



Local Plan

Covering the former Suffolk Coastal area

Council Response to Matter 3

**Area Specific Strategies – Development Allocations
(SCLP12.1 to SCLP12.33)**



EASTSUFFOLK
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General Questions

Is each site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints?

1. The Council sought clarification from the Inspector in respect of whether these un-numbered questions require a response. An overview is provided below, and the responses to the questions on the individual site allocations under this matter address these points further where relevant to the question.
2. The Site Selection Topic Paper (Document D36) explains the considerations that have informed the selection of site allocations. Initially, potentially suitable sites have been identified through the Strategic Housing and Economic Land Availability Assessment, through which sites which are suitable, available and achievable have been identified. In identifying appropriate site allocations consideration was given to the strategy of the Local Plan, to provide a variety of allocations which reflect the approach to focus development around the A12 and A14 corridors and to support growth in the rural areas.
3. The criteria in each site allocation policy have been informed by the characteristics and circumstances of each site, and by the Council's evidence and through liaison with infrastructure providers. The inclusion of criteria in the site allocations policies is not intended to cover every consideration as other policies in the plan would also form the basis for decision making where relevant, however they identify areas which are specific to the acceptability of development on a particular site.

Are there any significant factors that indicate any of the sites should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?

4. In identifying sites for allocation in the Local Plan, consideration has been initially given to whether sites are suitable, available and achievable through the Strategic Housing and Economic Land Availability Assessment. The methodology is set out in the Strategic Housing and Economic Land Availability Assessment (Document D10).
5. All sites that are identified as allocations have been made available for development over the Plan period, as set out in the Strategic Housing and Economic Land Availability Assessment (Document D10).
6. Infrastructure capacity has been considered in identifying appropriate site allocations, as explained in the Site Selection Topic Paper (Document D36). Where infrastructure is needed, in terms of enhancements or new provision, this is identified in the Infrastructure Delivery Framework in Appendix B of the Final Draft Local Plan as well as in the supporting text and/or

policy (depending on whether it is anticipated to be funded by Community Infrastructure Levy or S106 contribution).

7. Access requirements have been assessed with Suffolk County Council as Highways Authority. Paragraph 108 of the National Planning Policy Framework (Document C1) states that in assessing sites that may be allocated for development it should be ensured that appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The Strategic Housing and Economic Land Availability Assessment (Document D10) identifies that some sites were judged to be unsuitable due to access constraints and were not considered any further for allocation. The site allocations identified will each require works to ensure that a suitable access can be achieved and the measures that will be required, along with identified approximate costs, are set out in the Infrastructure Delivery Framework in Appendix B of the Final Draft Local Plan (Documents A1, page 443 – 453). This includes measures to support pedestrian and cycle access where these are required, considering the circumstances and location of the allocation.
8. The Whole Plan Viability Study (Document D38) has considered the policy requirements in assessing the viability of delivering the Plan as a whole. In relation to the two Garden Neighbourhoods a site specific assessment has been undertaken which specifically considers the policy requirements, including provision of suitable access and concludes that the developments would be viable.

Policy SCLP12.1: Neighbourhood Plans

Question 3.1

What is the justification for the indicative minimum dwelling figures set out in Policy SCLP12.1?

9. Paragraph 65 of the National Planning Policy Framework (NPPF) states that:

‘Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.’

10. Further guidance is provided in the Planning Practice Guidance (Document C2, Neighbourhood Planning, Paragraphs 101 Reference ID: 41-101-20190509 - 102 Reference ID: 41-102-20190509). The PPG accepts that there is no set method for identifying housing requirements for designated neighbourhood areas however suggests that this could include consideration of relevant policies such as the spatial strategy, evidence such as the Housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services, as well as any areas of assets which may restrict the scale, type or distribution of development in a neighbourhood plan area.
11. Paragraph 12.6 of the Final Draft Local Plan confirms that in identifying the numbers in Policy SCLP12.1 consideration has been given to the strategy of the Local Plan and the position of the settlement in the settlement hierarchy (set out in Policy SCLP3.2 of the Final Draft Local Plan). This is consistent with the guidance in the PPG.
12. Kesgrave and Martlesham Heath lie within the East of Ipswich Major Centre. The figures identified for the Neighbourhood Plans (noting that the Martlesham Neighbourhood Plan covers Martlesham village also) reflect that the strategy of the Local Plan is not looking to focus growth in this location, but that it is expected that some growth will come forward over the plan period.
13. Framlingham and Leiston are market towns with designated neighbourhood areas and have existing made Neighbourhood Plans. The approach towards additional growth is explained in the parts of the Plan which consider the strategies for these areas, in paragraphs 12.268-69 and 12.276-77. As Saxmundham is identified for a strategic level of growth in the emerging Local Plan (through the South Saxmundham Garden Neighbourhood), Policy SCLP12.1 does not set a further housing requirement.
14. In relation to Large Villages and Small Villages, the approach taken reflects the strategy of the Local Plan. Wickham Market is acknowledged as being well related to the A12 and also has a relatively wide range of services and facilities (as indicated in the Settlement Hierarchy Topic Paper, Document D34) and to accord with the strategy of the Plan a housing requirement of 70 dwellings has been set in SCLP12.1. This has been considered alongside the site allocation under Policy SCLP12.61 for 150 dwellings which, although outside of the Wickham Market Neighbourhood Plan area and in Pettistree Parish, adjoins the built area of Wickham Market and together with the Neighbourhood Plan figure represents an appropriate level of growth. Figures for the remainder of the Large Villages and Small Villages range from 20 – 25 dwellings, allowing medium scale site allocations to be identified reflecting the approach the Local Plan has taken to identifying allocations in such settlements.
15. For those settlements which are identified as 'countryside' within Policy SCLP3.2, Policy SCLP12.1 clarifies that Neighbourhood Plans which address housing should do so in

accordance with the countryside policies. To do otherwise would undermine the Settlement Hierarchy and the housing policies of the Local Plan.

16. A number of existing Neighbourhood Plans that have been made contain site allocations to deliver housing (Framlingham Neighbourhood Plan - Document F5, Leiston Neighbourhood Plan – Document F7 and Melton Neighbourhood Plan – F9) and draft Neighbourhood Plans currently in production have been published which identify site allocations aiming to deliver the numbers identified in the emerging Local Plan (Bredfield Neighbourhood Plan and Wickham Market Neighbourhood Plan). The Council is therefore confident that it can support Neighbourhood Plan groups in bringing forward plans which aim to deliver the number of houses identified in SCLP12.1. This aside, paragraph 12.6 states that where positive strategies for the delivery of housing are not forthcoming in a timely way the Council may consider allocating land in a future Local Plan review.
17. The PPG has been updated since the production of the Final Draft Local Plan. Paragraph 104 Reference ID: 41-104-20190509 provides further clarity on the expectations of Neighbourhood Plans in relation to delivering their housing requirement. On this basis, a modification to paragraph 12.6 would enable the Plan to be reflective of the PPG whilst also affirming the Council's expectation that Neighbourhood Plans plan positively to meet the housing requirements, as set out below (extract from paragraph 12.6):

~~The Planning Practice Guidance states that Neighbourhood Plans may meet their requirements through allocations plus windfall, however not through solely windfall.~~

“Neighbourhood plans are expected to plan positively to deliver the housing requirements set out in Policy SCLP12.1.”

18. Paragraph 104 Reference ID: 41-104-20190509 of the recently updated PPG states that where housing numbers are set as indicative numbers, these will need to be re-tested at the Examination of Neighbourhood Plans. The figures set out in Policy SCLP12.1 are intended to be minimum housing requirements that Neighbourhood Plans will seek to deliver. To provide certainty for neighbourhood plan groups and communities, a modification is proposed to SCLP12.1 to clarify that the numbers are not 'indicative' in the context of the PPG, as set out below:

“Where Neighbourhood Plans seek to plan for housing growth, they will be expected to plan for the ~~indicative~~ minimum housing requirements set out below:”

A modification to the title of the right hand column of the table in SCLP12.1 would be as set out below:

~~“Indicative m~~Minimum number of dwellings”

Question 3.2

Would the policy be effective in bringing development forward in Leiston? What is the present planning status of the consented sites in Leiston allocated in the Neighbourhood Plan SA1, SA3, SA4?

19. The Leiston Neighbourhood Plan (Document F7) covers the period 2015 – 2029 and was made in March 2017. Policy SCLP12.1 of the Final Draft Local Plan relates to bringing forward further development in Leiston later in the plan period (beyond 2031) as explained in paragraphs 12.276-77 of the Final Draft Local Plan. The policies in the made Neighbourhood Plan allocate sites for development over the period covered by the Neighbourhood Plan. Policy SCLP12.1 acknowledges that the 100 dwellings identified as a housing requirement is in addition to these existing allocations. In taking this approach the Local Plan is consistent with paragraph 65 of the NPPF which states that strategic policy-making authorities should set out a housing requirement for designated neighbourhood areas. Paragraph 12.6 of the Final Draft Local Plan sets out an approach whereby a local plan review would consider allocating sites where positive strategies for the delivery of housing are not forthcoming in a timely way through Neighbourhood Plans. Alongside the made Leiston Neighbourhood Plan, policy SCLP12.1 is therefore effective in bringing forward development in Leiston over the period to 2036.
20. The Neighbourhood Plan allocates sites for housing as summarised in the table below. The current planning status is identified alongside these site allocations. Policy SA2 has been included for completeness.

Policy	Site	Number of dwellings	Planning status
SA1	Land at Highbury Cottages	150	Outline planning permission granted on 21.6.2017 (reference DC/16/1961/OUT) for 187 dwellings. A Reserved Matters application was validated on 8.5.2019 (reference DC/19/1883/ARM). The decision is currently pending. A developer (Persimmon Homes) is identified. The Housing Land Supply Statement 2019 (Document H20) identifies the submission of the Reserved Matters application and there being a developer identified as clear evidence that the site is anticipated to start delivering within the next five years.
SA2	Land at Red House Lane	70	Full planning permission was granted for the development of 65 dwellings on 27.3.2018. As at 31.3.2019 11 dwellings have been completed. The site is being developed by Hopkins Homes who anticipate the development will be completed

			during 2020/21.
SA3	Land at rear of St Margaret's Crescent	70	Outline planning permission was granted on 29.6.2017 (reference DC/16/2104/OUT) for 77 dwellings. The Housing Land Supply Statement 2019 (Document H20) identifies that it is unlikely that the site will come forward in the next five years.
SA4	Land at Abbey Road	100 (mixed use, policy also includes 1,000sqm B1 employment uses)	Outline planning permission was granted on 7.6.2017 (reference DC/16/1322/OUT) for 100 dwellings. The Housing Land Supply Statement (2019) (Document H20) identifies that the land has been recently marketed and that it is realistic that some completions could take place during the five years.

21. The table above demonstrates that the sites allocated for housing development in the Leiston Neighbourhood Plan are being delivered. It is appropriate that the Local Plan acknowledges that the Neighbourhood Plan has taken a positive approach to identifying locations for growth, and that the Local Plan sets out a strategy which enables this growth to come forward in the early years of the Local Plan period whilst recognising that additional growth should be planned for through a review of the Neighbourhood Plan for the latter years of the Local Plan period.

Policy SCLP12.2: Strategy for Felixstowe

Question 3.3

Would the strategy be effective in addressing the potential impacts of development on the transport networks in and around Felixstowe consistent with the policies of the Framework?

22. The Council believes that the strategy for Felixstowe as outlined in Policy SCLP12.2 of the Final Draft Local Plan has been positively prepared, is justified and will be effective in guiding the future of the town over the plan period.
23. The strategy in Policy SCLP12.2 seeks to ensure that the thriving coastal resort and major centre with a comprehensive range of services and facilities which promotes sustainable development to meet the existing communities needs, as well as those of visitors and businesses in the town.
24. Felixstowe is a thriving seaside town with significant economic opportunities that has benefited from inward investment in recent years which has seen many positive outcomes across the town and its communities. The Local Plan seeks to ensure that the positive actions

continue to be a success and that future actions are complementary and ensure sustainable development is achieved in the future.

25. The Local Plan identifies Felixstowe as Major Centre due to the variety of services and facilities found in the town and the range of economic and regeneration opportunities alongside education provision, open spaces and green infrastructure. The town is also the largest by population in the area covered by the plan. It is for those reasons as detailed in chapter 3 of the Final Draft Plan (Document A1) that Felixstowe has been identified for large scale development over the plan period.
26. The Council acknowledge the representations received which indicate that the spatial distribution of growth across the plan area is too reliant on sites in Felixstowe which has limited or constrained transport opportunities. However the Council as local planning authority in conjunction with Suffolk County Council as local highways authority are confident that the level of growth directed towards Felixstowe is appropriate and is consistent with the policies in the National Planning Policy Framework (Document C1).
27. The town of Felixstowe is on a Peninsula and is predominately served by the A14 which is part of the Strategic Road Network across the country. The A14 provides direct connections to Felixstowe as well as Ipswich and other communities across Suffolk and the rest of the country. Felixstowe can also be accessed through other roads which are much smaller and have a lesser capacity due to their road classification (mixture of B and C class roads). Although the predominant form of transport is the private motor car (like the rest of the District), Felixstowe is also served by rail services, both passenger and freight associated with the Port of Felixstowe and bus services connecting to locations such as Ipswich and Woodbridge.
28. Transport modelling work (Documents D31 and D32) undertaken as part of the evidence base supporting the Final Draft Local Plan provide an indication of the impact the background growth (through population changes over the plan period) and the growth associated with the allocations identified will have on the transport network.
29. The Forecasting Report (Document D32) outlines the junctions across the highway network with capacity issues and there are many parts of the network which operate well within capacity in 2036. In respect of Felixstowe, the junctions that show capacity issues in 2036 are detailed in paragraphs 3.4.18-3.4.22. In order to address these capacity issues the transport modelling highlights that further detailed assessments need to be undertaken over the plan period to address the specific issues. However, it is not envisaged that any of these are unrealistic or unachievable. Therefore the Council as local planning authority is satisfied that the Strategy for Felixstowe is effective and that the impacts of development on the transport network can be addressed in accordance with the National Planning Policy Framework.

30. Measures to improve the capacity of junctions across Felixstowe as a result of the planned growth in the Final Draft Local Plan are specifically identified in Appendix B of the Final Draft Local Plan. Specific measures such as junction improvements as well as other interventions such as continuation of shared space and sustainable transport measures are on page 443 and 444 of the Final Draft Local Plan.
31. The Council continues to work with Suffolk County Council and the neighbouring authorities as part of the Ipswich Strategic Planning Area to identify a package of mitigation measures which can be brought forward across the wider area over the plan period. Some of these mitigation measures will be specific junction improvements where necessary to address issues of capacity and others will be the introduction of methods such as encouraging behaviour change of motorists through smarter choices initiatives alongside improvements to sustainable transport and greater focus on the provision and enhancement of walking and cycling routes and linkages.

Policy SCLP12.3: North Felixstowe Garden Neighbourhood

Question 3.4

What is the justification for the threshold of ‘up to 2000 dwellings’?

32. The Council consider that criterion r) of Policy SCLP12.3 is appropriate and that a threshold of up to 2000 dwellings provides a sound and robust position on which to guide the future development of the North Felixstowe Garden Neighbourhood.
33. Due to the scale of the North Felixstowe Garden Neighbourhood the Council has throughout the plan making process used the terminology of “up to 2000 dwellings” to ensure that considerations with statutory bodies and service providers is consistent and provides a maximum capacity on which to guide policy requirements. Other site allocations in the Final Draft Local Plan (Document A1) contain the wording “approximately” but as all of these are significantly smaller in number than the Garden Neighbourhood in Felixstowe the policy is justified.
34. As outlined in paragraph 12.31 of the Final Draft Local Plan, the North Felixstowe Garden Neighbourhood includes land at Candlet Road that was granted outline planning permission for 560 dwellings which are to be included with the “up to 2000”. It is noted that representation 1269 from Christchurch Land and Estates (Felixstowe) Limited, suggests the policy wording should be less prescriptive in terms of dwelling numbers to enable greater flexibility at the planning application stage.

