages was in decline. In other words, if previous promises can be cynically broken by SCDC there is no guarantee that current promises and commitments will be kept. It is to be hoped that Inspector Hill will bear both my warnings and SCDC's blatant failure to keep firm, written promises in mind.

Air Quality Management: SSP13 adds this paragraph to the end of the policy: "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."

Comment: SCDC are to be congratulated on recognising "the air quality impacts of traffic from cumulative development at Melton crossroads". However, it is very disturbing that they are cynically ignoring credible Creeping Baseline evidence presented by me at the recent Independent Planning Inquiry with regards to "the air quality impacts of traffic from cumulative development" in and around Felixstowe and the Trimley Villages. This refers to the cumulative deterioration in air quality due to: (a) extra traffic arising from approximately 2,000 new houses, as well as noxious diesel exhaust emissions generated by extra traffic from (b) many more lorries travelling to and from the Port (c) new lorry traffic to and from the Felixstowe Logistics Park (d) new van and lorry traffic travelling to and from the Uniserve Distribution Depot (e) commercial traffic travelling to and from the new warehousing facility at Anzani House. Very disturbing evidence was presented by myself - and not rebutted by SCDC - with regards to: (a) the current high vehicle numbers at various strategic routes in the vicinity of the Port of Felixstowe (b) particular locations and occupations that were especially vulnerable (c) the well-documented health hazards of nitrogen oxide and other dangerous diesel emissions and (d) the possible number of premature deaths on the Felixstowe Peninsula that could result from significantly increased diesel emissions. In addition, it has recently been announced that a one mile long passing loop will be constructed by Network Rail between Trimley St Mary Station and Grimston Lane, Trimley St Martin, where an unknown number of trains will idle throughout the day, emitting their own noxious diesel fumes in the vicinity of village housing, including close to

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

		O - 8064 - 2742 - MM1 - None
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8064 Object

Main Modifications (MM1 to MM24) MM1

Reeve Lodge, a sheltered housing facility. Sadly, if not negligently, SCDC have chosen to ignore these very real Creeping Baseline dangers to health. Worryingly, rather than strengthening air quality measurements in the vicinity of the Port, it has recently been announced that SCDC intend to revoke the Air Quality Management Area (AQMA) at Ferry Lane, Felixstowe, which is currently being measured at the Dooley Pub. This is being done by officials who must know about the various matters described above, which will cumulatively contribute to the Creeping Baseline of dangerously deteriorating air quality. It is to be hoped that Inspector Hill will show more concern for the health of the Residents of Felixstowe and the Trimley Villages that is being shown by SCDC Officers.

Summary: At the recent Independent Planning Inquiry, Inspector Hill was reminded by me of the fact that SCDC had already blatantly ignored firm promises to update the housing needs evidence base, including taking account of the 2011 Census, which conclusively showed that the population of Felixstowe and the Trimley Villages was in decline. In other words, if previous promises can be cynically broken by SCDC there is no guarantee that current promises and commitments will be kept. It is to be hoped that Inspector Hill will bear both my warnings and SCDC's blatant failure to keep firm, written promises in mind.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	No	Not Specified	None

Attachments:
SiteAllocations_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8082 - 3785 - MM1 - None

8082 Object

Main Modifications (MM1 to MM24) MM1

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: I wish to make the following comments on the changes and modifications.

Boundaries
2.20 I am not happy with the change from "restricted" to "limited". I would like the wording to strengthen the force of physical boundaries. The suggested change weakens it.

Affordable Housing
2.27 b) I oppose the suggestion that cash tariffs are acceptable. We need properly affordable housing and it is more important to increase the stock than to gather cash payments which may be used for other purposes

The change of wording to evidence of need is weaker and less clear than the original reference to "informed by appropriate local housing needs survey" I would like the original wording to be retained.

I am also concerned that the plan does not seem to address issues in the rented sector or the need for social housing.

Other comments (not sure of which paragraph)
School
The Plan expects developers to provide a new school in large developments but does not require identification of where such a school should be located. The Plan should identify site(s) and costs

Sewage outlet (pp30 and 51?)
References to foul sewage outlets have now omitted the need in some cases to improve capacity and replaced it with a simple requirement for Anglian Water to confirm that capacity is adequate. I oppose this change. Need for improvement should be independently identified.

Core Strategy
There is a change in wording to say that the Area local plan is at a lower level than the core strategy rather than co-existent with it (the original wording). The change devalues the importance of local consultation and views and therefore I would like the original wording restored

Summary: Boundaries
2.20 I am not happy with the change from "restricted" to "limited". I would like the wording to strengthen the force of physical boundaries. The suggested change weakens it.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8107 - 4564 - MM1 - ii, iii

8107 Object

Main Modifications (MM1 to MM24)

MM1

Respondent: Aldringham-cum-Thorpe (Mr Alan Williams) [4564] **Agent:** N/A

Full Text: SAASPD-MM1 / Page 22 / Paragraph 2.16

Amend paragraphs to read:

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). 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.

Objection

The principle of housing has not been accepted in Aldringham for SSP4.

SSP4 was added to the April 2016 version without any local consultation, admitted by the council in the document Local Plan Examination Hearing Statement Council Response to Issue 8 August 2016 Site Allocations and Area Specific Policies & Felixstowe Peninsula Area Action Plan Development Plan Documents

'The Parish Council were not specifically asked for their views on this change before the Proposed Submission document was finalised for consideration by the Council and published to receive representations'.

I believe that this lack of consultation means that the inclusion of SSP4, and the change to Physical Limit Boundaries, has not been compliant with Strategic Policy SP27 - Key and Local Service Centres - Section 4.86

4.86 Such allocations will have the prime purpose of achieving housing to meet local needs, an objective supported by many communities in the district, they will be restricted to those Key and Local Service Centres where :

* local housing need has been demonstrated; and

* there is community support.

Summary:

The principle of housing has not been accepted in Aldringham for SSP4.

SSP4 was added to the April 2016 version without any local consultation, admitted by the council in the document Local Plan Examination Hearing Statement Council Response to Issue 8 August 2016 Site Allocations and Area Specific Policies & Felixstowe Peninsula Area Action Plan Development Plan Documents

'The Parish Council were not specifically asked for their views on this change before the Proposed Submission document was finalised for consideration by the Council and published to receive representations'.

Change to Plan

Appear at exam?

Not Specified

Legal?

No

Sound?

No

Duty to Cooperate?

No

Soundness Tests

ii, iii

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8126 - 4200 - MM1 - ii, iv

8126 Object

Main Modifications (MM1 to MM24)

MM1

Respondent: Aldringham Neighbourhood Planning Team (Mr William HALFORD) [4200]

Agent: N/A

Full Text: Physical Limits Boundaries

Re para 2.16 addition of sentence "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 redrafted 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."

It is neither valid or legal to make this substantial change well after final deadline for any comments regarding the Site Allocations in this plan and of which (inter alia?) Site SSP4 at Aldringham was added without any attempt by the Council to notify or consult with the village or its Parish Council. Site SSP4 has not been "accepted" by Aldringham!

Re para 2.18 removal of clause "Physical limits boundaries are an important planning policy tool which fulfil a number of roles, not least in relation to the supply of housing."

This is contrary to the already approved Suffolk Coastal District Local Plan, Spatial Strategy Policies SP27, SP28, SP29 and others which all clearly make reference to Physical Limits Boundaries as policy tools.

Re: para 2.20 Alteration of the word "restricted" to "limited" would have the far reaching effect of changing all Development Management and Spatial Strategy Policies that reference Physical Limits to Guidelines. This may be the advantage of Developers and their Advisors, but is not what the NPPF is requiring and really makes pointless the concept of Physical Limits.

Re: proposed deletion of para 2.21 : Its deletion would appear to demonstrate an acceptance by the Council that development at those sites allocated has not been accepted in principle at every site (e.g. at SSP4). Para 2.19 states that there is a policy presumption that development inside the boundary is acceptable in principle. Logic dictates that there should be an equivalent policy assumption that development outside the boundary is not acceptable in principle and that exceptions must meet parameters laid down in the relevant Development Management Policies (DM's) and Spatial Strategy Policies (SP's).

Summary: Re para 2.16 addition of sentence

It is neither valid or legal to make this substantial change well after final deadline for any comments regarding the Site Allocations in this plan and of which (inter alia?) Site SSP4 at Aldringham was added without any attempt by the Council to notify or consult with the village or its Parish Council. Site SSP4 has not been "accepted" by Aldringham!

Change to Plan

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

No

Duty to Cooperate?

Not Specified

Soundness Tests

ii, iv

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8127 - 4200 - MM1 - ii, iv

8127 Object

Main Modifications (MM1 to MM24)

MM1

Respondent: Aldringham Neighbourhood Planning Team (Mr William HALFORD) [4200]

Agent: N/A

Full Text: Physical Limits Boundaries

Re para 2.16 addition of sentence "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 redrafted 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."

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This is contrary to the already approved Suffolk Coastal District Local Plan, Spatial Strategy Policies SP27, SP28, SP29 and others which all clearly make reference to Physical Limits Boundaries as policy tools.

