

**PINS reference number: APP/X3540/W/19/3242636**

**Land to the north and west of Garden Square & Gardenia Close, Rendlesham, Suffolk, IP12 2FD**

**East Suffolk Council planning reference number: DC/19/1499/FUL**

**Appellant: Capital Community Developments Ltd**

**Community Infrastructure Levy (CIL) compliance statement regarding planning obligations sought by Suffolk County Council**

### **Introduction**

1. This statement is submitted by Mr Neil McManus on behalf of Suffolk County Council (SCC) in respect of PINS appeal reference APP/X3540/W/19/3242636.
2. I am employed by SCC as the Development Contributions Manager.
3. I am a member of the Royal Institution of Chartered Surveyors (MRICS) having qualified in 1988. I am also a member of the Association of Chief Estate Surveyors and Property Managers in the Public Sector (ACES).
4. My role is the corporate lead officer for development contributions in order to ensure the funding of appropriate infrastructure to support the delivery of sustainable development. At the strategic level this means seeking approval for corporate policies, procedures, standards and protocols in respect of Section 106 planning obligations and the Community Infrastructure Levy (CIL), taking into account the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) and Regulation 122 of the CIL Regulations, and attendant Central Government policy on CIL. At a development management level this means regularly convening a corporate development team to consider, assess and respond to pre-application enquiries and planning applications (in both cases where the threshold is 10 dwelling units or over 1,000 square metres of floor space), to respond to Local Development Framework consultations, and to participate in appeals and public inquiries, as appropriate, to pursue the authority's service interests.
5. Where the facts and matters set out in this statement are within my own knowledge, they are true, and where they derive from other sources, they are true to the best of my knowledge and belief.

## **Planning Obligations**

6. There is the need to demonstrate the compliance of planning obligations with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) (the CIL Regulations) and set out in paragraph 56 of the National Planning Policy Framework.
7. **New CIL Regulations were laid before Parliament on 04 June 2019. These Regulations may be cited as the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019 and came into force on 1st September 2019 (“the commencement date”). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of ‘relevant infrastructure’).**
8. This statement is in respect of a phased development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access (“the Proposed Development”).
9. **The planning obligations sought by SCC in respect of the Proposed Development are:**
  - a) **Secondary School Transport Contribution – £52,800, subject to increase by the retail price index (RPI);**
  - b) **On-site and off-site Public Right of Way Contribution including dedication of land on-site – £12,000, subject to increase by the All In Tender Price Index published by the Building Cost Information Service of the Royal Institution of Chartered Surveyors (BCIS); and,**
  - c) **Public Transport Infrastructure Real Time Passenger Information (RTPI) Screen Contribution – £15,000, subject to increase by the BCIS.**
10. The Appellant will need to provide a planning obligation securing the matters set out in paragraph 9 above.
11. **To note that Garden Square and Gardenia Close are both unadopted roads and remain private roads. They were constructed by MSV Homes under planning reference C03/2362 which had an associated S106A dated 13 October 2004. However, MSV Homes did not provide a bond to the Highway Authority to cover the costs of the works under Section 38 of the Highways Act 1980. A bond or cash deposit can be called upon if the developer goes into liquidation or otherwise defaults on their**

responsibilities. MSV Homes have failed to bring the roads up to adoptable standards – refer to the separate note dated 13/03/2020 provided by the Highway Authority for the Inspector. On 03 February 2020 a petition by Suffolk County Council for a winding-up order against MSV Homes was granted by the Ipswich County Court as a result of the non-payment of the education contribution required by the planning obligation. The company is now in liquidation. The Official Receiver is looking into the company's affairs in an effort to recover money for the creditors. The county council has recently found out that Garden Square and Gardenia Close (previously assets of MSV Homes) have been transferred to Capital Community Developments Limited (a connected party). The Official Receiver is investigating if this is a breach of s238 of the Insolvency Act 1986 i.e. where a company has entered into a transaction at undervalue the Court can reverse the sale or movement of assets. Capital Community Development's title to this land is therefore in question until the Official Receiver makes his decision. This might have implications for the planning obligation if the land transferred from MSV to Capital Community Developments is 'reversed' i.e. the Official Receiver would then be in control of the assets known as Garden Square and Gardenia Close and would therefore need to agree to be a party to the planning obligation.

12. In the absence of an agreed, lawful and signed planning obligation securing the identified contributions SCC would invite the Inspector to dismiss the appeal as the Proposed Development would be contrary to the principles of delivering sustainable development as set out in the NPPF (including paragraphs 8, 11, 91, 92, 94, 98, 102, 103, 104, 108, 110 & 111), Suffolk Coastal District Council's Local Plan – Core Strategy & Development Management Policies, Suffolk Coastal District Council's Site Allocations and Area Specific Policies Development Plan Document, and Regulation 122 of the CIL Regulations.

### **Planning obligations CIL 122 compliance**

13. SCC is satisfied that the planning obligations meet the three legal tests under Regulation 122(2) of the CIL Regulations and set out within paragraph 56 of the National Planning Policy Framework (NPPF):

- a) *necessary to make the development acceptable in planning terms;*
- b) *directly related to the development; and*
- c) *fairly and reasonably related in scale and kind to the development.*

## **Relevant national policy, development plan policy, and emerging policy**

14. The NPPF [revised February 2019] sets out the Government's planning policies for England and how these should be applied.

15. Chapter 2 of the NPPF talks about the importance of achieving sustainable development.

*Paragraph 8: Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).*

*Paragraph 10: So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).*

16. Chapter 8 of the NPPF is concerned with promoting healthy and safe communities.

*Paragraph 91: Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

*c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

*Paragraph 98: Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.*

17. Chapter 9 of the NPPF highlights the importance of promoting sustainable transport measures.

*Paragraph 102: Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

*a) the potential impacts of development on transport networks can be addressed;*

*c) opportunities to promote walking, cycling and public transport use are identified and pursued;*

*e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

Paragraph 104: *Planning policies should:*

*a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*

*d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);*

Paragraph 108: *In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

*a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

*b) safe and suitable access to the site can be achieved for all users;*

Paragraph 110: *Within this context, applications for development should:*

*a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

*b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*

*c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

Paragraph 111: *All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.*

18. The Suffolk Coastal District Council Local Plan – Core Strategy & Development Management Policies Development Plan Document was adopted in July 2013. This document contains a number of references to infrastructure provision and sustainable development.
19. Objective 13 – Accessibility refers to the need to promote better access to housing, employment, services and facilities for every member of the community. It talks about the need to enable improved access to healthcare, leisure, education, training, employment and other services, when measured against national standards. By working in partnership, the creation of additional or improved provision in association with, and to support, new development.
20. Objective 15 – Physical and Community Infrastructure. This refers to the need to ensure that, as a priority, adequate infrastructure such as transport, utilities or community facilities are provided at an appropriate time, in order to address current deficiencies and meet the needs of new development. Paragraph 3.185 says *“Where current infrastructure is inadequate to meet the needs of new development, developers will be required to fund new or improved infrastructure that is directly related to those needs. This is especially important when considering proposed large-scale allocations of housing land but equally applies to small scale development proposals across the district given its potential cumulative impact.”*
21. Strategic Policy SP18 – Infrastructure. This includes ensuring that the infrastructure required in order to service and deliver new development must be in place or provided at the required phase of the development.
22. Under the chapter on ‘Implementation and Monitoring’ in paragraph 6.04 it refers to infrastructure constraints with the priority to ensure the delivery of sustainable development including that relating to education. The main driver for required infrastructure improvements is the combination of existing needs and future housing and population growth.
23. The Suffolk Coastal District Council Site Allocations and Area Specific Policies Document was adopted in January 2017. It sets out how land is to be used for housing, business, recreation and conservation. Paragraph 8.06 states that infrastructure will be delivered through various funding mechanisms including the use of Section 106 contributions to contribute

towards the provision of infrastructure in relation to site specific requirements. Paragraph 8.07 refers to Table 6.1 of the Core Strategy which outlines the level of infrastructure necessary for growth and development across the district.

24. The Suffolk Coastal District Plan Strategic Policy SP1 – Sustainable Development provides a policy objective to:

*“(d) ensure the provision of the appropriate infrastructure in order to support existing and proposed communities...”*

25. Strategic Policy SP11, which backs up SP1, states:

“In order to make the best use of capacity within the local and strategic road and rail networks serving the district, to support the District’s strategic economic role both within the subregion and nationally, to maintain quality of life and to contribute to reducing the impact of CO2 on climate change, the District Council will work with neighbouring authorities, the highway authority, public transport providers, developers and others to maximise opportunities for local journeys to be made by means other than the private motor car. In relation to public transport this will include improving both the quantity and quality of the service on offer. In relation to foot and cycle provision this will mean securing safe and easy access to local facilities where walking or cycling offers a realistic alternative for most people. Where new services and facilities are to be provided by means of developer contributions in association with new developments their timely provision will be secured by means of conditions, legal agreements and/or through the Community Infrastructure Levy (CIL)”.

26. The Suffolk Coastal Final Draft Local Plan was submitted to the Secretary of State for independent examination on 29 March 2019. The Inspector has recently responded to the district council setting out a number of issues which he has highlighted for consideration. This draft plan sets out the presumption in favour of sustainable development and settlement boundaries. Relevant policies in the Final Draft Local Plan for this Proposed Development include:

- Policy SCLP3.1 Strategy for Growth in Suffolk Coastal.
- Policy SCLP3.2: Settlement Hierarchy – Rendlesham is a Large Village.
- Policy SCLP5.1: Housing Development in Large Villages.
- Policy SCLP12.62: Land West of Garden Square Rendlesham.
- Policy SCLP3.5 Infrastructure Provision.
- Area Specific Strategies – Strategy for the Rural Areas.
- Appendix B – Infrastructure Delivery Framework.

27. The Suffolk Local Transport Plan (LTP) 2011 – 2031 is a material consideration. It has five targets for rural areas of the county (page 30) of which four relate to transport and sustainability. These are:
- a) Better accessibility to employment, education, and services;
  - b) Encouraging planning policies to reduce the need to travel;
  - c) Maintaining the transport network and improving its connectivity, resilience and reliability; and,
  - d) Reducing the impact of transport on communities
28. In the LTP it refers to having safe, healthy and inclusive communities; the important role the public rights of way network can play in rural areas and on the fringes of towns in providing traffic-free and safe routes for walking and cycling journeys; the aims of providing safe continuous routes for cycling and walking, removing gaps and addressing barriers and disincentives to users; creating the Greenest County through the reduction of carbon emissions by encouraging the use of more sustainable forms of transport; the role of walking and cycling in improving public health, and the aim of providing safe, continuous routes for cycling and walking, removing gaps and addressing barriers and disincentives to users.
29. The Suffolk – Greenest County policy also encourages the use of more sustainable forms of transport.
30. Suffolk Green Access Strategy [2019] Rights of Way Improvement Plan (ROWIP) highlights the importance of development giving people the greatest opportunity to access the countryside by walking and cycling. SCC Cabinet adopted the strategy (which is the county council's statutory Rights of Way Improvement Plan) on 5th November 2019. [Appendix 5].
31. The Active for Life Suffolk Walking Strategy 2015 to 2020 Action Plan seeks to ensure existing communities with a population over 500, and new developments over 10 dwellings have easy access to a one-mile natural walk or 2 hectares of green space, within 500 metres of their home. The second of the two aims of the Suffolk Walking Strategy is that walking becomes the 'default' choice for journeys of 20 minutes walking time or less.
32. Suffolk's Nature Strategy's 2020 vision for the natural environment includes seeking better access to enhanced enjoyment and a deeper understanding of Suffolk's natural environment's unique qualities. Recommendation 28 states Suffolk County Council should seek opportunities to improve the connectivity of the public access network and the development and improvement of the public rights of way network.

33. The Joint Health and Wellbeing Strategy for Suffolk 2012 to 2022 seeks positive outcomes in that Suffolk residents should have access to a healthy environment and take responsibility for the own health and wellbeing. This outcome informed the walking strategy's action plan planning target.
34. The 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk' was adopted by Suffolk Coastal District Council and by Suffolk County Council [2012]. This is adopted as Supplementary Planning Guidance.
35. The Developers Guide provides advice to landowners, developers, applicants for planning permission and anyone with an interest in development, on the use of planning obligations in the planning application process in the County. This Developers Guide represents a joint working approach to public service provision.
36. In appropriate cases, the Developers Guide will form a material consideration in the determination of planning applications and could form the basis for grounds for refusing a planning application if the requirements are not met. In some instances, it may be possible to make development proposals acceptable using planning conditions. Where this is not the case, it might be possible to make development acceptable by planning obligations, in accordance with paragraph 56 of the NPPF and Regulation 122 of the CIL Regulations.
37. The Developers Guide gives an indication of the level of contributions developers would be expected to make. However, all contributions sought will be assessed on a site by site basis directly related to an individual proposal.
38. The Education Provision document provides further information about the infrastructure requirements in chapter 4 of the Developers Guide. In paragraph 5.9 of the Education Provision document [Appendix 1] it says, '*Suffolk County Council has a duty to provide school transport for children under the age of eight living in excess of two miles from a school via a safe walking route and in excess of three miles via a safe walking route for older children. Therefore, where housing development is proposed and such routes are not available Suffolk County Council will look for an additional developer contribution to mitigate the impact of additional pupil living in an area that, in school transport terms, is 'unsustainable'.*
39. In the context of this appeal, the planning obligations sought by SCC are required in order to satisfactorily mitigate the impacts of the Proposed Development. These impacts arise directly as a result of the increased population generated by the development in the local area. The provision of such therefore, within a planning obligation, to mitigate for the increased demands on local services from the increased population as a result of the

development, is required as a matter of principle, having regard to national and development plan policy.

### **Specific need, relation to the development and reasonableness of amount**

40. Set out below is specific justification for the Secondary School Transport Contribution, the On-site and Off-site Public Right of Way Contribution and Public Transport Infrastructure Contribution planning obligations to demonstrate that they are necessary to make the development acceptable, are directly related to the development and are fairly and reasonably related in scale and kind to the development.

### **Secondary School Transport Contribution**

41. Assessing the need to provide school transport.

42. The Education Act 1996, as amended by Part 6 of the Education and Inspections Act 2006, places a duty on Local Authorities to make suitable travel arrangements free of charge for eligible children as they consider necessary to facilitate their attendance at school. Walking distance is defined by Section 444(5) of the Education Act 2006 at two miles for under-eights and three miles for those who have attained eight years.

43. These distances are measured by the shortest available walking route. An 'available route' is one which a child, accompanied as necessary, may walk with reasonable safety to school. In excess of these distances SCC must fund 'free' school transport. Where development is proposed in locations that require SCC to provide school transport, developer contributions are sought to fund provision for a minimum of five years for secondary pupils.

44. Where it is not possible to access a school place through a safe walking route within statutory distances, the county council will seek a contribution towards funding the provision of home to school transport. The requirement for this contribution will be determined on a case-by-case basis, in line with the statutory policy for provision of home to school transport. This states that where a child lives more than the statutory walking distance from the nearest school, transport arrangements are the Local Authority's responsibility.

45. On average the current cost (December 2019) of transporting a secondary school pupil from home to school is £5.05 per day (return) or £960 per annum [Appendix 2]. The calculation of school transport contributions is based on 190 days per year over 5 years for secondary school pupils [Source: Update on developer contribution costs for early years and education, page 2, Other

costs: final paragraph published on the Suffolk County Council website August 2019].