35. Representation 797 which was submitted on behalf of the Council as landowner provides an indicative master plan with number of dwellings and Suitable Alternative Natural Greenspace (SANG) requirement for each parcel of land in Appendix 3. The details within Appendix 3 of the representation show that the sites could deliver 1281 units and when added to the 560 which are permitted through the outline planning permission at Candlet Road the site could deliver 1841 units. Although this number of units is likely to fluctuate as part of the master plan process, it is a clear indication that the approach set out in Policy SCLP12.3 for “up to 2,000 dwellings” is justified.
36. The scale of development proposed at North Felixstowe Garden Neighbourhood is comparable to that seen at Brightwell Lakes, previously known as Adastral Park in the Core Strategy and Development Management Policies Development Plan Document (Document F1). Outline planning permission for up to 2000 dwellings was approved at Brightwell Lakes in April 2018. Brightwell Lakes is also in a part of the district which is in close proximity to designated landscapes and requires significant on-site infrastructure and experience from this application showed that setting an upper limit (of 2000 dwellings) enabled considerations such as capacity of green infrastructure, provision of SANG and education facilities could be identified and accounted for in a positive manner. Utilising this experience and focusing on the achievement of sustainable development the Council has positively prepared the Final Draft Local Plan to ensure that statutory requirements are comprehensively taken into account with a known capacity for the allocation clear and up front.
37. Policy SCLP12.3 is clear that the North Felixstowe Garden Neighbourhood is to be delivered through a comprehensive master plan approach which includes landowner collaboration and community engagement. Including the policy requirement for “up to 2000 dwellings” provides an upper limit on which to base the master plan. The site of approximately 143ha offers a variety of possibilities in terms of layout, mix and design but is to be guided by the other policy requirements which have been identified based on the limited number of dwellings to be provided.
38. Over the plan period, future planning applications may seek to increase the number of dwellings beyond the 2000. Should this happen, it will be for future planning applications to consider the impact of the cumulative impact of the Garden Neighbourhood and the additional dwellings proposed. Without this comprehensive thinking the infrastructure requirements and environmental constraints may be pushed beyond what is considered to be sustainable development.
39. The Council has prepared a sound Local Plan which delivers sustainable development across the District. It significantly boosts housing supply by identifying a range and variety of sites that meet the Council’s housing need as well as providing a contingency over the plan period. Therefore the Council does not consider it necessary to amend Policy SCLP12.3 to provide an approximate figure for the allocation.

Question 3.5

Would the Policy be effective in achieving the comprehensive development of the allocated area and integrating the development with the existing community of Felixstowe?

40. The North Felixstowe Garden Neighbourhood has been identified and developed to ensure that over the plan period it becomes integrated into the existing community of the town. In order to further promote sustainable development with the existing community, the Policy seeks to ensure that the master plan utilises existing linkages in the form of Public Rights of Way alongside new access points for vehicles, pedestrians and cyclists.
41. The principles of integrating the Garden Neighbourhood into the existing community, as well as the land allocated under Policy SCLP12.4, is a fundamental part of the master plan that is to guide the creation and future development in the area. Policy SCLP12.3 is clear in its position that “Critical to the success of this development will be the integration of the new Garden Neighbourhood with the existing community...”.
42. As detailed in paragraph 12.48 of the Final Draft Local Plan, Candlet Road is currently the northern boundary of the main built up area. However, through the outline planning permission for 560 dwellings permitted in 2017 (paragraph 12.31), the nature of Candlet Road will change dramatically to a connection which has a reduced speed limit and provides more crossing points for vehicles, as well as walking and cycling opportunities. Building on these principles, the Garden Neighbourhood requires a master plan to take a comprehensive approach to connections to ensure that sustainable transport and community integration are a priority.
43. Over the plan period, the Garden Neighbourhood will become integrated with the existing community of Felixstowe and achieve comprehensive development in this part of the District. The master plan approach requires the retention and enhancement of recreational areas, the provision of education facilities, relocation of leisure facilities, creation of a community hub to provide a range of services and facilities, links across the site and beyond which will provide opportunity to access the rest of the town as well as employment opportunities in the town centre, Port of Felixstowe and Innocence Farm. Together these measures are intended to deliver a comprehensive development on the site of the Garden Neighbourhood to ensure it becomes a location that complements the existing community of Felixstowe.
44. Alongside the on-site requirements identified within the Garden Neighbourhood, the Final Draft Local Plan also promotes a variety of off-site measures which are to be explored over the plan period. Either through planning obligations or as part of infrastructure delivered via the Community Infrastructure Levy, such as improving the accessibility and customer experience at Felixstowe train station, allotment provision and police facilities as detailed in the Infrastructure Delivery Framework.

45. The requirements of the policy have been taken into account as part of the Whole Plan Viability Study (Document D38) that supports the Final Draft Local Plan. Appropriate assumptions have been factored into the viability work to ensure that the policy requirements can be delivered alongside the level of development expected. The Whole Plan Viability Report provides further assurance that the policy is effective in achieving comprehensive development and can be integrated with the existing community.

Question 3.6

Would the Policy be effective in achieving the provision of education facilities?

46. Policy SCLP12.3 is clear in the requirement for the provision of primary school and early years provision. Suffolk County Council as education authority has identified a need for 630 primary school places and the Local Plan includes this policy requirement. Over the plan period, the flexibility is in place through the master plan to ensure that the details surrounding this provision are determined through community engagement and considerations with the service providers.
47. In the plan making stage, the requirement for primary school places and early years provision is appropriate. Over the plan period and as development takes place, the provision could come forward in one setting or through a range of settings spread in appropriate locations throughout the Garden Neighbourhood. These details are to be determined through the master plan and subsequent planning applications.
48. Suffolk County Council has identified a need for early years provision on numerous allocations within the Local Plan. Some of these are expected to be created alongside primary schools, whereas others are likely to be independent settings in appropriate locations such as community hubs, district centres or areas of employment. Across the Garden Neighbourhood, there will be opportunities to ensure that early years provision is delivered effectively and in a timely manner.
49. With regards to provision of secondary education, Felixstowe is predominately served by Felixstowe Academy. Over the plan period, the level of growth identified in Felixstowe may require the expansion of Felixstowe Academy. The existing school site has the ability to expand and is currently operating at a lower capacity than it was originally intended to provide when constructed and opened. The Council in conjunction with Suffolk County Council and Felixstowe Academy will monitor pupil capacity to ensure that any future expansion to provide increased secondary school capacity is brought forward at an appropriate time.

Question 3.7

In terms of vehicular access, is the proposed Garden Neighbourhood deliverable or developable?

50. The Garden Neighbourhood is expected to be served by a variety of access points which will serve as opportunities for vehicular traffic as well as walking and cycling linkages. The variety of access points reflects the different parcels of land that make up the Garden Neighbourhood, the different planning status of each (such as Candlet Road which has outline planning permission) and the master plan approach which expects development to be built in phases.
51. Responses from Suffolk County Council as local highways authority and the various landowners promoting the sites which make up the Garden Neighbourhood support the principal of numerous access points to the allocation. The Council as local planning authority is satisfied that the various access points is of great benefit to the successful implementation of the policy and delivery on the site.
52. The Glossary of the National Planning Policy Framework (Document C1) provides a definition of deliverable. The Council is confident that the site offers a suitable location for development and that there is a realistic prospect that housing will be delivered on the site within the next five years. Consultation responses from Christchurch Land and Estates (Felixstowe) Limited (Rep ID: 1269) indicates that the number of units on the site should be less prescriptive and that development will come forward within the first five years, due to the site benefiting from outline planning permission. As a result, the Housing Trajectory in Appendix D of the Final Draft Local Plan shows development starting within the next five years. The Council is therefore satisfied that the site is deliverable.
53. The Glossary of the National Planning Policy Framework (Document C1) provides a definition of developable. The Council is confident that the site is developable as the site is within a suitable location and that it will be viably developed over the plan period (following the master plan approach). The Housing Trajectory in Appendix D of the Final Draft Local Plan shows development being completed over the plan period. The Council is therefore satisfied that the site is developable.
54. Access to the site is a key component and factor in demonstrating deliverability and developability. However, due to the variety of vehicle access points envisaged and the lack of objections to this on grounds of highways technical specifications, the Council consider the allocation to be justified and effective over the plan period.

Question 3.8

Would the Policy be effective in addressing the needs for off-site infrastructure requirements arising from the scheme?

55. Policy SCLP12.3 contains requirements relating to on-site infrastructure and that which would be secured through Section 106 agreement. As the Community Infrastructure Levy (CIL) is in place, the Council has sought to distinguish between infrastructure which would need to be secured through Section 106 and that which would be provided through the Community Infrastructure Levy, as the mechanism for collecting and distributing funds is very different. It would not be appropriate to include reference in the policy to enhancements of facilities that would be funded by the Community Infrastructure Levy as funding of projects through CIL could not be factored in to the determination of a planning application.
56. The off-site infrastructure provisions related to the development that are anticipated to be funded by CIL include enhancements to provision of additional floor space for primary care in the Felixstowe area, new floor space at the Felixstowe Safer Neighbourhood Team Police Offices, enhancements to the Felixstowe Water Recycling Centre. Other off-site infrastructure, which is necessary for the development to take place, would be funded through Section 106, such as measures identified through the Transport Assessment. This approach reflects the approach taken in relation to all site allocations in the Plan.
57. A Statement of Common Ground has been agreed between the Council and Anglian Water, in response to the representation received on Policy SCLP12.3 (Rep ID: 749), to clarify the position in relation to delivery of capacity in the foul sewage network and water recycling facilities. The following modification to the penultimate paragraph of the Policy is proposed in order to address this: “The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions. ~~and water recycling upgrades undertaken by Anglian Water through the Asset Management Plan~~ Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity will be required, including, but not limited to, water recycling upgrades.”

Question 3.9

Would the Policy be effective in conserving the significance of designated Heritage Assets?

58. The Policy (SCLP12.3) has been informed by a comprehensive North Felixstowe Garden Neighbourhood Heritage Impact Assessment (Document D18). There are no Heritage Assets within the site boundary, however a number lie outside the site boundary. Document D18 finds that this proposed site allocation falls within the setting of three Heritage Assets, these being; Candlet Farmhouse, Gulpher Hall and Park Farm Cottages (Paragraph 7.7), and that the

setting of these assets makes an important contribution to their significance (Paragraph 6.12). Document D18 concludes that development in accordance with the Policy (SCLP12.3) would have less than substantial harm to these Heritage Assets (Paragraph 8.2).

59. Criteria h) and i) of the Policy (SCLP12.3) refer to the need for development proposals to preserve the setting of Listed Buildings in proximity to the site and to undertake a proportionate archaeological assessment. These criteria will help ensure Heritage Assets and their settings identified in Document D18 and any others that come to light in the future, which are likely to be affected by the development of the site, will be given appropriate consideration.
60. Criterion d) encourages the provision of appropriate formal and informal open spaces which is a supported approach in mitigating harm to Heritage Assets, as detailed in paragraph 7.9 of Document D18, “any harm can be mitigated through the inclusion of sufficient open space” (Page 22).
61. Paragraph 7.12 of Document D18 (page 22) finds that the large area of open space displayed on the North Felixstowe Garden Neighbourhood draft indicative masterplan of the Plan (Document A1; page 205) would preserve the existing open setting of Gulpher Hall and its associated outbuildings.
62. The draft indicative masterplan of the Final Draft Local Plan responds to the recommendation detailed at the third bullet point of Paragraph 8.3 of Document D18, through the inclusion of an area of open space directly south of Park Farm Cottages. This amendment respects the rural open character of Park Farm Cottages, which makes a positive contribution to its setting.
63. As the Policy (SCLP12.3) will lead to less than substantial harm to the significance of Heritage Assets affected by the Policy (SCLP12.3), as evidenced at paragraph 8.2 of the Document D18, page 23), emphasis should be placed on the significant public benefit that the Policy (SCLP12.3) would deliver, as stated in paragraph 196 of the Framework. The delivery of a Policy compliant scheme would provide a new leisure centre, a 630 place primary school and early years provision, a community hub comprising a variety of services and facilities, employment land for non-port related small businesses which would be more sympathetic to the surrounding historic and natural environment, and a mix of up to 2,000 dwellings to meet the needs of local people including those for older, younger and vulnerable people.

Question 3.10

Would the Policy be effective in mitigating any potential significant effects on the Deben Estuary SPA?

64. Policy SCLP12.3 lies in close proximity to the Stour and Orwell Estuary SPA/Ramsar sites and the Deben Estuary SPA/Ramsar sites.

65. The Habitats Regulations Assessment of the Final Draft Local Plan (Document A4) identified a need for the provision of Suitable Alternative Natural Greenspace (SANG) to mitigate the impact of increased recreation pressure on European designated wildlife sites. The requirement for the Masterplan work to be informed by a project level Habitats Regulation Assessment and to include provision of SANG has been included in criteria f) of policy SCLP12.3.
66. The Habitats Regulations Assessment (Document A4, paragraph 5.8) provides good practice guidance on effective SANG design. This includes the provision of a minimum of 8ha of SANG per 1,000 residents. As stated in the HRA (Document A4, paragraph 5.8) resident numbers are usually calculated on the basis of 2.4 residents per dwelling and this is considered appropriate at the plan making stage to ensure that there is scope to deliver SANG within the allocation.
67. The indicative draft masterplan on page 205 of the Final Draft Local Plan includes areas for informal/ formal open space which equate to approximately 47 ha. This is comfortably within the indicative requirement for 28 ha of SANG on the basis of the standards set out in the HRA report and would also provide other forms of open space such as more formal areas that should not be included as part of a SANG..
68. It is considered appropriate that the policy does not require a specific size of SANG, and that this should be determined through the masterplanning process, informed by the project level HRA as required by the criteria in Policy SCLP12.3. This allows some flexibility at the masterplanning stage, whilst having certainty at a Local Plan level that the required quantity and quality of SANG can be delivered.
69. The supporting text to policy SCLP12.3 (paragraph 12.37) is clear that the development will also be required to contribute to the Recreation Avoidance and Mitigation Strategy in accordance with Policy SCLP10.1.

Question 3.11

Would the proposed allocation safeguard the character and appearance of North Felixstowe?

70. The Strategy for Felixstowe set down in Policy SCLP12.2 and the Garden Neighbourhood as detailed in Policy SCLP12.3 acknowledge that the town and the allocation are influenced by the designated landscape and countryside locations surrounding the town.
71. The Local Plan has been informed by the Landscape Character Assessment (Document D20) and the Settlement Sensitivity Assessment (Document D22) which outline the specific landscape character areas across the District and identify sensitive locations. The findings of the landscape evidence have been used to guide Local Plan strategies and allocations and ensure that local characteristics are identified and protected.

72. The Council has also undertaken a Heritage Impact Assessment for the North Felixstowe Garden Neighbourhood (Document D18) which identifies areas of historic interest in close proximity to the sites allocated under Policy SCLP12.3. The historic assets identified in the Heritage Impact Assessment each make a contribution to the character and appearance of North Felixstowe and it is essential that these local assets are accounted for through the master planning stages which will guide the future development of the area.
73. A key element of the Garden Neighbourhood is the provision of Suitable Alternative Natural Greenspace to be provided. The requirement for SANG is a key component of the requirements under the Habitats Regulation Assessment and is necessary to ensure that the Garden Neighbourhood achieves sustainable development. The provision of SANG has recreational benefits to mitigate any potential impacts on protected sites in the District, but also has benefits in safeguarding the existing character and appearance of North Felixstowe through appropriate green infrastructure.
74. Development in this area will have an impact on the character and appearance of the area, but this will be greatly reduced through the master planning and policy requirements that require consideration of integration with the surrounding landscape, sensitivity to the heritage assets in the area and also the need to address the statutory requirements under the Habitats Regulation Assessment.

Question 3.12

Should the Master Plan be informed by the landscape character of the Suffolk Coast and Heaths AONB?