Re: para 2.20 Alteration of the word "restricted" to "limited" would have the far reaching effect of changing all Development Management and Spatial Strategy Policies that reference Physical Limits to Guidelines. This may be the advantage of Developers and their Advisors, but is not what the NPPF is requiring and really makes pointless the concept of Physical Limits.

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Summary: Re para 2.18 removal of clause "Physical limits boundaries are an important planning policy tool which fulfil a number of roles, not least in relation to the supply of housing."
This is contrary to the already approved Suffolk Coastal District Local Plan, Spatial Strategy Policies SP27, SP28, SP29 and others which all clearly make reference to Physical Limits Boundaries as policy tools.

Change to Plan

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

No

Duty to Cooperate?

Not Specified

Soundness Tests

ii, iv

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8128 - 4200 - MM1 - ii, iv

8128 Object

Main Modifications (MM1 to MM24)

MM1

Respondent: Aldringham Neighbourhood Planning Team (Mr William HALFORD) [4200]

Agent: N/A

Full Text: Physical Limits Boundaries

Re para 2.16 addition of sentence "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 redrafted 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."

It is neither valid or legal to make this substantial change well after final deadline for any comments regarding the Site Allocations in this plan and of which (inter alia?) Site SSP4 at Aldringham was added without any attempt by the Council to notify or consult with the village or its Parish Council. Site SSP4 has not been "accepted" by Aldringham!

Re para 2.18 removal of clause "Physical limits boundaries are an important planning policy tool which fulfil a number of roles, not least in relation to the supply of housing."

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Re: para 2.20 Alteration of the word "restricted" to "limited" would have the far reaching effect of changing all Development Management and Spatial Strategy Policies that reference Physical Limits to Guidelines. This may be the advantage of Developers and their Advisors, but is not what the NPPF is requiring and really makes pointless the concept of Physical Limits.

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Summary: Re: para 2.20 Alteration of the word "restricted" to "limited" would have the far reaching effect of changing all Development Management and Spatial Strategy Policies that reference Physical Limits to Guidelines. This may be the advantage of Developers and their Advisors, but is not what the NPPF is requiring and really makes pointless the concept of Physical Limits.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	No	Not Specified	ii, iv

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8129 - 4200 - MM1 - ii, iv

8129 Object

Main Modifications (MM1 to MM24)

MM1

Respondent: Aldringham Neighbourhood Planning Team (Mr William HALFORD) [4200]

Agent: N/A

Full Text: Physical Limits Boundaries

Re para 2.16 addition of sentence "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 redrafted 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."

It is neither valid or legal to make this substantial change well after final deadline for any comments regarding the Site Allocations in this plan and of which (inter alia?) Site SSP4 at Aldringham was added without any attempt by the Council to notify or consult with the village or its Parish Council. Site SSP4 has not been "accepted" by Aldringham!

Re para 2.18 removal of clause "Physical limits boundaries are an important planning policy tool which fulfil a number of roles, not least in relation to the supply of housing."

This is contrary to the already approved Suffolk Coastal District Local Plan, Spatial Strategy Policies SP27, SP28, SP29 and others which all clearly make reference to Physical Limits Boundaries as policy tools.

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Re: proposed deletion of para 2.21 : Its deletion would appear to demonstrate an acceptance by the Council that development at those sites allocated has not been accepted in principle at every site (e.g. at SSP4). Para 2.19 states that that there is a policy presumption that development inside the boundary is acceptable in principle. Logic dictates that there should be an equivalent policy assumption that development outside the boundary is not acceptable in principle and that exceptions must meet parameters laid down in the relevant Development Management Policies (DM's) and Spatial Strategy Policies (SP's).

Summary: Re: proposed deletion of para 2.21 : Its deletion would appear to demonstrate an acceptance by the Council that development at those sites allocated has not been accepted in principle at every site (e.g. at SSP4). Para 2.19 states that that there is a policy presumption that development inside the boundary is acceptable in principle. Logic dictates that there should be an equivalent policy assumption that development outside the boundary is not acceptable in principle and that exceptions must meet parameters laid down in the relevant Development Management Policies (DM's) and Spatial Strategy Policies (SP's).

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	No	Not Specified	ii, iv

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8048 - 3686 - MM2 - None

8048 Object

Main Modifications (MM1 to MM24)

MM2

Respondent: Hollesley Parish Council (Mrs Judi Hallett) [3686] **Agent:** N/A

Full Text: P.27 Para 2.27
We are very disappointed that item b) now indicates that CIL money will be paid on 'completion' of a development and not on 'commencement'.

Summary: P.27 Para 2.27
We are very disappointed that item b) now indicates that CIL money will be paid on 'completion' of a development and not on 'commencement'.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8077 - 4559 - MM2 - None

8077 Object

Main Modifications (MM1 to MM24) MM2

Respondent: Krystyna Smithers [4559] Agent: N/A

Full Text: Hi

I find the presentation of the document - and the way the proposed changes are presented - extremely confusing. However, I would like to make three points here which I feel strongly about.

1 I do not think it is appropriate for developers to make a financial contribution to Council funds. Their contribution should be a significant element of affordable housing or an important facility for the use of the people to be newly housed e.g. a school, health or sports centre.

2 I may have misunderstood, but won't one particular change mean that there may be a tendency for developers easily to get through batches of five homes with little responsibility for affordable housing or improving the area with, say, useable outside space?

2 There seems to be no mention of social housing. This is vital. Also this housing should not be separate from "private" housing but incorporated. We need to work towards a mixed and vibrant society not ghettos.

I do hope you can take my comments on board.

Summary: I do not think it is appropriate for developers to make a financial contribution to Council funds. Their contribution should be a significant element of affordable housing or an important facility for the use of the people to be newly housed e.g. a school, health or sports centre. I may have misunderstood, but won't one particular change mean that there may be a tendency for developers easily to get through batches of five homes with little responsibility for affordable housing or improving the area with, say, useable outside space?

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8083 - 3785 - MM2 - None

8083 Object

Main Modifications (MM1 to MM24) MM2

Respondent: Stephen Wyatt [3785] Agent: N/A

Full Text: I wish to make the following comments on the changes and modifications.

Boundaries
2.20 I am not happy with the change from "restricted" to "limited". I would like the wording to strengthen the force of physical boundaries. The suggested change weakens it.

Affordable Housing
2.27 b) I oppose the suggestion that cash tariffs are acceptable. We need properly affordable housing and it is more important to increase the stock than to gather cash payments which may be used for other purposes

The change of wording to evidence of need is weaker and less clear than the original reference to "informed by appropriate local housing needs survey" I would like the original wording to be retained.

I am also concerned that the plan does not seem to address issues in the rented sector or the need for social housing.

Other comments (not sure of which paragraph)
School
The Plan expects developers to provide a new school in large developments but does not require identification of where such a school should be located. The Plan should identify site(s) and costs

Sewage outlet (pp30 and 51?)
References to foul sewage outlets have now omitted the need in some cases to improve capacity and replaced it with a simple requirement for Anglian Water to confirm that capacity is adequate. I oppose this change. Need for improvement should be independently identified.

Core Strategy
There is a change in wording to say that the Area local plan is at a lower level than the core strategy rather than co-existent with it (the original wording). The change devalues the importance of local consultation and views and therefore I would like the original wording restored

Summary: Affordable Housing
2.27 b) I oppose the suggestion that cash tariffs are acceptable. We need properly affordable housing and it is more important to increase the stock than to gather cash payments which may be used for other purposes

The change of wording to evidence of need is weaker and less clear than the original reference to "informed by appropriate local housing needs survey" I would like the original wording to be retained.

I am also concerned that the plan does not seem to address issues in the rented sector or the need for social housing.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8093 - 4109 - MM3 - None

8093Support

Main Modifications (MM1 to MM24)MM3

Respondent: Mr Gavin Kingsnorth [4109]Agent: N/A

Full Text: This representation is made to support the following amendments in relation to Site SSP3:
SAASPD - MM3: A financial contribution towards affordable housing provision in lieu of on-site provision is a welcomed clarification of affordable housing policy in relation to this allocation.
SAASPD - AC10: Clarification that the existing access track is within the ownership of the site owner is also welcomed.
SCDC may also wish to note that a specialist Phase 1 Ecological Survey of the site has concluded that there are no bat roosts on the site and whilst the site boundary features provide suitable foraging habitats no additional bat survey is recommended. The reference to a specific bat survey within the supporting text to SSP3 would be unhelpful and would not accord with best practice assessment of ecological issues. It is therefore requested that this reference to a bat survey is omitted or widened to a broader assessment of ecological issues consistent with development management practice.

Summary: This representation is made to support the following amendments in relation to Site SSP3:
SAASPD - MM3: A financial contribution towards affordable housing provision in lieu of on-site provision is a welcomed clarification of affordable housing policy in relation to this allocation.

SCDC may also wish to note that a specialist Phase 1 Ecological Survey of the site has concluded that there are no bat roosts on the site and whilst the site boundary features provide suitable foraging habitats no additional bat survey is recommended.