46. By way of comparison – Essex County Council [Appendix 3] have an average cost (April 2019) for secondary school transport of £5.30 per day (return). The calculation of school transport contributions is based on 190 days per year over 5 years for secondary school pupils [Source: Paragraph 5.3.1 of the Essex County Council Developers' Guide to Infrastructure Contributions consultation document October 2019].
47. For secondary schools, a five-year period represents the cost of transporting pupils from year 7 to the end of year 11. It should be noted that the costs for the county council will be ongoing, but the calculation of the contribution has been limited to 5 years. It is recognised that the pupils forecast to directly arise from the Proposed Development will not all live in the new housing from the outset, or all start secondary school in year 7 – but nonetheless this is a reliable, robust and reasonable way of calculating the contribution, noting that the county council will have responsibilities to provide 'free' home to school transport on an ongoing basis for the life of the development.
48. The catchment and nearest primary school to the Proposed Development is Rendlesham Primary School which is under two miles walking distance.
49. The catchment and nearest secondary school to the Proposed Development is Farlingaye High School in Woodbridge which is more than three miles walking distance. A minimum walking route distance to Woodbridge by road or using footpaths has been calculated at about 6.8 miles. On this basis, children of secondary school age (ages 11 – 16) arising from the Proposed Development will be entitled to 'free' home to school transport provided by Suffolk County Council.
50. Contribution sought from the Proposed Development is based on the following formula:
- a) Daily cost of transport x 190 school days x number of years**
51. SCC anticipates a minimum yield of 11 secondary-age pupils arising from the Proposed Development of 75 dwellings (considering the dwelling type and mix). This is based on the methodology set out in the adopted Section 106 Developers Guide Education Provision topic paper paragraph 6.1 [Appendix 4] which is 18 secondary-age pupils arising for every 100 dwellings i.e. 0.18 per dwelling.
52. Contribution calculation

- a) 11 secondary-age pupils x £5.05 per pupil per day x 190 days x 5 years = **£52,772.5 rounded to £52,800.**

53. The contribution will be payable in full prior to first occupation of the first dwelling and held for a minimum period of 10 years from the date of the first occupation of the final dwelling. The contribution will be increased by reference to any change in the Retail Price Index between the date of the Deed and payment. The Department for Education (DfE) guidance 'Securing developer contributions for education' [November 2019] says in paragraph 4, "*We recommend that planning obligations allow enough time for developer contributions to be spent (often this is 10 years, or no time limit is specified)*".

54. The Secondary School Transport Contribution meets the 3 legal tests as follows:

- **Necessary to make the development acceptable in planning terms.**  
The Secondary School Transport Contribution is necessary because of the policies referred to and because of the additional demands which would be placed on the county council as a result of the Proposed Development.
- **Directly related to the development.** The Secondary School Transport Contribution directly relates to the number of secondary-age pupils forecast to arise and live in the Proposed Development.
- **Fairly and reasonably related in scale and kind to the development.**  
The Secondary School Transport Contribution is based on the current costs of the county council providing 'free' home to school transport for the secondary-age pupils forecast to arise and live in the Proposed Development.

55. The approach that Suffolk County Council takes in respect of securing school transport contributions is consistent with other local authorities e.g. Essex County Council, Oxfordshire County Council, and Cumbria County Council.

56. The securing of a School Transport Contribution has been confirmed in appeal decisions, as a matter of principle, to be compliant with Regulation 122 of the CIL Regulations. For example:

- a) APP/Q3115/W/16/3161733 (allowed) relating to Thames Farm, Reading Road, Shiplake, Henley-on-Thames, RG9 3PH for outline planning permission for up to 95 dwellings. In paragraph 50 of the Decision dated 02 August 2017 it says, '*Schedule 4 of the Deed requires the payment of County Contributions, towards public transport*

*improvements, bus stop infrastructure, primary school transport and rights of way improvements'. It goes on to say in paragraph 51, 'The obligations of the Undertaking are all related to requirements of development plan policies and are all necessary to make the development acceptable in planning terms. They are all, furthermore, directly related to the development, are fairly and reasonably related in scale and kind to the development, and are in place to mitigate the effects of the development. The Deed of Agreement therefore complies with the tests set out in the National Planning Practice Guidance and with Regulation 122 of the CIL Regulations 2010 (CIL)'.*

- b) APP/Q3115/W/17/3182192 (dismissed) relating to land south of the High Street, Tetsworth for up to 60 dwellings. In paragraph 60 of the Decision dated 04 June 2018 it says, '*This may mean that children from the proposed development may not be able to attend Tetsworth Primary School, and Oxfordshire County Council (OCC) may be required to provide funding for school transport to that alternative school. All of these alternatives are beyond the statutory walking distance'*. It goes on to say in paragraph 61, '*The need for this funding would be created by the development. The Planning Obligation makes for an agreed contribution in this event subject to me finding it complies with the Community Infrastructure Levy Regulations 2010 (as amended) (the CIL Regulations). For the reasons given above I consider that such a contribution would be necessary to make the development acceptable in planning terms, it would be directly related to the development and fairly and reasonably related in scale and kind to the development. This contribution would not represent infrastructure as defined by the CIL Regulations and consequently the totting-up provisions are not engaged'*.

### **On-site and Off-site Public Right of Way Contribution**

57. The Proposed Development sits close to a public rights of way network, giving access to amenities and the wider countryside. Public rights of way are important for recreation, encouraging healthy lifestyles and providing green links.

58. However, if the Proposed Development is granted planning permission without the creation of a new public right of way link into the surrounding countryside this opportunity will be lost for good. **This would be contrary to paragraph 98 of the NPPF.**

59. The parties to the planning obligation will include *Lilias Mulgrave Sheepshanks* and *Andrew Michael Alexander Skrine*, who, after research with

the HM Land Registry, appear to have title to land to the north of the Proposed Development over which the proposed off-site public right of way route crosses. Requests have been made to the appellant's agent to obtain the agreement of *Sheepshanks* and *Skrine* to include this off-site link within the planning obligation so that the entire length of the new public right of way is secured upon the grant of planning permission – to be secured by way of a Creation Agreement (with no land compensation arising). However, the appellant's agent has declined to do this.

60. Whilst the plan [Appendix 6] shows the proposed off-site public right of way route connecting with the B1069 Woodbridge Road at Ivy Lodge, there is also the **and/or** option of this new route going north to the Tumulus and then turning east to connect with Ivy Lodge Road.

61. The proposal is:

- a) The creation of a new public right of way link from Sycamore Drive (adopted highway), along Garden Square, through the appeal site, and then east along, or in the vicinity of, existing tracks to the B1069 Woodbridge Road and/or Ivy Lodge Road (adopted highways). [Appendix 6].
- b) The new public right of way will be secured for part of its route (Garden Square and the appeal site) by way of agreement on terms set out in the planning obligation. This is the 'on-site' public right of way. This will be secured by a Creation Agreement under the Highways Act Section 25.
- c) The creation of the 'off-site' part of the new public right of way will be sought by a Creation Agreement with the relevant Owner(s) under the Highways Act Section 25 or failing that by a Creation Order under the Highways Act Section 26.
- d) A financial contribution of £4,000 towards the new public right of way legal order making and associated costs for its entire new route.
- e) A financial contribution of £8,000 for off-site land compensation and costs associated with the creation of a new public right of way across adjoining land to the B1069 Woodbridge Road and/or Ivy Lodge Road.

62. Set out below are details of how the Public Right of Way Contribution is compliant, in regard to the Proposed Development, with Regulation 122 of the CIL Regulations.

63. The Public Rights of Way Contribution meets the CIL tests as follows:

**a. Necessary to make the development acceptable in planning terms:**

- i. In accordance with the NPPF paragraph 98 which seeks opportunities to provide better facilities for users, including by adding links to existing rights of way networks, and reinforces the importance of sustainable transport and health objectives.
- ii. To support Spatial Policies SP1 and SP11 of the Suffolk Coastal District Plan, Suffolk Local Transport Plan 2011-2031, SCC's Rights of Way Improvement Plan, the Active for Life Suffolk Walking Strategy 2015 to 2020 action plan and the Joint Health and Wellbeing Strategy for Suffolk.
- iii. To protect and enhance the public rights of way and access.
- iv. For recreation, encouraging healthy lifestyles and providing green links in respect of the new residents arising from the Proposed Development.
- v. To ensure that the residents of the Proposed Development have convenient access to well-maintained public rights of way, to enable them to enjoy country walks and to encourage people to walk more.

**b. Directly related to the development:**

- i. These improvements directly relate to the Proposed Development as a result of the likely increased usage of the new public rights of way network in the vicinity of the site.
- ii. To enable the new residents to have close and easy access to the public rights of way network in order to encourage walking and health objectives among new residents.
- iii. The Proposed Development directly provides the opportunity to access the public rights of way network into the adjacent countryside.

**c. Fairly and reasonably related in scale and kind to the development:**

- i. The contribution sought is based on current robustly estimated costs from SCC for the carrying out of the proposed works.
- ii. It is required to carry out improvements necessary due to the anticipated increase in usage of the local public rights of way network arising from a Proposed Development of 75 dwellings.

64. The provision of such therefore, within a planning obligation, to mitigate for the impact of the Proposed Development, is entirely satisfactory as a matter of principle, having regard to the NPPF, local plan policies and Regulation 122 of the CIL Regulations.

## **Public Transport Infrastructure Contribution**

65. The county council will deliver a solar-powered real time passenger information screen at the Redwald Drive stop opposite Sparrowscroft Road.
66. SCC requires a contribution of £15,000. This is to ensure that residents from the Proposed Development have access to reliable bus services to destinations in the wider area to encourage use of buses as a sustainable form of transport. The contribution is to provide enhanced bus stops in the vicinity of the Proposed Development.
67. The reasons for the improvements are as follows: These improvements directly relate to the development as the new residents will need to be able to have close and easy access to the public transport network in order to encourage sustainable transport modes; and
68. In order for the development to be sustainable and comply with paragraph 108 of the NPPF, Suffolk Coastal District Council's Local Plan – Core Strategy & Development Management Policies, Suffolk Coastal District Council's Site Allocations and Area Specific Policies Development Plan Document, improvements to the sustainable transport network in Rendlesham are necessary for the new residents to take up opportunities to use sustainable transport.
69. The public transport contribution sought meets the three tests set out in Regulation 122 of the CIL Regulations as follows:
- a. **Necessary to make the development acceptable in planning terms:**
    - To support paragraphs 102, and 103 of the NPPF, Spatial Policies SP1 and SP11 of the Suffolk Coastal District Plan, Suffolk Coastal District Council's Site Allocations and Area Specific Policies Development Plan Document, and the Suffolk Local Transport Plan 2011-2031 to mitigate the impact of the development on public transport, maximise opportunities for local journeys to be made by means other than the private motor car and improve the quantity and quality of the service on offer;
    - to encourage the residents to travel by sustainable transport modes.
  - b. **Directly related to the development:**
    - These improvements directly relate to the development as the new residents will need to be able to have close and easy access to the

public transport network in order to encourage sustainable transport modes.

**c. Fairly and reasonably related in scale and kind to the development:**

- The contribution sought is based on current robustly estimated costs from SCC

70. The securing of bus stop improvements within a planning obligation to mitigate the impact of the Proposed Development is therefore entirely satisfactory as a matter of principle, having regard to the NPPF, Suffolk Coastal District Council's Local Plan – Core Strategy & Development Management Policies, Suffolk Coastal District Council's Site Allocations and Area Specific Policies Development Plan Document, and Regulation 122 of the CIL Regulations.

**Community Infrastructure Levy (CIL)**

71. Suffolk Coastal District Council (the District Council) has adopted a Charging Schedule for their area which came into effect on Monday 13 July 2015.

72. The planning obligation contributions sought are in compliance with the CIL Regulation 122 and are site-specific requirements. Regulation 11 of the CIL Regulations 2019 removes regulation 123. Nonetheless for clarity, school transport costs, footpath improvements and public transport infrastructure were not previously included on the District's 123 List.

73. To further note that in respect of school transport contributions the Inspector in the appeal decision APP/Q3115/W/17/3182192 (referred to above) says in paragraph 61, '*This contribution would not represent infrastructure as defined by the CIL Regulations*'.

## **Conclusion**

74. **SCC would therefore invite the Inspector to conclude that the planning obligations sought are in compliance with the requirements of the CIL Regulations, the NPPF and local plan policies and should be taken into account and given sufficient weight in determining whether any planning permission should be granted pursuant to the appeal.**
75. **In the absence of an agreed, lawful and signed planning obligation securing the Secondary School Transport Contribution, the On-site and Off-Site Public Right of Way Contribution and the Public Transport Contribution, SCC would invite the Inspector to dismiss the appeal as the Proposed Development would not be sustainable and therefore contrary to the NPPF (including paragraphs 8, 11, 91, 92, 94, 98, 102, 103, 104, 108, 110 & 111), Suffolk Coastal District Council’s Local Plan – Core Strategy & Development Management Policies, Suffolk Coastal District Council’s Site Allocations and Area Specific Policies Development Plan Document, and Regulation 122 of the CIL Regulations.**

**Neil McManus  
Development Contributions Manager  
Suffolk County Council  
17 March 2020**

### **Appendices:**

- **Appendix 1: Extract from the Education Provision topic paper [Source: SCC website].**
- **Appendix 2: Update on developer contribution costs for early years and education published on the Suffolk County Council website August 2019 [Source: SCC website].**
- **Appendix 3: Extract from Essex County Council Developers’ Guide to Infrastructure Contributions consultation document October 2019 [Source: Essex County Council website].**
- **Appendix 4: Extract from the Education Provision topic paper [Source: SCC website].**
- **Appendix 5: Suffolk Green Access Strategy – Rights of Way Improvement Plan (ROWIP) – adopted 05 November 2019.**
- **Appendix 6: public right of way plan – proposed route**

# Appendix 1

School Size	Cost £ millions
Primary (1 form of entry 5 – 11): 210 places	4.35
Primary (1.5 forms of entry 5 – 11): 315 places	5.6
Primary (2 forms of entry 5 – 11): 420 places	6.9
Secondary (ages 11 -16): 900 places	29
Secondary (ages 11 -16): 1500 places	40

**Table 2** – Estimated total build costs

- 5.8 The school site must be rectangular in shape, on level ground and located on a gyratory road (i.e. not in a cul-de-sac) near to the centre of the development and close to other community facilities. The site must be free of contamination and cleared of any previous land use especially if the site was once industrial land. The developer will also provide services to the appropriate boundary of the site, including adequate access by motor vehicle and on foot, ICT connections, gas, electric and water supplies plus outlet to the local sewer system. This will be provided free of charge to the county council. The cost of all archaeological surveys and remedial work will be met by the developer.
- 5.9 Suffolk County Council has a duty to provide school transport for children under the age of eight living in excess of two miles from a school via a safe walking route and in excess of three miles via a safe walking route for older children. Therefore, where housing development is proposed and such routes are not available Suffolk County Council will look for an additional developer contribution to mitigate the impact of additional pupil living in an area that, in school transport terms, is 'unsustainable'.
- 5.10 In the case of smaller developments, contributions will be secured to fund extensions and/or improvements to existing schools on the basis of multiplying the number of places required by the appropriate cost multiplier. See table 1. For the 2015-2016 financial year these are £12,181 per primary school place, £15,268 per middle school place, £18,355 per high/upper school place and £19,907 per sixth form place.
- 5.11 In certain circumstances there may be a requirement to secure education contributions in order for the county council to provide temporary accommodation to meet the needs of pupils arising from development prior to the completion of school improvements or extensions or the opening of a new school. This will be assessed on a site by site basis.

## 6 FORECASTING PUPILS FROM NEW HOUSING

- 6.1 When estimating the number of pupils that a new housing development will generate (pupil yield), Suffolk County Council takes account of the number of houses and flats that are suitable to accommodate children whilst reviewing the demographical changes, e.g. inward migration and birth rates. One bed houses and other categories of dwellings such as student and elderly people's accommodation are normally excluded from any calculation. The pupil yields (Table 3) from houses with two or more bedrooms is 25 children per one hundred homes (0.25 per dwelling) for primary school age, 18 pupils per one hundred homes (0.18 per dwelling) for high school age, and 4 pupils per one hundred homes (0.04 per dwelling) for sixth form age pupils. The equivalent yields from 100 two (or more) bedroom flats are 15, 2, and 1, and for 100 one bedroom flats are 5, 1 and 1. The pupil yields from all types of dwelling will vary slightly to take account of middle school provision in areas of Suffolk where a 3-tier system of education is still in operation.

# Appendix 2

## Update on developer contribution costs for early years and education

The Developers Guide in paragraph 1.22 says, "The Developers Guide and supporting topic papers will be regularly updated to provide current cost information and changes to supporting policies". This update replaces previous cost multipliers information referred to in the Developers Guide, the Early Years and Childcare Provision topic paper, the Education Provision topic paper and The Code of Practice Protocol.