75. The Council is confident that the Final Draft Local Plan reflects the relationship of the Garden Neighbourhood with the Area of Outstanding Natural Beauty, as referenced in paragraph 12.35. It is also acknowledged that the Suffolk Coast and Heaths AONB unit will be part of the collaborative work anticipated through the master planning process as outlined in paragraph 12.32.
76. Representation 227 from the Suffolk Coast and Heaths AONB Unit suggests the inclusion of a new policy criterion to reference the natural beauty and special qualities of the AONB. Due to the information in the supporting text and the proximity of the Garden Neighbourhood to the AONB, the Council believe the AONB would be an important consideration as part of any development proposals. However the Council are satisfied that the addition of this criterion would be a positive policy requirement to ensure that the landscape character is taken into account.
77. It is noted that a similar requirement is already included within Policy SCLP12.2 (j) which reads “The protected habitats and designated landscapes are protected from inappropriate development and access to the countryside is enhanced.”

78. Based on the representation the Council suggest the following text is added to Policy SCLP12.3 as an additional criterion to read “s) Assessment of the impacts of Garden Neighbourhood proposals on the Natural Beauty and Special Qualities of the Area of Outstanding Natural Beauty.” This has been agreed through a Statement of Ground with the AONB Team.

Policy SCLP12.4: Land North of Conway Close and Swallow Close, Felixstowe

Question 3.13

Would the policy be effective in conserving and enhancing the landscape and scenic beauty of the Suffolk Coast and Heaths AONB?

79. The AONB Unit (Rep ID: 228) have made representations to the Final Draft Local Plan suggesting that additional policy criteria is added to Policy SCLP12.4. The allocation is an existing allocation carried forward from the Felixstowe Peninsula Area Action Plan (Document F3) as the Council consider it still to be a developable allocation.
80. The Settlement Sensitivity Assessment (Document D22) on page 14, highlights that the rural character of the northern fringes of Felixstowe are important to retain and this has been identified in Policy SCLP12.3 which requires proposals for the Garden Neighbourhood to take into account the Suffolk Coast and Heaths AONB and its setting. As the allocation SCLP12.4, Land North of Conway Close and Swallow Close is adjacent to the Garden Neighbourhood it is considered important and effective to include similar requirements within the policy.
81. To provide additional guidance to future applicants and the Council as decision maker on any future planning application, supporting text is also required to be added to the Final Draft Local Plan.
82. The Council and the AONB unit have been able to agree a Statement of Common Ground on this matter and propose the following additions to paragraph 12.63 and Policy SCLP12.4.

Amend paragraph 12.63 to read:

“The properties on Conway Close, Swallow Close and Upperfield Drive currently define the edge of the built up area of Old Felixstowe with countryside to the north. The land to the north of Conway Close and Swallow Close can provide a natural extension to the built form of Felixstowe without causing a detrimental impact on the Area of Outstanding Natural Beauty or important views of the Deben Estuary. Understanding the potential impact on the natural beauty and special qualities of this area and identifying appropriate mitigation measures to be delivered on site will be necessary to help conserve and enhance the nationally designated landscape.”

Add an additional criterion to Policy SCLP12.4:

“n) A Landscape and Visual Impact Assessment will be required, and any mitigation provided, including a lighting strategy to conserve and enhance the nationally designated landscape.”

Policy SCLP12.5: Land at Brackenbury Sports Centre

Question 3.14

Would the Policy be effective in conserving the significance of the Grade II listed Tyndale House?

83. As currently worded the Policy (SCLP12.5) would benefit from revisions in relation to conserving the significance of the Grade II listed Tyndale House. Thus, the Council would support a modification to address this issue and is engaging with Historic England to enter into a Statement of Common Ground in this respect.

Question 3.15

Is the Policy justified and consistent with paragraph 97 of the Framework which states that existing open space, sports and recreational buildings should not be built on except in specified circumstances?

84. The Council is confident that Policy SCLP12.5 which guides the future redevelopment of land at Brackenbury Sports Centre is justified and provides clarity on the circumstances under which redevelopment may take place.
85. Enhancing and re-developing modern leisure centre and sports hub facilities in the District is a specific action of the East Suffolk Business Plan (Document G1, page 15). The action identified in the East Suffolk Business Plan is a long standing commitment of the Council which has seen the redevelopment and modernisation of Deben Leisure Centre in Woodbridge and Leiston Leisure Centre in recent years. The provision of a new leisure centre in Felixstowe as part of the Garden Neighbourhood (Policy SCLP12.3) is part of the same redevelopment programme and also includes consideration of existing sites (such as Brackenbury Sports Centre and Felixstowe Leisure Centre).
86. Policy SCLP12.5 proposes residential uses on a site which is currently a sports centre, but only at a time when new leisure facilities have been brought into operation as part of the Felixstowe Garden Neighbourhood. The policy position ensures that existing sports and recreational facilities are maintained at all times and that the site is not redeveloped ahead of alternative provision being brought into use.

87. Paragraph 97 of the National Planning Policy Framework seeks to ensure that existing open space, sports and recreational buildings and land are not built on. However, criteria a), b) and c) provide circumstances which may enable this redevelopment. In the case of Policy SCLP12.5, Paragraph 97(b) is relevant in that the potential loss resulting from the redevelopment at Brackenbury will be replaced by better provision in terms of quantity and quality in a sustainable location (North Felixstowe Garden Neighbourhood).
88. Sport England (Rep ID: 669) have suggested that the policy should be amended to ensure that all facilities currently operating from Brackenbury are re-provided on a new site prior to the loss of the existing facility. The Council as local planning authority consider that this wording would be too restrictive and would not result in a positively prepared and effective requirement. Requiring all facilities currently operating at Brackenbury to be re-provided on a new site restricts flexibility of approach and may lead to uses which are reducing in use and participation being re-provided which is not sustainable. The Council considers that the current wording of Policy SCLP12.5 is justified and ensures that the operators and the community engagement (through the master plan process associated with the Garden Neighbourhood) can be undertaken in a positive manner.
89. The Council has demonstrated through the redevelopment in Leiston and Woodbridge, that new facilities provide better provision in terms of quantity and quality and there is no reason to expect anything different in Felixstowe.

Policy SCLP12.7: Port of Felixstowe

Question 3.16

Is it justified that all development proposals at the site should be subject to Habitats Regulations Assessment Screening given that some forms of development may not be capable of affecting the designated interest features of European Sites?

90. The requirement that all development proposals at the site should be subject to HRA screening was included in response to the Habitats Regulation Assessment (Document A4) and advice from Natural England. The approach is considered to be in accordance with the Conservation of Habitats and Species Regulations 2017, as amended.
91. The Port of Felixstowe lies adjacent to the Stour and Orwell Special Protection Area (SPA) and Ramsar site. While it is acknowledged that not all development at the site will have an adverse effect on the designated interest features of the SPA and Ramsar site, the Habitats Regulations require a precautionary approach, and for competent authorities to use HRA to demonstrate that adverse effects can be ruled out. HRA includes an initial screening stage and a more detailed appropriate assessment stage. The HRA screening process is the correct

vehicle for checking the nature of the development and concluding whether significant effects are likely. Further assessment will only be required where a likely significant effect is concluded.

92. Any HRA screening should be proportionate to the scale of the proposals and does not therefore represent an overly onerous requirement. It makes sure that the duties of the competent authority are met, and that there is a record of the checks made.

Policy SCLP12.8: Land at Bridge Road, Felixstowe

Question 3.17

Should part e) of the Policy be split into 2 parts to be effective?

93. Yes, the Council consider the wording of criterion e) of Policy 12.8 as currently written in the Final Draft Local Plan (Document A1) is a typographical error which does not impact the soundness of the plan.
94. The Council proposes the policy be amended to read:
- “e) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity or that capacity can be made available;
f) Landscaping of boundaries to be introduced to enhance the appearance of the site; and
g) Hours of operation to be limited by planning condition to resist over intensification.”
95. This modification as been agreed with Anglian Water through the Statement of Common Ground.

Policy SCLP12.9: Land at Carr Road/Langer Road, Felixstowe

Question 3.18

Given the proximity of the Felixstowe Water Recycling Centre, is the Policy consistent with paragraph 182 of the Framework and would it enable new development to integrate effectively with the existing water recycling facilities?

96. Paragraph 182 of the NPPF requires planning policies to ensure that new development can be effectively integrated with existing businesses and community facilities, and that existing businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Due to the close proximity of Felixstowe

water recycling centre to this allocation, Anglian Water have raised concerns in their representations (Rep ID: 825) regarding the continuous operation of the water recycling centre and the amenity of future occupants. The Council has sought to address these concerns through a Statement of Common Ground with Anglian Water which includes a modification as detailed below.

97. The Council has agreed, through a Statement of Common Ground, with Anglian Water to the following modification as additional criteria for Policy SCLP12.9: “Ensure that the risk of odour and other amenity impacts from Felixstowe Water Recycling Centre is not detrimental to the amenity of occupants or to the continuous operation of Felixstowe Water Recycling Centre. Where there is a potential impact on amenity, evidence should be provided to demonstrate that there is no unacceptable impact on the occupiers of the employment land and that any mitigation can be achieved without detriment to the continuous operation of Felixstowe Water Recycling Centre” to ensure that the policy is consistent with paragraph 182 of the NPPF and that new development will be able to integrate effectively with the existing water recycling facilities. The modification requires developments to address any risk of odour or other amenity impacts from the nearby Felixstowe Water Recycling Centre without affecting the continuous operation of the water recycling centre itself. As part of the modification, evidence will be required to demonstrate this.
98. With this modification, the policy is considered to be consistent with paragraph 182 of the NPPF as it requires any impact to be reduced to an acceptable level through provision of evidence demonstrating such. The modification also balances the impact on proposed development and nearby existing development to ensure that new development can be integrated effectively with existing development, in line with paragraph 182 of the NPPF.

Policy SCLP12.14: Spa Pavilion to Manor End

Question 3.19

Would the Policy be effective in sustaining and enhancing the significance of the Conservation Area and is it consistent with national policy in this regard?

99. As detailed in Paragraph 200 of the Framework, Local Planning Authorities should look for opportunities for development within Conservation Areas and within their setting to enhance or better reveal their significance. Policy SCLP12.14 aims to achieve this goal by encouraging appropriate uses in this prominent location that respect the character of the Conservation Area. The first paragraph of the Policy (SCLP12.14) responds to the objective of paragraph 200 of the NPPF by requiring development in this area to “be of a high quality design that respects the town’s heritage.”

100. However, in order to ensure the significance of the Conservation Areas are sustained and enhanced the Council would support a modification and is engaging with Historic England to enter into a Statement of Common Ground to agree wording in this respect.
101. Reference to a single Conservation Area in the final Paragraph of the Policy (SCLP12.14) requires modification as there are two Conservation Areas within the area of the Policy (SCLP12.14). The Council would support a modification to address this issue and is engaging with Historic England to enter into a Statement of Common Ground to agree wording in this respect.

Policy SCLP12.16: Felixstowe Leisure Centre

Question 3.20

Is the Policy consistent with paragraph 97 of the Framework which states that existing open space, sports and recreational buildings should not be built on except in specified circumstances?

102. The Council is confident that Policy SCLP12.16 which guides the future redevelopment of land at Felixstowe Leisure Centre is justified and provides clarity on the circumstances under which redevelopment may take place.
103. Enhancing and re-developing modern leisure centre and sports hub facilities in the District is a specific action of the East Suffolk Business Plan (Document G1, page 15). The action identified in the East Suffolk Business Plan is a long standing commitment of the Council which has seen the redevelopment and modernisation of Deben Leisure Centre in Woodbridge and Leiston Leisure Centre in recent years. The provision of a new leisure centre in Felixstowe as part of the Garden Neighbourhood (Policy SCLP12.3) is part of the same redevelopment programme and also includes consideration of existing sites (such as Brackenbury Sports Centre and Felixstowe Leisure Centre).
104. Policy SCLP12.16 proposes resort, tourist and visitor uses that support both the day time and night time economy on a site which is currently a Leisure Centre, but only at a time when new leisure facilities have been brought into operation as part of the Felixstowe Garden Neighbourhood. The policy position ensures that the existing Leisure Centre facility is maintained at all times and that the site is not redeveloped ahead of alternative provision being brought into use.
105. Paragraph 97 of the National Planning Policy Framework seeks to ensure that existing open space, sports and recreational buildings and land are not built on. However, criteria a), b) and c) provide circumstances which may enable this redevelopment. In the case of Policy SCLP12.5, Paragraph 97(b) is relevant in that the potential loss resulting from the

redevelopment of Felixstowe Leisure Centre will be replaced by better provision in terms of quantity and quality in a sustainable location (North Felixstowe Garden Neighbourhood).

106. The Council has demonstrated through the redevelopment in Leiston and Woodbridge, that new facilities provide better provision in terms of quantity and quality and there is no reason to expect anything different in Felixstowe.

Question 3.21

Are criteria b) and i) which relate to the town centre and residential accommodation respectively clear as to how a decision maker should react to development proposals?

107. Criterion b) has been included within Policy SCLP12.16 to highlight that town centre uses which are sequentially preferable to be located within the town centre should be directed to those locations. However, within the definition of resort, tourist and visitor uses, future development proposals may expect retail development or other uses defined as “main town centre uses” by the National Planning Policy Framework (Document C1).
108. In respect of criterion i) the Council is satisfied that the Policy is clear when read alongside paragraph 12.164 of the Final Draft Local Plan (Document A1). Paragraph 12.164 introduces the concept of residential opportunities on upper floors and is clear that this use is acceptable where it does not cause conflict with the predominant use of the site.
109. Policy SCLP12.16 seeks to facilitate the redevelopment of the site through a positive allocation which secures the continued use of the area for resort, tourist and visitor uses. The redevelopment opportunity which comes about through the relocation of leisure uses to the North Felixstowe Garden Neighbourhood is a once in a generation chance to further contribute to Felixstowe’s future. Enabling the provision of limited residential uses on the upper floors of any development will have a positive impact on the redevelopment of the site and that in turn will be positive for Felixstowe and the rest of the District.
110. At such a time when redevelopment opportunities are proposed, following the relocation of leisure facilities to the Garden Neighbourhood, the decision maker will be afforded the satisfaction that the leisure uses and recreational opportunities have been retained which is a fundamental part of the project. The policy provides flexibility for a decision maker to identify opportunities that may come forward through development proposals. Providing a flexible but proactive policy will ensure that the decision maker is able to react positively and identify the benefits of the scheme coming forward. The decision maker will also have the ability to refuse any proposals which do not deliver the resort, tourist and visitor uses anticipated as a

result of this “once in a generation” opportunity as outlined in paragraph 12.160 of the Final Draft Local Plan.

Question 3.22

Would the Policy be effective in sustaining and enhancing the significance of the Conservation Area and is it consistent with national policy in this regard?

111. Criterion d) of the Policy (SCLP12.16) and Paragraph 12.164 only refer to Felixstowe South Conservation Area. However, any development on this site will need to consider the impacts on the significance of both Felixstowe Conservation Area and Felixstowe South Conservation Area. In addition, in order to ensure the development of this prominent site appropriately accords with Paragraph 200 of the Framework in sustaining and enhancing the significance of the two Conservation Areas the Council would support a modification and is engaging with Historic England to enter into a Statement of Common Ground and agree wording in this respect.

Policy SCLP12.18: Strategy for Communities Surrounding Ipswich

Question 3.23

Would the strategy be effective in addressing the potential impacts of development on the transport networks consistent with the policies of the Framework?

112. The Policy sets the strategy for the communities surrounding Ipswich, and it is important to note that other policies in the Plan set out criteria in relation to considering and mitigating the transport impacts of development, including policies SCLP2.2 and SCLP7.1 with modifications as put forward under the Council’s responses to Inspector’s questions 2.35 and 4.21. As stated in paragraph 12.173 of the Final Draft Local Plan, this part of the plan area has a strong relationship with Ipswich including through the road corridors which provide access into and out of Ipswich town centre.
113. It is acknowledged that issues related to capacity on the highways are particularly apparent in and surrounding Ipswich. The Ipswich Strategic Planning Area (ISPA) authorities have co-operated throughout the preparation of their respective Local Plans on assessing impacts from growth on the highways network. The assessment of potential impacts on the highways network has been undertaken using the Suffolk County Transport Model, which has been developed as a model which can be used across the county for assessing impacts on the highways network, as a result of development and infrastructure changes. For the assessment

of impacts from growth planned for through Local Plans on the ISPA, this has been undertaken as follows:

- Local Plan Modelling for Babergh and Mid Suffolk, Ipswich and Suffolk Coastal – Methodology Report (August 2018) (Document D29) and Local Plan Modelling for Babergh and Mid Suffolk, Ipswich and Suffolk Coastal – Forecasting Report – Volume 1: Suffolk Coastal and Ipswich (August 2018) (Document D30) – this represents the initial stage of testing options for the Suffolk Coastal Local Plan.
- Local Plan Modelling for Babergh and Mid Suffolk, Ipswich and Suffolk Coastal – Methodology Report (January 2019) and Local Plan Modelling for Babergh and Mid Suffolk, Ipswich and Suffolk Coastal – Forecasting Report – Volume 2: Suffolk Coastal and Ipswich Preferred Option (January 2019) – this represents the testing of the ‘preferred option’ which is the development planned for within the Final Draft Local Plan, alongside preferred options for Ipswich and development options for Babergh and Mid Suffolk.

