Suffolk Coastal Local Development Framework

Core Strategy & Development Management Policies

Development Plan Document

Pre-Submission Document

Regulation 27 Statement of Consultation

January 2012
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INTRODUCTION

The Statement of Compliance

1.01 This Statement has been prepared as a supporting document to the Suffolk Coastal District Council Core Strategy & Development Management Policies Pre-Submission document (December 2011). This document is produced to comply with Regulation 27 of the Town & Country Planning (Local Development) (England) Regulations 2004 as amended in 2008 and 2009. This document records a summary of the Council’s significant consultation timeline and outcomes for the production of the Core Strategy & Development Management Policies.

1.02 The above Regulation 27 requires that local authorities should produce a statement with the following information:
- the bodies and persons invited to make consultation representations;
- how those bodies and persons were invited to make representations;
- a summary of the main issues raised from the representations; and
- how representations made and main issues have been taken into account and addressed in the Core Strategy & Development Management Policies document.

The Core Strategy & Development Management Policies (Core Strategy)

1.03 The Core Strategy is the guiding document which sets out the vision and strategic level priorities and policies which will guide development in the district up to 2027. It sets out the general approach to be taken to the main issues identified across the district including housing and infrastructure provision, employment floorspace, protection and enhancement of the environment, and community well-being issues. The Core Strategy also includes a set of more detailed development management policies which together with strategic policies, will be used in determining planning applications. The Core Strategy has been the subject of numerous public consultations and production has been undertaken through balancing these responses with the relevant national and regional planning policy framework.

Stages of Core Strategy Consultation

Sustainability Appraisal Scoping Report

1.04 The Council commenced the production of the Core Strategy by consulting with the statutory environmental bodies on the Sustainability Appraisal Scoping Report in February 2006. The responses were taken on board and a revised Sustainability Scoping Report was again consulted upon in June 2006.

Vision & Objectives

1.05 The Core Strategy [including Development Control Policies] & Site Specific Allocations & Policies: Vision & Objectives document was published for public consultation for a period of 6 weeks between 16th March 2006 and 2nd May 2006. It comprised a set of draft objectives and a vision which was introduced in the context of a new LDF format. The document produced was informed through consultation questionnaires and workshops held over 2002 – 2005.

Issues & Options

1.06 The Core Strategy Issues & Options document was published for public consultation for a period of 8 weeks between 5th February 2007 and 2nd April 2007. It set out a revised vision and objectives list as well as a suite of spatial policy options which may
achieve this. The document was formed from previous consultation representations as well as issues arising from themed workshops conducted during 2006.

Further Issues & Options

1.07 The Core Strategy: Potential Directions for Strategic Housing Growth document was published for public consultation for a period of 8 weeks between 1st February 2008 and 28th March 2008. It was a focused document on the subject of strategic housing locations and published generalised areas for growth options in the Ipswich Policy Area (IPA) and Felixstowe Peninsula (FP).

Preferred Options

1.08 The Core Strategy Preferred Options document was published for public consultation for a period of 10 weeks between 8th December 2008 and 20th February 2009. It set out the Council’s preferred spatial vision and objectives for the district and the policies for achieving them, as well as alternatives considered. The document was comprised of policy revisions and issues included as a result of previous consultation stages as well as issues emerging from completed evidence base documents.

Housing Distribution – Updated Preferred Option 7/09

1.09 The Housing Distribution – Updated Preferred Option 7/09 document was published for public consultation for a period of 8 weeks between 23rd September 2009 and 18th November 2009. The document was a specific targeted consultation based upon a revised housing distribution from the previous Preferred Options document. The document also contained further information in relation to potential infrastructure requirements in the major centre areas of the IPA and FP.

Reviewed Core Strategy

1.10 The Reviewed Core Strategy document was published for public consultation for a period of 8 weeks between 29th November 2010 and 23rd January 2011. The document contained the latest iterations of policies following previous debates as well as relevant updates to reflect national / regional planning statements by the Coalition Government.

Updated Core Strategy Sustainability Appraisal (SA) and Appropriate Assessment (AA)

1.11 The updated SA and AA documents were published for public consultation for a period of 6 weeks between 30th August 2011 and 14th October 2011. The SA and AA documents are supporting documents to the Core Strategy which are legally required to assess the potential impacts of the policy proposals. The consultation was specifically restricted to comments on the SA and AA documents which had been updated following the availability of new evidence. Comments were not invited directly on the latest Core Strategy document.

Legislation changes during production

1.12 While the Core Strategy was being progressed, the Town & Country Planning (Local Development) (England) Regulations 2004 was amended with some technical alterations to the LDF process and procedures. These alterations included changes to consultation bodies as well as procedural consultation changes to draft documents at an advanced stage. The Council has produced this statement and referred to the updated various regulations herein as published in the Town & Country Planning (Local Development) (England) Regulations 2004, and subsequent amendments in 2008 and 2009.
Statement of Community Involvement (SCI)

1.13 The Suffolk Coastal SCI was formally adopted in July 2006 and sets out how the Council intends to involve businesses, town/parish councils, individuals and other groups in the LDF decision making process. The Council has complied with the commitments in the SCI throughout an extensive programme of public consultation from 2002 to 2012.

1.14 Consultations and promotion of the Core Strategy has taken the form of questionnaires, workshops, exhibitions, public meetings postal and electronic response facilities, press articles/advertisements and leaflets. Much of the early stages of the Core Strategy involved significant use of workshops and exhibitions to stimulate interest and establish views on options, alternatives and preferred options. The latter stages of the Core Strategy mainly involved postal and electronic consultations where a substantial number of people and organisations who had registered an interest in the LDF were also invited to make comments on the Core Strategy. The Council has also given members of the public the opportunity to speak their views at a number of committee meetings.

1.15 Following the adoption of the SCI, each Regulation 25 consultation on the Core Strategy was for a minimum period of 8 weeks. The Pre-Submission consultation (Regulation 27/28) is proposed for a 6 week consultation between 25th January 2012 and 7th March 2012.
CONSULATION UNDER REGULATION 25
[October 2002 – October 2011]

2.01 A key element of the Local Development Framework (LDF) system is front loading and early discussion, identification of options and negotiation of issues. This is to engage communities in the whole process and have as many issues as possible identified and resolved early on before the formal examination. The Council has conducted a large amount of public consultation in producing the Core Strategy and this has generated a lot of feedback into the process.

2.02 All published documentation and full consultation responses have been made available at the Council’s main office Planning Helpdesk, as well as on the Council website (www.suffolkcoastal.gov.uk).

2.03 The following sections present a summary of the main issues raised and responses from each Core Strategy consultation stage.

Replacement Local Plan questionnaire
[October 2002]

2.04 In October 2002, the Council published a future planning questionnaire in Coastline magazine, which circulates to every household in the district. The exercise was originally intended to be used to inform the review of the then Local Plan policies but with the emergence of the Local Development Framework planning system in 2004, this information was noted and put to use in forming the early issues in the Core Strategy document production.

2.05 A summary of the main issues raised from the questionnaire article were as follows:

i) Housing (how many houses, distribution, affordable housing, second homes etc)
ii) Economy (job creation, rural vitality, tourism, town centres etc)
iii) Environment (landscape, bio-diversity, resource conservation etc)
iv) Design (density, materials, community safety etc)
v) Transport (A12/A14, rural travel, public transport etc)
vi) Community Needs (infrastructure, recreation, rural services etc)

Local Development Framework workshops
[June & July 2005] and [October 2007]

2.06 In June and July 2005 the District Council undertook a series of workshops intended to generate interest and increase the amount of community engagement within the Local Development Framework (LDF). At each workshop Town and Parish Councillors from across the District along with a number of elected Suffolk Coastal members were invited to discuss a range of important topics and issues that the LDF will have to cover. In total the District Council organised and facilitated three town and parish council workshops which over seventy people attended.

2.07 At each of the workshops, those who attended were given the opportunity to discuss each topic in detail. The topics that were discussed at the workshops were Affordable Housing, Settlement Hierarchy and Community Engagement. People who attended were also encouraged to put any further issues they think the LDF should address onto a Graffiti Board.
2.08 The comments made at the workshops were used to inform the decision-making process the District Council undertook as it produced the Core Strategy Issues & Options and Statement of Community Involvement documents.

2.09 In October 2007, the Council sought out the opportunity to engage with the Partnership with Older People network. Two sessions, covering the north and south of the district were held and covering the topics of housing, health and safety, recreation and supporting others.

2.10 Whilst the sessions represented only a small fraction of the older section of the population living within the district, it is considered likely that the majority of the points raised will be common to the majority of older people, to a greater or lesser extent. Most participants rated the sessions very highly. The issues and comments raised were used to informed the production of Core Strategy policies and also fed into the wider Community Strategy plan for the district.

Sustainability Appraisal Scoping Report
[February 2006 – March 2006] and [June 2006 – August 2006]

3.01 The Sustainability Appraisal (SA) – Scoping Report is the first formal stage of the Core Strategy production process. The main purpose of the SA Scoping Report is to identify the main sustainability issues relevant to the planned document, eg. health, economy, environmental quality etc, and inform the production of early draft objectives and policies to address the issues.

3.02 The Council first produced an SA Scoping Report for the Core Strategy in February 2006 and consulted with the ‘statutory environmental bodies’ and local town and parish councils. Comments were invited by email or by post. The main issues raised from this were:

i) Further and continuous scoping of most current relevant plans and strategies should be undertaken
ii) The SA should contain explanatory text for policy assessments in order to be transparent about decision making
iii) More data should be gathered regarding greenspace and openspace

SCDC Response

3.03 The Council’s is mindful of the need to review the list of scoped documents and will review and update as relevant throughout the iterations of the SA documents. When policy appraisals are carried out, a written record will be provided in terms of the decision making and justification to make the process transparent. Further studies relating to green infrastructure were published in the LDF Evidence Base.

3.04 A further revised SA Scoping Report from the Core Strategy was consulted upon again with the ‘statutory environmental bodies’ in June 2006 – no further main issues were raised at that time.
Core Strategy Vision & Objectives
[March 2006 – May 2006]

4.01 The Core Strategy [including Development Control Policies] & Site Specific Allocations & Policies: Vision & Objectives document was published for public consultation for a period of 6 weeks between 16th March 2006 and 2nd May 2006. The document set out an introduction to the formal LDF process, a vision for the district up to 2021 and identified a range of headline issues and objectives under key theme headings which were shared by the adopted Community Strategy.