The Department for Education (DfE) publications 'Securing developer contributions for education' [April 2019] and 'Education provision in garden communities' [April 2019], should be read in conjunction with the National Planning Practice Guidance (NPPG) advice on planning obligations [revised March 2019]. The county council will use the DfE guidance to help it secure developer contributions for education so that housing developers contribute to the cost of providing the new school places required due to housing growth.

In paragraph 15 of the DfE publication 'Securing developer contributions for education' it says, "We advise that you base the assumed cost of mainstream school places on national average costs published annually in the DfE school place scorecards. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the national average to reflect the costs in your region, using BCIS location factors. We recommend the use of index linking in planning obligations so that contributions are adjusted for inflation at the point they are due".

In paragraph 16 it says, "Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school. Similarly, further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place".

The most recent DfE school place scorecard is 2018. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. The county council will apply the following DfE school place scorecard costs to planning obligations entered into on or after 02 September 2019:

- Early years expansion cost per pupil place for 2019/20 is £16,596
- Early years new build cost per pupil place for 2019/20 is £19,611
- Primary school expansion cost per pupil place for 2019/20 is £16,596
- Primary school new build cost per pupil place for 2019/20 is £19,611
- Secondary school expansion cost per pupil place for 2019/20 is £22,738
- Secondary school new build cost per pupil place for 2019/20 is £23,962

- Sixth form expansion cost per pupil place for 2019/20 is £22,738
- Sixth form new build cost per pupil place for 2019/20 is £23,962

Other costs:

- In paragraph 17 of the DfE publication it says, "Special schools require more space per pupil than mainstream schools, and this should be reflected in the assumed costs of provision. We recommend that developer contributions for special or alternative school places are set at four times the cost of mainstream places, consistent with the space standards in Building Bulletin 104. You can also refer to the National School Delivery Cost Benchmarking report for the costs of delivering SEN school places".
- Temporary classroom costs – minimum cost of £250,000.
- School transport costs – annual school transport cost per pupil is £960, with a minimum of 7 years for primary-age pupils and a minimum of 5 years for secondary age (11 – 16) pupils.

Updated: 13 August 2019

# Appendix 3

## **The Cost of Additional Places**

Subject to indexation the cost per place for full-time post 16 places is £24,846.

The precise cost of projects will be determined by ECC after reviewing the Land Compliance Study report (see 'Section 4') that the developer must submit with any planning application that includes land for a new educational provision.

**Table 9: The cost of additional places.**

<b>Dwelling Type</b>	<b>Units</b>	<b>Post 16 - Factor</b>	<b>Post 16- Yield</b>	<b>Average Costs per place</b>	<b>Total</b>
<b>One bed</b>	120	0.01	0		0
<b>Flats</b>	200	0.02	4	£24,846	£99,384
<b>Houses</b>	65	0.04	3		£74,538
<b>Total</b>	<b>385</b>	<b>Pupils</b>	<b>7</b>		<b>£173,922</b>

## **5.3. School transport and sustainable travel.**

### **5.3.1. Assessing the need to provide school transport.**

The Education Act 1996, as amended by Part 6 of the Education and Inspections Act 2006, places a duty on Local Authorities to make suitable travel arrangements free of charge for eligible children as they consider necessary to facilitate their attendance at school. Walking distance is defined by S 444(5) of the Education Act 2006 at two miles for under-eights and three miles for those who have attained eight years.

These distances are measured by the shortest available walking route. An 'available route' is one which a child, accompanied as necessary, may walk with reasonable safety to school. In excess of these distances ECC has to fund 'free' school transport. Where development is proposed in locations that may require ECC to provide school transport, developer contributions are sought to fund provision for a minimum of seven years for primary and five years for secondary pupils

On average the cost of transporting a primary school child to school is around £11.40 per day (return). The corresponding cost for secondary school transport is £5.30 (April 2019 costs). This is due to economies of scale. The calculation of school transport contributions is based on 190 days per year over 7 years for primary school children, and 190 days per year over 5 years for secondary school children.

# Appendix 4

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Primary (1 form of entry 5 – 11): 210 places	4.35
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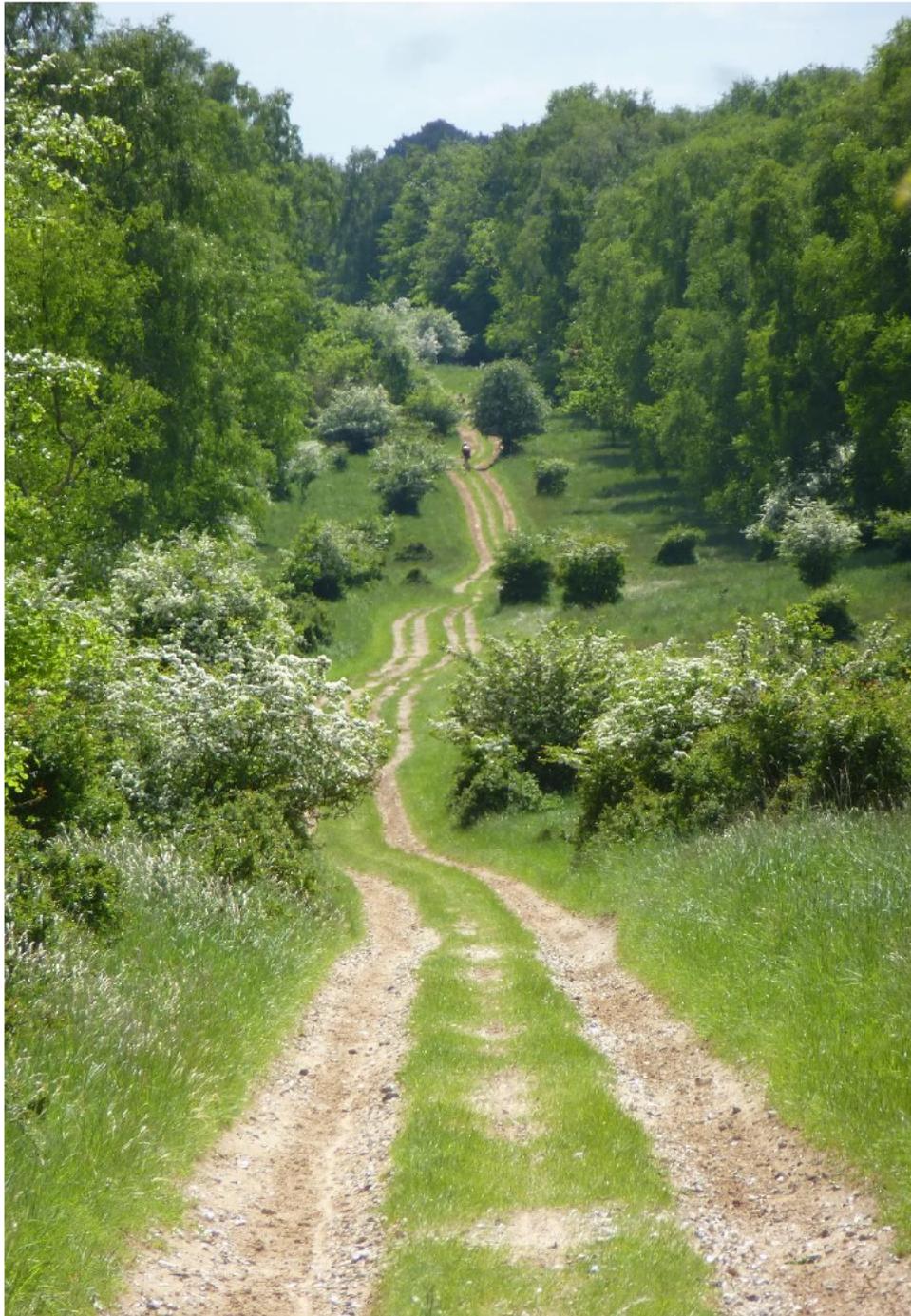
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## 6 FORECASTING PUPILS FROM NEW HOUSING

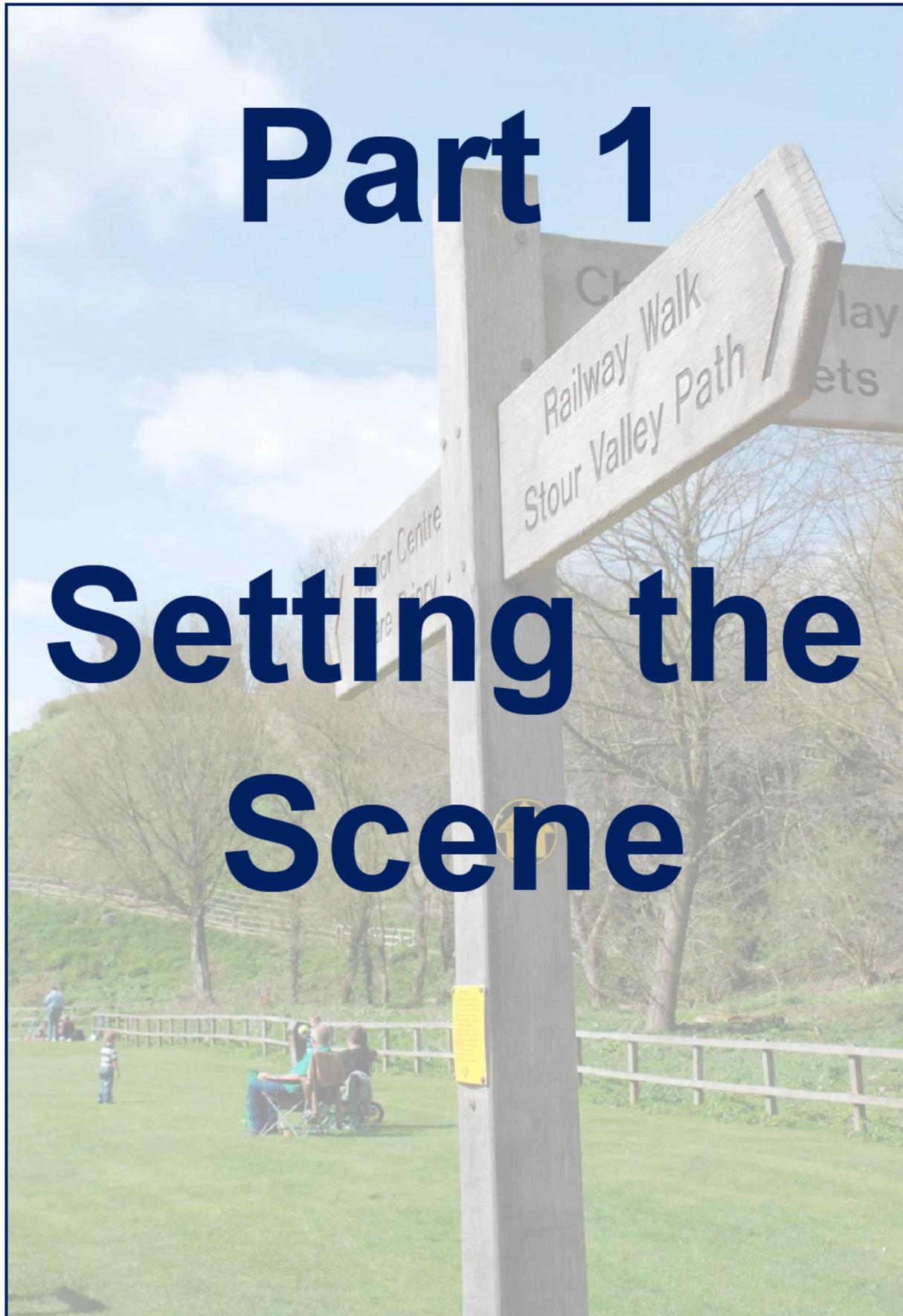
- 6.1 When estimating the number of pupils that a new housing development will generate (pupil yield), Suffolk County Council takes account of the number of houses and flats that are suitable to accommodate children whilst reviewing the demographical changes, e.g. inward migration and birth rates. One bed houses and other categories of dwellings such as student and elderly people's accommodation are normally excluded from any calculation. The pupil yields (Table 3) from houses with two or more bedrooms is 25 children per one hundred homes (0.25 per dwelling) for primary school age, 18 pupils per one hundred homes (0.18 per dwelling) for high school age, and 4 pupils per one hundred homes (0.04 per dwelling) for sixth form age pupils. The equivalent yields from 100 two (or more) bedroom flats are 15, 2, and 1, and for 100 one bedroom flats are 5, 1 and 1. The pupil yields from all types of dwelling will vary slightly to take account of middle school provision in areas of Suffolk where a 3-tier system of education is still in operation.

# Suffolk Green Access Strategy



The Icknield Way (the oldest recorded road in Britain), The Kings Forest, Suffolk

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Clare Country Park, Suffolk

# Part 1

# Setting the Scene

## **Foreword**

The public rights of way network in Suffolk makes up almost half of the highway network. It is an essential asset to us all for our health and wellbeing, safe and sustainable travel, leisure activity and economic growth. The network forms part of a wider green access network.

Improving the quality of the experience on urban and rural rights of way has become increasingly important politically and strategically. This forward plan represents our commitment as a council to make the very most of this asset and to provide our residents, our business community and our visitors with an array of different and innovative opportunities to use, enjoy and benefit from.

This plan, which is a statutory requirement under the Countryside and Rights of Way Act (2000) aims to identify changes that will “improve provision for walkers, cyclists, horse riders and those with mobility problems”. The plan is intended to last until 2030 but will be subject to periodic reviews to reflect new priorities and changing levels of investment. It will complement existing strategies including the Health and Wellbeing Strategy, the Sustainable Modes of Transport Strategy and the Growth Strategy and will seek out opportunities to work collaboratively with internal and external stakeholders to effectively deliver shared outcomes.

Our plan builds on previous work, specific research and detailed consultation with a wide range of consultees, including the Suffolk Local Access Forum, parish councils, local businesses, landowners, users and non-user groups. We hope that people across these groups can identify with the priorities within the document and that it is adopted across the county. We hope that it is seen as a collective commitment to take action at a local level to protect, maintain and develop our right of way and green access network in the most efficient way possible and to optimise its wonderful and immense value across a range of agendas.

Cllr Andrew Reid

Cabinet Member for Highways, Transport and Rural Affairs

## **Introduction**

### Our Vision

***“To get more people using and enjoying Suffolk’s green access network.”***

Suffolk is a predominantly rural county; it contains no motorways; it has no cities. The 2011 Rural Urban Classification shows that 39% of the population lives in rural areas, compared with 21% for all of England.

Suffolk is also becoming a more populous county. Between 2016 and 2031, Suffolk’s population is expected to grow by 27% to over 800,000<sup>1</sup>, one of the fastest growth rates in the East of England. Demand for housing will be met with an estimated 66,000 new homes to be built between 2019 and 2036<sup>2</sup>. In addition, Suffolk has an ageing population with estimates that by 2039, 1 in 3 people will be over 65 (compared with 1 in 4 for England)<sup>3</sup>, representing a third of its population. And approximately 18% of its population has a limiting illness or a disability<sup>4</sup>.

Although Suffolk is generally described as an affluent and healthy county (it is ranked 101 out of 152 upper tier local authorities in England with rank 1 being the most deprived)<sup>5</sup>, there are pockets of severe deprivation with 32% of Suffolk residents described as either of moderate means or hard pressed<sup>6</sup>. Research reveals a socio-economic gradient between socio-economic groups and the use of green space: people in lower socio-economic groups access the natural environment less frequently than those in higher groups.

These statistics highlight the importance and the growing relevance of the public rights of way and green access network. The network provides the means for encouraging sustainable travel choices, such as walking or cycling to work, and enables people to live healthier lives by using the countryside for leisure.

The Suffolk Green Access Strategy details why green access is so relevant to Suffolk’s population and its visitors. It focuses on how green access can benefit our quality of life and how it can contribute to the council’s corporate priorities. It explains the impact that green access can have on growing and managing tourism, how it delivers initiatives that impact on people’s physical and mental health, how it sits alongside Creating The Greenest County aspiration and why it offers cost savings in delivering council services and meeting corporate aims and objectives.