114. The modelling has identified that there would a number of locations where the highways network is likely to experience issues related to capacity by 2036, including the junctions on the A14 within the ISPA. The ISPA Councils are aware of ongoing capacity issues at these junctions, and the transport modelling has confirmed the extent of these issues in 2036.
115. The cumulative impacts associated with growth in the Local Plans in the ISPA are particularly evident within Ipswich Borough and on the A14 junctions. The issues identified are therefore particularly relevant to the communities surrounding Ipswich.
116. The position outlined above is reflected in the representation received from Suffolk County Council to the Final Draft Local Plan (Rep ID: 1072). This states that the impacts on the highway network outside of Ipswich are significant but of a scale which could reasonably be mitigated to an acceptable degree. The representation states that it is the impact on the junctions of the A12 and A14, within Highways England’s control, that could require a mixture of measures and where funding is less certain. The representation identifies that in principle, impacts within Ipswich could be mitigated largely by a Smarter Choices package of incentives and sustainable transport improvements to routes, infrastructure and services) enabling and encouraging significant modal shift. This would require a secure funding mechanism and commitment from the Ipswich Strategic Planning Area local planning authorities.
117. It is recognised that mitigation will involve a range of measures, and the focus should be on sustainable options to encourage sustained modal shift. Paragraph 102 of the National Planning Policy Framework (Document C1) requires opportunities to promote walking, cycling and public transport to be pursued, and this also takes forward local and national ambitions around healthy lifestyles. Broad mitigation measures to address these identified impacts are set out in the Infrastructure Delivery Framework to the Final Draft Local Plan (Appendix B).

118. In order to provide additional clarity in relation to the mitigation measures, East Suffolk Council and the County Council, along with Ipswich Borough Council, Babergh District Council and Mid Suffolk District Council, commissioned further work in relation to the transport modelling. Additional modelling has considered further the potential for modal shift (i.e. journeys undertaken by non-car modes and a reduction in single occupancy car trips) and has considered forecasts for both 2026 and 2036, in order to inform the phasing of mitigation throughout the Plan period and delivery of mitigation by Highways England on the Strategic Road Network.
119. The additional modelling assessed a reduction in existing trips and future development trips in the highway network in Ipswich, focussing on the AM and PM peak periods to address commuting. The trip adjustment considered the current level of trips by distance from Ipswich town centre and the nature of the trip, i.e. urban or rural. This work has shown that the adjustments in relation to modal shift reduce the number of junctions which exceed 85% capacity (in the AM or PM peak), and highway network links that exceed 100% capacity, however, there are still residual impacts within Ipswich. This is set out in the ISPA Local Plan Modelling Forecasting Report (August 2019) (Document H31), and the associated ISPA Local Plan Modelling Methodology Report (August 2019) (Document H30).
120. A Technical Note relating to impacts on the Strategic Road Network (Document H32) accompanies the above reports and considers the potential for infrastructure improvements at the junctions on the A14 in addressing the capacity issues. The measures are those which have been put forward for funding under Highways England's Roads Improvement Scheme 2; this funding decision is outstanding. The mitigation that would be provided by improvements at these junctions would need to be assessed as part of detailed design and include factors in addition to ISPA local plan growth.
121. Based upon the outputs above, in order to prioritise sustainable transport options and to ensure that significant impacts can be mitigated to an acceptable degree and that any severe impacts can be avoided, Suffolk County Council (in conjunction with the ISPA Local Planning Authorities) has undertaken further analysis of potential measures, costs and funding mechanisms. This identifies a phased minimum package of measures which will be needed. These include a 'Smarter Choices' approach, which would include working with businesses to address methods of travel; the introduction of a quality bus partnership; measures related to park and ride; and parking strategies, in addition to local junction improvements. Developer contributions will be required to fund the mitigation, in combination with other funding sources which become available. There is also a role for the Suffolk Local Transport Plan (Document H23) (which is currently being refreshed) in supporting the implementation of the required measures, although recognising that there is no guaranteed funding identified for this at this point in time. Alongside this, Highways England have made the authorities aware

of measures which could be undertaken on the Strategic Road Network in order to manage traffic volumes to improve the operation of junctions and the network in the short term as described in the Statement of Common Ground between the Council, Suffolk County Council and Highways England.

122. An overview of the work described above, and the mitigation measures that will need to be pursued collectively including the likely costs was presented to the Ipswich Strategic Planning Area Board at its meeting on 22nd July 2019. The Draft Action Notes from the meeting (appended to this statement) explain that the Board acknowledge there is a need to progress with the work to produce a mitigation strategy which would include the identification of appropriate funding sources and mechanisms across all ISPA authorities, with further detail to be discussed at future Board meetings.
123. Based upon the above, whilst policies SCLP2.2 Strategic Infrastructure Priorities and SCLP7.1 Sustainable Transport would act to address these issues, for clarity and considering that this area has a close relationship with Ipswich, the Council would support a modification to the second paragraph of Policy SCLP12.18 and to the supporting text as set out below, and in the Statement of Common Ground between the Council and Suffolk County Council. (Note that related modifications have also been agreed with Suffolk County Council in relation to SCLP2.2 Strategic Infrastructure Priorities and SCLP7.1 Sustainable Transport).

Additional paragraph after 12.177

“Development in the Ipswich Strategic Planning Area is predicted to collectively add to significant strain on the transport network in and around Ipswich. Additional highway capacity will not on its own address these issues and the ISPA authorities agree that robust steps must be taken to prioritise healthy and sustainable travel. A package of transport mitigation measures has been identified to reduce vehicle movements. Suffolk County Council as the Highway Authority has developed a strategy which contains a package of mitigation measures to deliver modal shift and mitigate impacts on the wider Ipswich highways network. The Council will work with the other authorities across the ISPA to ensure that there is a co-ordinated approach to funding the mitigation through the delivery of the Local Plan.”

Modification to second paragraph of policy:

“Provision of appropriate community infrastructure, education facilities and public transport will be supported where the needs are clearly demonstrated. Development will be expected to maximise its contribution to sustainable transport and promotion of modal shift in order to contribute to the delivery of new and enhanced sustainable transport measures in and around Ipswich.”

Policy SCLP12.19: Brightwell Lakes

Question 3.24

Would the Policy be effective in conserving the significance of the Scheduled Monuments within and close to the site?

124. Reference is made to Scheduled Monuments in paragraph 12.185, as follows: “There are Scheduled Monuments within and in close proximity to the site, including a scheduled bowl barrow and pill box, and development will need to ensure that these are protected.”
125. Throughout the determination of planning applications at Brightwell Lakes (Application Ref: DC/17/1435/OUT) the impact on heritage assets on and close to the site has been thoroughly considered and any harm has been addressed through appropriate mitigation measures, including the provision of a Heritage Park. The Council would support a modification to address the Heritage Park and is engaging with Historic England to enter into a Statement of Common Ground in this respect. A modification would make the Policy (SCLP12.19) effective in conserving the significance of Scheduled Monuments within and close to the site.

Policy SCLP12.21: Ransomes, Nacton Heath

Question 3.25

**Is the proposed allocation consistent with paragraph 172 of the Framework?
Where is the evidence that the proposed allocation has regard for the purpose of conserving and enhancing the natural beauty of the AONB?**

126. Paragraph 172 of the NPPF states that:
- ‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these areas. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads.’
127. Policy SCLP12.21 carries forward the allocation of 30ha of land for employment uses from the Site Allocations and Area Specific Policies Development Plan Document (January 2017) (Document F2) where it is allocated under Policy SSP20. Outline planning permission for development on 26.6ha of the site was granted in June 2018 under permission DC/17/4257/OUT. The principle of employment development on the site is therefore established.

128. Paragraph 12.199 of the Final Draft Local Plan recognises that this part of the AONB has a degree of physical and visual separation from areas of the AONB lying to the south, having been severed from the larger AONB designation by the construction of the A14 in 1980. Criterion a) of Policy SCLP12.21 however recognises that the site is located within the AONB and would expect that development accords with ‘Minimising impact on landscape including the national designated Area of Outstanding Natural Beauty, including through the use of appropriate mitigation measures, informed through landscape and visual impact assessment.’ Through this criterion, the policy has regard to the requirement to conserve and enhance the landscape and scenic beauty of the AONB, reflecting paragraph 172 of the NPPF, within the context of its location as described in paragraph 12.199.
129. Paragraph 12.200 of the Final Draft Local Plan refers to a previous agreement with the Suffolk Coast and Heaths AONB Partnership in relation to the principle of development on the site. This was set out in the form of a Statement of Common Ground dated 2016, which was produced to accompany the allocation of the site in the Site Allocations and Area Specific Policies Development Plan Document (Document F2). This is appended to the Statement of Common Ground with the AONB Team which has been produced in relation to the current Examination. The Statement of Common Ground states that the AONB Partnership do not have an objection in principle to the allocation of the site, subject to certain safeguards. It should be acknowledged that since the production of the Site Allocations and Area Specific Policies Development Plan Document, an outline planning permission has been granted in advance of the Council producing a development brief as was expected under SSP20. The position has therefore been reflected and updated in the Final Draft Local Plan, including that any development proposals should explicitly consider the needs of the AONB and take heed of national and local policy to conserve and enhance its natural beauty and special qualities and where this is not achieved, be appropriately mitigated.
130. Through the consideration of further planning applications for the site, including the consideration of reserved matters applications, criterion a) would therefore require that the impact on the AONB is minimised. Policy SCLP10.4 would also be relevant, and this states that ‘Conserving and enhancing the landscape and scenic beauty of the AONB is of particular importance.’
131. The Council proposes a modification to correct a typographical error in relation to paragraph 12.198, as set out below. This does not affect the soundness of the Plan.

“Outline planning permission was granted in June 2018 for B8 development under application ~~DC/17/4527/OUT~~ DC/17/4257/OUT which relates to 26.6ha of the site.”

Policy SCLP12.22: Recreation and Open Space in Rushmere

Question 3.26

Is the identification of recreation and open space land under Policy SCLP12.22 justified?

132. As identified in paragraph 12.204 the area of Recreation and Open Space in Rushmere has been identified in previous Local Plans in recognition of the relatively small area of open space separating Rushmere village from the edge of the built area of Ipswich.
133. The land identified under Policy SCLP12.22 is within the area identified as 'Land northeast of Ipswich IP2 (Suffolk Coastal)' in the Settlement Sensitivity Assessment Volume 1 – Landscape Fringes of Ipswich (July 2018) (Document D21, pages 17-18). The analysis on page 17 explains that the sensitivity of this area lies in the open land which separates the historic villages of Rushmere (and Westerfield) from Ipswich.
134. Policy SCLP12.22 also reflects the distinctive nature of this area of land in relation to the provision of sports and recreation facilities, by clarifying that such uses remain appropriate in the context of protecting the open nature of the land.
135. The identification of the area of Recreation and Open Space in Rushmere through Policy SCLP12.22 is therefore justified.

Policy SCLP12.24: Land at Humber Doucy Lane

Question 3.27

What is the justification for the allocation of land at Humber Doucy Lane coming forward beyond 2031? Is Policy SCLP12.24 developable within the plan period?

136. Land at Humber Doucy Lane is an allocation under Policy SCLP12.24 for the development of 150 dwellings to come forward post 2031. The site has been promoted as part of a larger area which includes land within Ipswich Borough, as indicated on the Draft Masterplan submitted by Kesgrave Covenant under representation 1170. Reflecting the tightly drawn boundary of Ipswich Borough, the Councils have sought to co-operate on the consideration of this area of land in a sustainable location to realise the opportunity for development on the edge of Ipswich, and assist in meeting the housing need for Ipswich within the Borough.

137. Policy SCLP12.24 therefore requires the site to come forward as part of a master planned approach with the land in Ipswich Borough. This is reflective of the position as outlined in paragraph 12.210 which identifies that the access would be required through land in Ipswich Borough.
138. The position is reflected in the Ipswich Strategic Planning Area Statement of Common Ground (Document A13, Page 12), which identifies that complementary policies are included within the Ipswich Core Strategy and Policies DPD Review Preferred Options (November 2018) and within the Suffolk Coastal Final Draft Local Plan (Policy SCLP12.24). Draft Policy ISPA4 on Page 30 of the Ipswich Core Strategy and Policies DPD Review Preferred Options (November 2018) (Document H29) identifies a broad location for future housing growth on the land within Ipswich Borough and identifies that development at this location would substantially follow that at Ipswich Garden Suburb and would not come forward prior to 2031.
139. Paragraph 12.215 of the Final Draft Local Plan identifies that the site is to come forward post 2031 to enable the delivery of the Ipswich Garden Suburb to become well established. Ipswich Garden Suburb is an existing allocation for a mix of uses including 3,500 dwellings under Policy CS10 of the Ipswich Core Strategy and Policies Development Plan Document Review (February 2017). The garden suburb comprises three neighbourhoods – Henley Gate, Fonnereau and Red House. Red House is the area which is located between Westerfield Road and Tuddenham Road and is therefore most closely related to the Land at Humber Doucy Lane. The development at Red House would include a school. The other areas of land at the Garden Suburb are currently subject to outline and hybrid planning applications which are awaiting decisions.
140. Paragraph 12.219 explains that Rushmere Hall School is operating close to capacity and is forecast to exceed capacity. Provision at the Red House area of Ipswich Garden Suburb provides opportunities for additional spaces to be available, however this is unlikely to come forward in the early part of the plan period.
141. In order to enable the site to come forward in a masterplanned way including land within Ipswich Borough and to ensure that infrastructure capacity is available, it is therefore justified that the allocation of land at Humber Doucy Lane under Policy SCLP12.24 of the Suffolk Coastal Local Plan would be planned to come forward after 2031. Identifying the site within this Local Plan provides certainty to communities and Ipswich Borough Council in relation to the development of this site.
142. The definition of ‘developable’ is set out within the glossary to the NPPF. This states:
- ‘To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.’ Paragraph 67 (b) of the NPPF states that planning policies should identify a supply of ‘specific, developable sites or broad locations for growth for years 6-10 and, where

possible, for years 11-15 of the plan.’ As the plan covers the period 2018 – 2036 the land at Humber Doucy Lane would not be coming forward prior to year 11-15 in terms of this paragraph.

143. The site has been made available to the Council (and to Ipswich Borough Council) for inclusion within the Local Plans as a site allocation. A representation to the Final Draft Local Plan (Rep ID:1170) on behalf of the landowner, Kesgrave Covenant Ltd, demonstrates that the site, including land in Ipswich Borough, is available for development. The site has been judged to be in a suitable location for housing development initially through the Strategic Housing and Economic Land Availability Assessment (Document D10, pages 473-474) which has identified it as a potentially suitable site. In considering the site as a potential site allocation, consideration has been given to a range of factors including infrastructure capacity. The site is also adjacent to the urban edge of Ipswich providing relatively good access to services and facilities as reflected in the Sustainability Appraisal Report (Document A3, pages 519 – 521). Criteria in Policy SCLP12.24 reflect the site assessment process and would ensure that development that comes forward addresses any potential impacts, as well as delivering enhancements such as through contributing to the creation of a ‘green rim’ around Ipswich. The infrastructure required to support the development, including education, early years, sustainable transport measures and health facility enhancements, is also set out in the supporting text, the policy and the Infrastructure Delivery Framework in Appendix B of the Final Draft Local Plan.
144. Pertinent to the consideration of this site has been the potential to plan positively with neighbouring Ipswich Borough Council in relation to meeting housing needs and to developing policy for the site which supports the strategies of both Local Plans. The Whole Plan Viability Assessment for the Suffolk Coastal Local Plan (Document D38) identifies through a typology approach to viability that development of the site, which would fall within the mid value greenfield typology, would be viable.
145. The site can therefore be considered to be developable in the context of the NPPF.