4.02 Comments were invited via post, and electronic communications from the specific and general consultation bodies and key stakeholders as identified in Appendix A as well as those additional organisations and individuals who had requested to be added to the Council’s LDF consultation database. Full consultation transcripts can be viewed on the Council website at www.suffolkcoastal.gov.uk

Main issues raised

[as presented and debated at committee: Local Plan Member Task Group 5th June 2006. Topics covered Strategic Approach, Housing, Economy, Environment, Community Well-Being]

4.03 All comments received from the Core Strategy Vision & Objectives consultation had been considered and reported to the Council’s LDF Task Group for debate and response. The comments were then used to inform the production of the next revision to the Core Strategy. The main issues raised at this consultation were as follows:

General

4.04 Main issues raised:

i) The vision was too vague and lacked local distinctiveness and objectives needed greater clarity to show the relationship with the Community Strategy.
ii) Some concerns were expressed about the financial deliverability of the objectives.

4.05 SCDC Response - The Council agreed to develop the vision and objectives as suggested. The Council agreed that the strategy should be deliverable and stated that this will be picked up as the LDF progress – i.e. Through the Issues & Options stages.

Strategic Approach

4.06 Main issues raised:

i) Some of the objectives were vague and generalised in nature and would require local distinctiveness.

4.07 SCDC response – The Council agreed that the objectives would need to be made more specific in future document revisions.

Economy

4.08 Main issues raised:
Support was raised for the need to upgrade the A12 road north of Wickham Market in order to stimulate economic development.

Support was expressed for the protection and enhancement of existing town centre viability.

**4.09 SCDC Response** - The Council agreed that the issues of the A12 and town centre boundaries were important and would be addressed in greater detail within further revisions to the Core Strategy.

### Built & Natural Environments

4.10 Main issues raised:

i) Comments were raised that the existing biodiversity objective should be split into two separate objectives.

ii) Suggestions were made to distinguish objectives between sustainability and renewable energy.

4.11 **SCDC Response** – The Council felt that the existing biodiversity objective was sufficient to cover relevant issues however it agreed that sustainability and renewable energy should form distinctive objectives.

### Housing

4.12 Main issues raised:

i) Support was raised for the creation of affordable housing and the aim to maintain a stock of small house units.

4.13 **SCDC Response** – The Council agrees with these principles.

### Community Well-Being

4.14 Main issues raised:

i) Comments were raised in relation to the need to provide additional green infrastructure and other community facilities.

ii) The theme of infrastructure provision was raised across a number of examples including health, education and police.

4.15 **SCDC Response** – The Council agreed with these comments and that these would be addressed in more detail through later revisions to the Core Strategy.

### Other issues

4.16 Main issues raised:

i) Other responses were raised relating to the submission of sites for potential development.

4.17 **SCDC Response** - The Council acknowledged these proposals but stated that they would be addressed as a later stage through the Site Specific Allocations & Policies document.
The Core Strategy Issues & Options document was published for public consultation for a period of 8 weeks between 5th February 2007 and 2nd April 2007. The document contained a revised vision and set of objectives themed in accordance with the adopted Community Strategy. Where there were realistic policy options to meet the vision and objectives these were also presented as well as justification for where no realistic policy options were considered.

Comments were invited via post, a consultation booklet of questions and electronic communications from the specific and general consultation bodies and key stakeholders as identified in Appendix A. Comments were also invited from those additional organisations and individuals who had requested to be added to the Council’s LDF consultation database. The responses were analysed by the Council before being presented to committee for decisions on any policy changes. Full consultation transcripts can be viewed on the Council website at www.suffolkcoastal.gov.uk

Material was advertised through press release and as part of Coastline magazine which is delivered to every household in the district.

The results and findings from this consultation were also shared and used to inform the revision process to the Council’s Community Strategy.

**Main issues raised**

*as presented and debated at committee: Local Plan Member Task Group 20th June 2007. Topics covered Settlements, Countryside, Housing, Economy, Access and Transport, Environment, Community Well-Being. Further debate on housing and employment issues took place in July, September and December 2007*

The main issues raised at the Core Strategy Issues & Options consultation were as follows:

**Settlements**

*Settlement Hierarchy*. Strong support (89%) for Option 2, the revised settlement hierarchy, which identifies key and local service centres. Whilst the majority of settlements were thought to be correctly located within this hierarchy questions were raised on 13 of these. There was some suggestion that greater weight should be given to the provision of public transport as one of the determining criterion.

*Wickham Market*. Question 8 related specifically to Wickham Market and to whether or not it should be classified as a market town. Responses were mixed, with many feeling unable to comment stating that it should left to the residents of Wickham Market themselves to decide. There was general agreement that the settlement offered more than other key service centres and for some offered an alternative to Woodbridge.

*Physical Limits Boundaries*. The suggestions as to how physical limits boundaries should be defined and the reason for identifying them was generally supported as a good starting point but that there should be scope for some local flexibility. Two clear messages emerged however, firstly that the final alignment should be drawn up in
conjunction with the local community; secondly that where sites are allocated for development that they should be included within the boundary.

SCDC Response:

5.09 The Council recognises the difficulty of devising a hierarchy to cater for all local circumstances and not every settlement will fit perfectly into a specific tier. However, the main aim of the hierarchy is to give communities a degree of understanding in terms of the role they play in the district, and what development proposals may be appropriate in their locality.

5.10 The Option 2 methodology for the hierarchy is constructed in the context of both physical size and local services and the functions they fulfil. It is acknowledged that some communities object to their place in the hierarchy and fear inappropriate development proposals, but the community will have full opportunity to take part in discussions regarding any development proposals in their area.

5.11 The Council agrees that Wickham Market is a unique case, but the parish council views should be most relevant here therefore the settlement will remain for Preferred Options consultation as a Key Service Centre.

5.12 Comments are noted regarding physical limits boundaries and the Council will be intending to draw these up in the future in consultation with local communities.

Countryside

5.13 There was marginal support in favour of a more flexible approach to the countryside (57%) with many of the view that the existing policies were working well and did not require change. A number of suggestions have been made for the addition /deletion of uses considered appropriate. There was concern that equal consideration should be given to the quality of life for residents in the rural areas as to those in the towns/urban areas.

SCDC Response:

5.14 Noted. The Council is keen to ensure that rural areas have sufficient flexibility to meet appropriate development needs.

Housing

5.15 The need for additional housing is accepted at least to meet the requirements of the RSS and create affordable housing. With regard to distribution, Option 5 was the clearly favoured option with Option 6 second. Both of these options look to distribute new development across the district albeit concentrating at the main urban areas and market towns. There is clear local objection to the Trimleys losing their separate identities. There was general support for the scales of development set out for each of the market towns.

SCDC Response:

5.16 The comments are noted. There are currently no specific proposals from the Council for development in the Felixstowe / Trimley villages area, the document is setting out the overall number of houses to be built and the broad distribution to be expected across the district.

The Economy

5.17 Employment A number of very important points have been raised under this heading. Port users have indicated an immediate need for more land to be allocated for port related uses, particularly for container storage and for parking linked to the new
booking in system now in operation at the docks. Others are concerned that whilst there may be an apparent surplus of more general employment land at present that this will be largely used up by 2010 so more will need to be allocated. Access to broadband is seen as increasingly important both for existing business practices and to attract new business investment into the area.

5.18 With regard to identifying strategic employment sites, one suggestion is that Ransomes Europark be identified as such given its size.

5.19 There was strong support (80%) for the introduction of a more formal sequential approach to the retention of employment land.

5.20 Retail Few issues were raised with regard to retail. Suggestions have been included to extend Woodbridge Town Centre, and for additional retail provision at Felixstowe.

SCDC Response:

5.21 The comments are noted. Further investigation of employment land needs in the district will be pursued, together with consideration of the status of any proposed extension to Ransome’s Europark.

Access and Transport

5.22 Comments under this section were predictable with access and congestion problems noted on the A12; A14; A1214 and A1152. In particular, concern is raised by a number of respondents regarding the capacity of the Felixstowe Peninsula to take additional growth given the lack of alternative routes.

5.23 There was general support for improvements to the East Suffolk Rail Line in the form of improved parking at stations, additional services and better integration with bus provision. A number of people suggested the re-instatement of the bus route to Felixstowe Docks.

SCDC Response:

5.24 The comments are noted. The Council intends to carry out further strategic transport studies in order to assess impacts and any suitable mitigation necessary.

Environment

5.25 Art and Design. General support for a good standard of design to be applied throughout the district and for the use of local styles. Provision of public art and the role it can play in development supported but tempered against the need to balance provision against other developer contributions.

5.26 Landscape. General recognition of the contribution the landscape makes to the quality of the local environment and therefore for the retention of local designations in advance of the landscape character assessment being published. A number of suggestions included for additions to the landscape designation.

5.27 Floodrisk/coastal erosion. A number of issues were raised including the need for greater consideration to be given to the role of the Shoreline Management Plan; support for the use of Sustainable Urban Drainage Systems (SUD’s) and for innovative ways of dealing with these issues. It was also suggested that the document was overly negative on this subject.

5.28 A couple of respondents’ thought that reference should also be included to winter water storage/capture particularly on farms.
5.29 **Energy.** The main issue in relation to this section was concern that the types of renewable energy noted was too restrictive and that all forms should be considered. The potential for biomass linked to agriculture/forestry is highlighted.

**SCDC Response:**

5.30 The comments are noted.

**Community Well-Being**

5.31 **Developer Contributions.** General support for developer contributions being highlighted/specified early on in the development process and for priorities to be set locally. Much debate about how ‘locally’ should be defined as this will depend on the type of facility or contribution being sought but that it should clearly relate to the community it is designed to serve.

5.32 **Retention of local services.** Strong support was expressed for the retention of local services. Post office, shop and meeting place were identified as the most important. A number of other facilities such as public toilets were identified as facilities which should be acknowledged and retained. Many of the suggestions related to looking at ways other than through the planning system as to how services and facilities could be retained including early, pro-active intervention by the Local Authority and other bodies to look at alternative means of provision.

5.33 **Green Space.** Strong support for the retention of all existing green space before looking to identify additional provision. A number of areas have been identified as lacking provision. Other suggestions relate to how and by whom open space is managed.

**SCDC Response:**

5.34 The comments are noted.
6.01 The Core Strategy: Potential Directions for Strategic Housing Growth document was published for public consultation for a period of 8 weeks between 1st February 2008 and 28th March 2008. It was a focused document on the subject of strategic housing locations and published generalised areas for growth options in the Ipswich Policy Area (IPA) and Felixstowe Peninsula (FP).

6.02 Five broad housing areas were considered in both the IPA and FP, but the Council later accepted another option (Area 6 – Innocence Lane, Kirton) in the FP for further consideration.

6.03 Comments were invited via post, and electronic communications from the specific and general consultation bodies and key stakeholders as identified in Appendix A as well as those additional organisations and individuals who had requested to be added to the Council’s LDF consultation database. The comments were collected and analysed by the Council before being presented to committee for decisions on any policy changes. A summary of the main comments and responses can be found below. Full consultation transcripts can be viewed on the Council website at www.suffolkcoastal.gov.uk

Main issues raised

[as presented and debated at committee: LDF Task Group 28th July and 4th August 2008. Topics covered strategic housing options in the Ipswich Policy Area and Felixstowe Peninsula area]

6.04 The main issues raised at Further Issues & Options consultation were as follows:

General:

How many houses are to be built?