## **Accessing Suffolk’s landscape**

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<sup>1</sup> [www.suffolkobservatory.info](http://www.suffolkobservatory.info)

<sup>2</sup> State of Suffolk Report 2019 [www.healthysuffolk.org.uk](http://www.healthysuffolk.org.uk)

<sup>3</sup> State of Suffolk Report 2019 [www.healthysuffolk.org.uk](http://www.healthysuffolk.org.uk)

<sup>4</sup> 2011 Census

<sup>5</sup> Index of Multiple Deprivation (IMD) 2015

<sup>6</sup> Acorn, 2013

Suffolk has a rich and varied landscape boasting a heritage coastline, an undulating heartland of historic wool towns, and The Brecks, a landscape of open heaths and dense forests. Within this are market towns such as Bury St Edmunds and Bungay, picture postcard villages such as Kersey and Cavendish, the home of horse racing in Newmarket, and the county town of Ipswich.

Suffolk's landscape is the product of glaciation which moulded the countryside, deposited sediment and influenced land use. The north of the county is characterised by open arable fields whilst the south has traditionally been large private estates where forests were often untouched, resulting in today's ancient woodlands. The Brecks is an almost semi-arid landscape of sandy soils of low fertility, historically a land of rabbit warrens. Today, it contains a concentration of heathlands and forests. Special features of Suffolk's landscape include:

- Areas of Outstanding Natural Beauty (AONB): Suffolk contains 2 AONBs. The Suffolk Coast and Heaths AONB spreads from Lowestoft to the Shotley Peninsular. Dedham Vale AONB (Constable Country) and Stour Valley Project extends from Manningtree to Sudbury.
- Long distance trails: Suffolk is blessed with long distance trails including:
  - The AONBs contain 4 long distance paths: the Suffolk Coast and Heaths Path, the Sandlings Walk, the Stour and Orwell Walk and the Stour Valley Path;
  - The Angles Way winds along the Waveney Valley;
  - The St Edmund Way spans the county from the Essex border to Norfolk;
  - The Icknield Way is Britain's oldest road;
  - The Lark Valley Path follows the River Lark from Bury St Edmunds to Mildenhall;
  - The Gipping Valley Path stretches from Stowmarket to Ipswich.
- Open access: Open access allows people the freedom to roam on foot. Suffolk has one of the largest expanses of heathlands in England, concentrated between Woodbridge and Southwold, and between Bury St Edmunds and Mildenhall. Complementing these areas are the public forest estates, including Thetford and Rendlesham Forests where there is access on foot, bicycle and horseback.

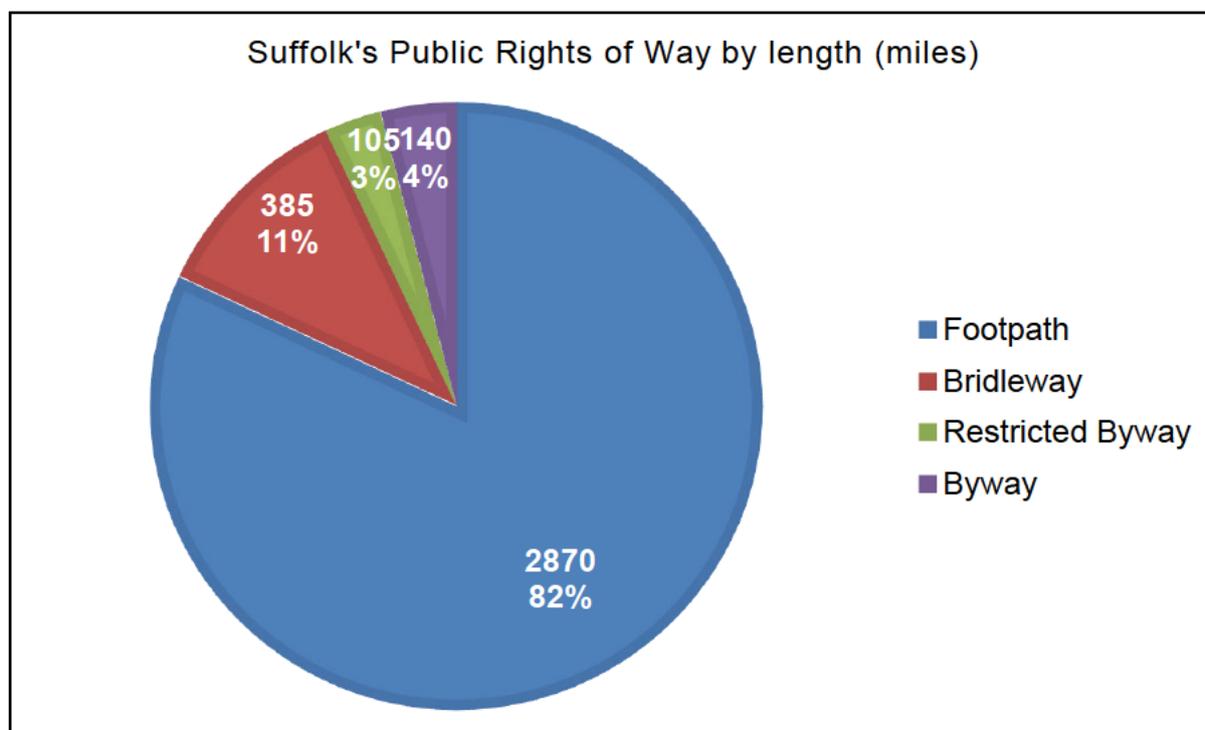
- National Trail: by 2021/22 Natural England will complete the England Coast Path, which will be Suffolk’s only National Trail.
- National Park: part of the Broads National Park lies in north Suffolk and features a network of broads (lakes), waterways and wildlife.

**Public rights of way (PRoW)**

Suffolk contains one of England’s most extensive networks of public rights of ways. The network exceeds 3,500 miles (5,700km), compared with approximately 4,000 miles (6,500km) of roads. In addition to public rights of way, there are long distance cycle routes (such as Sustrans’ national routes) and permissive paths (where landowners allow informal access).

There are four types of PRoW:

- Public footpath – these are for walking.
- Bridleway – in addition to walking, these are also for riding on either horseback or bicycle.
- Restricted byway – these are as bridleways with the addition of being available to non-motorised vehicles, such as horse drawn carriages or husky sledges.
- Byways open to all traffic (also referred to as BOATs) – as restricted byways but with the addition of being also open to motorised vehicles for off-road driving.



Most PRoW are natural surface routes, but where appropriate such as in urban locations or in high use areas, they can be surfaced with a compacted material such as crushed stone, a sealed surface such as asphalt, or with boardwalk or bridges to span wetlands and watercourses.

PRoW are protected but can change over time. New routes can be created, and existing routes diverted or extinguished through a legal process, or sometimes even lost where land has eroded into a river or the sea. A feature of Suffolk's PRoW network is it is in part fragmented.

Usage of PRoW varies over time, but the general trend is increasing.

### **What do we mean by green access?**

Green access includes public rights of way, open access and informal routes and moving about on foot, on bicycle or on horseback. It covers access to green space but also relates to accessing services, workplaces and schools. It is especially relevant to sustainable transport, health and wellbeing.

The Rights of Way and Access (ROW&A) team: Various Acts of Parliament, including the Highways Act 1980, the Wildlife and Countryside Act 1981, and the Countryside and Rights of Way Act 2000, place statutory responsibility and powers on Suffolk County Council to manage the public rights of way network.

The team with this specific responsibility is the Rights of Way and Access team. It works in partnership with others to manage the wider green access network which, in addition to public rights of way, includes other formal routes, such as cycle paths, less formal routes, such as permissive paths, and areas of open access.

The ROW&A team is split into area teams, who protect and maintain the PRoW and access network; the definitive map team, who maintain a legal record of PRoW; and the green access team who develop and promote green access.

Maintaining a legal record of all rights of way: the legal record of all rights of way is the definitive map and statement, managed by the definitive map team. The first maps were drafted in the 1950s when the network was recorded parish by parish. Over time, changes are made as new routes are identified, diverted, or extinguished. These changes are drafted by the definitive map team onto a working copy of the definitive map and periodically, changes are consolidated into a new definitive map, which is signed, sealed, dated and stored. This becomes the new legal record of the parish's network with a new working copy immediately created to accommodate any new routes, new diversions and new extinguishments.

After 2026 (known as the '2026 cut-off') all historic routes not recorded on the definitive map will be extinguished (subject to certain limited exemptions). In Suffolk many historic routes have already been added to the definitive map, but further scoping and evidential investigation is required to ensure any useful unrecorded routes are not lost.

Protecting and maintaining the rights of way network: area-based ROW&A team representatives have a wide-reaching role that involves working closely with the public, who report on the condition of network, and with landowners and managers, to ensure routes are easy to use. The ROW&A team has statutory duties and powers to make sure the 3,500 miles (5,700km) of the network are safe, fit and freely available for the public to use. This is achieved by:

- Signposting at the road to mark the start of every path.
- An annual programme of grass cutting on priority routes.
- Maintaining over 2,000 bridges.
- Improving path surfaces using boardwalks, drainage schemes and surfacing materials.
- Using negotiation and legal powers to ensure paths are not deliberately damaged, ploughed up or obstructed.

The ability of the council to deliver these functions is, of course, dependant on budget and resources.

Developing and promoting the network: the areas, definitive map and green access teams work closely together when there are opportunities to develop the network. This may be in response to a new development or a funding project which can enable new routes to be created or routes resurfaced. The green access team leads on promoting the network. It works with community groups to create new walking guides, deliver the annual Suffolk Walking Festival, and promote green access through the Discover Suffolk website, the media and social media sites.

### **Suffolk County Council's (SCC) priorities**

In Suffolk, green access is relevant to each of SCC's three corporate priorities: Inclusive Growth; Health, Care and Wellbeing; and Efficient and Effective Public Services.

Inclusive Growth: Tourism in Suffolk is valued at £1.9bn per year, employing nearly 40,000 people<sup>7</sup>. A third of Suffolk's residents say the countryside is the best thing about living in Suffolk<sup>8</sup>, making green access a key driver in growing the visitor economy. The ROW&A team works closely with tourism organisations across the county, including Visit Suffolk, destination management organisations and tourism action groups, to promote Suffolk's varied countryside locally, regionally and nationally. In addition, some PRoW maintenance is undertaken by small and medium sized local enterprises, benefitting the local economy.

Health, Care and Wellbeing: Green access is key to developing people's health and wellbeing. Inactivity is one of the top 10 causes of disease and disability in England

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<sup>7</sup> Destination Research, Economic Impact of Tourism Suffolk 2016

<sup>8</sup> East Anglian Daily Times survey, 2018

and accounts for as many deaths as smoking. It costs the UK economy £7.4billion per year, including £0.9billion to the NHS alone.

Natural England's annual Monitor of Engagement with the Natural Environment (MENE) shows that in England, 58% of people (25m) visit the countryside weekly, with an estimated 1.3 billion visits in 2015-2016. The research shows behaviours are changing with people visiting the countryside more frequently. For 47% of these visits, people are motivated by health and exercise (up from 34% in 2011) and 31% state these visits make them feel calmer and more relaxed (up from 25% in 2011).

Access to open countryside has a significant impact on how people feel physically and mentally. More and more research is highlighting the additional health benefits of being in the natural environment. Research by Outdoor Recreation Network<sup>9</sup>, a UK and Republic of Ireland network of countryside organisations, highlights the role countryside access plays in reducing anxiety and depression, whilst boosting self-esteem.

Rural populations are often more prone to health inequalities due to poorer access to health and care services, lack of public transport and isolation<sup>10</sup>. In Suffolk, the ROW&A team works in partnership with public health to promote health, care and wellbeing through Suffolk's green access network.

Efficient and Effective Public Services: Green access schemes provide value for money projects that address the corporate objectives of developing the economy and improving health, care and wellbeing as well as making Suffolk the greenest county. Working with external funders and local planning authorities, the ROW&A team draws in external investment from developers to enhance green access and provide sustainable travel options for commuting to work and school.

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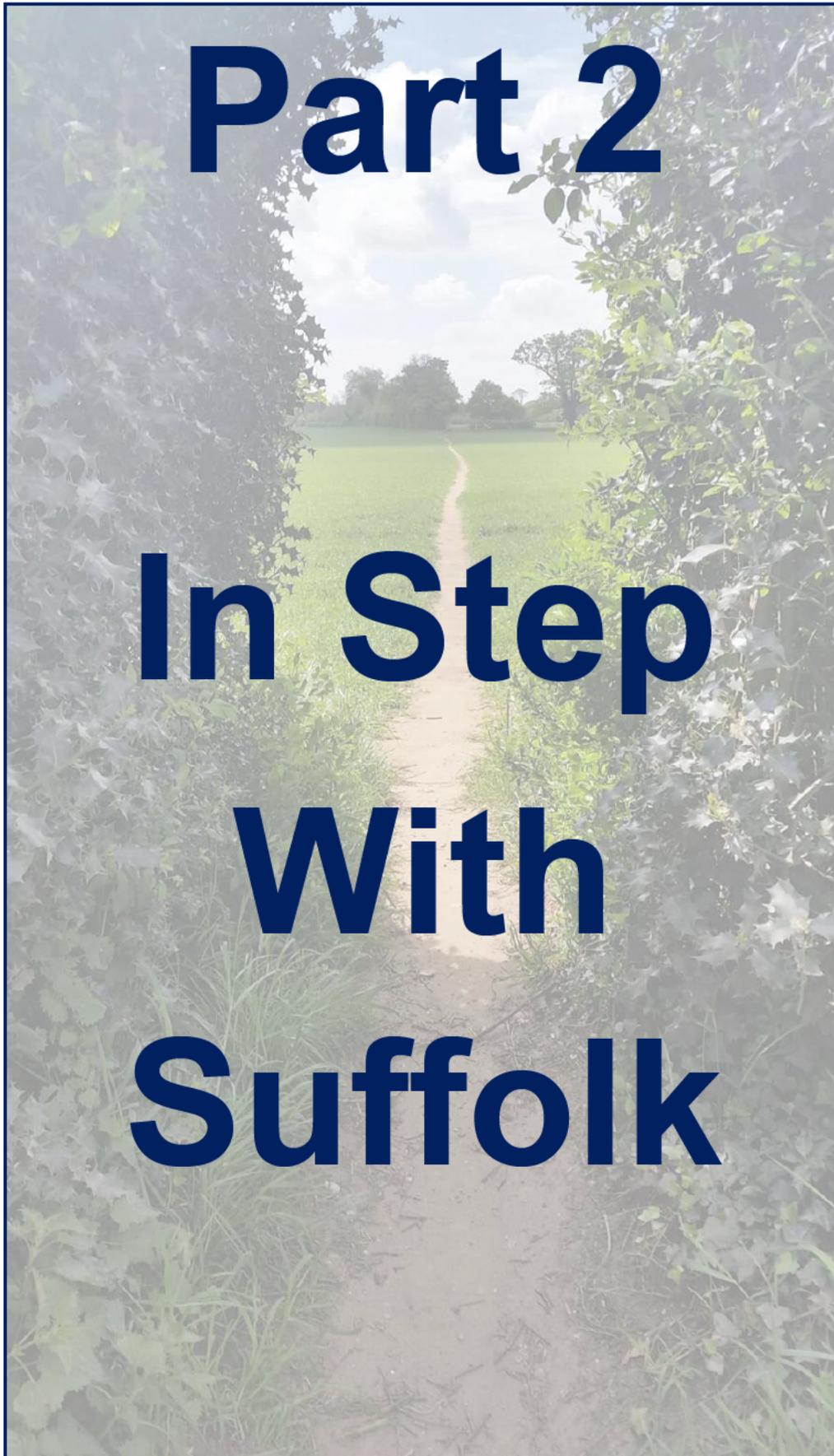
<sup>9</sup> [www.countrysiderecreation.org.uk](http://www.countrysiderecreation.org.uk)

<sup>10</sup> Local Government Association and Public Health England, Health and Wellbeing in Rural Areas 2017

Suffolk County Council's key plans and strategies

Green access supports many of Suffolk County Council strategic commitments, including aspirations of Creating the Greenest County. Actions within this plan will also support outcomes in the following strategies:

- Suffolk Joint Health and Wellbeing Strategy 2016-2019.
- Suffolk Prevention Strategy.
- Local Transport Plan 2011-2031.
- Economic Strategy for Norfolk and Suffolk.
- Active For Life Suffolk Walking Strategy 2015-2020.
- Suffolk Cycling Strategy.
- Suffolk Nature Strategy.