Policy SCLP12.25: Suffolk Police HQ, Portal Avenue, Martlesham

Question 3.28

Is Policy SCLP12.25 consistent with the policies of the Martlesham Neighbourhood Plan?

146. The Council has sought to take forward the policies and objectives of the made Martlesham Neighbourhood Plan (July 2018) (Document F8) where possible through the policy for the allocation of the Suffolk Police Headquarters site. Whilst there is no policy or legal

requirement for the Local Plan to be consistent with the Neighbourhood Plan the Council has nevertheless sought to take opportunities to advance the policies and objectives of the Neighbourhood Plan where this is appropriate within the context of the strategy and policies of the Local Plan. The policies of the Martlesham Neighbourhood Plan shall remain part of the Development Plan and will be applied in the consideration of planning applications until such time as they are reviewed or where there is a conflict with policies in a more recently adopted plan as per Section 38(5) of the Planning and Compulsory Purchase Act 2004 (as amended).

147. The Council understands that the Police Headquarters site was not made available for consideration as a housing allocation through the production of the Neighbourhood Plan, however it has since been made available to the Council for consideration as an allocation in the Local Plan.
148. The site is located within the Physical Limits Boundary as identified under Policy MAR1 in the Martlesham Neighbourhood Plan (Document F8, pages 18-19 and page 63) and the principle of development on the site is therefore accepted, subject to compliance with other planning policies.
149. The Final Draft Local Plan takes forward the policies and objectives of the Martlesham Neighbourhood Plan in the following ways:

Paragraph 12.227 of the Final Draft Local Plan acknowledges that Policy MAR5 of the Martlesham Neighbourhood Plan (Document F8, page 29) identifies a need for bungalows, flats and sheltered accommodation. Policy SCLP12.25 therefore includes an expectation under criterion a) that development of the site would deliver flats and a mix of residences to meet local needs.

Paragraph 12.228 of the Final Draft Local Plan identifies that the Martlesham Neighbourhood Plan (Document F8, page 34 and page 60) would support measures to address a lack of sports facilities and the under use of facilities at the Police Headquarters site. Criterion j) therefore would expect that development of the site would incorporate the provision of sports facilities for community use. It should be noted that an modification is proposed in relation to paragraph 12.228 to correct a typographical error:

“The existing sports facilities on the site provide an opportunity to increase provision of such facilities for all age groups by exploring arrangements to make them available for community use, as supported in Policy ~~SCLP12.17~~ SCLP12.18.”

Paragraph 12.230 of the Final Draft Local Plan acknowledges that Policy MAR11 of the Martlesham Neighbourhood Plan (Document F8, page 36-37) supports the provision of allotments and community growing spaces. Criterion i) of Policy SCLP12.25 therefore would expect that development of the site would incorporate allotments which are available to the wider community. It should be noted that a modification is proposed in relation to paragraph

12.228 to correct a typographical error in that from the sentence beginning ‘Martlesham Neighbourhood Plan Policy MAR11..’ onwards should be a new paragraph.

150. Whilst not specifically referenced in the Local Plan, there are other areas of Policy SCLP12.25 that would support the policies of the Martlesham Neighbourhood Plan. Paragraph 12.231 and criterion k) would expect the development to provide for enhanced permeability through the site and links into existing pedestrian and cycle routes. This supports Policy MAR13 of the Neighbourhood Plan (Document F8, page 47) which supports enhancements to pedestrian and cycle networks.

Question 3.29

Are there any factors which would mean that the site is not ‘deliverable’ or ‘developable’ as per the definitions in the Framework?

151. The Police Headquarters site (Policy SCLP12.25) is identified in the Housing Trajectory in Appendix D of the Final Draft Local Plan (Page 493) as anticipated to be delivered between 2024/25 and 2027/28. The National Planning Policy Framework (NPPF) states in paragraph 67 that:

‘Planning policies should identify a supply of:

- a) Specific, deliverable sites for years one to five of the plan period; and
- b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.’

152. It is therefore relevant to consider this site in terms of the definition of ‘developable’. The glossary to the NPPF defines developable as:

‘To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.’

153. The site has been made available to the Council for inclusion within the Local Plans as a site allocation. The position of the landowner (Suffolk Constabulary) is confirmed through a Statement of Common Ground which identifies that the site is developable. This confirms that there is a reasonable prospect that the site will be available during the plan period as part of the proposed relocation of the Police Headquarters.
154. The site has been judged to be in a suitable location for housing development initially through the Strategic Housing and Economic Land Availability Assessment (Document D10, pages 395-396) which has identified it as a potentially suitable site. In considering the site as a potential site allocation, consideration has been given to a range of factors including

infrastructure capacity. The site has been assessed through the Sustainability Appraisal Report (Document A3, pages 154 and 521 - 523) which has identified both positive and negative effects from the allocation. Criteria in Policy SCLP12.25 reflect the site assessment process and would ensure that development that comes forward addresses any potential impacts and opportunities. This site provides an opportunity for development on a previously developed site in a location which is well connected to services and facilities, being located in the East of Ipswich Major Centre.

155. The Whole Plan Viability Study (Document D38) has considered the viability of typologies of sites. It concludes, on pages 52-53, that a relatively high density improves the viability of brownfield development in the mid value zone, although recognises that viability may be more challenging for flatted developments.
156. It can therefore be demonstrated that the site falls within the definition of 'developable' contained within the NPPF.

Question 3.30

Is the loss of office floorspace justified in the context of the overall supply of employment land?

157. Supporting and delivering economic growth is central to the strategy of the Local Plan as set out in Policy SCLP3.1 Strategy for Growth in Suffolk Coastal District. The Local Plan has been informed by economic evidence contained in a number of reports in the document library. The Ipswich Economic Area Sector Needs Assessment (Document D3, paragraph 3.17, page 29) identifies that requirements for public administration will be determined by specific organisational requirements. Suffolk Constabulary has indicated that they intend to vacate the site. A Statement of Common Ground between Suffolk Constabulary and the Council related to the developability of the site acknowledges that Suffolk Constabulary are investigating options for future accommodation and that the site is considered developable. It is therefore considered appropriate that the loss of office floorspace at this location is viewed in the context of the site providing a public administration function for which future accommodation needs are under consideration by Suffolk Constabulary.
158. The Ipswich Economic Area Sector Needs Assessment (Document D3) identifies a need for 14.4ha of land, a large amount of which is a need for B1 uses, i.e. business uses (note these land requirements relate to the period 2014 – 36 and have therefore been factored down accordingly in the Local Plan to equate to a need for 11.7ha of land over the period 2018-36).
159. The Local Plan contains new site allocations for employment use to meet the needs identified in the Ipswich Economic Area Sector Needs Assessment (Document D3). This includes the site

allocated under Policy SCLP12.20 Land at Felixstowe Road under which 22.5ha of land is allocated for B1 and B2 uses¹, targeted at the business and professional services sectors. Paragraph 5.31 of the Ipswich Economic Area Sector Needs Assessment (Document D3) identifies that well connected locations on the fringe of the Ipswich urban area are considered to provide good opportunities for office development, and it is considered that the allocation of site SCLP12.20 therefore aims to meet the needs as identified in the employment evidence. The loss of office space, in use for public administration purposes, at the Police Headquarters sites does therefore not impact on the ability of the Plan to meet the needs for the supply of employment land.

Question 3.31

Is the Policy consistent with national policy in respect of open space and recreation as set out in paragraphs 96 – 97 of the Framework and is it justified?

160. Paragraph 96 of the NPPF requires planning policies to be based on robust and up to date assessments of the requirements for open space, sport and recreation facilities. Paragraph 97 of the NPPF states that existing open space, sports and recreational buildings including playing fields should not be built on unless the land is surplus to requirements, the loss would be replaced by equivalent or better provision or the development is for alternatives sports and recreation facilities which would outweigh the loss.
161. Criteria h), i) and j) of Policy SCLP12.25 set the following expectations in relation to redevelopment of the site:
- h) Provision of open space providing opportunities for all ages;
 - i) Provision of allotments which are accessible to residents and the wider community;
 - j) Provision of sports facilities with opportunities for community use;
162. In terms of criterion h), the need for open space to provide opportunities for all ages is consistent with the approach taken through the Plan. This reflects in particular the high proportion of the population as elderly, as referred to in paragraph 8.13 of the Final Draft

¹ B1 uses include general office, serviced business centre and business park, call centres, science park and small business centres, high tech research and development and light industry, and B2 uses include industry.

Local Plan. The requirement also supports policy SCLP11.1 which seeks to incorporate dementia friendly design into new development.

163. In relation to criterion i) Paragraph 12.230 of the Final Draft Local Plan acknowledges that Policy MAR11 of the Martlesham Neighbourhood Plan (Document F8, page 36-37) supports the provision of allotments and community growing spaces. Criterion i) of Policy SCLP12.25 therefore would expect that development of the site would incorporate allotments which are available to the wider community.
164. Paragraph 12.228 of the Final Draft Local Plan refers to the made Martlesham Neighbourhood Plan (Document F8) which identifies objectives for sports provision. Page 60 of the Neighbourhood Plan includes an action to seek community use on sites where use is currently restricted, and criterion j) therefore reflects this.
165. The requirements related to open space provision are therefore justified by taking forward policies and objectives set out in the made Martlesham Neighbourhood Plan.

Question 3.32

Would the Policy be effective in conserving the significance of designated Heritage Assets?

166. Paragraph 12.230 refers to the site being within an area of high archaeological significance and potential. However, in order to ensure the Policy and supporting text effectively conserve the significance of designated heritage assets the Council would support a modification to address this issue and is engaging with Historic England to enter into a Statement of Common Ground in this respect.

Policy SCLP12.27: Land rear of Rose Hill, Saxmundham Road, Aldeburgh

Question 3.33

Where is the evidence that Policy SCLP12.27 has been subject to Habitats Regulations Assessment screening?

167. As confirmed by paragraph 3.13 of the Habitats Regulations Assessment of the Suffolk Coastal Local Plan- Supplementary Note (Document 27) policy SCLP12.27 has been subject to Habitats Regulations Assessment.
168. As set out in paragraph 3.11 of the Habitats Regulations Assessment Report (Document A4) each allocation was checked individually as part of the screening process. The results of this are set out in table 3, pages 27-46 of the Habitats Regulations Assessment Report (Document

A4). Policy SCLP12.27 is considered on page 41 and 42 of the table under the section titled 'Sites allocations within 400m of a European site boundary'. Policy SCLP12.27 is also considered as part of the Appropriate Assessment in relation to urbanisation in section 6 of the Habitats Regulations Assessment Report (Document A4).

Policy SCLP12.28: Strategy for Saxmundham

Question 3.34

Is the 'and' at the end of point e) necessary to make the Policy effective?

169. The 'and' at the end of criterion e) of the Policy (SCLP12.28) is not necessary to make the Policy effective. Thus, the Council propose a modification to remove the 'and' from the end of criterion e) of the Policy (SCLP12.28), as follows: "Promote quality of life including through enhancements to networks of green infrastructure; ~~and~~"

Policy SCLP12.29: South Saxmundham Garden Neighbourhood

Question 3.35

Is the allocation of land for approximately 800 dwellings achievable within the area indicated for housing between the A12 road and railway line on the indicative draft masterplan?

170. As stated in Policy SCLP12.29, the allocation is for approximately 800 dwellings plus other uses including a primary school, early years provision, a community hub, open space and green infrastructure. As explained in paragraphs 12.291 and 12.292 of the Final Draft Local Plan (Document A1, page 274) the provision of 800 dwellings will support the development of a new school, and this is further explained in Suffolk County Council's representation to the Final Draft Local Plan (Rep ID: 1088).
171. The area identified for the allocation of the Garden Neighbourhood is the result of assessing the suitability of sites made available for development within and around Saxmundham. This assessment of alternatives is explained within the Sustainability Appraisal Report, and has been revisited throughout the preparation of the Plan (Document A3, pages 155 – 156).
172. Central to the consideration of a potential location and extent of the Garden Neighbourhood, has been the achievement of 'garden city' principles, alongside other plan objectives including the delivery of 1 and 2 bedroom dwellings as set out in Policy SCLP5.8 Housing Mix.

173. The Council is aware that representations have been received which query the site area quoted in Policy SCLP12.29 and the achievement of 800 dwellings on the site, including with reference to the Strategic Housing and Economic Land Availability Assessment (Document D10 and D11).
174. It is therefore important to explain the role of the Strategic Housing and Economic Land Availability Assessment in this respect. As stated in paragraph 1.3 of the Strategic Housing and Economic Land Availability Assessment (Document D10, page 1), the purpose is to identify the potential supply of available land in the Local Plan area. The flow chart on page 3 of Document D10 illustrates the process, with the aim of arriving at a conclusion of understanding whether there is enough suitable land in the area to accommodate the identified housing (and employment) needs. As part of this assessment, the Council therefore sought to consider the potential yield of dwellings from each site assessed as potentially suitable. Paragraph 2.35 on page 11 of the Strategic Housing and Economic Land Availability Assessment explains that a conservative view of potential yield has been applied, which is appropriate for an assessment which is considering whether there is likely to be enough land to meet the housing requirement across the Local Plan area.
175. The indicative draft masterplan on page 277 of the Final Draft Local Plan (Document A1) indicates that the policy requirements could be met by locating the residential and community uses in the area between the railway and the A12. This area correlates with site reference 714 Land south of Saxmundham, as shown in the Strategic Housing and Economic Land Availability Assessment – Map Book (Document D11, page 90). The site has been assessed through the Strategic Housing and Economic Land Availability Assessment (Document D10, pages 497 - 498). This has identified, that the site could contribute 495 dwellings towards the supply, based upon the densities set out in paragraphs 2.35 – 2.38 of the Strategic Housing and Economic Land Availability Assessment. However, the 495 dwellings should not be viewed as a ‘maximum’ or ‘capacity’. This calculation of 495 dwellings was based upon the location of the site being partly within Saxmundham town and partly within Benhall, a site area of 26.9 ha, and that it has been put forward for mixed uses. Using the methodology set out in paragraphs 2.35 – 2.38 of the Strategic Housing and Economic Land Availability Assessment (Document D10, page 11 – 12), the figure was calculated as being partly 15 dwellings per hectare and partly 30 dwellings per hectare, with an assumption that 80% of the site could be developed for housing as it had been submitted for mixed use. Arguably, due to the location of the site, the Council could have considered the full site at 30 dwellings per hectare however for the purposes of the Strategic Housing and Economic Land Availability Assessment as explained above a conservative approach has been taken.
176. As the land subject to allocation under SCLP12.29 comprises a combination of whole and parts of sites assessed in the Strategic Housing and Economic Land Availability Assessment (with reference to page 90 of Document D11), the table below clarifies the site areas that have been included within the allocation.

SHELAA reference	Land area identified in SHELAA	Land area included within allocation
714 (whole site in SCLP12.29)	26.9ha ² (page 497 – 498)	33ha
716 (part of site in SCLP12.29)	16.29ha (page 91 – 92)	7.2ha
717 (whole site in SCLP12.29)	9.4ha (page 499 – 500)	9.4ha
1012 (part of site in SCLP12.29)	10.02ha ³ (page 493 – 494)	17ha

177. The Council is also aware that representations have been submitted which query the site area of 66.6ha as set out in Policy SCLP12.29. The Council can confirm that the full area of the site shown on the inset map on page 272 of the Final Draft Local Plan is 67.8ha (66.6ha is the area of the site excluding the railway line however this is within the area covered by the allocation). The Council would support a modification to address this, as set out below.

“Approximately ~~66.6ha~~ 67.8ha of land for a garden neighbourhood is identified to the south of Saxmundham, which includes land within the parish of Benhall, for an education led development, comprising primary school provision, community facilities, employment land and open space alongside a variety of residential development. This new development will be delivered through a master plan approach brought forward through landowner collaboration and community engagement.”