6.05 SCDC Response - The proposal at present is that about 1,650 new houses will be built in the area east of Ipswich in the period to 2025 of which about 1,050 will be on greenfield land. The rest consists of houses with planning permission and others on potential brownfield sites scattered throughout the area. This excludes small infill plots scattered around and hard to identify.

Are all of the houses necessary?

6.06 SCDC response - Yes, for a number of reasons. First of all to meet requirements established in the Regional Plan but also to meet other needs:

i) To meet the increasing need for housing as new households are constantly created (approx 70% would be meeting the current population needs)
ii) To address the ageing population of much of the district by encouraging younger people to remain in the district or move into it.
iii) To help support local services such as education.
iv) To create affordable housing for local people.
Does the Council have to follow the Regional Plan?

6.07 SCDC response - The answer is a strong “Yes”. Non-consistency with the Regional Plan is not an option. The Core Strategy must conform with this higher level strategic policy document. For it not to be so runs the risk that the requirement will be met by other means – notably through the submission of planning applications on an ad-hoc and unplanned basis. The Council also has to demonstrate that land is constantly available for building – planned for over a 15 year period with the first 5 year’s worth ready to start.

Who will occupy the houses?

6.08 SCDC Response - A mixture of occupants but mostly local people who will live and work in the area. A third of the houses are guaranteed for local occupation to meet an identified local affordable housing need secured by a condition on a planning permission or the developer signing a legal agreement to this effect.

What type of housing will be built?

6.09 SCDC Response - A mixture. This will include a variety of bedrooms and combination of houses and flats depending upon the local circumstances and nature of the land. There will also be a proportion of housing for rent as well as shared equity/ownership.

Where will the occupants work?

6.10 SCDC Response - It is anticipated that most will work locally. There are two major employment areas – Martlesham Heath and Ransomes Europark – plus the town centre. One factor in choosing the preferred location for the new housing will be the proximity to these areas and means of reaching them by means other than the car.

Does “greenfield” land have to be lost to housing?

6.11 SCDC Response - Unfortunately yes, but all steps will be taken to ensure as many features as possible are retained, such as trees and woodland, ponds and wildlife habitats. The district does not contain large areas of redundant brownfield land as might occur in cities. However, potential sites have been identified and these will be taken account of in terms of overall supply. The Council will continue to promote where possible the re-development of brownfield sites ahead of greenfield but the only means of creating all of the houses needed is to utilise greenfield land, which will be carefully chosen having regard to such matters as visual impact, wildlife and agricultural land quality.

What about the infrastructure – roads, sewers, schools, etc? This should be in place before development starts.

6.12 SCDC Response - The Council has asked the necessary questions of the providers and is satisfied that the infrastructure required can be created to support the numbers of houses proposed. When a preferred location is chosen the next stage will be to estimate the cost of providing the infrastructure and calculate when it will be required. Some will be required up front, but others will be necessary as the population increases. This will all form part of a “master plan” for the development on the area chosen.

Can the road system cope with the number of houses proposed?

6.13 SCDC Response - The answer is yes, although some improvements may be required at junctions and roundabouts where pressure is greatest. It will also be required that public transport is increased and cycling and walking opportunities improved.
Why was the consultation exercise so short of detail?

6.14 SCDC Response - It is appreciated that many respondents were critical of the exercise itself and how it was conducted including:

i) The lack of information and detail.
ii) The use of diagrammatic maps.
iii) The absence of public meetings.
iv) Insufficient distribution of the document itself, relying on electronic means.

6.15 It is clear from the responses that the general public failed to appreciate fully the purpose of the exercise and its position in the process of preparing the Core Strategy. This was the first stage of a long process towards adoption during 2010. The exercise was intended to introduce broad concepts in respect of potential locations for future housing, to stimulate a dialogue and discussion within the towns and parishes. Hence the use of diagrams rather than maps; the public was being asked to consider broad locations or directions of growth and not specific sites. This level of detail will come later when the principles have been established in the Core Strategy. Further consultation will then take place.

Are the statistics up to date?

6.16 SCDC Response - They are as up to date as the latest information that is available to the Council. The base date will be moved forward to April 2008 and the housing requirements calculated on that basis.

Why do we need housing when we've got so many empty properties in the area?

6.17 SCDC Response - The occurrence of empty properties has been taken account of in the calculations. The potential 'brownfield' supply of housing includes properties that have been empty for twelve months or more. This is to distinguish them from the normal occurrence of vacant properties as people move or vacate properties. Indeed, if the Council was to take account of empty properties the requirement for new housing should be increased in order to have regard to the fact that a proportion of properties will be empty at any one time. In respect of empty properties used as second homes, the Council has no control over the occupancy of those properties.

6.18 In addition to the above general points, the following broad issues were raised in specific relation to identified strategic growth areas:

Ipswich Policy Area:
‘AREA 1’ – Ipswich boundary Westerfield to Rushmere St Andrew (village)

Areas of Concern

IPA1. Landscape and Countryside
   i) The Fynn valley is a particularly attractive aspect of the SLA. Protection of the integrity of its landscape should rank highly as a planning objective.

6.19 SCDC Response. The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape. In this case this is particularly important given that the Fynn Valley is a designated special landscape area.

IPA2. Wildlife and Habitats
   i) Valuable wildlife habitats exist in the hedgerows, river valleys and remnants of heathland

6.20 SCDC Response. The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on biodiversity. Protection and/or mitigation measures may need to be introduced.

IPA3. Other Environmental Issues
   i) the land within Area 1 is predominately greenfield and comprises a blend of Grade 2 and 3 agricultural land which should be protected and retained.
   ii) This location potentially includes a public water supply borehole at Tuddenham (TM 193476) as operated by Anglian Water. Subsequently part of the area is also designated as a Source Protection Zone 1. Any development must not impact on this resource.

6.21 SCDC Response. The comments are noted and appreciated. The loss of agricultural land, but particularly its grade, will be factors to be considered in the choice of development options. The location of a borehole is noted.

IPA4. Urban Sprawl
   i) The amenities of this popular local recreational area would be severely damaged if the new housing were to intrude on the skyline.
   ii) the site is not located within an identifiable corridor of development and future growth within this area would lead to urban sprawl which is likely to impact upon the land to the north in future decades
   iii) The site lies outside of a clear boundary to Ipswich and would give rise to a feeling of urban sprawl.

6.22 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. The development of any of the options to the east of Ipswich must be designed so as to integrate with the current urban edge and appear to be a natural extension. The impression of urban sprawl must be avoided and can be achieved with the right layout.

IPA5. Impact on Existing Communities
   i) Protection should be provided for the rural setting of the villages of Rushmere St Andrew, Tuddenham and Westerfield and the green spaces between each and Ipswich
ii) Any development should protect the rural environment and preserve the green space between Ipswich and Tuddenham.

iii) Westerfield only has about 184 houses, so putting nearly one thousand on the doorstep will completely swamp the village, undermining its desire to remain a village and keep its identity.

iv) Contrary to the Westerfield Parish Plan.

6.23 **SCDC Response.** The comments are noted and recognised as major considerations in the choice of the preferred development option. The character and identity of existing communities must be preserved and where possible enhanced. The retention of spaces between each is one of a number of means of achieving that objective. This would apply to any of the options.

**IPA6. Local Traffic issues**

i) extremely poor and mostly unclassified roads in this vicinity

ii) extra development will put an even greater burden on these roads

iii) Humber Doucy Lane and Church Lane (some of it a single track road with passing places), is already a rat run for traffic crossing east-west across north Ipswich.

iv) These roads are not main roads, and should not be used as such

6.24 **SCDC Response.** The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed. This would apply to any of the options but is critical here given that the roads are B and C class, including the radials into Ipswich.

**IPA7. Local Services and Facilities**

i) no immediate local employment opportunities

6.25 **SCDC Response.** The comments are noted. It is true that major employment areas are not located within the area but in considering this option it will need to be recognised that Ipswich town centre is accessible (including by train) and pockets of local employment (such as Westerfield) do exist.

**IPA8. Miscellaneous**

a) The location also potentially falls within 250m of historic landfill sites at TM178477 and TM181471

6.26 **SCDC Response.** The comments are noted and appreciated.

**Opportunities and Benefits**

**IPA9. Relationship to Employment and Services**

i) good relationship to the existing town and the built up area.

ii) The area is, by a significant margin, closer to Ipswich town centre with its comprehensive range of shopping, community and other facilities, than any of the other areas identified.

iii) This site is the most sustainable as it is closest to the important employment site of Ipswich.

iv) close to an existing railway station, which is located at Westerfield, and which provides rail services to Ipswich, Woodbridge and beyond, including London.
6.27 **SCDC Response.** The comments are noted and recognised as being positive points in favour of this option.

**IPA10. Current Land Use and Character**

i) Much of the southern part of the area around Rushmere St Andrew and Rushmere Street already has a suburban character and the central and northern parts of the area comprise a fairly unremarkable area of mainly large arable fields.

6.28 **SCDC Response.** The comments are noted albeit they are subjective in their nature. The current character of the area, in comparison with other options, will be one element in the assessment of the sites.

**IPA11. Opportunities for Planning Gain**

i) The area could incorporate a section of a potential northern bypass for Ipswich, linking the A14(T) and A12(T).

ii) Development would support the acknowledged shortfall of medical and shopping facilities in the north east Ipswich area.

iii) Ample land is available to provide new sporting facilities, in particular to provide much needed space for an improved rugby club and associated facilities.

iv) The flat topography of the area facilitates the creation of cycle links to the station from the development.

6.29 **SCDC Response.** The comments are noted. All of the options have the potential for planning gain. The actual deliverability of that gain will need to be considered when each option is assessed. The point about the northern bypass is a valid one given the current study into ease-west capacity of the A14 around Ipswich.

**IPA12. Long Term Planning**

i) The north of Ipswich was considered, amongst others, in the County Structure Plan Examination in Public in 2000 and, at that time was judged to be the most suitable.

ii) Could complement the development of land within Ipswich Borough, and provide a new strategic direction for the expansion of the town.

6.30 **SCDC Response.** The comments are noted.

**‘AREA 2’ – North of A1214, Woodbridge Road**

**Areas of Concern**

**IPA13. Landscape and Countryside**

i) It has been agreed in the past that any significant development north of A1214 should be avoided, described as it was by the Bypass enquiry as being the ‘Lung of Kesgrave’, and should remain as countryside.

ii) It can be observed from the Special Landscape area.

iii) should not be developed because the character of the landscape offers opportunity for significant areas of green infrastructure for the growth areas.

iv) The area includes areas of woodland which could be affected by development.
6.31 SCDC Response. The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape. In this case this is particularly important given that the Fynn Valley is a designated special landscape area.