Change to PlanN/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:
Main-Mods-Representation-Form- Site SSP3 Representation_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8089 - 4561 - MM4 - ii, iii

8089 Object

Main Modifications (MM1 to MM24)

MM4

Respondent: Mr Alan Williams [4561]

Agent: N/A

Full Text: SSP4

The failure by SCDC to consult with the relevant Parish Council about last minute changes to the physical limits is in direct conflict with their legal obligation to consult with local communities.

SSP4 is the only allocation that was initially rejected by SCDC but, after appeal, was re-introduced without consultation with the appropriate Parish Council, and based on a flawed set of assumptions to calculate viability. This has resulted in an allocation that has no support within the village, is outside the physical limits agreed in 2015, is close to two Grade II listed buildings, within a Special Landscape Area and has by far the highest housing density of all allocations within the plan.

SSP4 should be removed from the plan.

Summary:

SSP4 is the only allocation that was initially rejected by SCDC but, after appeal, was re-introduced without consultation with the appropriate Parish Council, and based on a flawed set of assumptions to calculate viability. This has resulted in an allocation that has no support within the village, is outside the physical limits agreed in 2015, is close to two Grade II listed buildings, within a Special Landscape Area and has by far the highest housing density of all allocations within the plan.

Change to Plan SSP4 should be removed from the plan.

Appear at exam?

Not Specified

Legal?

No

Sound?

No

Duty to Cooperate?

No

Soundness Tests

ii, iii

Attachments:

Local Plan Main Modifications Consultation Representation Form - SSP4-1 - 25-11-2016_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8073 - 4557 - MM5 - None

8073 Support

Main Modifications (MM1 to MM24) MM5

Respondent: Environment-Agency (Mr G Steel) [4557] Agent: N/A

Full Text: Sound & legally compliant

Summary: Sound & legally compliant

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

- 2.131.pdf
- SSP11.pdf
- 2.134.pdf
- SSP19.pdf
- SSP8.pdf
- SSP5.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8058 - 3757 - MM6 - None

8058Object

Main Modifications (MM1 to MM24)MM6

Respondent: Mrs Sheila Fry [3757]

Agent: N/A

Full Text:

Abject apologies for leaving it so long before responding to your letter of 14th October.

My sole concern is the B1121 between the A12 and Bigsby's Corner on the B1121 which is perhaps 1/2 mile in length and the fact that on plans for development along that stretch, which is inevitable all show a straight stretch of road with no regard to undulations and curves. That approximate 1/2 mile stretch of the B1121 has two gradients and two descents and is divided more or less into three straight sections joined by two bends.

Some years ago, a man who'd stopped to aid a motorist in some distress was knocked down by one car, then run over and killed by the following car. County Surveyors came out from Saxmundham at the request of a number of residents, and believe it or not, he said he had no idea that the road curved and undulated.

I've lived in Chalfont Drive for nearly 30 years. Originally the entry into the Drive was right-angled, but for safety reasons before any of the plots were sold, it was changed to a curved entry. Then, a few years ago, Suffolk CDC changed it back to right-angled one side, leaving the other curved; an unsightly mess.

It is difficult to get in and out of Chalfont Drive, especially with the volume and speed of traffic; pedestrians have one overgrown footpath with no crossing point. I am aware that speed checks occasionally take place, but if one is waiting to join the B1121 in any direction, one has to be very sure that there is no car coming into view, for there is barely time to make that manoeuvre.

Recently, whilst standing on the apron of Chalfont Drive, just slightly sideways, waiting to drive into Ipswich, I edged forward to ascertain that the road was indeed clear, when the right side of my car was hit by a car which went straight on at speed so that I barely had chance to see more than that it was a darkish car driven by someone who had no idea that he/she had just hit my car - perhaps a telephone user....

Dare I suggest that a small "island" at the crossing from Grays Lane to Benhall Green where traffic to Benhall School and Benhall Club turns left when coming from Saxmundham might prove to be useful.

Please be kind enough to record my continuing concerns regarding safety and excessive speed along this 40mph stretch of the B1121, but I have no need to be kept informed of anything else.

Summary:

Traffic safety and speed concerns

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

S Fry 171116_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8074 - 4557 - MM7 - None

8074 Support

Main Modifications (MM1 to MM24) MM7

Respondent: Environment-Agency (Mr G Steel) [4557] Agent: N/A

Full Text: Sound & legally compliant

Summary: Sound & legally compliant

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

- SSP19.pdf
- SSP5.pdf
- SSP11.pdf
- 2.134.pdf
- 2.131.pdf
- SSP8.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8075 - 4557 - MM10 - None

8075 Support

Main Modifications (MM1 to MM24) MM10

Respondent: Environment-Agency (Mr G Steel) [4557] Agent: N/A

Full Text: Sound & legally compliant

Summary: Sound & legally compliant

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

- SSP11.pdf
- SSP19.pdf
- 2.131.pdf
- 2.134.pdf
- SSP5.pdf
- SSP8.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8065 - 2742 - MM11 - None

8065 Object

Main Modifications (MM1 to MM24)

MM11

Respondent: Michael & Barbara Shout [2742]

Agent: STAG (Mr Ian Cowan) [312]

Full Text: Consultation Response By Ian Cowan To "Site Allocations And Area Specific Policies - Main Modifications And Additional Changes" Document

Summary: According to Abraham Lincoln: "You can fool some of the people all of the time." It is to be hoped that Planning Inspector Hill will not ignore credible evidence presented by myself on behalf of Mike and Barbara Shout at various sessions of the recent Independent Planning Inquiry. If evidence that does not suit the purposes of SCDC is discarded, Abraham Lincoln's aphorism will rightly be applied. Therefore, it is to be hoped that Inspector Hill ignores and amends some of their Main Modifications and recognises our very genuine concerns, as described below.

Important Note: The following major matters given in evidence by the writer on behalf of Mike and Barbara Shout have not been addressed by any of SCDC's Main Modifications, and are still outstanding -

1. There is no evidence to support the claim that at least 1,760 new houses are needed on the Felixstowe Peninsula.
2. In fact, evidence from the 2011 Census confirms that houses already built or in the pipeline are more than enough to satisfy the Peninsula's needs for the foreseeable future.
3. Worryingly, SCDC have failed to address various very important Creeping Baseline issues, including: (a) traffic congestion (b) education, social and medical needs (c) dangerously deteriorating air quality (d) various infrastructure requirements.

Soundness: Failure to address these material matters will mean that SCDC's Site Allocations And Area Specific Policies - Main Modifications And Additional Changes Document is unsound.

Physical Limits Boundaries: The following additional wording has been inserted by SCDC at Paragraph 2.16: "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 redrafted 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. " This is reinforced at amended Paragraph 2.20: "Outside of the physical limits boundary, opportunities for housing development are considerably more restricted limited as countryside policies of restraint will apply (Core Strategy policies SP28 and SP29)." It is further reinforced by Paragraph 2.20:

"Outside of the physical limits boundary, opportunities for housing development are considerably more restricted limited as countryside policies of restraint will apply (Core Strategy policies SP28 and SP29)."

Comment: Regrettably, Physical Limits Boundary constraints were cynically ignored at the Planning Committee Meeting of 5 September 2016 with regards to the approval of Application DC/16/1919/FUL for 69 houses on farmland adjacent to Seamark Nunn off High Road, Trimley St Martin. If SCDC Officers and Members blithely ignore pre-existing Local Development Plan requirements, when they all know there is no need for these houses, there is no guarantee that the amended requirements will be honoured and housing numbers limits adhered to, to the detriment of food producing farmland. At the recent Independent Planning Inquiry, Inspector Hill was reminded by me of the fact that SCDC had already blatantly ignored firm promises to update the housing needs evidence base, including taking account of the 2011 Census, which conclusively showed that the population of Felixstowe and the Trimley Villages was in decline. In other words, if previous promises can be cynically broken by SCDC there is no guarantee that current promises and commitments will be kept. It is to be hoped that Inspector Hill will bear both my warnings and SCDC's blatant failure to keep firm, written promises in mind.

Air Quality Management: SSP13 adds this paragraph to the end of the policy: "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."

Comment: SCDC are to be congratulated on recognising "the air quality impacts of traffic from cumulative development at Melton crossroads". However, it is very disturbing that they are cynically ignoring credible Creeping Baseline evidence presented by me at the recent Independent Planning Inquiry with regards to "the air quality impacts of traffic from cumulative development" in and around Felixstowe and the Trimley Villages. This refers to the cumulative deterioration in air quality due to: (a) extra traffic arising from approximately 2,000 new houses, as well as noxious diesel exhaust emissions generated by extra traffic from (b) many more lorries travelling to and from the Port (c) new lorry traffic to and from the Felixstowe Logistics Park (d) new van and lorry traffic travelling to and from the Uniserve Distribution Depot (e) commercial traffic travelling to and from the new warehousing facility at Anzani House. Very disturbing evidence was presented by myself - and not rebutted by SCDC - with regards to: (a) the current high vehicle numbers at various strategic routes in the vicinity of the Port of Felixstowe (b) particular locations and occupations that were especially vulnerable (c) the well-documented health hazards of nitrogen oxide and other dangerous diesel emissions and (d) the possible number of premature deaths on the Felixstowe Peninsula that could result from significantly increased diesel emissions. In addition, it has recently been announced that a one mile long passing loop will be constructed by Network Rail between Trimley St Mary Station and Grimston Lane, Trimley St Martin, where an unknown number of trains will idle throughout the day, emitting their own noxious diesel fumes in the vicinity of village housing, including close to

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8065 - 2742 - MM11 - None

8065 Object

Main Modifications (MM1 to MM24)

MM11

Reeve Lodge, a sheltered housing facility. Sadly, if not negligently, SCDC have chosen to ignore these very real Creeping Baseline dangers to health.