# Part 2

# In Step With Suffolk

The Sandlings Walk, nr. Martlesham, Suffolk

## **Rights of Way Improvement Plan (ROWIP) – Suffolk Green Access Strategy**

### **What is a ROWIP?**

Each local highway authority in England is required to publish a Rights of Way Improvement Plan. The Countryside and Rights of Way (CROW) Act 2000 (Section 60 and 61) places this duty on each such authority. It asserts that the purpose of the ROWIP is to provide a clear direction as to how the rights of way and access network is managed, maintained and improved to meet the needs of all users. The ROWIP is aimed at a wide group of people which includes the general public, community groups, local authority officers and developers, as well as policy and decision makers.

The Suffolk Green Access Strategy is SCC's second ROWIP – its first, published in 2006, was titled 'In Step With Suffolk'. The Department for Environment, Food and Rural Affairs (Defra) provides statutory guidance on developing a ROWIP which states that a ROWIP needs to be reviewed every 10 years, and that it must explain how improvements to the public rights of way network will provide a better experience for walkers, cyclists, horse riders, carriage drivers, people with mobility problems and people using motorised vehicles. The Suffolk Green Access Strategy goes further than this statutory guidance as it also addresses open access sites, informal access arrangements, and access for walking and cycling on the wider highway network, including footways and quiet lanes.

Defra guidance requires the local highway authority to consult user groups and interested parties, assess the current state of the PRow network, devise the plan and prepare a statement of action before publishing a draft plan for comment before the final plan is published. The same guidance has been followed in the preparation and publication of the Suffolk Green Access Strategy.

This strategy replaces the previous ROWIP and reviews the achievements, then sets out objectives and actions for the rights of way and access network for a further 10 years.

The new plan has been developed against a backdrop of challenges but sets out opportunities for the ROW&A team, its partners and communities, to ensure the green access network continues to meet the needs of all people in Suffolk.

## Review of the 2006 ROWIP

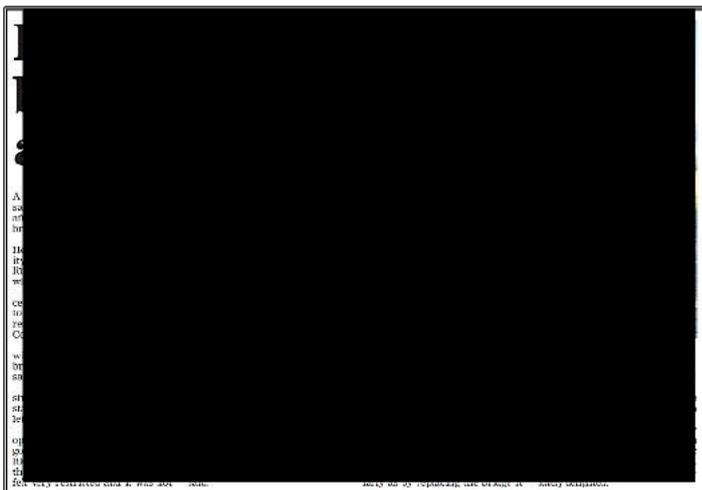
Suffolk County Council's first ROWIP "In Step with Suffolk" spanned 2006-2016. It was developed following widespread consultation through questionnaire surveys and focus groups, and reviewed the use, demand and management of the rights of way network. The consultation identified 6 key objectives:

- Objective A: Provide a better signed, maintained and accessible network.
- Objective B: Provide and protect a more continuous network that provides for the requirements of all users.
- Objective C: Develop a safer network.
- Objective D: Increase community involvement in improving and managing the network.
- Objective E: Provide an up-to-date and publicly available digitalised definitive map for the whole of Suffolk.
- Objective F: Improve promotion, understanding and use of the network.

Here are some of the 2006 ROWIP's achievements:

### Objective A: Provide a better signed, maintained and accessible network

- Between 2006 and 2011, over £1.5m was invested in PRoW secured from the Government's Local Transport Plan funding for highway improvements.



East Anglian Daily Times, 22<sup>nd</sup> December 2014.

- In 2015, the county council successfully gained £2.3m from the Government's Safer Cycling Fund, delivering significant rights of way schemes in Bury St Edmunds and in Mildenhall.
- The ROW&A team responded to and acted upon over 2,500 reports from the public every year on issues they've experienced using rights of way.

- Maintenance of rights of way is managed on a system of priorities. The system was reviewed creating Category 1 and 2 paths. Two thirds of the network are Category 1 paths, which means they receive a higher level of maintenance throughout the year.
- Between 2004 and 2010, over 10,000 roadside public rights of way signs were replaced.

- Between 2006 and 2016, over 600 barriers (stiles or gates) were either removed or improved to enhance access.
- Between 2006 and 2016, the grass cutting programme was re-tendered twice, reducing per metre costs and increasing the length of PRow cut.
- Up to 2,485 miles (4,000km) of paths are cut each year and, in addition, over 50 landowners cut the paths on their land.
- Suffolk County Council worked with land managers, the National Farmers Union, the Countryside & Landowners Association and the Suffolk Local Access Forum to launch a Land Manager Guide and adjust enforcement policy.

Objective B: Provide and protect a more continuous network that provides for the requirements of all users.

- Green access has been integrated into SCC's policy documents including the Health and Wellbeing Strategy, Suffolk Cycling Strategy, Suffolk Walking Strategy, Suffolk Nature Strategy and Local Transport Plan.
- Coordination and awareness raising with local planning authorities and developers over planning applications led to commitments of significant funds for PRow improvements including £500,000 at Haverhill, £230,000 in Stowmarket, and £75,000 in Lowestoft.
- In 2011, SCC's countryside sites were divested to local communities, with public rights of way created to protect access at each site. Sites included the Lavenham Walk, Sudbury Valley Trail and Melford Walk.
- Numerous new rights of way were dedicated by landowners across Suffolk, including new routes in Assington and Whepstead.
- In 2013, a bridleway underpass was agreed in the design for the dualling of the A11 between Barton Mills and Thetford. The underpass links 2 large areas of open access with Thetford Forest and Lakenheath Warren to the north and The Kings Forest and a series of open access sites to the south, providing a continuous off-road network linking West Stow and Brandon County Parks. The local access forum played a significant part in this.
- Between 2008 and 2010, all open access sites were reviewed with new signs installed carrying clearer mapping and improved visitor information.
- In 2013, a new footpath was created alongside the A1094 Saxmundham Road to enable walkers following the Sailors Path to walk off-road beside Aldeburgh Golf Course.

- Working with the Access Group for Suffolk, the Easy-Going Trails booklet was published, promoting 12 accessible walks around the county for people with limited mobility, wheelchair users and pushchairs. The guide was launched at Thornham Walks in May 2012.
- In 2011, SCC secured £130,000 of Growth Area Funding from St Edmundsbury Borough Council to improve access along the Lark Valley Path north of Bury St Edmunds.
- The green access team's Discover Suffolk website has been promoted at various bus stops around the county, linking the use of sustainable transport with visiting the countryside.
- The Discover Suffolk project has supported the promotion of local village walks, circular cycle rides, horse riding trails and the Four Ferries leaflet.



Disabled Ramblers on the Suffolk Coast & Heaths Path.

#### **Creating a more continuous network...**

The Sailors' Path is an ancient commuting route once used by sailors between Snape and Aldeburgh. Today, the route is a popular tourist destination linking the heritage coast with Snape Maltings. Although mostly off-road, one section caused issues where the footpath met a main road, forcing walkers to walk on the road. Negotiations with Aldeburgh Golf Club and funding through a European cross-border project, allowed a new right of way to be created linking the footpath with the pavement.

#### Objective C: Develop a safer network.

- Improved bridleway links have been created between Mildenhall and West Row, and Stowmarket and Onehouse. These have provided significant off-road access for walking and cycling between towns and outlying villages.
- Cycle track conversion orders create new cycle routes from existing footpaths. A number of new cycle routes were created including Dock Spur Bridge in Felixstowe and a link connecting Bury St Edmunds town centre with the hospital.
- Officers have worked with passenger transport to include PRow as walking routes to school to improve health, sustainability and support school travel plans. The County Council seeks walking routes to school in any new development, e.g. Haverhill North East with a proposed new cycle path from Keddington using public rights of way.

- Officers worked with Network Rail to divert and extinguish high risk level crossings to improve local rail transport links. This included the confirmed Gun Lane Transport and Works Act Order that formed part of the Felixstowe Branch line improvements.
- The County Council reviewed its inspection regime for PRow bridges with all bridges being inspected; a new specification devised for new bridges; and capital funding for PRow structures increased.
- Traffic regulation orders (TROs), which enable the County Council to restrict the use of PRow to limit damage and avoid conflict between users, have been used where necessary and officer guidance provided to landowners and user groups on the management of byways.

#### **Developing a safer network...**

Between 2010 and 2013, a new off-road cycle route was created between West Row and Mildenhall. The new route enabled cyclists and equestrians to avoid a busy main road. The route was surfaced making it suitable not only for cyclists, but also walkers, runners, pushchairs, wheelchair users and equestrians. Realising the project was achieved by a partnership of county and local councils, planning officers, ecologists, tree officers, the Environment Agency, Natural England, County Farms, local cycling groups, angling clubs, schools, the cricket club and highways contractors. Opened in 2013, the route became an immediate commuter route, a safe route to schools and a leisure path for people to enjoy the countryside.

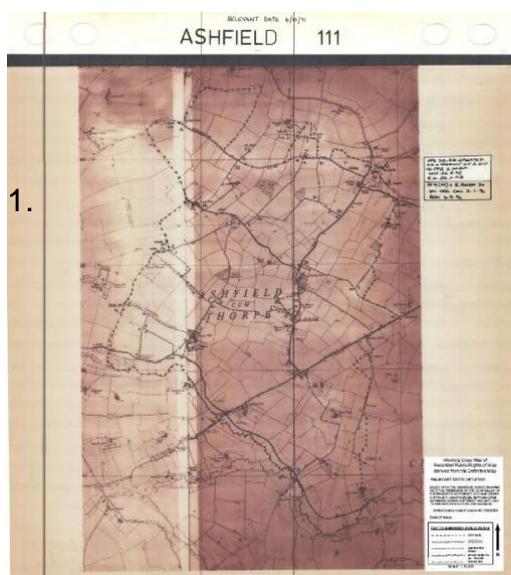
#### Objective D: Increase community involvement in improving and managing the network.

- The County Council provides secretariat and guidance to the Suffolk Local Access Forum, recruiting new members, when appropriate, to extend the knowledge, skills and experiences of the forum to enhance their role and effectiveness.
- The County Council's work with the Suffolk Local Access Forum helps promote understanding of different needs of land managers and users of public rights of way.
- Guidance and advice has been given to parishes on the development of parish plans.
- In 2010, the County Council developed a community project in preparation for a submission to Heritage Lottery "Access to Nature" Fund. Although the bid was unsuccessful, a 2-year project left a legacy of village walk leaflets, community involvement in maintaining rights of way and guided countryside walks.
- In 2016, the County Council started promoting Walkers Are Welcome, a national scheme for communities to promote their destination as walker-friendly.

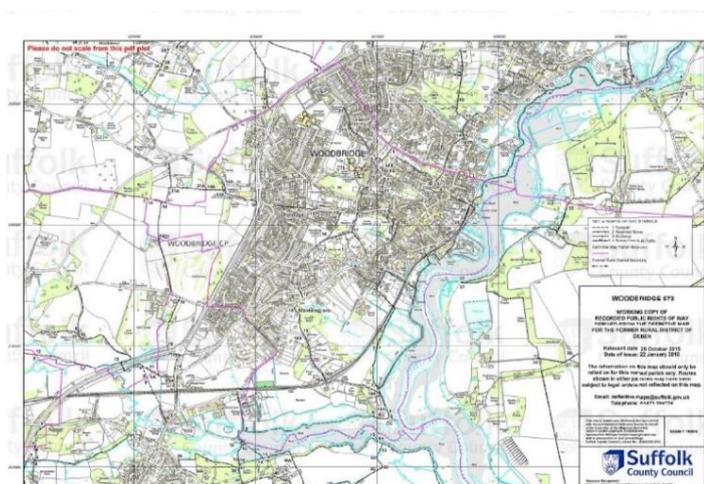
- The Council works with public health and OneLife Suffolk to promote the health walk programmes.

Objective E: Provide an up to date and publicly available digitalised definitive map for the whole of Suffolk

- All public rights of way are recorded on a definitive map and statement, a legal record of each route. Over time, the map changes as alterations are made to the network: a claim for a route yet to be recorded; a need to divert a route; a route being extinguished; or a new route being created. These changes take place through a legal process called a definitive map modification order (DMMO) and a public path order (PPO). Between 2006 and 2016, 172 DMMO claims were investigated with 81 orders confirmed, and 215 PPO cases were processed with 192 orders or agreements confirmed.
- Eight traffic regulation orders (which manage access along a public rights of way) and 7 licensed path agreements (which create time-limited public rights of way) were completed.
- A definitive map of Ipswich was published for the first time in May 2009, with 21 routes, a further 41 routes were added between 2009 and 2016.
- A new process was developed to review and prioritise order making casework to give priority to cases that potentially deliver greatest public benefit.
- Scanned images of the working copy definitive map and copies of DMMOs and PPOs can now be viewed online.



1. An example of an old working copy of the definitive map, with hand-drawn updates. Ashfield Parish, 1991



An example of a new working copy of the Definitive Map produced and updated digitally. Woodbridge, 2015

### **Providing up to date maps...**

There is a definitive map and statement for each parish, forming a legal record of all its public rights of way. These documents are legally signed, sealed, dated and stored in the County Records Office. Any subsequent legal changes to the network are recorded on a working copy definitive map. The working copy definitive maps can be viewed at County Council offices and online. Periodically, all changes are legally consolidated to produce a new definitive map. Since 2016, over 90 parishes have been digitally consolidated, bringing the oldest definitive maps up to date on modern Ordnance Survey base mapping. Digital consolidation has the advantage that updated working copies can be printed incorporating legal changes and removing the need for hand-drawn annotations. The digital public rights of way lines can also be shared with local authorities and other parties, such as developers.

### Objective F: Improve promotion, understanding and use of the network.

- In 2008, the Discover Suffolk Project was launched. The project develops and promotes countryside access and delivered new and improved access in the Waveney Valley, lead to the creation of the Suffolk Walking Festival and created a website to promote Suffolk's countryside.
- The Suffolk Walking Festival was launched in 2010. It evolved out of the Heart of Suffolk Walking Festival which ran from 2008 to 2011. It is Suffolk's only pan-county event and is a partnership of all local authorities, RSPB, National Trust, Suffolk Wildlife Trust, Blue Badge Guides and many volunteer groups.
- Discover Suffolk has worked in partnership with communities, parish and town councils, tourism organisations and the Church of England to promote the countryside and the use of public rights of way.
- The green access team has represented the Council on Visit Suffolk's Marketing Panel, steering how the county is promoted to tourists.
- The team has worked closely with the media including BBC Radio Suffolk, Archant who produce the East Anglia Daily Times and the Suffolk Magazine, and various local, regional and national publications to promote Suffolk as a countryside destination.

### **Promoting the network...**

In 2018 over 2,000 people attended the Suffolk Walking Festival, walking over 10,000 miles and taking an astonishing 24 million steps across Suffolk. It was "...the most relaxed and friendly walk I've been on to date", one customer said. The festival impacts on health and the economy: half of participants said they would become more active as a result of taking part; and over £175,000 was contributed to the county's economy.



## **Suffolk Green Access Strategy**

### **Consultation**

Developing Suffolk County Council's Green Access Strategy started with consultation. In 2016, online consultation was conducted through Survey Monkey. It sought people's views on the rights of way network, including asking how they use the network, their views on how easy it is to use, how they discover where to visit, what adversely affects them using rights of way, and for landowners how rights of way affect managing their land. The consultation received over 800 responses. These were from members of the public, user groups, parish councils and land managers. A second consultation was carried out in 2019 which received 357 comments, resulting in further amendments to this strategy.