IPA14. Wildlife and Habitats

i) The area incorporates large areas of heathland (Playford Heath) including areas identified as a SSSI, which would be likely to be either directly or indirectly affected by development.

6.32 SCDC Response. The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on biodiversity. Protection and/or mitigation measures may need to be introduced.

IPA15. Other Environmental Issues

i) The area incorporates a number of scheduled ancient monuments which may be directly or indirectly affected by development.

ii) composed wholly or partly of higher grade agricultural land (grades 2 and 3).
   a. Potentially includes historic landfill sites at TM208456 and TM228463.

6.33 SCDC Response. The comments are noted and appreciated. The loss of agricultural land, but particularly its grade, will be factors to be considered in the choice of development options.

6.34 The location of a landfill site is noted.

IPA16. Urban Sprawl

i) The A1214 forms a natural and logical edge to the built-up area. It is a very busy road with no good planning reasons to allow development on its “wrong” side.

ii) There is no identifiable or defensible barrier to the north and should this land be allocated for future development it is likely that there will be further urban sprawl.

iii) Development of land to the east of Kesgrave Church would be particularly damaging.

iv) is less well related to the existing built up area of Ipswich.

6.35 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. The development of any of the options to the east of Ipswich must be designed so as to integrate with the current urban edge and appear to be a natural extension. The impression of urban sprawl must be avoided and can be achieved with the right layout.

IPA17. Impact on Existing Communities

i) will be severed from the rest of the Kesgrave community either by lack of direct road access or by the A1214.

ii) For 20 years Kesgrave has seen continued growth increasing its population by 250 -300%. Attaining community cohesion takes time.

iii) would result in the loss of the village community of Rushmere St Andrew.

6.36 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. The character and identity of
existing communities must be preserved and where possible enhanced. New development must be integrated with existing communities where possible.

6.37 The retention of spaces between each is one of a number of means of achieving that objective. This would apply to any of the options.

IPA18. Local Traffic issues

i) Grange Farm residents report on the difficulties of entering and exiting the current development. The original outline permission anticipated a bypass to take through traffic away from that of residential traffic.
ii) Additional housing would not be easily served by superoute 66 or park and ride.
iii) additional pressure will be generated along the rural Playford Road/Rushmere Street corridor which is already used as an unsuitable rat run.
iv) will add to traffic on the Foxhall Road.
v) is located further from the town centre and any railway stations.

6.38 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed. This would apply to any of the options but is critical here given the current pressures on the A1214.

IPA19. Local Services and Facilities

i) Employment not available locally. New residents will need to travel exacerbating traffic problems on A1214 and feeder roads. This must have an effect on access for emergency services.
ii) Infrastructure in Kesgrave is already severely stretched with difficulties in meeting demand by the current population.
iii) Schools are at capacity. Kesgrave High School has 1,800 pupils. Results in traffic challenges at morning peak in particular and all day parking in the vicinity which is detrimental to the amenity of nearby residents.
iv) Medical services are at saturation point. The Practice Manager at the Medical Centre confirms they have 35-45% “high needs” patients and are unable to take on additional patients It is unreasonable to expect residents to look outside the parish for their own medical services.
v) The latest Outdoor Playing Space Parish Schedule shows an inadequacy of Sports Ground by 1.55 hectares. This is based on the 2001 population of 9,026. Electorate numbers alone are now 9,801. With the current requirement for high density housing it is imperative that public facilities are adequate for the whole population.

6.39 SCDC Response. The comments are noted. It is true that major employment areas are not located within the area but in considering this option it will need to be recognised that Martlesham Heath is accessible.

6.40 Adequate infrastructure to support any development would have to be provided.

IPA20. Miscellaneous

6.41 No comments

Opportunities and Benefits

IPA21. Relationship to Employment and Services

i) good relationship to the existing town and the built up area.
i) This site is sustainable as it is well-related to Ipswich via road and high quality bus route 66.
ii) Well related to the A12.
iii) Kesgrave has a good range of facilities.

6.42 SCDC Response. The comments are noted and recognised as being positive points in favour of this option.

IPA22. Current Land Use and Character

6.43 No comments

IPA23. Opportunities for Planning Gain

6.44 No comments.

IPA24. Long Term Planning

6.45 No comments.

‘AREA 3’ – South of Kesgrave & Martlesham Heath

Areas of Concern

IPA25. Landscape and Countryside

i) will lead to the loss of local countryside, rural paths and recreational sites used by walkers and cyclists. Loss of these facilities reduces the quality of life for local people.

6.46 SCDC Response. The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape.

IPA26. Wildlife and Habitats

i) The heathland of Martlesham Heath (designated as part of Ipswich Heaths SSSI) is particularly vulnerable to the knock on effects of domestic development.

6.47 SCDC Response. The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on biodiversity. Protection and/or mitigation measures may need to be introduced.

IPA27. Other Environmental Issues

i) is not favoured because it is close to Foxhall Road Landfill site.
ii) Noise from speedway stadium.

6.48 SCDC Response. The comments are noted and appreciated. The landfill site is expected to be become a country park when it ceases to be used in 2024. The speedway stadium does generate noise when events occur but there are controls on the times of use.
IPA28. Urban Sprawl

i) Grange Farm development is nearing completion. It has an integrity, coherence and legibility and has reached a planned and natural limit.

ii) Martlesham Heath will eventually become part of an urban sprawl, surrounded by what will inevitably be much higher density housing estates.

6.49 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. The development of any of the options to the east of Ipswich must be designed so as to integrate with the current urban edge and appear to be a natural extension. The impression of urban sprawl must be avoided and can be achieved with the right layout.

IPA29. Impact on Existing Communities

i) It would seem too late to achieve any genuine integration with the Grange Farm development. Development would look and feel like a separate settlement.

ii) For 20 years Kesgrave has seen continued growth increasing its population by 250 -300%. Attaining community cohesion takes time.

iii) As the area becomes urbanised the issue of personal safety arise with the proposed use of underpasses.

6.50 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. Integration with existing settlements will be essential for all options. Personal safety can be secured through careful design.

IPA30. Local Traffic issues

i) Highway links would depend on the already substandard Dobbs Lane and Bell Lane.

ii) extra development will put an even greater burden on these roads.

6.51 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed. This would apply to any of the options but is critical here given that Foxhall Road is one of the radials into Ipswich.

IPA31. Local Services and Facilities

i) Infrastructure in Kesgrave is already severely stretched with difficulties in meeting demand by the current population.

ii) Schools are at capacity. Kesgrave High School has 1,800 pupils. Results in traffic challenges at morning peak in particular and all day parking in the vicinity which is detrimental to the amenity of nearby residents.

iii) Medical services are at saturation point. The Practice Manager at the Medical Centre confirms they have 35-45% "high needs" patients and are unable to take on additional patients. It is unreasonable to expect residents to look outside the parish for their own medical services.

iv) The latest Outdoor Playing Space Parish Schedule shows an inadequacy of Sports Ground by 1.55 hectares. This is based on the 2001 population of 9,026. Electorate numbers alone are now 9,801. With the current requirement for high density housing it is imperative that public facilities are adequate for the whole population.

6.52 SCDC Response. Adequate infrastructure to support any development would have to be provided.
IPA32. Miscellaneous

i) Suggestion that Area 3 is designated for parkland. This would tie up with proposals to eventually turn the Foxhall landfill site into a country park.

6.53 SCDC Response. The comments are noted and appreciated. Part of the area could be used to create green spaces.

IPA33. Relationship to Employment and Services

i) has direct access to a main radial road into Ipswich and has easy access to the A12.
ii) The existing development of Kesgrave is close by and can be accessed by both foot and cycle links.

6.54 SCDC Response. The comments are noted and recognised as being positive points in favour of this option.

Opportunities and Benefits

IPA34. Current Land Use and Character

i) The existing land comprises of only Grade 4 agricultural land, the loss of which would not be of any great significance to the agricultural requirements in the area.
ii) it does not encroach upon any villages

6.55 SCDC Response. The comments are noted. The current quality of the land, in comparison with other options, will be one element in the assessment of the sites.

IPA35. Opportunities for Planning Gain

i) Given the amount of housing required, there is ample land within Area 3, particular the land at Longstops, to accommodate the housing requirement within the IPA and provide the required levels of green space and infrastructure.

6.56 SCDC Response. The comments are noted. All of the options have the potential for planning gain. The actual deliverability of that gain will need to be considered when each option is assessed.

IPA36. Long Term Planning

6.57 No comments

‘AREA 4’ – South of Old Martlesham / East of A12

Areas of Concern

IPA37. Landscape and Countryside

i) the site is located in an area of largely flat and open countryside very close to the Suffolk Coast & Heaths AONB, and development on the scale proposed
would, even with significant landscaping, be likely to have a significant adverse effect on the integrity and character of the AONB.

ii) will lead to the loss of local countryside, rural paths and recreational sites used by walkers and cyclists. Loss of these facilities reduces the quality of life for local people.

6.58 SCDC Response. The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape. The proximity to the AONB is a particularly pertinent issue. The opportunity could be available to enhance access routes into the surrounding countryside.

IPA38. Wildlife and Habitats

i) Lowland heathland is one of the fastest shrinking habitats in the country.

ii) By re-generating the heath not developing it, it could become a place for people to visit, study the environment, to ride, cycle or walk through. In restoring the area, BT would be quoted as the best of examples to follow in considering the environment and would win plaudits both nationally and internationally.

iii) The heathland of Martlesham Heath (designated as part of Ipswich Heaths SSSI) is particularly vulnerable to the knock on effects of domestic development.

6.59 SCDC Response. The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on biodiversity. Protection and/or mitigation measures may need to be introduced. The opportunity could be available to incorporate new or restored habitats into any development.

IPA39. Other Environmental Issues

i) The Geological SSSI and tumuli, add further dimensions to this important area.

ii) The area incorporates a number of scheduled ancient monuments which may be directly or indirectly affected by development.

iii) This area looks to include a number of watercourses which should be retained.

iv) There is a currently authorised landfill, licensed to take inert waste at TM260447, and an historic landfill at TM256447

6.60 SCDC Response. The comments are noted and appreciated.

IPA40. Urban Sprawl

i) Martlesham Heath will eventually become part of an urban sprawl, surrounded by what will inevitably be much higher density housing estates.

ii) The site does not appear a sustainable one and would bring about a rather fragmented community, divided, as it would be, by the A12.

iii) It is the only Option East of the A12, which has formed a barrier to development in the past.

iv) would effectively represent a new settlement in an area of countryside.

6.61 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. The development of any of the options to the east of Ipswich must be designed so as to integrate with the current communities and appear to be a natural extension. The impression of urban sprawl must be avoided and can be achieved with the right layout.

IPA41. Impact on Existing Communities
i) As the area becomes urbanised the issue of personal safety arise with the proposed use of underpasses.

ii) proximity to the villages of Brightwell, Newbourne and Waldringfield, which would lose their rural character.