178. It should be acknowledged that in progressing sites from being identified as potentially suitable in the Strategic Housing and Economic Land Availability Assessment the Council has given considerable further consideration to the potential and constraints of the sites to deliver housing and other policy objectives, with reference to the Council’s evidence base and to the characteristics of sites. In respect of South Saxmundham, in addressing comments received in relation to the First Draft Local Plan and considering how and whether the garden neighbourhood could be delivered in a way which respects the heritage sensitivities of the land covered by site reference 1012, the Council has considered the potential for land under site reference 714 to achieve the development of 800 dwellings along with the education and community uses within the principles of garden cities. It is important to acknowledge that the Indicative Draft Masterplan set out on page 277 of the Final Draft Local Plan (Document A1) illustrates one way in which the development could come forward to enable the community to visualise the various policy requirements, however the policy contains a requirement for masterplanning, informed, through community engagement, and it is fully expected that the approach to the design of the garden neighbourhood will evolve.

² The Council also acknowledges that there is an error in the Strategic Housing and Economic Land Availability Assessment in relation to site 714 (page 497) as the area of the site is 33ha, as shown in the Issues and Options Consultation (Document B1, page 161).

³ The Council acknowledges that in relation to site 1012 there is an error in the Strategic Housing and Economic Land Availability Assessment (page 493). The full site area which should be referred to is 38.6ha.

179. The indicative draft masterplan shows the area of site 717, 33ha, as the area for residential, education and community uses, including open space and green links. The policy contains a requirement for 2.2ha of land for a primary school including early years and 0.13ha of land for further early years provision (see also response to question 3.40 with associated modifications). Whilst the indicative draft masterplan shows potential areas for different uses, it is important to acknowledge that there will be flexibility in how the policy requirements can be achieved. The Council considers that based on a site area of 33ha there is certainly scope for the uses set out in the policy to be delivered within the principles of garden cities. The policy does not set out any assumptions in relation to densities, however it does require (in criterion s), a range of types and sizes of dwellings, and it is expected that there will be an element of relatively high density development within the Garden Neighbourhood.
180. The scale and location of the garden neighbourhood provides an opportunity to incorporate the types of development that may be less appropriate in the more rural parts of the Suffolk Coastal area, such as appropriately scaled flatted development. This is entirely consistent with the principles of garden cities, which refer to ‘beautifully and imaginatively designed homes with gardens, combining the best of town and country living to create healthy homes in vibrant communities’ (see glossary of the Final Draft Local Plan, Document A1, page 515). Examples of developments that have been designed to garden city principles include those with higher density elements, where this is based around the concept of access to green spaces (which can be communal spaces) and links. The Town and Country Planning Association Practical Guides for Creating New Communities - Design and Masterplanning (December 2017) sets out that garden city principles do not mean low density, and that a range of densities across different areas would be expected⁴. It is expected that such options would be explored through the masterplanning process.

Question 3.36

Is the indication of the area to the east of the A12 road for mixed use development justified given it would be used to provide open space?

181. The area to the east of the railway is shown as ‘informal / formal open space’ on the indicative draft masterplan on page 277 of the Final Draft Local Plan.
182. The Council has shown the extent of the Garden Neighbourhood to the east of the A12 as mixed use on the basis that the policy contains a requirement for masterplanning through landowner collaboration and community engagement. The indicative draft masterplan is included on page 277 of the Final Draft Local Plan (Document A1) to illustrate how the policy

⁴ <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=79f031bb-14de-496c-b8dd-0ce34c4801f9>,
page 18

requirements could be achieved, however the Council wishes to provide flexibility for the evolution of the masterplan.

183. The indicative draft masterplan has evolved from that presented in the First Draft Local Plan (Document B4, page 243), particularly recognising the conclusions of the South Saxmundham Garden Neighbourhood Heritage Impact Assessment in relation to the sensitivity of the Conservation Area and Listed Buildings in proximity to the eastern part of the site (Document D19) which was produced in response to comments raised through consultation on the First Draft Local Plan as set out in the Consultation Statement for the Suffolk Coastal Local Plan – Regulation 22c Statement (Document A10, pages 774 – 784). Whilst the area to the immediate west of the B1121 is identified as being sensitive to built development, it may be appropriate for recreational or other use of land which contributes to the maintenance of its open character as set out in the conclusions of the Heritage Impact Assessment.
184. The Habitats Regulations Assessment has identified a requirement for Suitable Alternative Natural Greenspace, as set out in the Habitats Regulations Assessment of the Suffolk Coastal District Local Plan at Final Draft Plan Stage (Document A4, chapter 5). The delivery of the Garden Neighbourhood will therefore require the provision of Suitable Alternative Natural Greenspace (SANG), as per criterion d) of the policy, however there may be variation in the ways in which this can be provided whilst also meeting the requirements of criterion j) in relation to ensuring the development of the site is sympathetic to heritage assets. This response needs to be viewed alongside the Council's response to questions 3.38 and 3.41 which comment on the options for the delivery of SANG.
185. The area illustrated for informal and formal open space is therefore reflecting the evidence underpinning the South Saxmundham Garden Neighbourhood, however the Council would expect that the full extent of the land shown as mixed use would be considered as a whole in masterplanning the development.

Question 3.37

In the context of Policy SCLP3.3: Settlement Boundaries, is the definition of the settlement boundary to include land which would be solely used for informal/open space justified? Why is the proposed employment land outside of the settlement boundary?

186. The Settlement Boundary has been drawn around the mixed use allocation under Policy SCLP12.29 to demonstrate that the site is intended to come forward as a masterplanned area. Policy SCLP3.3 Settlement Boundaries explains that the principle of development within Settlement Boundaries is accepted 'subject to consideration of other relevant policies.' In this respect any development proposed in the area within the Settlement Boundary would need to accord with Policy SCLP12.29 as well as any other relevant policies within the Plan.

187. In a similar context, there are numerous locations within Settlement Boundaries that may not be suitable for development, for example open spaces which make an important contribution to Conservation Areas. It should also be noted that the Settlement Boundary for the North Felixstowe Garden Neighbourhood encompasses the full area included in the indicative draft masterplan including the area to the north of the allocation shown as informal / formal open space. To do otherwise would undermine the requirement in the Policy for the development to be masterplanned.
188. The employment land is shown outside of the Settlement Boundary as, although a part of the garden neighbourhood, it has been identified solely for employment due to its location adjacent to the A12 in order to protect it for employment use. This reflects the evidence set out in the Ipswich Economic Area Sector Needs Assessment (Document D3, summarised on page 207, Table 16.6) which identifies the A12 corridors as a location focus and a key area of demand. There are limited other employment allocations in this part of the A12 corridor, even considering the remaining undeveloped area of land at Carlton Park, Kelsale allocated under Policy SCLP12.37 (currently allocated in the Site Allocations and Area Specific Policies DPD, Document F2), noting that a part of the area shown as undeveloped in Policy SCLP12.37 has subsequently received planning permission for an extension to an existing unit.

Question 3.38

Would the provision of the SANG to the east of the railway be effective given the limited crossing points of the railway? Is the extent of land indicated for informal/formal open space to the east of the railway justified?

189. Policy SCLP12.29 does not require the Suitable Alternative Natural Greenspace (SANG) to be to the east of the railway, however considering the constraints to development within this area as set out in the policy, in particular in relation to heritage assets to the north and east of the site, the Council considers that land to the east of the railway could appropriately contribute towards SANG provision. There are two crossing points on the railway as indicated on the Indicative Draft Masterplan on page 277 of the Final Draft Local Plan (Document A1), one at the northern part of the allocation which is an existing bridge over the railway and one at the southern part of the allocation which is a level crossing. Criterion e) of Policy SCLP12.29 requires that the development includes the provision of circular walks and criterion p) requires significant pedestrian and cycle accessibility throughout the site, with connections and improvements to networks beyond the site, including to the station and town centre. The success of the crossing points in relation to provision of SANG to the east of the railway would depend on how the routes are integrated into the layout, and in this respect the Council considers it would be appropriate to include a modification in paragraph 12.288 as set out below:

“To reduce the impact of the development and alongside providing for sufficient SANG areas, significant green infrastructure provision and areas of natural green space for recreation should be integral to the layout of the Garden Neighbourhood. These areas will provide amenity value for the future community and, a variety of habitats for wildlife. Green areas will also reduce the perception of settlement coalescence between the built up areas of Benhall and Saxmundham. Ensuring the provision of appropriate green infrastructure is a fundamental part of the creation of a new community in this part of the District and will complement the existing areas of woodland, the public rights of way and the adjacent countryside. Particular attention will need to be paid to how movements will take place between the areas to the east and west of the railway. The northern part of the area to the west of the B1121 known as The Layers provides an open setting to Hurts Hall, and has the potential to be enhanced to provide a high quality area of open space which makes the most of its history and links with surrounding heritage as well as potentially contributing to SANGs requirements. Any enhancements in relation to the provision of open space in this area need to be sympathetic to the character and setting of this area and heritage assets. The southern part of this area adjoining the B1121 could remain in its existing use, and links could be retained between Benhall and the rest of the Garden Neighbourhood through existing footpaths.”

190. In terms of the extent of Suitable Alternative Natural Greenspace, the Habitats Regulations Assessment (Document A4, paragraph 5.8) states that a minimum of 8ha per 1,000 residents should be provided, which would equate to a need for 15.4ha based on 2.4 people per dwelling as set out in that paragraph. The use of 2.4 residents per dwelling is appropriate to consider at the plan making stage to ensure that there is scope to deliver SANG within the allocation, noting that paragraph 5.8 of the Habitats Regulations Assessment acknowledges that local information can be used to determine an appropriate requirement. In this respect it is appropriate that the policy does not require a specific size of SANG. The Council acknowledges that the full extent of the land to the east of the railway line is 26.4ha which would exceed the requirements for SANG. However, the characteristics of the site do not lend themselves to the identification of exactly 15.4ha and this would also leave little scope for incorporating other policy requirements, such as the provision of formal areas of open space that should be in addition to requirements for Suitable Alternative Natural Greenspace. The Council recognises that there will need to be careful consideration of how a SANG can be designed to effectively function within the constraints and characteristics of the site, and therefore the policy allows for this at the masterplanning stage, whilst having certainty at a Local Plan level that the required quantity and quality of SANG can be delivered to meet requirements.
191. The area immediately to the west of the B1121 is a relatively open area of land, currently in agricultural use. This part of the site is close to heritage assets including Saxmundham Conservation Area and Listed Buildings and the South Saxmundham Garden Neighbourhood Heritage Impact Assessment (Document D19, page 32) recommends that development is

avoided on this area of land. The indicative draft masterplan therefore shows it as being for informal / formal open space, however the masterplanning process provides the opportunity to consider the most appropriate approach to open space provision within the land identified as the mixed use allocation.

Question 3.39

Would the Policy give rise to coalescence with Benhall village?

192. In allocating the South Saxmundham Garden Neighbourhood the Council has been aware of concerns raised through consultation in relation to the potential for coalescence with Benhall, as set out in the Consultation Statement for the Suffolk Coastal Local Plan – Regulation 22c Statement (Document A10, pages 774 – 784).
193. Whilst the South Saxmundham Garden Neighbourhood is partly within the parish of Benhall, Benhall village is located to the south and south east of the South Saxmundham Garden Neighbourhood. It is acknowledged also that there are some built areas outside of the Benhall Settlement Boundary, including to the north of the Settlement Boundary along Main Road, Kiln Lane and Church Hill. These areas are in closest proximity to the South Saxmundham Garden Neighbourhood. The topography between this area and the South Saxmundham Garden Neighbourhood is such that, to the west of the B1121, Kiln Lane acts as a point at which the character appears to change. To the south of Kiln Lane the land slopes gently southwards and there is the perception of being more closely related to Benhall than Saxmundham, however to the north the perception is that of being more closely related to Saxmundham. The Council has therefore not defined the garden neighbourhood boundary any further south than Kiln Lane.
194. The Policy, in criterion e), requires the retention and enhancement of the natural features on the site such as trees, woodland and hedgerows and this would apply to those within the site in the vicinity of Kiln Lane.
195. Therefore whilst the South Saxmundham Garden Neighbourhood would clearly reduce the scale of the gap between Saxmundham and Benhall, it would not lead to coalescence of the two settlements either physically or visually.

Question 3.40

Would the Policy be effective in achieving the provision of required education facilities? Is it justified to include early years provision within both criteria a) and b)?

196. Criterion a) requires the provision of a one form entry primary school on a 2.2ha site to enable further expansion and early years provision. Criterion b) requires a further 0.13ha of land for early years provision.

197. The primary school facilities required are as outlined in the representation from Suffolk County Council (Rep ID: 1088). The representation confirms that the existing Saxmundham Primary School cannot expand on its current site, and opportunities to expand Benhall and Kelsale Primary Schools are limited, and therefore the approach set out in Policy 12.29 helps deliver sufficient growth to overcome education constraints and provide for future growth in future plans. The representation identifies that it is necessary to require 2.2ha of land for a primary school to enable it to operate independently as it cannot be guaranteed that an operator would be the same as that for the adjacent Saxmundham Free School.
198. In relation to early years, criterion b) of the policy requires early years facilities to be provided as part of the new school and through a further setting on 0.13ha of land. The requirement for early years provision to be included within criteria a) and criteria b) is due to the need for early years provision generated by developments in the Saxmundham ward⁵. The County Council have identified a need for 99 additional full time equivalent spaces, based upon planned development in the Saxmundham area. The Infrastructure Delivery Framework in Appendix B of the Final Draft Local Plan (Document A1, Page 460) identifies contributions towards early years provision as being required from a number of site allocations in the former Saxmundham ward. It is possible however that opportunities for an additional early years setting may become available in other locations in the area, and therefore to provide flexibility the Council has agreed to modifications with Suffolk County Council in this respect.
199. Additionally, in reviewing the requirements for early years, Suffolk County Council identified that it would be appropriate for 0.1ha of land to be identified for early years. This size of site is consistent with other policies in the Plan. This is reflected in the Statement of Common Ground with Suffolk County Council and in the modification set out below. It is also acknowledged that the representation from Pigeon Capital Management 2 Ltd questioned the justification for the requirement for early years provision on the site (Rep ID: 1493), and the modification would assist in addressing this issue.
200. The modifications are set out below:

Modification to paragraph 12.291:

“12.291 Consultation responses and engagement with Suffolk County Council have highlighted the need for increased primary school provision in the Saxmundham area. Limited capacity in existing schools is increasingly acting as a barrier to the future development of Saxmundham and the surrounding communities. The provision of a primary school with early years provision would support future development in this part of the District. The exact location of a new primary school with early years provision will need to be considered early in the master planning stages to ensure it is an integral and accessible part of the design and

⁵ Ward area prior to Local Government reorganisation

layout of the new development, and opportunities to benefit from shared facilities with Saxmundham Free School will be supported. Early years capacity is forecast to be exceeded in the area over the plan period, and therefore new provision is expected to be provided alongside the new primary school. In addition, to meet forecast need, the policy also requires provision for a new early years setting on 0.1ha of land unless suitable and accessible accommodation is available elsewhere. At the time of a planning application, it will need to be demonstrated either that provision is to be made on site, or that there is certainty that suitable provision can be provided elsewhere.”

Modification to criterion b) of Policy 12.29:

“b) 0.13ha of land on the site should be reserved for a further new early years setting should suitable and accessible alternative provision not be available elsewhere. Proportionate contributions will be required towards the additional early years provision;”

Question 3.41

Are there any factors which would mean that the site is not ‘deliverable’ or ‘developable’ as per the definitions in the Framework?