Worryingly, rather than strengthening air quality measurements in the vicinity of the Port, it has recently been announced that SCDC intend to revoke the Air Quality Management Area (AQMA) at Ferry Lane, Felixstowe, which is currently being measured at the Dooley Pub. This is being done by officials who must know about the various matters described above, which will cumulatively contribute to the Creeping Baseline of dangerously deteriorating air quality. It is to be hoped that

Inspector Hill will show more concern for the health of the Residents of Felixstowe and the Trimley Villages that is being shown by SCDC Officers.

Summary:

SCDC are to be congratulated on recognising "the air quality impacts of traffic from cumulative development at Melton crossroads". However, it is very disturbing that they are cynically ignoring credible Creeping Baseline evidence presented by me at the recent Independent Planning Inquiry with regards to "the air quality impacts of traffic from cumulative development" in and around Felixstowe and the Trimley Villages. Sadly, if not negligently, SCDC have chosen to ignore these very real Creeping Baseline dangers to health.

Change to Plan

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

No

Duty to Cooperate?

Not Specified

Soundness Tests

None

Attachments:

SiteAllocations_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8099 - 4189 - MM12 - None

8099 Support

Main Modifications (MM1 to MM24)

MM12

Respondent: Historic England (Debbie Mack) [4189]

Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Proposed Main Modifications and Additional Changes Oct - Nov 2016 and Site Allocations and Area Specific Policies Proposed Main Modifications and Additional Changes Oct - Nov 2016

Thank you for consulting us on the Proposed Main Modifications and Additional Changes to the Felixstowe Peninsula Area Action Plan and Site Allocations and Area Specific Policies. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the Proposed Main Modifications and Additional Changes.

We attach the 6 response forms and a continuation sheet and summarise our comments below:

FPAAP - MM12

FPP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)
Historic England welcomes this Main Modification.

FPAAP - MM14

FPP8: Land off Thurmans Lane, Trimley St Mary

Historic England welcomes the amendment to bullet point 8 but has concerns regarding this modification in respect of the dwelling capacity as set out in our response form.

FPAAP-AC25

Tourism and Sea Front Activities

Historic England welcomes this proposed modification.

SAASPD - MM12

Historic England welcomes this proposed modification which refers to preserving and enhancing the character of the conservation Area and listed buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary

In our previous responses to you we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. We advised that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings. We therefore welcome the amended bullet point 8 in FPAAP - MM14. However, Historic England is particularly concerned about the increase in proposed capacity of the site from 100 to 150 dwellings. As we advised in our e-mail to you dated 13th September, the eastern end of the site is the most sensitive in historic terms given the presence of the grade II listed 18th century farmhouse. To that end, we would be cautious and concerned about substantially increasing the number of dwellings indicated in the policy from 100 to 150 dwellings.

Continued on separate sheet

FPAAP - MM14 continued

FPP8: Land off Thurmans Lane, Trimley St Mary

It might be more appropriate to limit the capacity of the site to between 120 and 130 in recognition of the need to protect and enhance the setting of the grade II listed building. In addition, it may be helpful to add comment in the policy to the effect that the eastern end of the site closest to the listed building should be left open to provide a buffer and to help mitigate the impact of the development upon the setting of the asset.

As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. We consider that this dwelling capacity is not consistent with the NPPF (para 132) given that development of this scale on the site would lead to the harm of the setting of a heritage asset.

Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)" (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).

This clearly has implications for other proposed modifications including FPAAP-AC5, AC6, AC8, AC9 and AC10.

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8099 - 4189 - MM12 - None

8099 Support

Main Modifications (MM1 to MM24)

MM12

Thank you for consulting Historic England on the Sustainability Appraisal Report Addendums for Felixstowe Peninsula Area Action Plan and Site Allocations and Area Specific Policies October 2016.

We have no additional comments to make at this stage on the Main Modifications and Additional Changes to the Sustainability Appraisals.

Summary:

SAASPD - MM12

Historic England welcomes this proposed modification which refers to preserving and enhancing the character of the conservation Area and listed buildings.

Change to Plan N/A

Appear at exam?

Not Specified

Legal?

Yes

Sound?

Yes

Duty to Cooperate?

Yes

Soundness Tests

N/A

Attachments:

_HERef_Places - S_L275037_Redacted.pdf

16.11.28 CONCASE Letter HERef_PL00020745_275021__Redacted.pdf

16.11.23 Main-Mods-Form FPAAP MM14_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8056 - 3927 - MM13 - None

8056 Support

Main Modifications (MM1 to MM24)

MM13

Respondent: Crest Nicholson [3927]

Agent: Barton Willmore (Miss Leah Needham) [3746]

Full Text:

SUFFOLK COASTAL DISTRICT COUNCIL
SITE ALLOCATIONS AND AREA SPECIFIC POLICIES DPD MAIN MODIFICATIONS CONSULTATION
REPRESENTATIONS ON BEHALF OF CREST NICHOLSON

We write on behalf of our Client, Crest Nicholson, in response to Suffolk Coastal District Council's (SCDC) Site Allocations and Area Specific Policies DPD (SAASP) Main Modifications consultation.

Crest Nicholson has control of the northern parcel of Ipswich Garden Suburb (IGS), known as 'Henley Gate'. The majority of Henley Gate is located within the administrative area of Ipswich Borough Council (IBC), however a small area is located within Suffolk Coastal District Council's (SCDC) administrative boundary.

A cross-boundary Outline planning application for Henley Gate was submitted to IBC (IP/16/00608/OUT) and SCDC (DC/16/2592/OUT) on 22 June 2016. The area within SCDC's boundary comprises a small section of the proposed Country Park, including a proposed vehicular access from Westerfield Road. This access will serve a small car park (approximately 10 spaces) for the Country Park.

Notwithstanding our Client's specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy - in particular Government guidance as set out in the National Planning Policy Framework (NPPF, March 2012) and National Planning Practice Guidance (NPPG)

Proposed Main Modifications

a) MM13 - Paragraphs 2.126 and 2.127

SCDC IS proposing amendments to the supporting text at Paragraphs 2.126 and 2.127, which relate to the consideration of requests for contributions from the SCDC CIL pot and the recognition of the need to contribute towards infrastructure provision, given the clear linkages and relationship between 'Westerfield (and Winesham) and IGS.

In this regard, it should be noted that negotiations regarding developer contributions will take place as part of the on-going planning application process, in order to secure the delivery of necessary infrastructure to support the development of IGS.

b) MM21 - Policy SSP35

Emerging Policy SSP35 allocates 2No. parcels of land as public open space, which are intended to form part of the IGS Country Park. The allocation of this land is supported and reflects Crest's current development proposals, as outlined above.

Our previous representations to the Proposed Submission consultation (Barton Willmore, 31 May 2016), Examination Hearing Statement in respect of Issue 10 (Barton Willmore, August 2016) and subsequent letter to the Inspector (08 September 2016), indicated that emerging Policy SSP35 should be updated to include reference to the Country Park car park, access point on Westerfield Road, maintenance vehicle access and new pedestrian and/or cycle link on Lower Road.

It is considered that for the purposes of clarity, sufficient detail regarding the allocation of these parcels of land should be included within the Policy wording in order to be consistent with National Policy and to be considered "sound".

We therefore support the amendment to the wording of emerging Policy SSP35, which includes reference to safeguarding exiting pedestrian and cycle access points, provision of the car park and maintenance access points and tracks. As such this Policy is now considered to be "sound".

Our Client wishes to continue to positively engage with SCDC to ensure that the shared vision for the Country Park is realised.

Please do not hesitate to contact me should you have any queries on the above.

Summary:

SCDC IS proposing amendments to the supporting text at Paragraphs 2.126 and 2.127, which relate to the consideration of requests for contributions from the SCDC CIL pot and the recognition of the need to contribute towards infrastructure provision, given the clear linkages and relationship between 'Westerfield (and Winesham) and IGS.

In this regard, it should be noted that negotiations regarding developer contributions will take place as part of the on-going planning application process, in order to secure the delivery of necessary infrastructure to support the development of IGS.

Change to Plan N/A

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8056 - 3927 - MM13 - None				
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8056 Support

Main Modifications (MM1 to MM24) MM13

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	N/A

Attachments:
24013 A3 LN kf 161118 Main Modifications November 2016_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8108 - 2442 - MM13 - None

8108 Support

Main Modifications (MM1 to MM24)

MM13

Respondent: Suffolk County Council (James Cutting) [2442]

Agent: N/A

Full Text: Site Allocations and Area Specific Policies Development Plan Document - Main Modifications

Thank you for consulting Suffolk County Council on the modifications to the Site Allocations and Area Specific Policies Development Plan Document. The County Council does not object to the proposed modifications. The following comments are offered in relation to those main modifications which are relevant to the County Council's service responsibilities and policy objectives.