6.62 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. Personal safety can be secured through careful design.

IPA42. Local Traffic issues

i) There would be significant transport impacts, both from residents driving into Ipswich for work, and also parents on the ‘school run’ to Kesgrave High School - the distance from the site to Kesgrave HS would tend to preclude walking as a realistic option for children.

ii) The A12, A14 and Orwell Bridge are all overstretched, and a large scale development in Area 4 would make this worse.

6.63 SCDC Response. The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed. This would apply to any of the options but is critical here given that the A12 is part of the primary road network around Ipswich.

IPA43. Local Services and Facilities

i) is less well related to the existing built up area of Ipswich, possibly more so than any other area being considered; in fact it is significantly closer to Woodbridge than to Ipswich.

ii) is located further from the town centre and any railway stations.

iii) Education provision in the area is also reaching its limit, and development in Area 4 would put more strain on the system.

6.64 SCDC Response. Adequate infrastructure to support any development would have to be provided.

IPA44. Miscellaneous

i) The area is more suited to employment use and appropriate for employment use development than residential development bearing in mind that it effectively wraps around an existing employment area.

ii) The area is included in a British Telecommunications Safeguarding Zone which is protected from development which would adversely affect existing and future testing facilities (as identified in the adopted Local Plan).

6.65 SCDC Response. The comments are noted and appreciated. The safeguarding area would need to be discussed with British Telecom.

Opportunities and Benefits

IPA45. Relationship to Employment and Services

i) Adjacent to Adastral Park (which hosts approximately 4000 jobs).

ii) Has development possibilities as employment opportunities are potentially local and therefore a possible opportunity to reduce commuting.

iii) The area is well-served by the Superoute 66 bus link. There are existing cycle-paths to Kesgrave High School.
iv) The northern area is well-located to the existing settlements of Martlesham and Martlesham Heath, has a large Tesco store and other comparison retail units (on Beardmore Park).

v) Proximity to the A12, thus alleviating traffic congestion problems.

vi) This site would have the major advantage of taking the Adastral Park development southwards connecting to the under-utilised limb of the Brightwell Corner roundabout, which could be used as a major A12 junction.

6.66 **SCDC Response.** The comments are noted and recognised as being positive points in favour of this option.

**IPA46. Current Land Use and Character**

i) Although technically greenfield land its previous use makes it more suitable for housebuilding than agricultural purposes.

6.67 **SCDC Response.** The comments are noted albeit. The current quality of the land, in comparison with other options, will be one element in the assessment of the sites.

**IPA47. Opportunities for Planning Gain**

- BT is one of three major employment areas locally along with Ipswich and Felixstowe docks. Adastral Park is the only major substantial hi-tech employment area in Suffolk, the District, and with the exception of Cambridge, East Anglia. The area as a whole and the region would benefit by building on this base by providing a much expanded hi-tech employment area. It is an essential part of the Haven Gateway strategy.
- The initial costs of undertaking this expansion will be substantial and it is unlikely that BT would be able to embark on them without the support of finance from associated development, including housing. This justifies the allocation of housing in this area.

6.68 **SCDC Response.** The comments are noted. All of the options have the potential for planning gain. The actual deliverability of that gain will need to be considered when each option is assessed.

**IPA48. Long Term Planning**

6.69 No comments.

‘AREA 5’ – North west of A14

**Areas of Concern**

**IPA49. Landscape and Countryside**

i) is located close to the sensitive Suffolk Coast and Heaths AONB

6.70 **SCDC Response.** The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape. The proximity to the AONB is a particularly pertinent issue.

**IPA50. Wildlife and Habitats**

i) includes (or would affect) the Purdis Heath SSSI a very valuable remnant of Sandlings heathland. The site is already very heavily used by local people for recreation and dog walking and as such is suffering from declining numbers of important species.
ii) Much of the showground itself is potentially very valuable lowland heathland habitat if managed in a more suitable way.

6.71 **SCDC Response.** The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on biodiversity. Protection and/or mitigation measures may need to be introduced. The opportunity could be available to incorporate new or restored habitats into any development.

**IPA51. Other Environmental Issues**

i) This area looks to potentially include agricultural irrigation boreholes TM230420 which must not be affected.  
   ii) is located close to the junction of the A12(T) and A14(T) there are issues about noise and air quality.

6.72 **SCDC Response.** The comments are noted and appreciated.

**IPA52. Urban Sprawl**

i) Adds to the urban sprawl of Ipswich onto green space.  
   ii) creates the first attempt of a ribbon development towards Felixstowe.  
   iii) does not relate to an existing built up area / residential area and so would be difficult to accommodate without it being an isolated development area unrelated to existing development.

6.73 **SCDC Response.** The comments are noted and recognised as major considerations in the choice of the preferred development option. The development of any of the options to the east of Ipswich must be designed so as to integrate with the current communities and appear to be a natural extension. The impression of urban sprawl must be avoided and can be achieved with the right layout.

**IPA53. Impact on Existing Communities**

6.74 No comments.

**IPA54. Local Traffic issues**

i) Proximity to Ipswich Borough, and the development of Ransomes Industrial Estate and ever-increasing number of dwellings on Ravenswood, has resulted in our local roads and other facilities being stretched to breaking point.  
   ii) Adds to commuter traffic on A1156 [which is ill equipped to handle this].

6.75 **SCDC Response.** The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed. This would apply to any of the options but is critical in respect of radial routes into Ipswich.

**IPA55. Local Services and Facilities**

i) The area seems to include Trinity Park and the Ipswich Golf Course, which serve the community.  
   ii) The area is located further from the town centre and any railway stations than other options.  
   iii) Local schools are now having problems to accommodate more and more children of all ages and medical services stretched.
6.76 **SCDC Response.** The potential loss of community facilities are important considerations. Adequate infrastructure to support any development would have to be provided.

**IPA56. Miscellaneous**

6.77 No comments.

**Opportunities and Benefits**

**IPA57. Relationship to Employment and Services**

i) It is close to the Europark retail park and several industrial estates, which could provide employment.

ii) The Cranes Site at Nacton Road has been suggested as a new strategic employment site in the Ipswich LDF.

iii) Bus services are good.

iv) Excellent road links to A14/A12 and Ipswich via Felixstowe Road.

v) Good link to rail network and London via Derby Road station.

6.78 **SCDC Response.** The comments are noted and recognised as being positive points in favour of this option.

**IPA58. Current Land Use and Character**

i) The Showground could be classed as a Brownfield Site and is a natural area for housing development - an extension of Warren Heath Purdis Farm.

ii) reasonably isolated from existing settlements so will place less pressure on existing community facilities.

6.79 **SCDC Response.** The comments are noted. All things being equal, sequentially brownfield should have priority over greenfield. However, other factors may have to be taken into account.

**IPA59. Opportunities for Planning Gain**

i) in order to fund the on-going evolution and improvement of the Showground facilities, the Suffolk Agricultural Association would like to promote the development of 16.5 acres (6.7 hectares) of land on its western boundary, abutting the existing built-up area, sufficient for about 300 dwellings. The proceeds of this development will allow a re-ordering of the site, and provision of new and updated facilities.

ii) could give the opportunity for the provision of additional public transport (rail and park and ride) opportunities.

6.80 **SCDC Response.** The comments are noted. All of the options have the potential for planning gain. The actual deliverability of that gain will need to be considered when each option is assessed.

**IPA60. Long Term Planning**

6.81 No comments.
Felixstowe Peninsula:

‘AREA 1’ – North East of A14

Areas of Concern

FWT1. Landscape and Countryside

i) The area is a high quality landscape and development would compromise the quality of the AONB. The AONB should be extended to include this area.
ii) It is classified as a Greenfield site.
iii) The A14 is a natural barrier between the urban and rural landscape and should be preserved, as the A12 is at Woodbridge.

6.82 SCDC Response - The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape. The proximity to the AONB is a particularly pertinent issue. The opportunity could be available to enhance access routes into the surrounding countryside.

FWT2. Wildlife and Habitats

i) The area is considered rich in wildlife and development would compromise this.

6.83 SCDC Response - The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on biodiversity. Protection and/or mitigation measures may need to be introduced. The opportunity could be available to incorporate new or restored habitats into any development.

FWT3. Other Environmental Issues

i) This includes watercourses and some potential flood zone.
ii) It could also be affected by historic landfill sites.
iii) It would result in the loss of high quality arable farmland.
6.84 SCDC Response - The comments are noted and appreciated. The loss of agricultural land, but particularly its grade, will be factors to be considered in the choice of development options.

FWT4. Urban Sprawl

6.85 No comments

FWT5. Impact on Existing Communities

i) It would do away with recreational facilities like playing pitches allotments and country walks.

6.86 SCDC Response - The comments are noted and appreciated. Any development could capitalise and enhance any such existing local amenity benefits by incorporating these into a scheme. Alternatively, a suitable and satisfactory replacement provision would need to be found.

FWT6. Local Traffic issues

i) Not a sustainable location as it would be solely reliant on private motor vehicles.
ii) There is no direct transport links to the Port of Felixstowe, the town’s main employer.

6.87 SCDC Response – The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed. The capacity and distinctive pressures brought on to the A14 road will need to be assessed in detail.

FWT7. Local Services and Facilities

i) The area does not have sufficient key service infrastructure to cope with high levels of development.
ii) It is a long way from all existing facilities.
iii) It is clearly separated from existing services, towns, villages etc by the A14 – a strong physical boundary.

6.88 SCDC Response - There are nearby existing neighbourhood centres at the Trimley villages, however there are at present strong accessibility constraints to these from the A14. Adequate infrastructure to support any development would have to be provided.

FWT8. Miscellaneous

i) The Council, has already paid Council tax payers money for the David Lock report which has already suggested that the area north of Felixstowe should not be developed.

6.89 SCDC Response - The David Lock study has not been the subject of public scrutiny and the Council is not bound by its findings. It will have regard to it, particularly in respect of its analysis of the town.

Opportunities and Benefits

FWT9. Relationship to Employment and Services

i) Access to this area would not immediately impact upon existing housing.
6.90 **SCDC Response** - The comments are noted and recognised as being positive points in favour of this option.

**FWT10. Current Land Use and Character**

6.91 No comments.

**FWT11. Opportunities for Planning Gain**

6.92 No comments.

**FWT12. Long Term Planning**

6.93 No comments.

‘AREA 2’ – Land between Trimley villages, north of railway line and south of A14

**Areas of Concern**

**FWT13. Landscape and Countryside**

i) This is predominately high quality agricultural land in production, which is classified as Greenfield.

ii) It is a valuable green space and provides a footpath network and is a natural barrier to the villages and their communities.

6.94 **SCDC Response** - The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape. The loss of agricultural land, but particularly its grade, will be factors to be considered in the choice of development options.