### **Key Themes**

Four key themes were identified from the consultation:

1. Managing green access infrastructure, looking at:
  - How the network is recorded, managed, maintained and protected.
  - How landowners are advised of their responsibilities.
2. Improving green access infrastructure, identifying:
  - How the network is enhanced by improving existing rights of way, creating new routes, and developing the network for today's user.
3. Promoting green access, focusing on:
  - How the public are encouraged and enabled to use the green access network more easily.
  - How well we understand what motivates or inhibits people from visiting the countryside, using the green access network and travelling sustainably.
  - How we communicate with the public including: marketing; editorials and advertising; events; and working with volunteers and communities to promote access locally.
4. Developing healthy and sustainable communities, addressing:
  - How green access can be embedded in the health agenda and how can green access contribute to our physical and mental wellbeing.

- How working with communities can make people healthier.
- How planning of developments can allow for green access, both within and outside the development site.
- How rights of way can be a key feature of any new development, creating green corridors and access into the surrounding countryside.
- The way communities can be involved in the management and promotion of green access.

Well managed infrastructure provides the building blocks for promotion and working with communities and other agencies to improve and exploit the green access network.



## **1. Managing green access infrastructure**

*“Walking is the nearest activity to perfect exercise” (Morris and Hardman, 1997).*

### Introduction

Public rights of way are a key component of the highway network. The highway network refers to the entire network of roads and public rights of way and Suffolk County Council, as the local highway authority, has a duty to maintain this network. This is set out in Section 36 of the Highways Act 1980, with Section 130 of the Act providing a further duty to protect the rights of the public to both use and enjoy all highways.

Although the local highway authority exercises this duty, in most instances it does not actually own the land on which the right of way lies. It is only responsible for the surface of the route, and consequently, managing the network becomes a shared responsibility between the highway authority, the landowner and the local community.

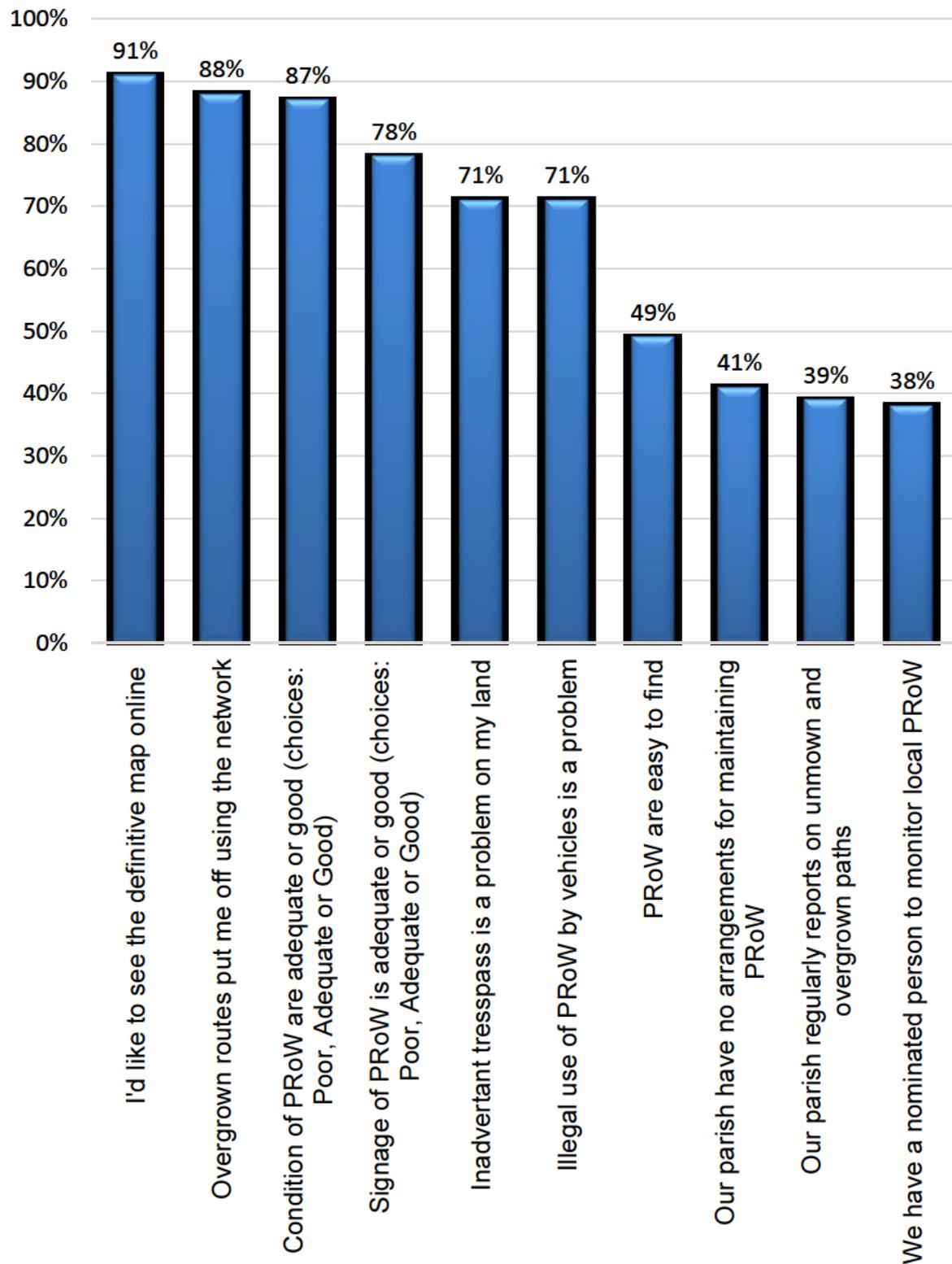
To manage the network, the ROW&A team records, protects, maintains, develops and promotes the network.

The definitive map team ensures all public rights of way are accurately recorded, and that any changes to the network are completed in compliance with the law.

The area teams work closely with landowners and the public to ensure all rights of way are accessible on the ground, addressing any obstacles to access and repairing damage to routes.

The green access team focuses on development and promotion, coordinating responses to planning developments, working in partnership on external funded projects and promoting green access to the public.

**Consultation key findings:  
managing green access infrastructure**



1. Delivery Plan: managing green access infrastructure					
Objective:	Action:	Timescale:	Resource:	Performance measure:	Outcome:
		<p>1 = On-going activity</p> <p>2 = within 3 years</p> <p>3 = within 5 years</p> <p>4 = 5 years+</p>	<p>£ = existing resources</p> <p>££ = additional resources (up to £100k) and reallocation of staff resources</p> <p>£££ = significant additional resources (over £100k) and additional staff</p>		
<b>1.1 Recording the network</b>					
1.1.1 Ensure the definitive map is accessible to the public.	Complete the legal process to produce a digitally updated definitive map and statement for the whole county. Consolidate the existing definitive maps and statements into a single countywide definitive map and statement and commence rolling consolidation.	1	£	Number of parishes digitally consolidated. Rolling consolidation of countywide definitive map commenced.	Up to date definitive map is easily accessible to all.

<b>Objective:</b>	<b>Action:</b>	<b>Timescale:</b>	<b>Resource required:</b>	<b>Performance measure:</b>	<b>Outcome:</b>
1.1.2 Ensure the definitive map is accessible to the public.	Publish a digital version of the definitive map on the county council's website.	1	£	Publication of the digital working copy definitive map online.	Up to date definitive map is easily accessible to all.
1.1.3 Making orders in the public interest.	Continue to prioritise definitive map case work in the public interest.	1	£	Number of high priority cases put into workstream each year.	A public rights of way network that meets the needs of today's user.
1.1.4 Making orders in the public interest.	Review the prioritisation scheme to cover the 2026 cut-off in line with legislation when implemented.	1	£	Review complete.	A public rights of way network that meets the needs of today's user.
1.1.5 Making orders in the public interest.	2026 cut-off date – scope outstanding historic claims and anomalies with sufficient evidence to proceed by DMMO and prioritise. Process applications and discovery of evidence arising from 2016 cut-off.	2	£££	Number of historic DMMO cases determined.	A public rights of way network that meets the needs of today's user.

Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
<b>1.2 Protecting the network</b>					
1.2.1 Make it easy to access the PRow network.	Work with land managers to help them meet their statutory responsibilities, using enforcement procedures where public rights of way are obstructed.	1	£	Annual condition survey data.	More people with mobility issues using the network.
1.2.2 Make it easy to access the PRow network.	When opportunities arise, remove unnecessary physical and psychological barriers that adversely affect people using the network.	1	£	Barriers removed.	More people with mobility issues using the network.
1.2.3 Make it easy to access the PRow network.	Protect the network from adverse impacts from new developments.	1	£	Number of developments addressed.	More routes in the PRow network used regularly.
1.2.4 Make it easy to access the PRow network.	Review the role of communities in giving informal advice to land managers on caring for PRow on their land.	2	£	Review complete.	More routes in the PRow network used regularly.
1.2.5 Make it easy to access the PRow network.	Prepare for a new agricultural policy post-Brexit, and if required review relationship with stakeholders.	2	££	Policy reviewed.	More PRow routes used regularly.

Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
1.2.6 Make it easy to access the PRow network.	Work with land managers to prepare for the UK's departure from the EU, to ensure both compliance with highway law and to support access related diversification.	2	£	Discussions held and a post-Brexit understanding with land managers on managing access on their land in place.	More PRow routes used regularly.
<b>1.3 Maintaining the network</b>					
1.3.1 Manage the network efficiently.	Develop the public rights of way asset management to ensure innovative, prioritised and efficient management of the network that reflects available budget.	1	££	Updated asset management plan.	A more effectively and efficiently managed network – being used by more people.
1.3.2 Manage the network efficiently.	Use local contractors and land managers on small to medium scale PRow maintenance.	1	£	Number of schemes delivered.	More routes used regularly because a more efficiently maintained network.
1.3.3 Manage the network efficiently.	Review the management of large scale projects to deliver best value.	2	£	An agreed policy for how the council manages larger scale projects.	A more efficiently managed network.

Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
1.3.4 Manage the network efficiently.	Review the system for prioritisation of the PRow network.	2	£	A reprioritised network.	Planned maintenance rather than expensive / disruptive emergency works on most used routes.
1.3.5 Manage the network efficiently.	Migrate the PRow management and customer reporting systems to Insight.	1	£	Successful migration from PROWS to Insight database.	More defects on the network being fixed because of higher levels of reporting.
1.3.6 Manage the network efficiently.	Deliver a cost effective programme of works.	1	£	Outputs of maintenance works, e.g. signposts replaced.	Planned maintenance rather than expensive / disruptive emergency works on most used routes.
1.3.7 Byway maintenance	Work with user groups to deter anti-social use and take a proportionate approach to byways maintenance. Where damage by public vehicles cannot be repaired at reasonable cost, consider restricting or prohibiting access to those types of vehicles causing the damage. Access will only be restricted where there is evidence of a pattern of misuse.	1	£	Traffic orders made.	Restoration of a reasonable surface.

<b>Objective:</b>	<b>Action:</b>	<b>Timescale:</b>	<b>Resource required:</b>	<b>Performance measure:</b>	<b>Outcome:</b>
1.3.8 Looking after our structures (mainly bridges)	Work on structures will be prioritised using a scoring system.	1	£	A scoring system in place.	A more efficiently managed network.
1.3.9 Looking after our structures (mainly bridges)	Works on high priority structures which can be funded from existing budgets will be programmed in the same way as other maintenance work.	1	£	A prioritised work programme in place.	A more efficiently managed network.
1.3.10 Looking after our structures (mainly bridges)	Suffolk Highways will seek to extend the life of high cost high priority bridges and other structures requiring repair using low cost solutions.	1	£	Examples of low cost solutions.	Planned maintenance rather than expensive/disruptive emergency works on most used routes.
1.3.11 Looking after our structures (mainly bridges)	Where high priority structures require refurbishment or replacement and there is no funding, Suffolk Highways will seek contributions.	1	££ or £££ depending on cost	Locations where contributions received.	More funds available to work on structures.
1.3.12 Looking after our structures (mainly bridges)	Where appropriate Suffolk Highways will seek diversions to alternative crossing points where funds are not available to repair or replace a high priority structure.	1	£ or ££ depending on cost	Locations where PRow successfully diverted.	Reduced spending managing structures releases funding for other works on PRow network.

<b>Objective:</b>	<b>Action:</b>	<b>Timescale:</b>	<b>Resource required:</b>	<b>Performance measure:</b>	<b>Outcome:</b>
1.3.13 Looking after our structures (mainly bridges)	Lower priority work on structures will be assessed on the basis of cost and benefit	1	£	Works completed.	Reduced spending managing structures releases funding for other works on PROW network.
1.3.14 Looking after our network	Where a public right of way becomes unusable and the council considers the cost of repair or reinstatement to be too high, it will consider creating an alternative route. The community will be consulted.	1	££	Locations where PROW successfully diverted.	PROW routes available to use.
1.3.15 Manage the network efficiently.	Instigate a new public rights of way vegetation cutting contract, reflecting current market prices.	2	£	Award of new contract and length of paths cut.	Reduced spending releases funding for other works on PROW network.

## 2. Improving green access infrastructure

*“A healthier population makes for a more robust and prosperous economy.”<sup>11</sup>*

### Introduction

The opportunities for developing green access involve the whole ROW&A team. Development projects will often include changes to the definitive map requiring legal orders to be drawn up; working closely with land owners requesting permissions and access to sites; liaising with the public on how the development will be delivered; working on funding bids and reporting on the delivery of projects; and celebrating the delivery of new projects through the media.

PRoW works are relatively low cost, providing excellent value for money. Past public rights of way projects have been funded through partnerships (Sustrans and parish councils), utilising local and national capital budgets (Local Transport Plan and Department for Transport Cycle Safety Fund), and through the European Regional Development Fund (InterReg Cross Border Cooperation Programme).

A key opportunity for funding is the planning process. Suffolk County Council is a statutory consultee on all local planning applications that affect public rights of way and the team receives over 1,000 consultations a year.

With aspirations to build 66,000 new homes in Suffolk between 2019 and 2039<sup>12</sup>, there is a growing number of planning applications and consultations. Where developments are significant, it is possible to obtain funding or to agree works with the developer to improve the network. This approach can create new routes, improve existing routes, or change the status of a route, for example upgrading a footpath to a bridleway.

The Ministry of Housing, Communities and Local Government’s National Planning Policy Framework (NPPF) informs that the purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development is defined as “making economic, environmental and social progress for this and future generations.”

The NPPF also sets out aspirations to make the planning process more inclusive and creative. It provides a framework for local communities and their councils to produce their own distinctive local and neighbourhood plans which will reflect the needs of their local communities.