Main Modifications

MM13

Suffolk County Council supports the reference to the role of Westerfield and implications raising due to its proximity to Ipswich. The county council is currently recording where local pupils are going to school and will continue to monitor education provision and capacity matters, especially regarding the new development in Ipswich Garden Suburb. The identified need for additional contributions towards infrastructure provision where necessary recognised through any planning application is welcomed.

MM19 -21

SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Additional Changes

AC6-AC7 and AC09

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

I trust that the above is of assistance.

Summary: Suffolk County Council supports the reference to the role of Westerfield and implications raising due to its proximity to Ipswich. The county council is currently recording where local pupils are going to school and will continue to monitor education provision and capacity matters, especially regarding the new development in Ipswich Garden Suburb. The identified need for additional contributions towards infrastructure provision where necessary recognised through any planning application is welcomed.

Change to Plan N/A

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

Not Specified

Duty to Cooperate?

Not Specified

Soundness Tests

N/A

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8060 - 4555 - MM14 - None

8060 Support

Main Modifications (MM1 to MM24)

MM14

Respondent: The NDA and Magnox Limited [4555]

Agent: Bilfinger GVA (Mr Ben Lewis) [4129]

Full Text: MAIN MODIFICATIONS TO THE SITE ALLOCATIONS & AREA SPECIFIC POLICIES DEVELOPMENT PLAN DOCUMENT

Representation on behalf of the NDA and Magnox Limited

We are writing to you, on behalf of the Nuclear Decommissioning Authority (NDA) and Magnox Limited, in respect of the current consultation on the Site Allocations and Area Specific Policies Development Plan Document. GVA is the appointed property advisor for the NDA and Magnox Limited, and provides planning advice across the NDA's UK-wide estate. We have made representations to various local plan and other consultations across the UK, affecting various NDA sites.

These representations are made in respect of the NDA owned land on the Sizewell 'A' site, which is operated by Magnox Limited (the Site License Company) under contract to the NDA to carry out the decommissioning and remediation process. Decommissioning involves the systematic removal and management of plant, buildings and waste previously associated with electricity generation; it is a long process expected to occur throughout and beyond the plan period.

We have reviewed the Main Modifications to the Site Allocations and Area Specific Policies Development Plan Document on behalf of the NDA and Magnox Limited and welcome the recognition of the site's importance as a strategic employment site. In particular, the NDA and Magnox welcome the recognition given to the on-going decommissioning activities at the site within the introduction to the 'Economy' section of the Document (modification reference 'SAASPD-MM14'). It is also noted that the GVA agreed the wording with the Council in advance of the Examination Hearings, which took place earlier this year.

This representation has been made by GVA on behalf of the NDA and Magnox Limited in response to the current consultation on the Main Modifications to the Site Allocations and Area Specific Policies Development Plan Document. In summary, the NDA and Magnox Limited welcome the recognition of the site's importance as a strategic employment site and the on-going decommissioning activities at the site. If you require anything further in respect of this representation, then please contact me on 02920 248911 or at ben.lewis@gva.co.uk.

Summary: We have reviewed the Main Modifications to the Site Allocations and Area Specific Policies Development Plan Document on behalf of the NDA and Magnox Limited and welcome the recognition of the site's importance as a strategic employment site. In particular, the NDA and Magnox welcome the recognition given to the on-going decommissioning activities at the site within the introduction to the 'Economy' section of the Document (modification reference 'SAASPD-MM14'). It is also noted that the GVA agreed the wording with the Council in advance of the Examination Hearings, which took place earlier this year.

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

NDA & Magnox Ltd SAASP Main Modifications (221116) (SUBMITTED)_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8052 - 3055 - MM17 - None				
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8052 Support

Main Modifications (MM1 to MM24) MM17

Respondent: Evolution Town Planning (Mr Steven Bainbridge) Agent: N/A
[3055]

Full Text: We have reviewed the proposed modifications in relation to draft policy ssp23 (Debach) and SSP24 (Bentwaters) and the supporting text in paragraphs 3.15, 3.25, 3.26, 3.32, 3.34, and 3.35 and can confirm we are content with the changes proposed as reflecting earlier representations and discussions at the recent hearings.

Summary: We have reviewed the proposed modifications in relation to draft policy ssp23 (Debach) and SSP24 (Bentwaters) and the supporting text in paragraphs 3.15, 3.25, 3.26, 3.32, 3.34, and 3.35 and can confirm we are content with the changes proposed as reflecting earlier representations and discussions at the recent hearings.

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Not Specified	N/A

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8053 - 3055 - MM18 - None				
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8053 Support

Main Modifications (MM1 to MM24) MM18

Respondent: Evolution Town Planning (Mr Steven Bainbridge) Agent: N/A
[3055]

Full Text: We have reviewed the proposed modifications in relation to draft policy ssp23 (Debach) and SSP24 (Bentwaters) and the supporting text in paragraphs 3.15, 3.25, 3.26, 3.32, 3.34, and 3.35 and can confirm we are content with the changes proposed as reflecting earlier representations and discussions at the recent hearings.

Summary: We have reviewed the proposed modifications in relation to draft policy ssp23 (Debach) and SSP24 (Bentwaters) and the supporting text in paragraphs 3.15, 3.25, 3.26, 3.32, 3.34, and 3.35 and can confirm we are content with the changes proposed as reflecting earlier representations and discussions at the recent hearings.

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

O - 8062 - 2693 - MM18 - i, ii, iii, iv

8062 Object

Main Modifications (MM1 to MM24)

MM18

Respondent: Eyke Parish Council (Mrs Jacqueline Pooley) [2693] **Agent:** N/A

Full Text: Mod ref:- SAASPD-MM 18.Evolutiontown Planning/ 71 SSP24 - Bentwaters Park, Rendlesham (page 8)

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 and infrastructure 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). Accordingly the Council will permit new employment uses where they will not breach site, environmental and highway constraints

Before the regulisation of Bentwaters Park industrial site (planning application C/10/3239) Approximately 80% of businesses and operations did not have the required legal planning permissions. On granting the regulisation planning permission, planning and use conditions were imposed.

The statement "that it does so within the identified constraints as set out in the agreed comprehensive plan" Clearly indicates that there are strict conditions that apply to this site. Further more this industrial site of 964 acres sits wholly within an Area of Outstanding Natural Beauty. Sadly, if allowed, it has the potential to be come one of the largest industrial sites in the country.

The proposed amendment would lose these conditions, which are considered by many to be inadequate. It is a general statement open to any interpretation developers and planning officers might see fit to put on it does not relate to the fact that Bentwaters Industrial Park sits wholly within an Area of Outstanding Natural Beauty. It also indicates that this AONB designated area is open to industrialised use.

The proposed amendment is unsound and does not address the reality and true position of this Industrial site and the problems that are already being experienced. We ask that this proposed amendment be deleted/refused.

Summary: The statement "that it does so within the identified constraints as set out in the agreed comprehensive plan" Clearly indicates that there are strict conditions that apply to this site.
The proposed amendment would lose these conditions, which are considered by many to be inadequate. It is a general statement open to any interpretation developers and planning officers might see fit to put on it does not relate to the fact that Bentwaters Industrial Park sits wholly within an Area of Outstanding Natural Beauty. It also indicates that this AONB designated area is open to industrialised use.

Change to Plan The proposed amendment is unsound and does not address the reality and true position of this Industrial site and the problems that are already being experienced. We ask that this proposed amendment be deleted/refused.

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	No	Not Specified	i, ii, iii, iv

Attachments:

SAASPD-MM18_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8109 - 2442 - MM19 - None

8109 Support

Main Modifications (MM1 to MM24)

MM19

Respondent: Suffolk County Council (James Cutting) [2442]

Agent: N/A

Full Text: Site Allocations and Area Specific Policies Development Plan Document - Main Modifications

Thank you for consulting Suffolk County Council on the modifications to the Site Allocations and Area Specific Policies Development Plan Document. The County Council does not object to the proposed modifications. The following comments are offered in relation to those main modifications which are relevant to the County Council's service responsibilities and policy objectives.

Main Modifications

MM13

Suffolk County Council supports the reference to the role of Westerfield and implications raising due to its proximity to Ipswich. The county council is currently recording where local pupils are going to school and will continue to monitor education provision and capacity matters, especially regarding the new development in Ipswich Garden Suburb. The identified need for additional contributions towards infrastructure provision where necessary recognised through any planning application is welcomed.

MM19 -21

SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Additional Changes

AC6-AC7 and AC09

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

I trust that the above is of assistance.

Summary: SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Change to Plan N/A

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

Not Specified

Duty to Cooperate?

Not Specified

Soundness Tests

N/A

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8110 - 2442 - MM20 - None

8110 Support

Main Modifications (MM1 to MM24)

MM20

Respondent: Suffolk County Council (James Cutting) [2442]

Agent: N/A

Full Text: Site Allocations and Area Specific Policies Development Plan Document - Main Modifications

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Main Modifications

MM13

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MM19 -21

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Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

I trust that the above is of assistance.