**FWT14. Wildlife and Habitats**

6.95 No comments.

**FWT15. Other Environmental Issues**

i) It could also be affected by historic landfill sites.

ii) The Trimley villages have been significantly affected by air and noise pollution from the port and the A14 North Felixstowe would provide a better quality of life in this regard.

6.96 **SCDC Response** - The comments are noted and appreciated.

**FWT16. Urban Sprawl**

i) This area should retain its ‘green’ status keeping the villages of Trimley St Mary and Trimley St Martin separate from each other.

ii) It would adversely change the character of the Trimley villages.

6.97 **SCDC Response** - The comments are noted and recognised as major considerations in the choice of the preferred development option. The development of any of the options in the Felixstowe Peninsula must be designed so as to integrate with the
current urban edge and appear to be a natural extension. The impression of urban sprawl must be avoided and can be achieved with the right layout.

FWT17. Impact on Existing Communities

i) This Greenfield land has historically acted as a barrier between the villages of Trimley St Martin and Trimley St Mary. This is essential to their individuality and the identity of these historic communities.

6.98 SCDC Response - The comments are noted and recognised as major considerations in the choice of the preferred development option. The character and identity of existing communities must be preserved and where possible enhanced. The retention of spaces between each is one of a number of means of achieving that objective. This would apply to any of the options.

FWT18. Local Traffic Issues

ii) The existing road through the Trimleys is already congested. More traffic in the Trimleys would be wrong.

iii) Development in Trimley would increase travel by car into Felixstowe town centre and Ipswich.

iv) Access would be seriously affected by congestion as the result of the port closing, i.e. operation stack.

6.99 SCDC Response - The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed. The capacity and distinctive pressures brought on to the A14 road will need to be assessed in detail.

FWT19. Local Services and Facilities

6.100 No comments.

FWT20. Miscellaneous

6.101 No comments.

Opportunities and Benefits

FWT21. Relationship to Employment and Services

i) Provide the best option for people working outside the Felixstowe/Trimleys because of good transport infrastructure.

ii) This would make the best use of existing rail and road public transport.

6.102 SCDC Response - The comments are noted and recognised as being positive points in favour of this option.

FWT22. Current Land use and Character

i) Access to this area would not immediately impact upon existing housing.

ii) This area is suitable as it is practically developed anyway.
iii) Development in area 2 would be effectively contained between the railway, existing housing and the A14 and would have no adverse effect on the important AONB landscapes.

iv) The nearest parts of the Deben and Orwell estuaries are some 2.5 km and 3-5 km respectively from the Trimley's villages and therefore development on area 2 would have no impact on the wildlife value of these designated wildlife sites.

v) The area is a relatively featureless open site of no significant landscape quality.

6.103 SCDC Response - The comments are noted. A number of relevant assessments will need to be carried out to determine the potential impacts upon the AONB, and designated wildlife sites.

FWT23. Opportunities for Planning Gain

vi) Development should be concentrated on land between the A14 and the railway line and include the addition of a new railway stop for a metro service.

vii) With a larger population the Trimley's could sustain better services such as a food supermarket, improved community centres, library etc which would reduce travel movement.

viii) This option is the only one which has a nearby rail station from which single carriage trains operate on an hourly basis throughout the day to both Ipswich and Felixstowe. Major development at the Trimley's could open up the possibility of a new local station as well as supporting a new circular bus route through the housing areas and a new bus link to the station.

6.104 SCDC Response - The comments are noted. All of the options have the potential for planning gain. The actual deliverability of that gain will need to be considered when each option is assessed.

FWT24. Long Term Planning

i) This area is better facilitated than the other areas and is urban in character. The Felixstowe Peninsula settlements function as one large area and so gaps are less appropriate.

6.105 SCDC Response - The comments are noted.

‘AREA 3’ – South of Dockspur Roundabout between Walton and Trimley St Mary

Areas of Concern

FWT25. Landscape and Countryside

i) Should not be touched due to maintenance of the gap between Felixstowe, Walton and Trimley villages.

ii) This represents a green buffer and is of high agricultural value.

iii) It would result in the loss of an existing bit of countryside in the town.

iv) It would adversely change the character of the Trimley villages.

v) The Local Plan did have strong policies to protect the openness of this area. It is felt that this established approach is still the correct one and that the gap between the two built-up areas should be maintained.
vi) The importance of open spaces in the context of the urban fabric is equally important as built form.

6.106 SCDC Response - The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape.

FWT26. Wildlife and Habitats

6.107 No comments.

FWT27. Other Environmental Issues

i) There are concerns about air quality.
ii) The light and noise pollution from the port and A14/ Dockspur Road would be considerable.
iii) Land in this area is high quality Grade 1 agricultural land (as classified by DEFRA).

6.108 SCDC Response - The comments are noted and appreciated. The loss of agricultural land, but particularly its grade, will be factors to be considered in the choice of development options.

FWT28. Urban Sprawl

6.109 No comments.

FWT29. Impact on Existing Communities

i) This should retain its ‘green’ status keeping the villages of Trimley St Mary and Trimley St Martin separate from each other and Walton.
ii) This site provides an important green space and barrier between Trimley St Mary and Walton. A loss of community identity would be inevitable.

6.110 SCDC Response - The comments are noted and recognised as major considerations in the choice of the preferred development option. The character and identity of existing communities must be preserved and where possible enhanced. The retention of spaces between each is one of a number of means of achieving that objective. This would apply to any of the options.

FWT30. Local Traffic Issues

i) It has poor access to roads.
ii) The existing road through the Trimleys is already congested. More traffic in the Trimleys would be wrong.
iii) Access to this site is poor. All cars would need to access the site via the High Road from east or west. The road is already overused and subject to traffic calming.

6.111 SCDC Response - The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed.

FWT31. Local Services and Facilities

i) It has poor access to employment.
ii) Insufficient infrastructure to support the number of houses proposed.
iii) The site is too small to accommodate recreation and leisure facilities as part of the scheme. It does not access countryside walks, which is an important aspect of quality of life.

iv) This site is significantly further away from Felixstowe than the north Felixstowe option.

6.112 SCDC Response - The area is in close proximity to the Port and Felixstowe Town Centre with existing access links. Adequate infrastructure to support any development would have to be provided. An assessment will need to be carried out to consider green space provision and access in the area.

FWT32. Miscellaneous

i) There is a real risk of new housing in this area being affected by poor air quality and traffic noise since it is bisected by the Dock Spur Road that carries high volumes of HGV traffic including parked vehicles when operation stack is in deployed.

6.113 SCDC Response - The comments are noted and recognised. An assessment must be undertaken in order to establish to what extent any level of noise or air quality pollution is a problem and whether there are suitable mitigation options.

Opportunities and Benefits

FWT33. Relationship to Employment and Services

i) It has good transport access and access to services / employment opportunities.
ii) This would make the best use of existing rail and road public transport.
iii) It has good transport access.

6.114 SCDC Response - The comments are noted and recognised as being positive points in favour of this option.

FWT34. Current Land Use and Character

i) This area is suitable as it is practically developed anyway.
ii) It is best suited for development as it is sheltered from impacting adversely on the AONB.

6.115 SCDC Response - The comments are noted. An assessment will need to be carried out to determine the potential impacts upon the AONB.

FWT35. Opportunities for Planning Gain

6.116 No comments.

FWT36. Long Term Planning

i) This area is better facilitated and is urban in character. The Felixstowe Peninsula settlements function as one large area and so gaps are less appropriate.

6.117 The comments are noted.
‘AREA 4’ – North of Candlett Road

Areas of Concern

FWT37. Landscape and Countryside

i) The area is a high quality landscape and development would compromise the quality of the AONB. The AONB should be extended to include this area.
ii) It would result in the loss of valuable farmland.
iii) The A14 is a natural barrier between urban and rural landscape and should be preserved, as the A12 does at Woodbridge.
iv) Once started this development will eventually engulf our AONB land and ruin the countryside forever.
v) The David Lock analysis concluded that this area is of high landscape value and should be considered for an extension of the AONB.
vi) The eastern part of Area 4 is a rolling landscape with relatively steep valley sides which would be more difficult to develop than alternative flatter sites.

FWT38. Wildlife and Habitats

i) Development will destroy the local environmental amenity areas such as ‘the Grove’ and the ‘duck pond’.

FWT39. Other Environmental Issues

i) This site has watercourses and a small amount of flood zone.

FWT40. Urban Sprawl

No comments.

FWT41. Impact on Existing Communities

i) It would do away with recreational facilities like playing pitches allotments and country walks.
ii) Loss of an alternative tourist attraction away from the sea front.
iii) The Groves should be retained, if developed, as open space on a green corridor to the north side of Grove Road.
iv) It would require the relocation of allotments.

SCDC Response - The comments are noted and appreciated. Any development could capitalise and enhance any such existing local amenity benefits by incorporating these into a scheme. Alternatively, a suitable and satisfactory replacement provision would need to be found.
FWT42. Local Traffic issues

6.123 No comments.

FWT43. Local Services and Facilities

i) The area does not have sufficient key service infrastructure to cope with high levels of development.
ii) There is no direct transport link to the Port – the town’s main employer.
iii) It does not benefit from proximity to existing public transport facilities.

6.124 SCDC Response - There is a nearby existing neighbourhood centre at Walton, and there are opportunities to enhance or create new links to the Port. Adequate infrastructure to support any development would have to be provided.

FWT44. Miscellaneous

i) The Council has already paid Council tax payers money for the Lock report which has already suggested that the area north of Felixstowe should not be developed.
ii) While this area seems the most suitable for development it should not be on the scale of 1600 houses.

6.125 Answered elsewhere.

Opportunities and Benefits

FWT45. Relationship to Employment and Services

i) Represent a good sustainable option and benefit from existing recreational areas and access to the town centre. The location is adjacent to Felixstowe town centre centre as such does not present problems of coalescence.
ii) Development in this area would ensure a stronger and more viable town centre close to jobs and facilities without using the car.
iii) Direct access could be achieved from the A154 and Grove Road. This gives a direct road link to the employment centre of the port.
iv) It would have direct access to the town centre without compromising existing road networks.
v) The site provides a direct access to existing leisure facilities, rural footpath networks and the seafront.

6.126 SCDC Response - The comments are noted and recognised as being positive points in favour of this option.

FWT46. Current Land Use and Character

i) There is a lot of misinformation being presented about the high value of this area 4.
ii) This area is made up of typical fringe development, a significant amount of Brownfield site and degenerated greenfield.
iii) It does not constitute an important wildlife habitat, nor does it provide a high quality setting for approach to Felixstowe or enhance the AONB.

6.127 SCDC Response - The comments are noted. A number of relevant assessments will need to be carried out to determine the potential impacts upon the AONB and wildlife. A suitably designed scheme could provide an attractive setting to the Felixstowe approach.
FWT47. Opportunities for Planning Gain

i) There is a range of public transport available that could be improved and extended to include the site area. The AONB could be enhanced by creating a country park buffer zone providing further open space and enhancing the existing facilities.