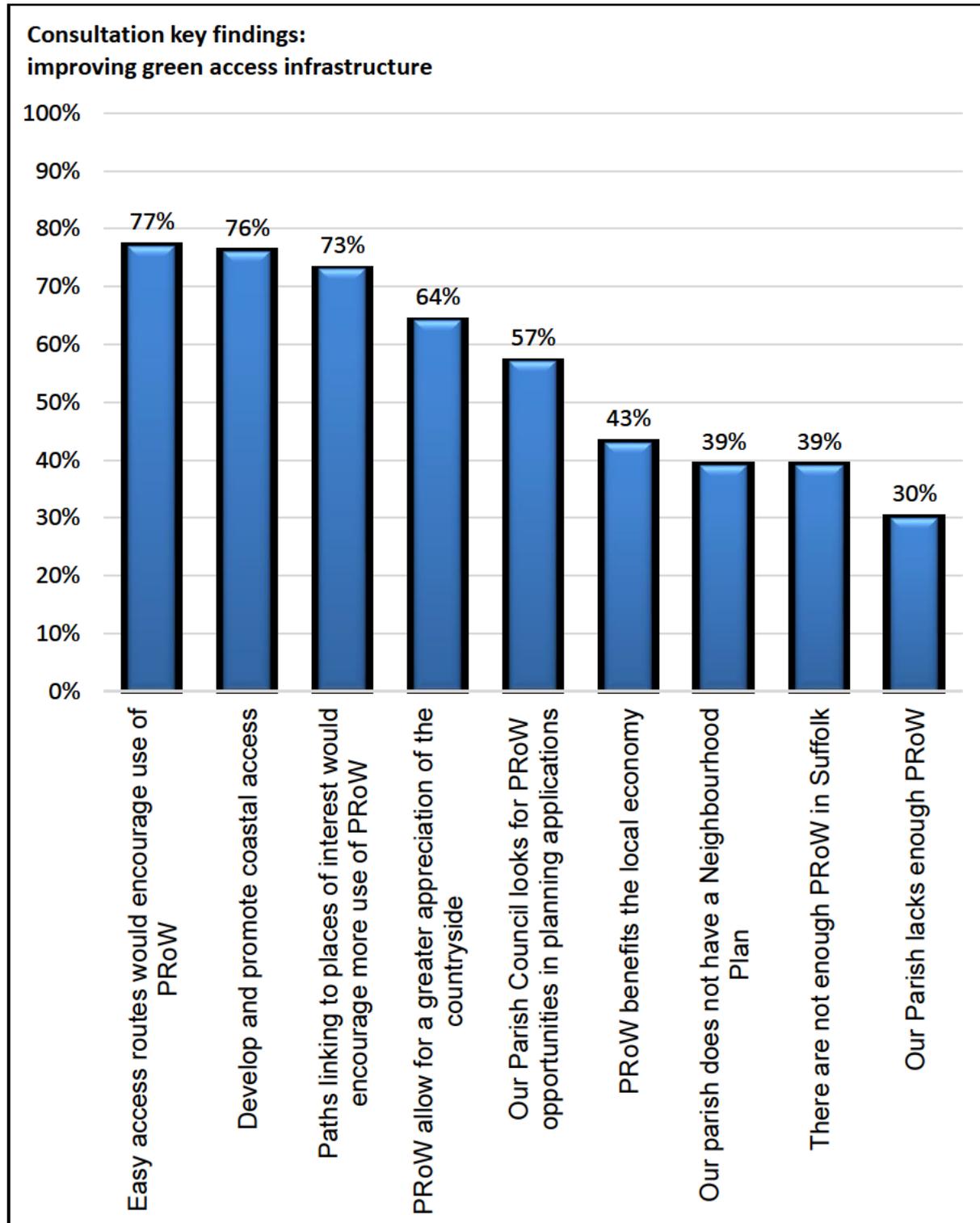
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<sup>11</sup> Department for Transport Nov 2014, Claiming the Health Dividend: A summary and discussion of value for money estimates from studies of investment in walking and cycling

<sup>12</sup> The State of Suffolk Report 2019 [www.healthysuffolk.org.uk](http://www.healthysuffolk.org.uk)

The ROW&A team provides advice and guidance on the development of local and neighbourhood plans, presenting the case that the public rights of way network plays a key role in developing sustainable communities. Also, within this context sits Suffolk's Walking and Cycling Strategies. The walking strategy aims to make walking the default option for any journey under 20 minutes. This is where the rights of way network plays a pivotal role; providing safe off-road travel options for those wishing to walk or cycle as an alternative to driving.

The county council is committed to maintaining the green access network within the constraints of revenue and capital funding allocation.



2. Delivery Plan: improving green access infrastructure					
Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
<b>2.1 Improving the network</b>					
2.1.1 Make the network better for all users.	Seek opportunities to enhance public rights of way, including new linkages and upgrading routes where there is a need, to improve access for all and support healthy and sustainable access between communities and services. Funding to be sought through development and transport funding, external grants, other councils and partnership working.	1	£	Improvements delivered.	Easier access to green space and healthier communities.

Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
<b>2.2 Developments</b>					
2.2.1 Make the network better for all users.	Where possible and appropriate, work with planners to enhance public rights of way as green corridors within new developments. Where this is not possible, seek the realignment of public rights of way within a green corridor that retains its integrity and links to the natural environment.	1	£	Number of sites with enhanced PRow.	Easier access to green space and healthier communities.
2.2.2 Make the network better for all users.	Where relevant, seek the improvement and creation of new offsite public rights of way to link to other public rights of way or to features of interest.	1	£	Number of sites with enhanced off-site PRow.	Easier access to green space and healthier communities.
2.2.3 Make the network better for all users.	Develop a range of improvement proposals that are fit for funding.	2	£	Number of improvements identified.	Easier access to green space and healthier communities.

<b>Objective:</b>	<b>Action:</b>	<b>Timescale:</b>	<b>Resource required:</b>	<b>Performance measure:</b>	<b>Outcome:</b>
2.2.4 Recognise green access as a strategic and valuable asset in achieving sustainable communities and economic growth.	Streamline the public rights of way response to local planning authorities and other consultations.	2	£	Launch new process.	Greater investment in green access.
2.2.5 Recognise green access as a strategic and valuable asset.	Influence the development of local plans, neighbourhood plans and design guides.	1	£	Number of plans reviewed.	Greater investment in green access.
2.2.6 Recognise green access as a strategic and valuable asset.	Raise awareness with local planning authorities to influence the design of new developments with a strong emphasis on delivering those parts of the National Planning Policy Framework which relate to improving green access and the county council's policies.	2	£	Number of local planning authorities met and influenced.	Greater investment in green access.
2.2.7 Recognise green access as a strategic and valuable asset.	Contribute to the development of the Suffolk Design Guide to ensure green access is embedded in the guide.	1	£	Inclusion in the guide of green access principles.	Greater investment in green access.

Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
<b>2.3 Connectivity</b>					
2.3.1 Take a whole highway approach when considering the journeys of vulnerable users.	Work with colleagues and other agencies to consider the needs of non-motorised users on the road as well as the PRow network.	1	£	Number of agencies influenced.	Greater investment in green access.
2.3.2 Create a more connected network.	Obtain significant public rights of way improvements and legacies on nationally important development projects, such as Sizewell C and East Anglia Wind Farm developments.	1	££	Number of schemes influenced.	Greater investment in green access.
2.3.3 Create a more connected network.	Work with Network Rail to improve safety at public rights of way level crossings. Where closures are sought, ensure new public rights of way are created which work well for all users, are well maintained, safe and funded. Oppose proposals which do not meet the needs of local communities in accessing public rights of way.	3	££	Number of schemes influenced.	Greater investment in green access.

<b>Objective:</b>	<b>Action:</b>	<b>Timescale:</b>	<b>Resource required:</b>	<b>Performance measure:</b>	<b>Outcome:</b>
2.3.4 Create a more connected network.	Work with Highways England to address public rights of way severed by trunk roads through diversions to existing infrastructure or provision of new grade-separated crossings.	1	£	Number of crossings where the council has sought changes.	Greater investment in green access.
2.3.5 Create a more connected network.	Carry out legal order-making to facilitate improvements to the network as opportunities arise.	1	£	Orders made	Greater investment in green access.
<b>2.4 England Coast Path</b>					
2.4.1 Promote coastal access and bring economic benefits to the region.	Inaugurate the new England Coast Path infrastructure on behalf of Natural England and maintain it thereafter in line with national trail standards.	2	££	Sections of ECP (out of total of 5) where new infrastructure completed.	Increased economic activity.
2.4.2 Promote coastal access and bring economic benefits to the region.	Establish a partnership to maintain and promote the England Coast Path around East Anglia as a regional coast path, maximising its benefits.	3	£££	Partnership established.	Increased economic activity.

Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
2.4.3 Promote coastal access and bring economic benefits to the region.	Work with Natural England to launch the England Coast path in Suffolk with emphasis on first and last sections.	2	££	Number of launch events.	Increased economic activity.
<b>2.5 Open Access</b>					
2.5.1 Ensure people can experience and enjoy Suffolk's heathland landscapes.	Work with Natural England, land managers and communities to manage open access.	1	£	Number of sites managed.	Easier access to green space and healthier communities.
2.5.2 Ensure people can experience and enjoy Suffolk's heathlands.	Identify potential areas of new open access where opportunities arise.	2	££	Number of new sites identified.	Greater access to green space.
2.5.3 Ensure people can experience and enjoy Suffolk's heathlands.	Work with Natural England to dedicate new areas of open access, where it meets the criteria for dedication.	2	£	Number of new sites dedicated.	Greater access to green space.
2.5.4 Use the green access network to promote Suffolk as a desirable location to live, work and visit.	Review promotion and accessibility of open access sites	3	££	Number of sites reviewed.	Easier access to green space and healthier communities.

**Suffolk Green Access Strategy**  
**Part 3 – Delivery Plan**

Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
2.5.5 Ensure people can experience and enjoy Suffolk's heathlands.	Work with Natural England, the Suffolk Local Access Forum and land managers when open access restrictions are reviewed to ensure any restrictions are valid.	3	££	Number of sites reviewed.	Greater access to green space.

### **3. Promoting green access**

#### Introduction

*“Suffolk provides an intoxicating variety of places to explore”* (BBC Country Magazine, 2018)

Suffolk is an attractive destination to live and work and access to the countryside plays a key role in drawing in tourists and enhancing the quality of life for those living in the county. The public rights of way network is vital in enabling people to experience, enjoy and appreciate the natural environment. The quality of the network therefore has a direct impact on the county’s economy through tourism, and on people’s wellbeing by enabling healthier lifestyles. However, people’s awareness of green access is often limited, and therefore promoting green access is highlighted as a key theme for Suffolk’s Green Access Strategy.

Tourism – Suffolk’s tourism economy is worth £1.9bn per year, employing nearly 40,000 people. It is Suffolk’s 3<sup>rd</sup> largest employer after ‘Public Administration, Education and Health’, and ‘Wholesale and Retail Trade’. In 2018, BBC Countryfile shortlisted Suffolk as one of the top 5 holiday destinations in the UK, confirming that Suffolk’s natural environment is a key driver in promoting Suffolk as a place to visit.

Countryside access has a proven benefit to the tourism economy. The England Coast Path (ECP) is a new long-distance walking route around the coast of England. Where the ECP has been completed elsewhere in England, it has had an impact on coastal destinations on both visitor numbers and spend. In 2012, the South West Coast Path was estimated to have generated a spend of £436 million, supporting 9,771 full time equivalent jobs.

The ROW&A team works closely with Natural England to ensure the ECP delivers the best outcome for Suffolk. A key feature for Suffolk, differentiating it from many other counties, are its estuaries and the County Council will seek to ensure the route includes access along these estuaries, providing a continuous path for people to follow.

The ROW&A team works closely with tourism partners and local communities to promote countryside access at national, regional, local and grass-roots levels. The Discover Suffolk project delivers a range of access projects and activities that promote tourism. The project includes websites ([www.discoveruffolk.org.uk](http://www.discoveruffolk.org.uk)) and social media, develops new village walking and cycling leaflets, and works with the media to promote Suffolk’s countryside.

The annual Suffolk Walking Festival, established in 2010, is Suffolk’s only pan-county event with media partners of BBC Radio Suffolk and Archant publications. It has established partnerships with various organisations including RSPB, National Trust,

Suffolk Wildlife Trust and public health and is supported by each of the county's district and borough councils and attracts private sponsorship.

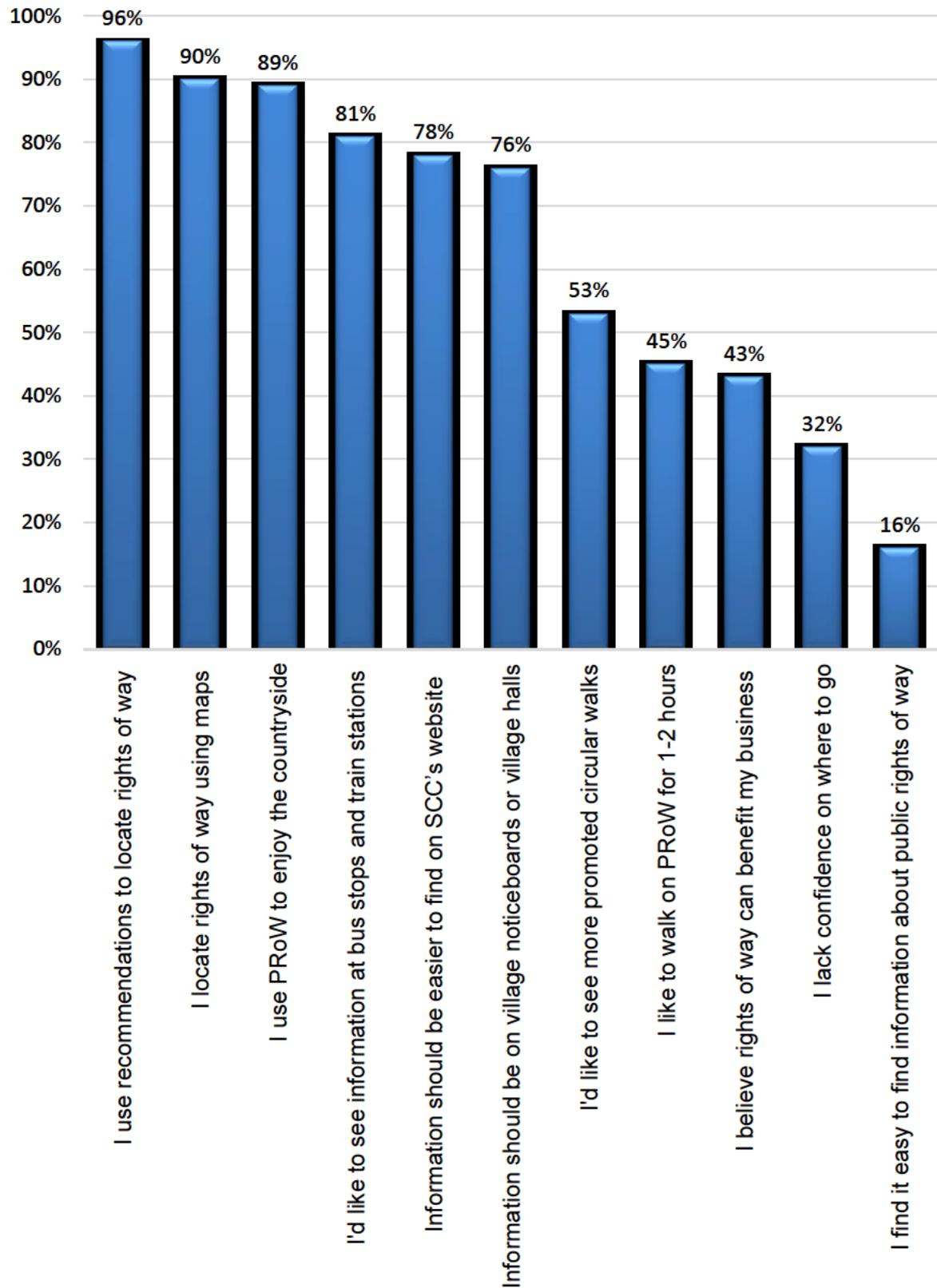
Health – Although covered in more detail in theme 4, the health benefits of being active also impact on the county's economy. Incorporating activity into everyday lifestyles reduces the risk of developing life-limiting health conditions and this provides preventative care. This helps to address the costs of curative care by the NHS and the associated costs to business through absence from work, low productivity and out of work benefits.

Walking is often cited as one of the most accessible ways to be active. The Department for Transport has a long-term ambition for walking and cycling to become the natural choice for shorter journeys including commutes to school and work. In Suffolk's Walking Strategy, that target is for walking to be the default choice for all journeys under 20 minutes. SCC considers this target should be extended to cycling as well and will use this standard when considering proposals that impact on green access and when opportunities arise to improve access.

Developing an accessible right of way network that is well promoted helps everyone and with Suffolk's ageing population keeping active for longer will have continued effect on health costs and employment productivity.

The ROW&A team works with public health and, specifically, the Most Active County team and OneLife Suffolk to identify ways to address health inequalities by utilising the green access network.