Summary: SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Change to Plan N/A

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

Not Specified

Duty to Cooperate?

Not Specified

Soundness Tests

N/A

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8057 - 3927 - MM21 - None

8057 Support

Main Modifications (MM1 to MM24)

MM21

Respondent: Crest Nicholson [3927]

Agent: Barton Willmore (Miss Leah Needham) [3746]

Full Text:

SUFFOLK COASTAL DISTRICT COUNCIL
SITE ALLOCATIONS AND AREA SPECIFIC POLICIES DPD MAIN MODIFICATIONS CONSULTATION
REPRESENTATIONS ON BEHALF OF CREST NICHOLSON

We write on behalf of our Client, Crest Nicholson, in response to Suffolk Coastal District Council's (SCDC) Site Allocations and Area Specific Policies DPD (SAASP) Main Modifications consultation.

Crest Nicholson has control of the northern parcel of Ipswich Garden Suburb (IGS), known as 'Henley Gate'. The majority of Henley Gate is located within the administrative area of Ipswich Borough Council (IBC), however a small area is located within Suffolk Coastal District Council's (SCDC) administrative boundary.

A cross-boundary Outline planning application for Henley Gate was submitted to IBC (IP/16/00608/OUT) and SCDC (DC/16/2592/OUT) on 22 June 2016. The area within SCDC's boundary comprises a small section of the proposed Country Park, including a proposed vehicular access from Westerfield Road. This access will serve a small car park (approximately 10 spaces) for the Country Park.

Notwithstanding our Client's specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy - in particular Government guidance as set out in the National Planning Policy Framework (NPPF, March 2012) and National Planning Practice Guidance (NPPG)

Proposed Main Modifications

a) MM13 - Paragraphs 2.126 and 2.127

SCDC IS proposing amendments to the supporting text at Paragraphs 2.126 and 2.127, which relate to the consideration of requests for contributions from the SCDC CIL pot and the recognition of the need to contribute towards infrastructure provision, given the clear linkages and relationship between 'Westerfield (and Winesham) and IGS.

In this regard, it should be noted that negotiations regarding developer contributions will take place as part of the on-going planning application process, in order to secure the delivery of necessary infrastructure to support the development of IGS.

b) MM21 - Policy SSP35

Emerging Policy SSP35 allocates 2No. parcels of land as public open space, which are intended to form part of the IGS Country Park. The allocation of this land is supported and reflects Crest's current development proposals, as outlined above.

Our previous representations to the Proposed Submission consultation (Barton Willmore, 31 May 2016), Examination Hearing Statement in respect of Issue 10 (Barton Willmore, August 2016) and subsequent letter to the Inspector (08 September 2016), indicated that emerging Policy SSP35 should be updated to include reference to the Country Park car park, access point on Westerfield Road, maintenance vehicle access and new pedestrian and/or cycle link on Lower Road.

It is considered that for the purposes of clarity, sufficient detail regarding the allocation of these parcels of land should be included within the Policy wording in order to be consistent with National Policy and to be considered "sound".

We therefore support the amendment to the wording of emerging Policy SSP35, which includes reference to safeguarding exiting pedestrian and cycle access points, provision of the car park and maintenance access points and tracks. As such this Policy is now considered to be "sound".

Our Client wishes to continue to positively engage with SCDC to ensure that the shared vision for the Country Park is realised.

Please do not hesitate to contact me should you have any queries on the above.

Summary:

Our previous representations to the Proposed Submission consultation and subsequent letter to the Inspector indicated that emerging Policy SSP35 should be updated to include reference to the Country Park car park, access point on Westerfield Road, maintenance vehicle access and new pedestrian and/or cycle link on Lower Road.

We therefore support the amendment to the wording of emerging Policy SSP35, which includes reference to safeguarding exiting pedestrian and cycle access points, provision of the car park and maintenance access points and tracks. As such this Policy is now considered to be "sound".

Change to Plan N/A

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8057 - 3927 - MM21 - None				
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8057 Support

Main Modifications (MM1 to MM24) MM21

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Yes	Not Specified	N/A

Attachments:
24013 A3 LN kf 161118 Main Modifications November 2016_Redacted.pdf

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8111 - 2442 - MM21 - None

8111 Support

Main Modifications (MM1 to MM24)

MM21

Respondent: Suffolk County Council (James Cutting) [2442]

Agent: N/A

Full Text: Site Allocations and Area Specific Policies Development Plan Document - Main Modifications

Thank you for consulting Suffolk County Council on the modifications to the Site Allocations and Area Specific Policies Development Plan Document. The County Council does not object to the proposed modifications. The following comments are offered in relation to those main modifications which are relevant to the County Council's service responsibilities and policy objectives.

Main Modifications

MM13

Suffolk County Council supports the reference to the role of Westerfield and implications raising due to its proximity to Ipswich. The county council is currently recording where local pupils are going to school and will continue to monitor education provision and capacity matters, especially regarding the new development in Ipswich Garden Suburb. The identified need for additional contributions towards infrastructure provision where necessary recognised through any planning application is welcomed.

MM19 -21

SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Additional Changes

AC6-AC7 and AC09

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

I trust that the above is of assistance.

Summary: SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Change to Plan N/A

Appear at exam?

Not Specified

Legal?

Not Specified

Sound?

Not Specified

Duty to Cooperate?

Not Specified

Soundness Tests

N/A

Attachments:

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8100 - 4189 - MM22 - None

8100 Support

Main Modifications (MM1 to MM24)

MM22

Respondent: Historic England (Debbie Mack) [4189]

Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Proposed Main Modifications and Additional Changes Oct - Nov 2016 and Site Allocations and Area Specific Policies Proposed Main Modifications and Additional Changes Oct - Nov 2016

Thank you for consulting us on the Proposed Main Modifications and Additional Changes to the Felixstowe Peninsula Area Action Plan and Site Allocations and Area Specific Policies. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the Proposed Main Modifications and Additional Changes.

We attach the 6 response forms and a continuation sheet and summarise our comments below:

FPAAP - MM12

FPP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)
Historic England welcomes this Main Modification.

FPAAP - MM14

FPP8: Land off Thurmans Lane, Trimley St Mary
Historic England welcomes the amendment to bullet point 8 but has concerns regarding this modification in respect of the dwelling capacity as set out in our response form.

FPAAP-AC25

Tourism and Sea Front Activities
Historic England welcomes this proposed modification.

SAASPD - MM12

Historic England welcomes this proposed modification which refers to preserving and enhancing the character of the conservation Area and listed buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary

In our previous responses to you we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. We advised that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings. We therefore welcome the amended bullet point 8 in FPAAP - MM14. However, Historic England is particularly concerned about the increase in proposed capacity of the site from 100 to 150 dwellings. As we advised in our e-mail to you dated 13th September, the eastern end of the site is the most sensitive in historic terms given the presence of the grade II listed 18th century farmhouse. To that end, we would be cautious and concerned about substantially increasing the number of dwellings indicated in the policy from 100 to 150 dwellings.

Continued on separate sheet

FPAAP - MM14 continued

FPP8: Land off Thurmans Lane, Trimley St Mary

It might be more appropriate to limit the capacity of the site to between 120 and 130 in recognition of the need to protect and enhance the setting of the grade II listed building. In addition, it may be helpful to add comment in the policy to the effect that the eastern end of the site closest to the listed building should be left open to provide a buffer and to help mitigate the impact of the development upon the setting of the asset.

As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. We consider that this dwelling capacity is not consistent with the NPPF (para 132) given that development of this scale on the site would lead to the harm of the setting of a heritage asset.

Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)" (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).

This clearly has implications for other proposed modifications including FPAAP-AC5, AC6, AC8, AC9 and AC10.

1) Site Allocations Main Modifications Schedule (Comments before the Inspector)

S - 8100 - 4189 - MM22 - None

8100 Support

Main Modifications (MM1 to MM24)

MM22

Thank you for consulting Historic England on the Sustainability Appraisal Report Addendums for Felixstowe Peninsula Area Action Plan and Site Allocations and Area Specific Policies October 2016.

We have no additional comments to make at this stage on the Main Modifications and Additional Changes to the Sustainability Appraisals.

Summary: SAASPD.- MM22 We welcome this proposed modification which corrects the word English Heritage to Historic England.

Change to Plan N/A

Appear at exam?

Not Specified

Legal?

Yes

Sound?

Yes

Duty to Cooperate?

Yes

Soundness Tests

N/A

Attachments:

16.11.28 CONCASE Letter HERef_PL00020745_275021__Redacted.pdf

16.11.23 Main-Mods-Form FPAAP MM14_Redacted.pdf

_HERef_Places - S_L275037_Redacted.pdf

3) Additional Changes Schedule (Comments not before the Inspector)

O - 8130 - 4200 - AC3 - i, ii

8130 Object

Additional Changes (AC1 to AC46)

AC3

Respondent: Aldringham Neighbourhood Planning Team (Mr William HALFORD) [4200] **Agent:** N/A

Full Text: Re: SAASPD - AC3 SCDC 6 1.18 Amend paragraph to read: (Thorpeness) has applied for neighbourhood area status. A decision is due by May 2016. Assuming..."