6.128 SCDC Response - The comments are noted. All of the options have the potential for planning gain. The actual deliverability of that gain will need to be considered when each option is assessed.

FWT48. Long Term Planning

6.129 No comments.

‘AREA 5’ – North of Felixstowe

Areas of Concern

FWT49. Landscape and Countryside

i) The area is a high quality landscape and development would compromise the quality of the AONB. The AONB should be extended to include this area.

ii) The A14 is a natural barrier between urban and rural landscape and should be preserved, as the A12 is at Woodbridge.

iii) Once started this development will eventually engulf our AONB land and ruin the countryside forever.

iv) The David Lock analysis concluded that this area is of high landscape value and should be considered for an extension of the AONB.

6.130 SCDC Response - The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on the landscape. The proximity to the AONB is a particularly pertinent issue. The opportunity could be available to enhance access routes into the surrounding countryside.

FWT50. Wildlife and Habitats

i) The natural habitat of the wildlife and rural countryside will be destroyed,

ii) This is a popular amenity for bird/wildlife observers.

6.131 SCDC Response - The comments are noted and recognised. For whichever Option is chosen an assessment will need to be made of the impact on biodiversity. Protection and/or mitigation measures may need to be introduced. The opportunity could be available to incorporate new or restored habitats into any development.

FWT51. Other Environmental Issues

i) This site has watercourses and a small amount of flood zone,

ii) The northern parts of this area are within flood zone 2/3 as identified by the Environment Agency.

iii) It would result in the loss of valuable farmland.

6.132 SCDC Response - The comments are noted and appreciated. The loss of agricultural land, but particularly its grade, will be factors to be considered in the choice of development options.
FWT52. Urban Sprawl

6.133 No comments.

FWT53. Impact on Existing Communities

i) It would do away with recreational facilities like playing pitches allotments, country walks and views over the estuary.
ii) Loss of an alternative tourist attraction away from the sea front.
iii) It would require the relocation of allotments.
iv) This popular recreational amenity for walkers and cyclists would be lost forever.

6.134 SCDC Response - The comments are noted and appreciated. Any development could capitalise and enhance any such existing local amenity benefits by incorporating these into a scheme. Alternatively, a suitable and satisfactory replacement provision would need to be found.

FWT54. Local Traffic issues

i) The opening up of Ferry Road, which would need to be widened, would create a 'rat run' through residential areas in Old Felixstowe and be detrimental to road safety.
ii) The opportunities for providing vehicular access to a major development area north of Felixstowe are limited.

6.135 SCDC Response - The comments are noted and recognised as major considerations in the choice of the preferred development option. The capacity of the local road network to absorb further traffic must be assessed.

FWT55. Local Services and Facilities

i) The area does not have sufficient key service infrastructure to cope with high levels of development.
ii) There is no direct transport link to the Port – the town’s main employer.

6.136 SCDC Response - The comments are noted. There are opportunities to enhance or create new links to the Port. Adequate infrastructure to support any development would have to be provided.

FWT56. Miscellaneous

i) The Council has already paid Council tax payers money for the Lock report which has already suggested that the area north of Felixstowe should not be developed.
ii) This area is within a number of ownerships, and given the access constraints, development of the area as a whole on a comprehensive basis could be difficult.

6.137 The comments are noted.

Opportunities and Benefits

FWT57. Relationship to Employment and Services

i) Represent a good sustainable option and benefit from existing recreational areas and access to the town centre.
ii) The area lies adjacent to the urban area of Felixstowe and therefore in good proximity to key services and facilities.
iii) The site provides direct access to existing leisure facilities, rural footpath networks and the sea front.

6.138 SCDC Response - The comments are noted and recognised as being positive points in favour of this option.

FWT58. Current Land Use and Character

i) Public transport could be provided to accommodate travel to and from the port, as could a dedicated cycle route.

ii) The natural topography prevents large areas of this site being seen from the AONB. A sensitive scheme could mitigate any remaining impact and the AONB could be enhanced by creating a country park buffer zone.

6.139 SCDC Response - The comments are noted. A number of relevant assessments will need to be carried out to determine the potential impacts upon the AONB.

FWT59. Opportunities for Planning Gain

6.140 No comments.

FWT60. Long Term Planning

6.141 No comments.

‘AREA 6’ – Innocence Lane, ‘Trimley All Saints’

Areas of Concern

FWT61. Landscape and Countryside

i) Area 6 is totally unacceptable due to the scale involved.

6.142 SCDC Response - The comments are noted. There is a residual housing need to allocate for approximately 1600 houses in the Felixstowe Peninsula. This housing target figure is relevant to all of the Options presented and is not looking to be extended.

Opportunities and Benefits

FWT62. Relationship to Employment and Services

i) It offers the opportunity to develop a new and sustainable village.

ii) This site is the best as all services such as sewers etc can be planned from scratch rather than fit into outdated existing capacity.

6.143 The comments are noted.
7.01 The Core Strategy Preferred Options document was published for public consultation for a period of 10 weeks between 8th December 2008 and 20th February 2009. It set out the Council’s preferred spatial vision and objectives for the district and the policies for achieving them. It also contained a commentary on alternative policies considered and the reasons for dismissing them. The document was comprised of policy revisions and issues included as a result of previous consultation stages as well as issues emerging from completed evidence base documents.

7.02 In addition to publishing the consultation documents, the Council also conducted a number of exhibitions and workshops relating to the Core Strategy Preferred Options. These were held at a variety of locations across the district and were open to the public and specifically town and parish councils. In particular, some of the topics most discussed at the workshops and exhibitions were the overall housing numbers, the housing distribution and the settlement hierarchy.

7.03 Comments were invited via post, and electronic communications. The consultation responses were collected and analysed by the Council before being presented to committee for decisions on any policy changes. A summary of the main comments and responses can be found below. Full consultation transcripts can be viewed on the Council website at www.suffolkcoastal.gov.uk

[as presented and debated at committee: LDFTG 16th June 2009 – Appendix 2. Topics covered Housing, Settlement Policy and Gypsies/Travellers]

Main issues raised

7.04 The main issues raised at this consultation were as follows:

Policy numbers quoted are those as they appear in the relevant consultation document.

SP2: SETTLEMENT POLICY

Main Issues Raised:

7.05 Parish Councils and individuals took the opportunity to confirm or object to where their settlement had been placed in the settlement hierarchy.

7.06 Common recurring general themes are:

a) Potential loss of character of a particular village should further development occur,

b) There is no potential for growth in a particular village,

c) The fact that facilities such as shop or post office no longer exist in particular villages and, therefore, the designation is incorrect,

d) Not all facilities should have equal weight when determining a particular designation, e.g. a shop and/or a post office may be much more important than say, having public transport,

e) Where public transport is available the frequency of service is often minimal and not seen as sufficient to justify giving it a similar weight to a shop, post office, pub, or meeting place,
f) Village envelopes should not be changed except where it is for affordable housing to meet a local need.

SCDC Response:

7.07 The identification of a settlement hierarchy is the key tool to be used in the distribution of housing across the district, meeting the requirements of the RSS and adhering to the principles of sustainable development and sustainable communities. As set out in policy SP2 such a hierarchy consists of a number of ‘ tiers’ and each settlement in the District was designated a particular status.

7.08 Key Service Centres are settlements which provide a wide range of facilities. The strategy for such settlements, as put to the public, was for development up to estate-scale to be permitted within current village envelopes. In terms of expansion onto ‘greenfield’ sites this should take place primarily in order to create affordable housing to meet local needs.

7.09 Local Service Centres are settlements providing a smaller range of facilities than the key service centres. New housing will be on a very limited scale in order to address local needs.

7.10 Other Villages are settlements with few or minimal facilities. New housing development will be restricted. Similarly, the Countryside consists of hamlets and small groups of dwellings that are dispersed across the district, even though these may create a parish. The general presumption is against new housing development.

Comments on Key Service Centres, Local Service Centres, Other Village and Countryside

7.11 As a general rule the responses sought a ‘downgrading’ of a particular settlement. However, this may not always be the result of an objective consideration of the settlement and its future but a means of rejecting the requests for specific sites to be allocated or included within village envelopes.

7.12 The natures of each settlement and the facilities serving it were checked and the designations on the whole were considered to be the correct ones. The Council must monitor the availability of services and facilities in each settlement in order to be in a position to amend the designation in a future review of the Core Strategy if necessary.

7.13 Given that the Council is fully supportive of a ‘bottom up’ approach to the preparation of the Core Strategy and places great weight on the input from parish and town councils, the changes advocated by them should be accommodated wherever possible.

7.14 However, the following proposals from local councils were not be acceded to for the reasons given:

7.15 **Purdis Farm** – the Parish Council believes that it should not be listed as a Major Centre as the designation should only be relevant to the Warren Heath area

7.16 Response: The parish of Purdis Farm includes not only the Warren Heath development but also the Trinity Park showground plus development that extends out of Ipswich along Bucklesham Road and Purdis Farm Lane. A large proportion of it is, therefore, urbanised and physically and functionally forms part of the Major Centre that is Ipswich.
7.17 **Trimley St Martin** and **Trimley St Mary** – the Parish Councils are in agreement with the hierarchy and the villages being designated a Key Service Centre. However, neither is appropriate for consideration of strategic levels of housing growth.

7.18 **Response**: The close proximity to and relationship with Felixstowe means that both settlements have to be considered as potential locations for any growth associated with it.

7.19 **Melton** - The local Parish Council recognises that the bulk of Melton parish is already designated as Town due to the proximity with Woodbridge. However, the remainder of Melton (the village) should be downgraded to Local Service Centre.

7.20 **Response**: Melton village (around the junction of Woods Lane, Melton Road, The Street and Wilford Bridge Road) has a primary school, railway station, industrial estate, regular public transport to Ipswich and shops. It is a substantial and sustainable community and should be a Key Service Centre.

7.21 **Sibton** - The local Parish Council considers the amount of facilities in Sibton village to be under-represented and the community aspires to have modest development. It should be upgraded to a Local Service Centre.

7.22 **Response**: Sibton parish physically merges with that of Peasenhall in that the village envelope of the latter, as defined in the current Local Plan, extends into Sibton parish. Part of it, therefore, is built up but the remainder is rural in character with few facilities. As such the correct status is Countryside although the Key Service Centre of Peasenhall could be named 'Peasenhall (with part of Sibton)'.

### The Way Forward

7.23 No fundamental revisions need be made to the policy and text although minor changes could be made in response to specific points.