**Consultation key findings:  
promoting green access**



3. Delivery Plan: promoting green access					
Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
<b>3.1 Research</b>					
3.1.1 Understand how and why people use green access.	Work with University of East Anglia and others to research how people use the green access network to better understand the barriers to entry.	1	£	Research report received.	Increased use of green access.
3.1.2 Understand how and why people use green access.	Gather feedback following each Suffolk Walking Festival to understand the value of the festival to participants and ways to further develop the event.	1	£	Report received.	Increased use of green access.
3.1.3 Develop innovative means of promoting green access.	Where appropriate, implement new ideas from research to alleviate those issues that inhibit access to the countryside.	2	££	Number of projects delivered.	Increased use of green access.
<b>3.2 Promotion</b>					
3.2.1 Raise awareness, appreciation, and understanding of Suffolk's countryside.	Work closely with tourism organisations, communities and businesses, to promote Suffolk as a destination of diverse and accessible landscapes.	1	£	Number of joint projects delivered.	Increased tourism economy.

<b>Objective:</b>	<b>Action:</b>	<b>Timescale:</b>	<b>Resource required:</b>	<b>Performance measure:</b>	<b>Outcome:</b>
3.2.2 Promote the Discover Suffolk brand.	Develop the Discover Suffolk range of leaflets promoting circular and accessible walks and rides.	1	£	Number of new leaflets published.	Increased tourism economy.
3.2.3 Use the green access network to promote Suffolk as a desirable location to live, work and visit.	Develop the Discover Suffolk website to promote access to Suffolk's countryside, highlighting seasonal activities, local walks and rides, and relevant tourism businesses.	1	£	New and refreshed Discover Suffolk website launched.	Increased tourism economy.
3.2.4 Engage the public in green access.	Review and refresh green access presence on county council's websites.	1	£	Refreshed website presence.	Improved on-line experience.
3.2.5 Engage the public in green access.	Use social media to engage with users, community groups and visitors to promote Suffolk's countryside and green tourism.	1	£	Volume of social media activity including followers on social media platforms.	Increased tourism economy.
3.2.6 Publicise green access and the Discover Suffolk brand.	Work with the media at a local, regional and national level to promote Suffolk's green access network.	1	£	Number of media articles achieved.	Increased tourism economy.

<b>Objective:</b>	<b>Action:</b>	<b>Timescale:</b>	<b>Resource required:</b>	<b>Performance measure:</b>	<b>Outcome:</b>
3.2.7 Promote the health benefits of green access.	Work in partnership to integrate green access into other strategies and plans.	1	£	Number of partnership plans affected.	Healthier communities.
<b>3.3 Events</b>					
3.3.1 Showcase Suffolk as an accessible destination.	Champion the Suffolk Walking Festival, working collaboratively to enable and encourage residents and tourists of all abilities to participate in the event.	1	£	Number of walking festival events delivered.	Increased tourism economy.
3.3.2 Develop relationships with local businesses to seek sponsorship and promotion of green access.	Seek external funding and investigate efficiencies to secure the Suffolk Walking Festival as self-supporting.	2	££	Amount of sponsorship secured.	Increased tourism economy.

## **4. Developing healthy and sustainable communities**

### Introduction

*“How we plan design and manage our landscapes should be guided as much by their importance for health as for all of their other functions.” (The Landscape Institute 2013)*

Whilst the benefits of the natural environment on wellbeing are well recognised, Suffolk’s countryside and its rights of way network remain underutilised as a health resource. With a network of over 3,500 miles of rights of way across Suffolk, plus permissive paths and open access land, the green access network offers significant opportunities to enhance the health and wellbeing of local communities. And with increasing demands on health providers, green access offers sustainable models of enhancing health and wellbeing from both a preventative and a rehabilitative perspective.

Being active, especially in green space, is proven to be good for both physical and mental health and wellbeing (the same is true for blue space, which is being beside water, lakes, rivers or the sea). Studies identify that access to green space for outdoor exercise delivers £2.2bn of health benefits to adults in England each year<sup>13</sup>. It can have positive outcomes on a wide range of health conditions including obesity; long term health conditions; preventing early death; and mental health, including dementia.

Involving people and communities in managing green access provides a range of benefits. Research undertaken by the Social and Economic Research Group based at the University of Essex ([www.iser.essex.ac.uk](http://www.iser.essex.ac.uk)) shows that environmental volunteering can help overcome socioeconomic barriers to green access, improve self-esteem and build social capacity. It can give people meaning and a sense of identity and can be a means of re-integrating marginalised people into society whilst enhancing people’s value of the environment. Volunteering in green access can involve clearing vegetation, building paths and steps, installing new gates or seating, or waymarking routes. It can include researching new trails, writing new guides or guiding walks. These activities can complement the work of other organisations, such as conservation groups, in developing communities and building what is referred to as “community capacity”.

SCC is committed to developing community capacity by influencing the shape of places. It’s important to maximise the potential for green access in new developments and recognise the significant contribution it can make to improving health outcomes by enabling more active lifestyles.

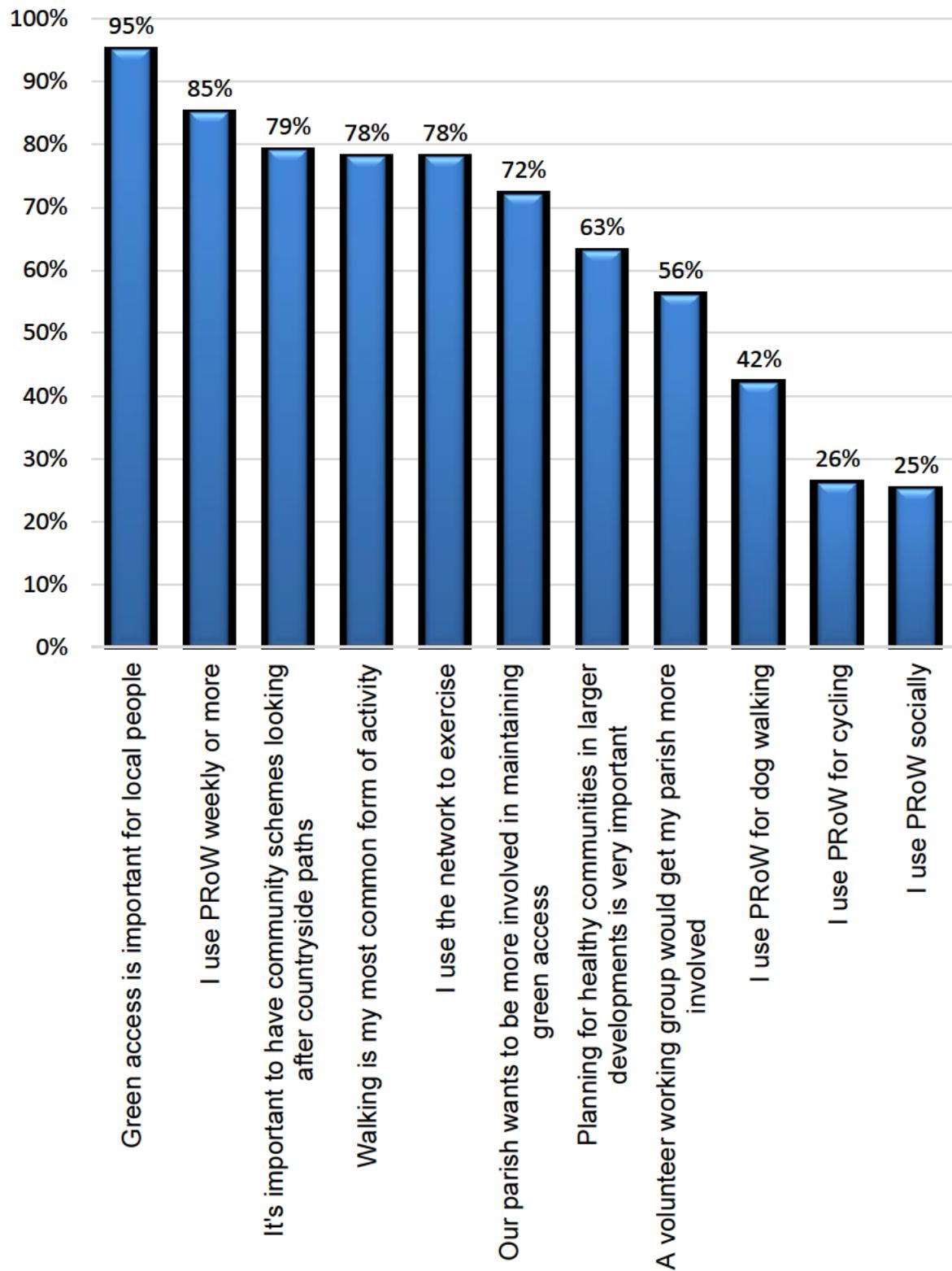
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<sup>13</sup> White. Journal of Preventative Medicine 2016

SCC recognises the importance of involving communities in the development and management of the green access network, especially when resources are limited. The impact of local communities through such initiatives as Walkers Are Welcome, and through volunteer programmes run by partner organisations, has a significant impact. Volunteers assist in monitoring the state of the network, highlighting maintenance issues and delivering essential works, and plan events, including health walks as well as leading walks for the Suffolk Walking Festival. These activities all help to raise awareness of the local green access network and encourage others to enjoy the countryside with its benefits to health and the tourism economy.

The ROW&A team work closely with volunteers, partner organisations, community groups, and facilitate the Walkers Are Welcome programme in Suffolk, to enable communities to become involved in managing and developing green access.

**Consultation key findings:  
developing healthy and sustainable communities**



4. Delivery Plan: developing healthy and sustainable communities					
Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
<b>4.1 Health</b>					
4.1.1 Promote green access as integral to the health agenda.	Work with public health to champion green access across a range of programmes.	1	£	Number of programmes influenced.	Healthier communities.
4.1.2 Promote green access as integral to the health agenda.	Enable a wider and more diverse range of people to become active, especially those from underrepresented groups and those with long term health conditions.	1	££	Number of participants on Health Walks and similar programmes.	Healthier communities.
4.1.3 Make walking and cycling the natural choice for short journeys.	Work with SCC's Transport Policy team to encourage a shift to sustainable travel.	1	£	Number of PRoW schemes delivered that promote sustainable travel.	Healthier communities and reduced congestion and air pollution.
4.1.4 Make walking and cycling the natural choice for short journeys.	Support programmes to embed and deliver the public rights of way network as suitable routes to school.	1	££	Number of PRoW routes identified as suitable routes to school.	Healthier communities and reduced congestion and air pollution.

Objective:	Action:	Timescale:	Resource required:	Performance measure:	Outcome:
<b>4.2 Communities</b>					
4.2.1 Embed green activity into community-based programmes and initiatives.	Provide guidance to planners and developers to develop a shared understanding on how improving green access can help build healthy communities.	1	£	Number of guidance provided.	Healthier communities.
4.2.2 Embed green activity in communities.	Embed green access into Neighbourhood Plans.	1	£	Number of plans influenced.	Healthier communities.
4.2.3 Embed green activity in communities.	Support communities in managing and developing green access.	1	£	Number of communities supported.	Healthier communities.
4.2.4 Embed green activity in communities.	Support communities to achieve and maintain the national Walkers are Welcome (WaW) accreditation.	1	£	Number of communities achieving WaW accreditation.	Healthier communities and improved local tourism economy.
4.2.5 Embed green activity in communities.	Encourage and support communities in protecting the PRoW network.	1	££	Number of communities supported.	Healthier communities.

<b>Objective:</b>	<b>Action:</b>	<b>Timescale:</b>	<b>Resource required:</b>	<b>Performance measure:</b>	<b>Outcome:</b>
4.2.7 Embed green activity into community-based programmes and initiatives.	Develop a community scheme that lays out to communities all the ways in which they can get involved in green access – from reporting to maintenance to promotion.	2	££	Number of communities engaged.	Healthier communities.

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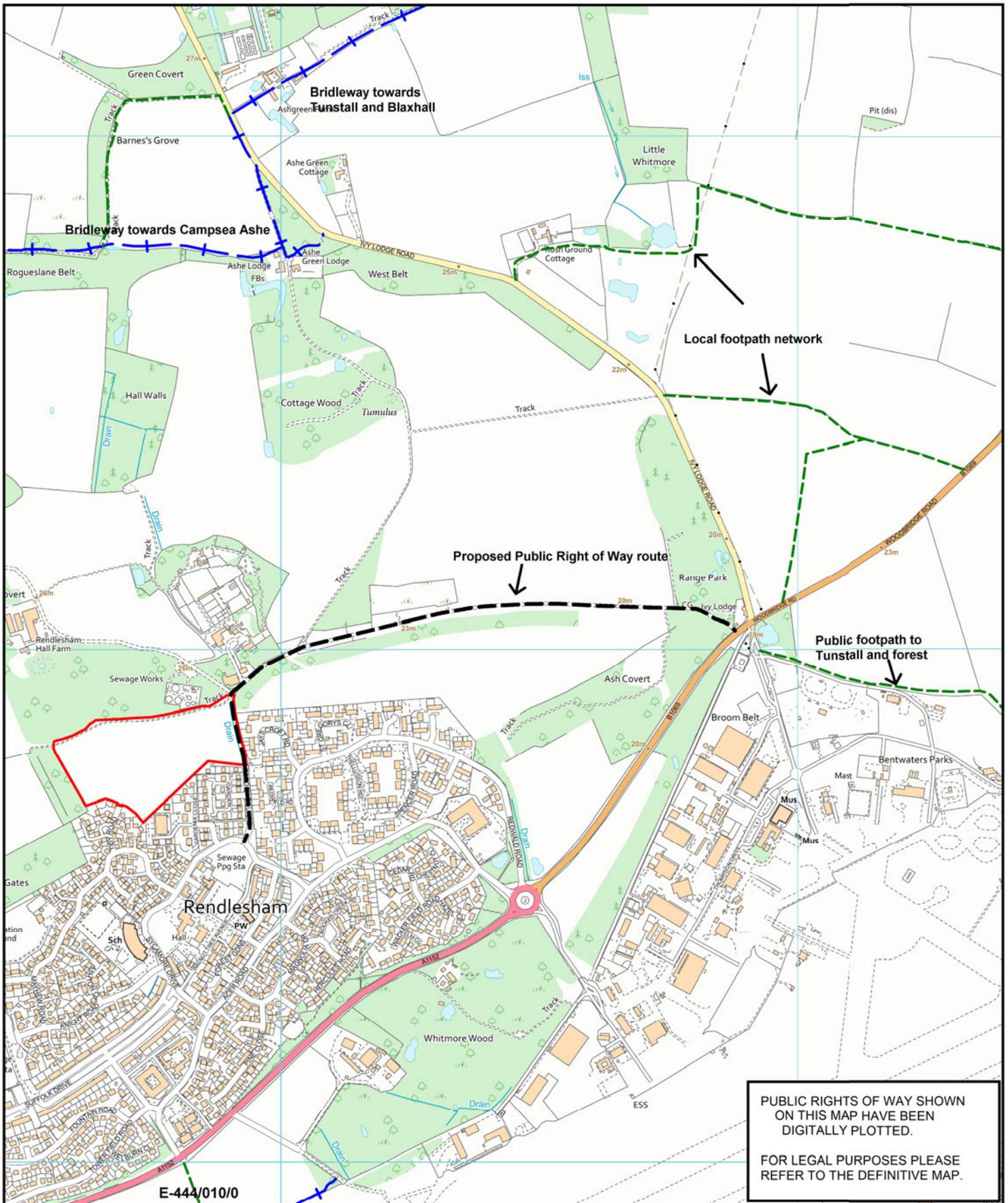
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**Russian**

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**Proposed Public Right of Way route from Sycamore Drive to the B1089, Woodbridge Road**

<p><b>1:7500</b></p>	<ul style="list-style-type: none"> <li><span style="color: green;">- - - - -</span> Public Footpath</li> <li><span style="color: blue;">+ + + + +</span> Bridleway</li> <li><span style="color: black;">- - - - -</span> Proposed Public Right of Way</li> <li><span style="color: red;">—————</span> Appeal site</li> </ul>	
<p>Growth, Highways &amp; Infrastructure          Endeavour House, 8 Russell Road, Ipswich, Suffolk. IP1 2BX</p>		<p>Ordnance Survey MasterMap © Crown copyright. All rights reserved.          Suffolk County Council Licence No. 100023395 2015</p>

Do not scale from this map

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