The wording above is misleading. It would be correct to clearly reword as:

***Aldringham cum Thorpe applied to SCDC to have neighbourhood planning area status on 5 January 2016 . The Council finally approved this application on 5 May 2016.

Summary: Re: SAASPD - AC3 SCDC 6 1.18 Amend paragraph to read: (Thorpeness) has applied for neighbourhood area status. A decision is due by May 2016. Assuming..."

The wording above is misleading. It would be correct to clearly reword as:

***Aldringham cum Thorpe applied to SCDC to have neighbourhood planning area status on 5 January 2016 . The Council finally approved this application on 5 May 2016.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	No	Not Specified	i, ii

Attachments:

3) Additional Changes Schedule (Comments not before the Inspector)

O - 8131 - 4564 - AC3 - ii, iii

8131 Object

Additional Changes (AC1 to AC46)

AC3

Respondent: Aldringham-cum-Thorpe (Mr Alan Williams) [4564] **Agent:** N/A

Full Text: SAASPD-AC3 Page 6 1.18

Amend paragraph to read:

***Aldringham cum Thorpe (Thorpeness) has applied for neighbourhood area status. A decision is due by May 2015 2016. Assuming..."

Whilst this is shown as an Additional Change I believe that the significance of the dates that the Aldringham cum Thorpe Neighbourhood Plan was submitted, and subsequently designated is significant, and requires a Main Modification.

The Aldringham cum Thorpe Neighbourhood Plan was submitted in January 2016 when the council's position was to not allocate sites in proposed Neighbourhood Plan Areas. This would have precluded the inclusion of SSP4.

In the document FINAL Hearing Statement Issue 10 - Site Allocations Para 10.5 states:-

Subsequently, the Council's position changed from not allocating sites in proposed NP areas, to one of not allocating sites in designated NP areas. The designation of a neighbourhood plan area is the first formal stage in the neighbourhood plan process. At the time, Aldringham cum Thorpe neighbourhood plan area had not been designated.

The fact that a submission had already been made prior to the council changing their position, and that it took 4 months for the plan to be designated, suggests that the delay in the designation process brought SSP4 into scope when in fact had the designation process been completed in a realistic time scale it would still have been out of scope.

I would like to request that SSP4 is removed from the SAASP document for the compelling reasons above.

Summary:

The Aldringham cum Thorpe Neighbourhood Plan was submitted in January 2016 when the council's position was to not allocate sites in proposed Neighbourhood Plan Areas. This would have precluded the inclusion of SSP4. Subsequently, the Council's position changed from not allocating sites in proposed NP areas, to one of not allocating sites in designated NP areas. The designation of a neighbourhood plan area is the first formal stage in the neighbourhood plan process. At the time, Aldringham cum Thorpe neighbourhood plan area had not been designated.

Change to Plan I would like to request that SSP4 is removed from the SAASP document for the compelling reasons above.

Appear at exam?

Not Specified

Legal?

No

Sound?

No

Duty to Cooperate?

No

Soundness Tests

ii, iii

Attachments:

3) Additional Changes Schedule (Comments not before the Inspector)

8112

Object

Additional Changes (AC1 to AC46)

AC6

Respondent: Suffolk County Council (James Cutting) [2442]

Agent: N/A

Full Text:

Site Allocations and Area Specific Policies Development Plan Document - Main Modifications

Thank you for consulting Suffolk County Council on the modifications to the Site Allocations and Area Specific Policies Development Plan Document. The County Council does not object to the proposed modifications. The following comments are offered in relation to those main modifications which are relevant to the County Council's service responsibilities and policy objectives.

Main Modifications

MM13

Suffolk County Council supports the reference to the role of Westerfield and implications raising due to its proximity to Ipswich. The county council is currently recording where local pupils are going to school and will continue to monitor education provision and capacity matters, especially regarding the new development in Ipswich Garden Suburb. The identified need for additional contributions towards infrastructure provision where necessary recognised through any planning application is welcomed.

MM19 -21

SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Additional Changes

AC6-AC7 and AC09

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

I trust that the above is of assistance.

Summary:

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

3) Additional Changes Schedule (Comments not before the Inspector)

8113

Object

Additional Changes (AC1 to AC46)

AC7

Respondent: Suffolk County Council (James Cutting) [2442]

Agent: N/A

Full Text:

Site Allocations and Area Specific Policies Development Plan Document - Main Modifications

Thank you for consulting Suffolk County Council on the modifications to the Site Allocations and Area Specific Policies Development Plan Document. The County Council does not object to the proposed modifications. The following comments are offered in relation to those main modifications which are relevant to the County Council's service responsibilities and policy objectives.

Main Modifications

MM13

Suffolk County Council supports the reference to the role of Westerfield and implications raising due to its proximity to Ipswich. The county council is currently recording where local pupils are going to school and will continue to monitor education provision and capacity matters, especially regarding the new development in Ipswich Garden Suburb. The identified need for additional contributions towards infrastructure provision where necessary recognised through any planning application is welcomed.

MM19 -21

SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Additional Changes

AC6-AC7 and AC09

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

I trust that the above is of assistance.

Summary:

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

3) Additional Changes Schedule (Comments not before the Inspector)

8114

Object

Additional Changes (AC1 to AC46)

AC9

Respondent: Suffolk County Council (James Cutting) [2442] Agent: N/A

Full Text: Site Allocations and Area Specific Policies Development Plan Document - Main Modifications

Thank you for consulting Suffolk County Council on the modifications to the Site Allocations and Area Specific Policies Development Plan Document. The County Council does not object to the proposed modifications. The following comments are offered in relation to those main modifications which are relevant to the County Council's service responsibilities and policy objectives.

Main Modifications

MM13

Suffolk County Council supports the reference to the role of Westerfield and implications raising due to its proximity to Ipswich. The county council is currently recording where local pupils are going to school and will continue to monitor education provision and capacity matters, especially regarding the new development in Ipswich Garden Suburb. The identified need for additional contributions towards infrastructure provision where necessary recognised through any planning application is welcomed.

MM19 -21

SSP 26 The County Council welcomes this modification, which seeks to safeguard the historic environment as an asset and is in line with the requirements of the National Planning Policy Framework (Chapter 12).

Additional Changes

AC6-AC7 and AC09

The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Additional Observations

SSP33

As per previous representations on this matter and for consistency with other sites, the County Council is content for the policy to include the following sentence:

'Archaeological investigation will be required.'

I trust that the above is of assistance.

Summary: The total increase from 1,120 to 1,170 is made to reflect 50 additional dwellings at the Thurmans Lane sites (FPP8). However, this does not include the applications for which there is a resolution to grant permission at High Road, Trimley St Martin.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	Not Specified	Not Specified	None

Attachments:

3) Additional Changes Schedule (Comments not before the Inspector)

S - 8094 - 4109 - AC10 - None

8094 Support

Additional Changes (AC1 to AC46)

AC10

Respondent: Mr Gavin Kingsnorth [4109]

Agent: N/A

Full Text: This representation is made to support the following amendments in relation to Site SSP3:

SAASPD - MM3: A financial contribution towards affordable housing provision in lieu of on-site provision is a welcomed clarification of affordable housing policy in relation to this allocation.

SAASPD - AC10: Clarification that the existing access track is within the ownership of the site owner is also welcomed.

SCDC may also wish to note that a specialist Phase 1 Ecological Survey of the site has concluded that there are no bat roosts on the site and whilst the site boundary features provide suitable foraging habitats no additional bat survey is recommended. The reference to a specific bat survey within the supporting text to SSP3 would be unhelpful and would not accord with best practice assessment of ecological issues. It is therefore requested that this reference to a bat survey is omitted or widened to a broader assessment of ecological issues consistent with development management practice.

Summary: This representation is made to support the following amendments in relation to Site SSP3:

SAASPD - AC10: Clarification that the existing access track is within the ownership of the site owner is also welcomed. SCDC may also wish to note that a specialist Phase 1 Ecological Survey of the site has concluded that there are no bat roosts on the site and whilst the site boundary features provide suitable foraging habitats no additional bat survey is recommended.

Change to Plan	N/A
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Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

Main-Mods-Representation-Form- Site SSP3 Representation_Redacted.pdf

3) Additional Changes Schedule (Comments not before the Inspector)

S - 8101 - 4189 - AC20 - None

8101 Support

Additional Changes (AC1 to AC46)

AC20

Respondent: Historic England (Debbie Mack) [4189]

Agent: N/A

Full Text: Felixstowe Peninsula Area Action Plan Proposed Main Modifications and Additional Changes Oct - Nov 2016 and Site Allocations and Area Specific Policies Proposed Main Modifications and Additional Changes Oct - Nov 2016

Thank you for consulting us on the Proposed Main Modifications and Additional Changes to the Felixstowe Peninsula Area Action Plan and Site Allocations and Area Specific Policies. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the Proposed Main Modifications and Additional Changes.

We attach the 6 response forms and a continuation sheet and summarise our comments below:

FPAAP - MM12

FPP6: Land opposite Hand in Hand Public House, Trimley St Martin (451b)
Historic England welcomes this Main Modification.