201. The site is identified to come forward from year 6 of the trajectory set out in Appendix D to the Final Draft Local Plan (Document A1). In terms of the NPPF, paragraph 67b) states that planning policies should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, years 11-15 of the plan. The definition of a developable site is set out in the glossary to the NPPF (Document C1, page 66) which states that ‘to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged’.
202. The Garden Neighbourhood has been assessed as being within a suitable location for housing development. Saxmundham is a Market Town adjacent to the A12 and on the rail line between Ipswich and Lowestoft. Saxmundham has been identified as a focus for growth through the consideration of strategic options, and the strategy of the Plan is explained in paragraphs 3.30-3.32 of the Final Draft Local Plan (Document A1).
203. The area subject to the allocation comprises all or part of four separate sites that were submitted through the call for site process. These are sites 714, 716, 717 and 1012, as shown on the map contained in the Strategic Housing and Economic Land Availability Assessment – Map Book (Document D11, page 90). The sites put forward were initially judged to be in a suitable location for housing development through the Strategic Housing and Economic Land Availability Assessment which has identified them as potentially suitable sites. The Draft Strategic Housing and Economic Land Availability Assessment (Document D12, pages 91-92, 481-484 and 477-478) had assessed all four sites as potentially suitable for housing

development. The Final Strategic Housing and Economic Land Availability Assessment reflects the conclusions of the Heritage Impact Assessment in relation to site 1012 (Document D10, pages 493-494). Other sites within Saxmundham were also identified as potentially suitable through the Strategic Housing and Economic Land Availability Assessment and the Sustainability Appraisal report outlines the reasons for selecting the preferred sites (Document A3, pages 155-156).

204. The responses received to the consultation on the First Draft Local Plan raised significant concerns over the potential impact on heritage assets, including Saxmundham Conservation Area and the Grade II Listed Hurts Hall to the east of the B1121. The Council responded to these concerns by commissioning a Heritage Impact Assessment to inform progression with the site allocation. The conclusions of the Heritage Impact Assessment have been incorporated into Policy SCLP12.29 (criterion j) and paragraph 12.286 of the supporting text.
205. Responses received have also raised concern in relation to flooding and drainage. The site is identified in the Strategic Flood Risk Assessment (document D23, Figure 05.19) as being in Flood Zone 1, however a Flood Risk Assessment would be required at the planning application stage due to the scale of the site. The Strategic Flood Risk Assessment (Document D23, Figure 06.19) identifies an area of surface water flooding running north-south through the western part of the site and this is recognised in paragraph 12.289 of the Final Draft Local Plan.
206. Concern is also raised in relation to how access can be achieved, and this is covered below in the response to question 3.42. In terms of impact on the wider highway network, the transport modelling has identified that the eastern link of the junction of the B1121 and Chantry Road to the north east of the site within Saxmundham would be over capacity in 2036 (Document D32, page 17). Further assessment of the junction was undertaken, as detailed on pages 10-11 of Appendix B (Document 32). This identifies that there are measures that would provide some additional capacity, and reference to the need for highways infrastructure is set out in the Infrastructure Delivery Framework of the Final Draft Local Plan (Document A1, page 448).
207. Consideration has also been given to infrastructure capacity, within the context of understanding that the allocation is intended to deliver a new primary school. However other infrastructure such as water recycling centre capacity and the capacity of health services, has formed part of the consideration of the suitability of the allocation. The supporting text to the policy sets out areas where contributions will be required to deliver infrastructure enhancements, which may be through either Community Infrastructure Levy or Section 106 agreement as set out in the Infrastructure Delivery Framework in Appendix D of the Final Draft Local Plan.
208. Policy SCLP12.29 contains numerous criteria to ensure that the garden neighbourhood is delivered in a suitable and sustainable way, which would need to be reflected in the

development coming forward on the site. In this respect it is considered that the site is a suitable location for development.

209. In terms of availability, all of the land has been made available for consideration through the local plan process. Pigeon Capital Management 2 Ltd are promoting the land to the west of the A12, the land between the A12 and the railway line and the land between the railway line and the tree belt which runs north-south (along with other areas of land excluded from the allocation) as set out in their representation (Rep ID: 1493). The land immediately to the west of the B1121 and to the east of the tree line is currently being promoted for housing by Hopkins Homes and Hopkins & Moore Ltd (Rep ID: 1302) who state that they have an option on the land until 2027. The Council would support and expect the landowner interests of the site to engage in conversations to address deliverability, in the interests of bringing forward a development which meets with the requirements of the Policy.
210. The Whole Plan Viability Study (Document D38) has been carried out to test, at the plan making stage, the viability of the plan's policies and site allocations. The Whole Plan Viability Report has been carried out in accordance with the Planning Practice Guidance on Viability (Document C2). In particular in relation to the South Saxmundham Garden Neighbourhood, as a strategic site the Whole Plan Viability Study has undertaken a separate assessment which considers the specific circumstances and policy requirements of this site (as per Planning Practice Guidance paragraph 10-005-20180724). In accordance with the Planning Practice Guidance the viability testing has identified land values through applying the Existing Use Value plus approach and has considered comparable land values in and around Suffolk Coastal in doing so, as set out pages 47 – 51 of the Whole Plan Viability Study. A robust assessment of market values has informed the values per square metre of properties, as set out on pages 40 – 42 and Appendix 2 of the Whole Plan Viability Study. This an analysis of achieved new build sales from published Land Registry data, new build quoting prices from Rightmove, conversations with estate agents, consideration of Zoopla's market report, and discussions stakeholder (event held 30 October 2018) for each area.
211. The specific assessment of the viability of the South Saxmundham Garden Neighbourhood is set out on pages 53 to 57 of the Whole Plan Viability Study (Document D38) and the detailed appraisal is included in Appendix 4 of the assessment (pages 284 to 293 of the PDF version of Document D38) . This has considered the costs associated with delivering the policy, including provision for the new primary school and 33% affordable housing in accordance with Policy SCLP5.10. The costs considered are set out on pages 42 – 45 & 55 – 56 of the Whole Plan Viability Study. The assessment results in 'options' in relation to the level that Community Infrastructure Levy would be set, and the Council will consider further an appropriate CIL rate for the site through its review of Community Infrastructure Levy charging. Whilst the discussion on pages 53-57 of the study considers possible CIL levels up to £50 per sqm, the detailed appraisal on page 288(of the PDF version) illustrates testing of CIL up to £200 per sqm. Crucially, the Whole Plan Viability Study concludes that the

212. development of the South Saxmundham Garden Neighbourhood is viable with a maximum CIL rate of up to £160 per sqm.
213. Representations have been submitted to the Final Draft Local Plan which raise a number of points in relation to the viability testing that has been carried out. However, as set out above the Council is confident that it has undertaken a robust assessment of viability at the plan making stage, which is in accordance with national policy and guidance and concludes that the south Saxmundham Garden Neighbourhood is viable to deliver as per Policy SCLP12.29.
214. It is therefore concluded that the site is developable in the context of the definition in the NPPF.

Question 3.42

Is it justified that the site is accessed via a single vehicular access?

215. The Council has engaged with Suffolk County Council as highways authority through the production of the Local Plan. Suffolk County Council have not raised any representations in relation to the access to South Saxmundham Garden Neighbourhood. The provision of a single vehicular access recognises the characteristics of the site adjacent to the A12 and the strategic importance of the A12.
216. The Council acknowledges that consideration would need to be given to additional access for emergency vehicles at the masterplanning and planning application stages.
217. The Council expects opportunities for walking and cycling to be maximised and further accesses for walking and cycling would be expected to be integral to the design of the development, as set out in criterion p) of policy SCLP12.29, in particular in relation to journeys to the station and to the town centre.
218. It is therefore justified that the site is accessed via a single vehicular access. The Council would support entering into a Statement of Common Ground with Suffolk County Council and with Pigeon Capital Management Ltd in this respect.

Question 3.43

Would the Policy be effective in addressing the needs for off-site infrastructure requirements arising from the development?

219. Policy SCLP12.29 contains requirements relating to on-site infrastructure and that which would be secured through Section 106 agreement. As the Community Infrastructure Levy is in place, the Council has sought to distinguish between infrastructure which would need to be secured through Section 106 and that which would be provided through the Community

Infrastructure Levy, as the mechanism for collecting and distributing funds is very different. It would not be appropriate to include reference in the policy to enhancements or facilities that would be funded by the Community Infrastructure Levy as funding of projects through CIL could not be factored in to the determination of a planning application.

220. The off-site infrastructure provisions related to the development that are anticipated to be funded by CIL include enhancements to provision of primary care, new floor space at the Saxmundham Safer Neighbourhood Team Police Offices, enhancements to the Benhall Water Recycling Centre, improvements to the 11kv network between Benhall and Saxmundham, improvements at Leiston Household Waste Recycling Centre and enhancements to Saxmundham library. Other off-site infrastructure, which is necessary for the development to take place, would be funded through Section 106, such as measures identified through the Transport Assessment as required under criterion q). This approach reflects the approach taken in relation to all site allocations in the Plan.
221. A Statement of Common Ground has been agreed between the Council and Anglian Water, in response to Anglian Water's representation on SCLP12.3, which is equally applicable to SCLP12.29, to clarify the position in relation to delivery of capacity in the foul sewage network and for water recycling centres. The Statement of Common Ground supports a modification to the penultimate paragraph of policy SCLP12.29 as set out below:

"The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions. ~~and water recycling upgrades undertaken by Anglian Water through the Asset Management Plan~~ Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity will be required. Including, but not limited to, water recycling upgrades."

Policy SCLP12.32: Former Council Offices, Melton Hill

Question 3.44

Would the Policy be effective in conserving the significance of designated Heritage Assets?

222. The Policy is effective in ensuring the significance of designated heritage assets are conserved through criterion b) of the Policy (SCLP12.32), which states the following: "Design, layout and height of buildings to be appropriate to the site's location in proximity to heritage assets and the Area of Outstanding Natural Beauty;"
223. The supporting text, in particular paragraphs 12.334, 12.336 and 12.338, provides more detail in respect of designated and non-designated heritage assets within and surrounding the site.

However, a modification may be necessary to ensuring the conservation of the historic environment and provide greater clarity in relation to the implementation of the Policy (SCLP12.32). The Council would support a modification to address this issue and is engaging with Historic England to enter into a Statement of Common Ground in this respect.

224. Paragraph 12.338 details the archaeological importance of the site. The Council would support a modification to the Policy (SCLP12.32) to ensure the archaeological potential of the site is explored and is engaging with Historic England in this respect.

Policy SCLP12.33: Land at Woodbridge Town Football Club

Question 3.45

Is paragraph 12.350 consistent with Policy SCLP12.33 in that it refers to the relocated facilities being ‘within the town’? Is this justified?

225. The references in paragraph 12.350 and SCLP12.33 in relation to the relocation of the football club seek to ensure that a new facility would be located where it would be accessible to the local population. This is consistent with paragraph 97 of the NPPF which requires that where facilities are lost due to development they are replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Policy SCLP8.2 of the Final Draft Local Plan would require that such a location is equally or more accessible to the community. This approach will help to take forward the aims of the Suffolk Coastal Leisure Strategy (Document G6, page 5) which includes recommendations around active travel routes and accessibility of leisure facilities and open spaces. Locating sports uses in locations where they can be accessed by non-car modes of transport supports active travel as well as participation in sport, which takes forward the policy of paragraph 91 of the NPPF in relation to enabling and supporting healthy lifestyles through the encouragement of walking and cycling.
226. In order to provide additional clarity in relation to the application of the policy, the Council would support a modification to the supporting text in paragraph 12.35 as set out below:

“12.350. The site is currently occupied by Woodbridge Town Football Club however it is acknowledged that a new location for the football club will need to be identified during the Local Plan period. The allocation of this site is intended to provide a degree of certainty to the football club and the community in identifying options for relocation of the site. Critical to the policy is that the development of the site would only be supported as part of a comprehensive scheme within which the football club is facilitated in relocating to a suitable location ~~within the town~~, which is accessible to the community by non-car modes of transport.”

Question 3.46

Would the Policy be effective in conserving the significance of designated Heritage Assets?

227. The Policy (SCLP12.33) is effective in conserving the significance of designated Heritage Assets. There are no Listed Buildings or Scheduled Monuments in the vicinity of the site. However, a number of archaeological finds have been discovered on the site dating to the Bronze Age. In this respect, criterion (e) requires an archaeological assessment for the site. In response to the site's prominent location criterion (b) of the Policy (SCLP12.33) sets out that design, layout and height of buildings must be appropriate to the site's location adjacent to the AONB. Criterion (c) ensures that the existing landscaping and trees on the perimeter of the site are retained and strengthened. Paragraph 12.356 details the archaeological significance of the site. Paragraphs 12.351 and 12.352 state that an LVIA will need to inform any planning application on the site and that development should be located towards the north of the site, thereby reducing the impact on the wider landscape.

Suggested Modifications

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.1	Paragraph 12.5	Amend paragraph 12.5 to read:: “Neighbourhood Plans have to be produced in accordance with legislation and, prior to going through a referendum, are subject to an Examination undertaken by an independent Examiner. Neighbourhood Plans must be <u>meet a set of ‘basic conditions’ including that it must be in general conformity with the strategic policies of the Local Plan and have regard to national policy, as well as well as complying with regulations relating to environmental assessment and the protection of habitats.</u> The Council is committed to supporting those communities who wish to produce a Neighbourhood Plan and a number of the Local Plan policies contain specific guidance in relation to areas of policy that Neighbourhood Plans may choose to cover. “	To provide clarification in relation to national policy and environmental legislation.	Suffolk County Council AONB Team Rep ID: 226
3.2	Paragraph 12.6 (MIQ3.1)	Amend paragraph 12.6 to read: “The Planning Practice Guidance states that Neighbourhood Plans may meet their requirements through allocations plus windfall, however not through solely windfall. Neighbourhood plans are expected to plan positively to deliver the housing requirements set out in Policy SCLP12.1.”	To reflect the recently updated PPG (Paragraph 104 Reference ID: 41-104- 20190509) and to clarify that Neighbourhood Plans will be expected to plan positively to meet the housing requirements set out in Policy SCLP12.1.	N/A
3.3	Policy	Amend the last sentence of SCLP12.1 to read:	To clarify that the figures are	N/A

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
	SCLP12.1 (MIQ3.1)	<p>“Where Neighbourhood Plans seek to plan for housing growth, they will be expected to plan for the indicative minimum housing requirements set out below:”</p> <p><i>A modification to the title of the right hand column of the table in SCLP12.1 would be as set out below:</i></p> <p>Indicative m “Minimum number of dwellings”</p>	requirements, and not indicative figures in the context of the recently updated PPG (Paragraph 104 Reference ID: 41-104-20190509)	
3.4	Paragraph 12.25	<p>Amend paragraph 12.25 to read:</p> <p>“Land to the north and south west of Felixstowe is designated as being of national and international importance for its landscape and nature conservation interests. Over the plan period opportunities to enhance design, landscaping and green spaces will be realised which take account of the town setting and protected landscapes, <u>including opportunities to provide for biodiversity net gain</u>. Alongside the countryside locations, the sea as well as the River Deben and River Orwell provide an important and valued backdrop to the town for both residents and visitors.”</p>	To reflect national policy in relation to biodiversity net gain.	Suffolk Wildlife Trust Rep ID: 810
3.5	Policy SCLP12.3 (MIQ3.12)	<p>Add a new criterion to SCLP12.3 to read:</p> <p><u>“(s) Assessment of the impacts of Garden Neighbourhood proposals on the Natural Beauty and Special Qualities of the Area of Outstanding Natural Beauty.”</u></p>	To provide additional guidance in relation to potential impacts on the AONB.	Suffolk Coast and Heaths AONB Unit Rep ID: 227

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.6	The penultimate paragraph of SCLP12.3 (MIQ 3.8)	Amend the penultimate paragraph to SCLP12.3 to read: “The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions. and water recycling upgrades undertaken by Anglian Water through the Asset Management Plan <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity will be required, including, but not limited to, water recycling upgrades.”</u>	For clarity	Anglian Water Services Rep ID: 749
3.7	Paragraph 12.63 (MIQ3.13)	Amend paragraph 12.63 to read: “The properties on Conway Close, Swallow Close and Upperfield Drive currently define the edge of the built up area of Old Felixstowe with countryside to the north. The land to the north of Conway Close and Swallow Close can provide a natural extension to the built form of Felixstowe without causing a detrimental impact on the Area of Outstanding Natural Beauty or important views of the Deben Estuary. <u>Understanding the potential impact on the natural beauty and special qualities of this area and identifying appropriate mitigation measures to be delivered on site will be necessary to help conserve and enhance the nationally designated landscape.”</u>	To provide additional guidance in relation to potential impacts on the AONB.	Suffolk Coast and Heaths AONB Unit Rep ID:228
3.8	Policy	Add an additional criterion to Policy SCLP12.4 to read:	To provide additional guidance in	Suffolk