FPAAP - MM14

FPP8: Land off Thurmans Lane, Trimley St Mary
Historic England welcomes the amendment to bullet point 8 but has concerns regarding this modification in respect of the dwelling capacity as set out in our response form.

FPAAP-AC25

Tourism and Sea Front Activities
Historic England welcomes this proposed modification.

SAASPD - MM12

Historic England welcomes this proposed modification which refers to preserving and enhancing the character of the conservation Area and listed buildings.

FPP8: Land off Thurmans Lane, Trimley St Mary

In our previous responses to you we expressed concerns in respect of the site due to the impact on the setting of Grade II Listed Building Mill Farmhouse. We advised that the policy should also state that any new development should be of a high quality and sympathetic to the character of the area and existing Listed Buildings. We therefore welcome the amended bullet point 8 in FPAAP - MM14. However, Historic England is particularly concerned about the increase in proposed capacity of the site from 100 to 150 dwellings. As we advised in our e-mail to you dated 13th September, the eastern end of the site is the most sensitive in historic terms given the presence of the grade II listed 18th century farmhouse. To that end, we would be cautious and concerned about substantially increasing the number of dwellings indicated in the policy from 100 to 150 dwellings.

Continued on separate sheet

FPAAP - MM14 continued

FPP8: Land off Thurmans Lane, Trimley St Mary

It might be more appropriate to limit the capacity of the site to between 120 and 130 in recognition of the need to protect and enhance the setting of the grade II listed building. In addition, it may be helpful to add comment in the policy to the effect that the eastern end of the site closest to the listed building should be left open to provide a buffer and to help mitigate the impact of the development upon the setting of the asset.

As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. We consider that this dwelling capacity is not consistent with the NPPF (para 132) given that development of this scale on the site would lead to the harm of the setting of a heritage asset.

Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)" (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).

This clearly has implications for other proposed modifications including FPAAP-AC5, AC6, AC8, AC9 and AC10.

3) Additional Changes Schedule (Comments not before the Inspector)

S - 8101 - 4189 - AC20 - None

8101 Support

Additional Changes (AC1 to AC46)

AC20

Thank you for consulting Historic England on the Sustainability Appraisal Report Addendums for Felixstowe Peninsula Area Action Plan and Site Allocations and Area Specific Policies October 2016.

We have no additional comments to make at this stage on the Main Modifications and Additional Changes to the Sustainability Appraisals.

Summary: SAASPD - AC20 We welcome this proposed modification which adds a new paragraph relating to the Conservation Area and listed buildings.

Change to Plan N/A

Appear at exam?

Not Specified

Legal?

Yes

Sound?

Yes

Duty to Cooperate?

Yes

Soundness Tests

N/A

Attachments:

_HERef_Places - S_L275037_Redacted.pdf

16.11.23 Main-Mods-Form FPAAP MM14_Redacted.pdf

16.11.28 CONCASE Letter HERef_PL00020745_275021__Redacted.pdf

3) Additional Changes Schedule (Comments not before the Inspector)

8049Object

Additional Changes (AC1 to AC46)AC21

Respondent: Phase2 Planning and Development Ltd (Ms Emma Walker) [2918]

Agent: N/A

Full Text:

We note that para 2.131 of the supporting text to Policy SSP17 has been amended in the light of comments made by the EA to remove reference to the requirement for a Flood Risk Assessment, but this amendment has not been carried through to the Policy itself. In the interests of consistency and clarity (and hence Effectiveness), the third bullet of Policy SSP17 should be amended likewise.

Summary:

We note that para 2.131 of the supporting text to Policy SSP17 has been amended in the light of comments made by the EA to remove reference to the requirement for a Flood Risk Assessment, but this amendment has not been carried through to the Policy itself. In the interests of consistency and clarity (and hence Effectiveness), the third bullet of Policy SSP17 should be amended likewise.

Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	No	Not Specified	iii

Attachments:

3) Additional Changes Schedule (Comments not before the Inspector)

S - 8071 - 4557 - AC21 - None

8071 Support

Additional Changes (AC1 to AC46) AC21

Respondent: Environment-Agency (Mr G Steel) [4557] Agent: N/A

Full Text: Sound & legally compliant

Summary: Sound & legally compliant

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

- SSP5.pdf
- 2.131.pdf
- 2.134.pdf
- SSP19.pdf
- SSP8.pdf
- SSP11.pdf

3) Additional Changes Schedule (Comments not before the Inspector)

S - 8072 - 4557 - AC22 - None

8072 Support

Additional Changes (AC1 to AC46) AC22

Respondent: Environment-Agency (Mr G Steel) [4557] Agent: N/A

Full Text: Sound & legally compliant

Summary: Sound & legally compliant

Change to Plan N/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:

- SSP5.pdf
- 2.134.pdf
- SSP11.pdf
- SSP19.pdf
- SSP8.pdf
- 2.131.pdf

3) Additional Changes Schedule (Comments not before the Inspector)

O - 8063 - 2693 - AC24 - i, ii, iii, iv

8063 Object

Additional Changes (AC1 to AC46)

AC24

Respondent: Eyke Parish Council (Mrs Jacqueline Pooley) [2693] **Agent:** N/A

Full Text: Ref:- SAASP-AC24Evolution Town Planning (3055/8031 & 3055/8036); SCDC Para 3.15 (page 17)

Suffolk Coastal contains a legacy of former airfields - Parham, Debach and Rendlesham (Bentwaters Park). They are large, part brownfield sites in the countryside, which are generally poorly related to the main road network in the district. They are located on or close to the zone distributor lorry route network as set out in the Suffolk Lorry Route Network. Over time, a number of the buildings have been re-used or re-developed ..."

Bentwaters industrial park is wholly within an Area of Outstanding Natural Beauty, it is served by country roads that were never designed for HGV 's and is poorly related to the main road network In the district. It is some 5 miles from the A12 and to say 'located on or close' ignores the reality of the true situation completely. Further to include Bentwaters Airfield with Parham and Debach as 'brownfield sites' is misleading. The village of Eyke takes the brunt of most HGV's and associated traffic generated by Bentwaters Park Industrial Site. In parts of the village there are no footways and pedestrians have to walk in the road with the traffic. Because of the width of the road HGV's, buses and farm vehicles have difficulty in passing. 'which are generally poorly related to the main road network in the district' Makes a clear and factual statement. The proposed is factually incorrect, unsound and is misleading. It gives the Impression that the area is suitable for HGV's and industrial traffic. We ask that the proposed amendment be deleted/refused.

History -The Americans operated at RAF Bentwaters from the 1950's they also operated at RAF Woodbridge. Most of the traffic generated at the time was between the two air bases. However the road from the north side of Eyke to the Bentwaters Air Base had a particular bend that American cars had difficulty in negotiating leading to many accidents. It became necessary that road Improvements would be required. The B1152 as it was then would have to be classed an 'A' road to qualify for funding. Hence it became the A1152 up to the Bentwaters Base. The only A road standard is the mile stretch that adjoins the roundabout at Bentwaters which removed the difficult bend.

DEFRA guide to AONB's Include the following statements:-

National Parks, the Broads and Areas of Outstanding Natural Beauty (AONBs) have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection. National Park purposes are to conserve and enhance their natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of their special qualities by the public. The Broads' purposes are to conserve and enhance their natural beauty, promote their enjoyment by the public and protect the interests of navigation. And the statutory purpose of AONBs is to conserve and enhance the natural beauty of their area.

In National Parks, if it appears there is an irreconcilable conflict between the Park's two purposes then greater weight should be attached to the conservation purpose (the "Sandford principle"). Under section 11A(2) of the 1949 Act, this obligation also falls on relevant authorities when having regard to the purposes of National Parks.

Summary: Bentwaters industrial park is wholly within an Area of Outstanding Natural Beauty, it is served by country roads that were never designed for HGV's and is poorly related to the main road network In the district. It is some 5 miles from the A12 and to say 'located on or close' ignores the reality of the true situation completely. Further to include Bentwaters Airfield with Parham and Debach as 'brownfield sites' is misleading. 'which are generally poorly related to the main road network in the district' Makes a clear and factual statement.

Change to Plan The proposed is factually incorrect, unsound and is misleading. It gives the impression that the area is suitable for HGV's and industrial traffic. We ask that the proposed amendment be deleted/refused.

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	No	Not Specified	i, ii, iii, iv

Attachments:

<http://suffolkcoastal.jdi-consult.net/localplan/adminsc/download.php?action=download&uploadid=2747>
SAASPD-AC24_Redacted.pdf

3) Additional Changes Schedule (Comments not before the Inspector)

S - 8059 - 4186 - AC46 - None

8059Support

Additional Changes (AC1 to AC46)AC46

Respondent: Mr Anthony Ingram [4186]Agent: N/A

Full Text:The amendment following the hearing is sound, reasonable & proper within the reasonable limitations of Ordnance Survey mapping.

Summary:The amendment following the hearing is sound, reasonable & proper within the reasonable limitations of Ordnance Survey mapping.

Change to PlanN/A

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Yes	Yes	Yes	N/A

Attachments:
Cleeves Planning 161119 to SCDC_Redacted.pdf
T Ingram_Redacted.pdf