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
	SCLP12.4 (MIQ3.13)	<u>“n) A Landscape and Visual Impact Assessment will be required, and any mitigation provided, including a lighting strategy to conserve and enhance the nationally designated landscape.”</u>	relation to potential impacts on the AONB.	Coast and Heaths AONB Unit Rep ID: 228
3.9	Policy SCLP12.4	Additional criteria inserted after criterion m) requesting: <u>“Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</u>	For clarity	Anglian Water Services Rep ID: 770
3.10	Policy SCLP12.5	Additional criteria inserted after criterion h) requesting: <u>“Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</u>	For clarity	Anglian Water Services Rep ID: 767
3.11	Policy SCLP12.8	Additional criteria inserted after criterion h) requesting: <u>“Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</u>	For clarity	Anglian Water Services Rep ID: 767

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.12	Policy SCLP12.8 (MIQ3.17)	Amend the following paragraphs of SCLP12.8 to read: “e) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity or that capacity can be made available Hours of operation to be limited by planning condition to resist over intensification; f) Landscaping of boundaries to be introduced to enhance the appearance of the site; and g) <u>Hours of operation to be limited by planning condition to resist over intensification.”</u>	To correct typographical error in the Final Draft Local Plan by identifying g) as a separate criterion	Anglian Water Services Rep ID:760
3.13	Policy SCLP12.9 (MIQ3.18)	Additional criterion inserted to SCLP12.9 after criterion f) to read: “i) Ensure that the risk of odour and other amenity impacts from <u>Felixstowe Water Recycling Centre is not detrimental to the amenity of occupants or to the continuous operation of Felixstowe Water Recycling Centre. Where there is a potential impact on amenity, evidence should be provided to demonstrate that there is no unacceptable impact on the occupiers of the employment land and that any mitigation can be achieved without detriment to the continuous operation of Felixstowe Water Recycling Centre.”</u>	For consistency with the NPPF.	Anglian Water Services Rep ID: 825
3.14	Policy SCLP12.10	Additional criteria inserted after criterion h) requesting: “ <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</u>	For clarity.	Anglian Water Services Rep ID: 762

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.15	Policy SCLP12.16	Additional criterion inserted requesting “ <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.</u> ”	For consistency	See Statement of Common Ground with Anglian Water
3.16	Paragraph 12.177 (MIQ3.23)	Additional paragraph after 12.177: “ <u>Development in the Ipswich Strategic Planning Area is predicted to collectively add to significant strain on the transport network in and around Ipswich. Additional highway capacity will not on its own address these issues and the ISPA authorities agree that robust steps must be taken to prioritise healthy and sustainable travel. A package of transport mitigation measures has been identified to reduce vehicle movements. Suffolk County Council as the Highway Authority has developed a strategy which contains a package of mitigation measures to deliver modal shift and mitigate impacts on the wider Ipswich highways network. The Council will work with the other authorities across the ISPA to ensure that there is a co-ordinated approach to funding the mitigation through the delivery of the Local Plan.</u> ”	To reflect approach to delivery of transport mitigation measures in the ISPA.	Suffolk County Council Rep ID: 1072

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.17	Policy SCLP12.18 (MIQ3.23)	Amend paragraph two of SCLP12.18 to read: “Provision of appropriate community infrastructure, education facilities and public transport will be supported where the needs are clearly demonstrated. <u>Development will be expected to maximise its contribution to sustainable transport and promotion of modal shift in order to contribute to the delivery of new and enhanced sustainable transport measures in and around Ipswich.</u> ”	To reflect approach to delivery of transport mitigation measures in the ISPA.	Suffolk County Council Rep ID: 1072
3.18	Policy SCLP12.20	Amend fifth paragraph of policy SCLP12.20 to read: “Buildings will be expected to provide a high quality attractive environment with areas of green infrastructure and appropriate provision for vehicular parking, walking and cycling. <u>Opportunities to encourage and enable travel to the site by walking and cycling must be realised along with measures to encourage travel to the site by public transport.</u> Opportunities to enhance and link into the existing Public Rights of Way network are encouraged.”	To provide greater emphasis on sustainable transport.	Suffolk County Council Rep ID: 1107
3.19	Policy SCLP12.20	Additional criteria inserted requesting: “ <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.</u> ”	For consistency	See Statement of Common Ground with Anglian Water

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.20	Policy SCLP12.21	Additional criteria inserted after criterion j) requesting: <u>“Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”</u>	For clarity.	Anglian Water Services Rep ID: 776
3.21	Paragraph 12.198 (MIQ3.25)	Amend paragraph 12.198 to read: “Outline planning permission was granted in June 2018 for B8 development under application DC/17/4527/OUT <u>DC/17/4257/OUT</u> which relates to 26.6ha of the site.”	Typographical error	N/A
3.22	Policy SCLP12.23	Add a new criterion to SCLP12.23 to read: <u>“e) Provide enhancements or biodiversity.”</u>	To include reference to ecological enhancements as part of the country park	Suffolk Wildlife Trust Rep ID: 645
3.23	Paragraph 12.228 (MIQ3.28)	Amend paragraph 12.228 to read: “The existing sports facilities on the site provide an opportunity to increase provision of such facilities for all age groups by exploring arrangements to make them available for community use, as supported in Policy SCLP12.17 <u>SCLP12.18.</u> ”	Typographical error	N/A

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.24	Paragraph 12.230 (MIQ3.28)	The sentence beginning ‘Martlesham Neighbourhood Plan Policy MAR11..’ onwards should be a new paragraph.	Typographical error	N/A
3.25	Policy SCLP12.28 (MIQ3.34)	Amend criterion e) to read: “Promote quality of life including through enhancements to networks of green infrastructure; and ”	Typographical error	N/A
3.26	Paragraph 12.289	“To reduce the impact of the development and alongside providing for sufficient SANG areas, significant green infrastructure provision and areas of natural green space for recreation should be integral to the layout of the Garden Neighbourhood. These areas will provide amenity value for the future community and, a variety of habitats for wildlife. Green areas will also reduce the perception of settlement coalescence between the built up areas of Benhall and Saxmundham. Ensuring the provision of appropriate green infrastructure is a fundamental part of the creation of a new community in this part of the District and will complement the existing areas of woodland, the public rights of way and the adjacent countryside. Particular attention will <u>need to be paid to how movements will take place between the areas to the east and west of the railway.</u> The northern part of the area to the west of the B1121 known as The Layers	For clarity	N/A

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
		provides an open setting to Hurts Hall, and has the potential to be enhanced to provide a high quality area of open space which makes the most of its history and links with surrounding heritage as well as potentially contributing to SANGs requirements. Any enhancements in relation to the provision of open space in this area need to be sympathetic to the character and setting of this area and heritage assets. The southern part of this area adjoining the B1121 could remain in its existing use, and links could be retained between Benhall and the rest of the Garden Neighbourhood through existing footpaths.”		
3.27	Paragraph 12.291	Amend paragraph 12.291 to read: “12.291 Consultation responses and engagement with Suffolk County Council have highlighted the need for increased primary school provision in the Saxmundham area. Limited capacity in existing schools is increasingly acting as a barrier to the future development of Saxmundham and the surrounding communities. The provision of a primary school with early years provision would support future development in this part of the District. The exact location of a new primary school with early years provision will need to be considered early in the master planning stages to ensure it is an integral and accessible part of the design and layout of the new development, and opportunities to benefit from shared facilities with Saxmundham Free School will be supported. <u>Early years capacity is forecast to be exceeded in the area</u>	To clarify policy in relation to early years provision	N/A

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
		<u>over the plan period, and therefore new provision is expected to be provided alongside the new primary school. In addition, to meet forecast need, the policy also requires provision for a new early years setting on 0.1ha of land unless suitable and accessible accommodation is available elsewhere. At the time of a planning application, it will need to be demonstrated either that provision is to be made on site, or that there is certainty that suitable provision can be provided elsewhere.”</u>		
3.28	Policy SCLP12.29 (MIQ3.35)	Amend the first paragraph of SCLP12.29 to read: “Approximately 66.6ha <u>67.8ha</u> of land for a garden neighbourhood is identified to the south of Saxmundham, which includes land within the parish of Benhall, for an education led development, comprising primary school provision, community facilities, employment land and open space alongside a variety of residential development. This new development will be delivered through a master plan approach brought forward through landowner collaboration and community engagement.”	For clarity	N/A
3.29	Policy SCLP12.29 (MIQ3.40)	Amend criterion b) of Policy 12.29 to read: “b) 0.13ha <u>0.1ha</u> of land <u>on the site should be reserved for a further new early years setting should suitable and accessible alternative provision not be available elsewhere. Proportionate contributions will be required towards the additional early years provision;</u> ”	To clarify policy in relation to early years provision.	N/A

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.30	The penultimate paragraph of SCLP12.29 (MIQ 3.43)	Amend the penultimate paragraph to SCLP12.29 to read: “The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions. and water recycling upgrades undertaken by Anglian Water through the Asset Management Plan <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity will be required. Including, but not limited to, water recycling upgrades.</u> ”	For clarity	N/A
3.31	Policy SCLP12.30	Additional criteria inserted after criterion j) requesting: “ <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.</u> ”	For clarity.	Anglian Water Services Rep ID: 789
3.32	Policy SCLP12.32	Additional criteria inserted requesting: “ <u>Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.</u> ”	For consistency	See Statement of Common Ground with Anglian Water

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
3.33	Paragraph 12.350	“12.350. The site is currently occupied by Woodbridge Town Football Club however it is acknowledged that a new location for the football club will need to be identified during the Local Plan period. The allocation of this site is intended to provide a degree of certainty to the football club and the community in identifying options for relocation of the site. Critical to the policy is that the development of the site would only be supported as part of a comprehensive scheme within which the football club is facilitated in relocating to a suitable location within the town , which is accessible <u>to the community</u> by non-car modes of transport.”	To provide consistency with Policy SCLP12.33	N/A

Action Notes

Meeting	Ipswich Strategic Planning Area Board
Date	Monday 22 nd July 2019
Time	17:00
Location	Orwell Room, Ipswich Borough Council, Grafton House
Attendees	Cllr Paul West (Suffolk County Council) (Cllr PW) Cllr Carole Jones (Ipswich Borough Council) (Cllr CJ) Cllr David Ritchie (East Suffolk Council) (Cllr DRi) Cllr Clive Arthey (Babergh District Council) (Cllr CA) Cllr David Burn (Mid Suffolk District Council) (Cllr DB) James Cutting (Suffolk County Council) (JC) Suzanne Buck (Suffolk County Council) (SB) Sally Minns (Ipswich Borough Council) (SM) Carlos Hone (Ipswich Borough Council) (CH) Robert Hobbs (Babergh Mid Suffolk) (RH) Philip Ridley (East Suffolk Council) (PR) Desi Reed (East Suffolk Council) (DRe) Andrea McMillan (East Suffolk Council) (AM) Isaac Plummer (East Suffolk Council) (IP)
Distribution	Attendees, Tom Barker, Robert Feakes, Graeme Mateer, Martyn Fulcher, Mark Edgerley
Apologies tendered in advance	Tom Barker (Babergh Mid Suffolk) (TB)

	Item	Action	Attachments
1.0	Apologies for absence		
1.1	Robert Feakes (Suffolk County Council) (RF) Graeme Mateer (Suffolk County Council) (GM) Martyn Fulcher (Ipswich Borough Council) (MF) Mark Edgerley (East Suffolk Council) (ME)		

2.0	Action Notes from March Board meetings		Draft ISPA Board Action Notes 13 th March 2019
2.1	All in agreement that action notes were accurate.		Draft ISPA Board Action Notes 20 th March 2019
3.0	Terms of Reference		Draft Revised Terms of Reference (July 2019)
3.1	AM took ISPA Board members through the updates proposed to the Terms of Reference since the March 2019 ISPA Board meeting. AM highlighted the following updates: Replacing 'Suffolk Coastal District Council' with 'East Suffolk Council' throughout the document.		
3.2	Secretariat role will be undertaken by East Suffolk Council. The Secretariat role will be reviewed at 31 st March 2021.		
3.3	Notes from the ISPA Board meetings will continue to be published on the ISPA webpage.		
3.4	CJ explained that the Terms of Reference acts as important evidence of an up to date agreement across the ISPA.		
3.5	Discussion was had around including set times for officer meetings prior to ISPA Board meetings in the Terms of Reference, however the Board agreed that this was not necessary.		
3.6	The revised Terms of Reference were agreed.		
4.0	Local Plan updates		
4.1	RH informed that the Babergh and Mid Suffolk Joint Local Plan Preferred Options (Regulation 18) is currently out for consultation. The consultation will run for 10 weeks, closing at 4pm Monday 30 th September 2019.		
4.2	SM informed the Ipswich Final Draft Local Plan (Regulation 19) will go to full council on 3/9/19 followed by a consultation. IBC are aiming to submit document to PINS in March 2020.		
4.3	DRe informed that the Suffolk Coastal Local Plan was submitted for examination on 29/3/19. Hearing statements are currently being prepared ahead of the hearing sessions that will run between 20/8/19 and 20/9/19.		

	Phillip Lewis has been appointed as the Inspector for the examination.		
4.4	JC informed that Suffolk County Council are waiting for the Inspector's report for the Suffolk Minerals and Waste Plan. A period of consultation on modifications will then follow.		
4.5	Cllr CJ raised a question around the alignment of each authority's progress with their Local Plans. DRe explained that although the timetables were not fully aligned, the authorities are aligned in terms of production of evidence and addressing cross boundary matters.		
5.0	Transport Assessment and Mitigation		
5.1	SB presented an overview to the Board of the work that Suffolk County Council have been undertaking around transport modelling and mitigation through modal shift, junction improvements and other measures. SB covered the following points:		
5.2	The need for additional work to provide clarification on the identification of mitigation measures to address the impacts of growth on the capacity of the highways network has been identified, to take forward the conclusions of earlier transport modelling, particularly in relation to impacts of growth on junction capacity in and around Ipswich.		
5.3	The further work focuses on modelling the potential outcomes from a realistic modal shift, and considers the impacts on the network in both 2026 and 2036.		
5.4	The results show that with modal shift adjustments applied, there are still anticipated to be junctions and links at or over capacity, which is likely to increase in the period 2026 – 2036, and that, therefore, a more significant change is needed in relation to mitigation to reduce the volumes of vehicle traffic on the network in and around Ipswich.		
5.5	SB outlined the anticipated measures that would be needed to address peak hour congestion from commuting, as a package of measures. The measures discussed include: a		

	<p>‘smarter choices’ approach, which would include working with businesses to address methods of travel; the introduction of a quality bus partnership, parking strategies to discourage commuter parking including greater park and ride patronage.</p>		
5.6	<p>It is estimated cost of implementing the measures could be around £25 million. Discussion was had around the role of developer contributions and other potential funding sources.</p>		
5.7	<p>In terms of the A14, it was reported that Highways England could potentially look to introduce measures to manage traffic flows through its “minor” fund, of up to £20 million.</p>		
5.8	<p>Members and officers had further discussion around the outputs of the transport mitigation work, in order to further understanding around how the potential costs of mitigation have been calculated and to understand how an apportionment of the impacts is identified. It was considered that Infrastructure Delivery Plans would play a role in the funding of mitigation projects. There was discussion around how implementation of the strategy would be monitored and it was agreed that this would need to be integral to the delivery of a strategy.</p>		
5.9	<p>There was an acknowledgement from attendees that there is a need to progress with the work to produce a mitigation strategy which would include the identification of appropriate funding sources. A paper containing further detail would be circulated to Members and would be discussed further at a future Board meeting.</p>		
6.	Date of future meetings		
6.1	<p>SM expressed an interest in holding the next board meeting in September, after the Suffolk Coastal Local Plan examination has concluded.</p>	<p>IP to organise next ISPA Board meeting.</p>	
7.	AOB – Nothing raised		

Write to us



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