7.24 It is proposed that the levels in the hierarchy remain unchanged but that some individual settlements are accorded a different status. Those to change should be:

- Bruisyard,
- Clopton,
- Friston,
- Great Bealings,
- Kettleburgh,
- Kirton,
- Melton Park,
- Sutton,
- Ufford,

### SP3: AREA EAST OF IPSWICH

#### Main Issues Raised:

7.25 The preferred strategy for the Ipswich Policy Area, as contained in both SP3 and SP18 on housing distribution has generated considerable opposition, most of which relates to the choice of the area east of the A12 at Martlesham as the location for growth. This opposition included two local parish councils Martlesham and Waldringfield.

7.26 An alternative strategy put forward by many was to disperse the housing across the Ipswich eastern fringe.

7.27 In addition, specific reference was made to the alternative options. In particular, the benefits of Option 1, to the north of Ipswich, were emphasised e.g. proximity to Ipswich town centre and the presence of rail links. The accuracy of the assessment of the area was also questioned. Part of Option 5, north of Felixstowe Road, was also...
raised as a potential source of land that was available for immediate development should the Council not be able to demonstrate a 5 year land supply.

**SCDC Response:**

7.28 Some valid points have been made about the alternative locations for housing growth. It is accepted that Option 1 to the north of Ipswich does have good public transport links to the town centre, there is a station at Westerfield and social/community facilities such as schools. However, the preferred option east of the A12 has advantages in respect of its proximity to employment, the quality of the landscape and the presence of transport links. The early availability of land within Option 5 is noted.

7.29 A dispersed strategy was and still is not considered appropriate given the need to achieve a sustainable community with sufficient supporting infrastructure.

7.30 Further relevant comments found in SP18: Housing Distribution below.

**SP4: FELIXSTOWE**

**Main Issues Raised:**

7.31 This preferred strategy for Felixstowe, as contained in both policies SP4 and SP18 on housing distribution received considerable local objection most of which related to the scale of housing proposed.

7.32 Most relevant comments found in SP18: Housing Distribution below.

**SCDC Response:**

7.33 Responses to these issues are also covered in SP18: Housing Distribution below.

**SP5: ALDEBURGH**

**Main Issues Raised**

7.34 The submitted comments included the following general issues:

   i) There is general support for the approach taken to not include Aldeburgh as a location to help meet strategic housing needs given its location within the AONB,
   ii) there is a need for affordable housing but it is recognised that environmental constraints limit the availability of sites,
   iii) concern over allowing affordable housing on floodplains thereby compromising safety and standards,
   iv) the ‘centre’ of Aldeburgh has shifted away from the seafront to ‘the Roundabout’,
   v) The provision of good transport links between the town and Leiston to access higher order leisure facilities is supported.
   vi) Any additional electricity requirements could be fed via an extension from the existing local network infrastructure.

**SCDC Response:**

7.35 The comments are noted.

7.36 The comment about the centre of the town is an interesting one. The town is a popular tourist destination and as a result many of the shops in the town centre are targeted at the visitor rather than the local population. Reference to the needs of the local population could be included in the strategic policy.
7.37 In terms of housing, like other market towns in the District this will need to be examined during the lifetime of the Core Strategy in order that the long term needs of the town can be assessed and planned for.

**The Way Forward**

7.38 No fundamental revision needs be made to the policy and text although minor changes could be made in response to specific points. These might include adding to the policy reference to weighting the balance of services and facilities in favour of the resident population.

### SP6: FRAMLINGHAM

#### Main Issues Raised

7.39 The main issues raised by respondents include:

i) Reliance on existing sites coming forward will limit the availability of choice of housing sites and type within the plan period and ignores the availability of sustainable located green sites adjoining the existing built up area.

ii) The emphasis on the town remaining largely “self sufficient” is supported.

iii) Given Framlingham’s importance as an employment centre, any net loss of employment land will need to be robustly evidenced. This should take into account future needs as well.

iv) Any additional electricity requirements could be fed via extension via the existing local network infrastructure.

#### SCDC Response

7.40 The comments are noted.

7.41 In terms of housing, like other market towns in the District this will need to be examined during the lifetime of the Core Strategy in order that the long term needs of the town can be assessed and planned for.

**The Way Forward**

7.42 No fundamental revision needs be made to the policy and text although minor changes could be made in response to specific points.

### SP7: LEISTON

#### The Main Issues

7.43 The comments received in respect of Leiston and housing included the following:

i) There is support for the Council’s approach in emphasising the wider role that Leiston plays as a service centre for other neighbouring market towns and the surrounding villages.

ii) Remove reference to Aldeburgh in paragraph 3.79 and replace with ‘for all other small towns and villages over a wide geographic area.

iii) There is concern that the reference to ‘modest’ new housing provision under criterion (a) of Policy SP7 may be open to misinterpretation.

iv) Development of new nuclear reactors C and D at Sizewell will require large amounts of off-site land for uses including workers housing, materials storage and marshalling, pre-fabrication, park and ride etc. This should be taken into account in the strategic policy for the town.
v) Part (b) of policy SP7 should refer to supporting an increase in infrastructure (investment) over and above just improving the quality and range of facilities.

**SCDC Response**

7.44 In terms of housing, like other market towns in the District this will need to be examined during the lifetime of the Core Strategy in order that the long term needs of the town can be assessed and planned for. This is particularly important in respect of Leiston given the unconfirmed prospect of an additional nuclear power station at Sizewell.

7.45 Such an examination can concentrate on the permanent housing needs. However, a constructional workforce has a need for temporary accommodation and this may need to be addressed as an exception to the Core Strategy should it arise.

7.46 The term 'modest' can be quantified in the document.

**The Way Forward**

7.47 Reference to the potential housing needs associated with Sizewell should be referred to in the document. Otherwise no fundamental revision needs be made to the policy and text although minor changes could be made in response to specific points.

**SP9: SAXMUNDHAM**

**Main Issues Raised**

7.48 The comments received in respect of Saxmundham and housing include the following:

i) support for the reuse of brownfield sites within Saxmundham for encouraging residential development to contribute positively towards the regeneration of this small historic market town.

ii) the development of new reactors at Sizewell will require housing provision being made for workers in the district. Significant housing provision for new housing is going to have to be made and will be necessary to make housing allocations on sustainable sites in nearby towns such as Saxmundham and Leiston.

iii) because of the relatively high infrastructural costs involved to develop housing on land east of the Fromus, which includes a pedestrian access to the adjacent town centre, together with the creation of new public open space alongside the river, the stance of the local planning authority of preventing the further release of greenfield land is welcomed and supported.

iv) Saxmundham is not constrained by the Fromus; it can be bridged by replacement development. Para. 8.88 should be deleted or amended.

V) The provision of good foot, cycle and public transport links is welcomed.

**SCDC Response**

7.49 The comments are noted.

**The Way Forward**

7.50 In terms of housing, like other market towns in the District this will need to be examined during the lifetime of the Core Strategy in order that the long term needs of the town can be assessed and planned for.
7.51 No fundamental revision needs be made to the policy and text although minor changes could be made in response to specific points.

**SP10: WOODBRIDGE**

The Main Issues

7.52 The comments received in respect of Woodbridge and housing include the following:

i) The preferred strategy being ‘potentially one of constraint although modest expansion may be positive’ is too vague. The word “potentially” should be deleted.

ii) Table 2 allocates 200 dwellings (plus 40 “urban potential”) to Woodbridge. Expansion of the town physical limits to Melton and perhaps the countryside north of the A1152 will be strongly resisted.

iii) Aspects of the policy are welcomed and, it is hoped, apply equally to that part of the town within Melton.

iv) The policy should be strengthened to state that expansion to the west of the town will be strictly constrained due to the potentially detrimental impact on the estuary, an area of high nature conservation and landscape value.

v) Support the basis tenet that the strategy should be one of “consolidating” rather than growth since, given the physical constraints of the A12 and the River Deben, very few sites remain within the Woodbridge planning envelope for new build.

vi) Agree that the A12 remains as the firm edge.

vii) Suggest the physical limits boundary be increased to bring Woodbridge football club grounds into Woodbridge and be retained for sport and leisure in perpetuity.

SCDC Response

7.53 The actual locations of allocations of land for new housing will be made in the Site Specific Allocations and Policies development plan document. Such locations would need to be consistent with the Core Strategy, for example in respect of retaining the A12 as a firm edge to the town. The football ground would be examined at that time.

7.54 In terms of housing, like other market towns in the District this will need to be examined during the lifetime of the Core Strategy in order that the long term needs of the town can be assessed and planned for.

The Way Forward

7.55 No fundamental revision needs be made to the policy and text although minor changes could be made in response to specific points.

**SP11: KEY SERVICE CENTRES AND LOCAL SERVICE CENTRES**

Main Issues Raised

7.56 The majority of comments received in respect of policies SP11, Key and Local Service Centres, were largely based on individual settlements and their position in the hierarchy or specific sites that had been put forward for development. Comments relating to the policy itself include the following:

i) General support for the principle of limited growth as long as emphasis is placed on the correct scale and proportion,

ii) Extensions to village envelopes, leading to large developments, should be supported by proper service infrastructure,
iii) Extensions to existing housing should be encouraged, allowing people to remain in their existing communities as families grow.
iv) Affordable housing should be integrated with the existing community.

SCDC Response

7.57 The comments are noted.

The Way Forward

7.58 No fundamental revision needs be made to the policy and text although minor changes could be made in response to specific points.

SP12: OTHER VILLAGES AND THE COUNTRYSIDE

Main Issues Raised

7.59 Again the majority of comments received in respect of policy SP12, Other Villages and the Countryside, were largely based on individual settlements and their position in the hierarchy or specific sites that had been put forward for development. Comments relating to the policy itself include the following:

i) General support for the protection of the countryside and the rural communities
ii) Recognition that new housing within ‘clusters’ may assist the vitality of individual settlements and could relieve the pressure on larger ones

SCDC Response

7.60 The comments are noted.

The Way Forward

7.61 No fundamental revision needs be made to the policy and text although minor changes could be made in response to specific points.

SP16: NEW HOUSING

Main Issues Raised

7.62 The issues raised in respect of this general policy include:

i) There should be recognition of the housing needs associated with such groups as key workers, defence personnel and an ageing population
ii) Making maximum use of existing stock is welcomed and a role for the District Council suggested in terms of making it happen
iii) There should be reference to the findings of the Housing Needs Study, Strategic Housing Market Assessment and Strategic Housing Land Availability
iv) Making maximum use of the stock through extensions contradicts policy DC3 which prevents them

SCDC Response

7.63 The comments are noted. The needs of the existing and future population are based on research and survey. Need, such as that created by defence personnel and key workers, will be identified and quantified in such research. Until then proposals will have to be treated on their individual merit and considered as exceptions to policy if necessary.
7.64 The inconsistency with DC3 will be considered with the comments on that policy.

The Way Forward

7.65 No fundamental revision needs be made to the policy and text although minor changes could be made in response to specific points.

SP17: HOUSING NUMBERS

Main Issues Raised

7.66 Issues raised during consultation in respect of policy SP17 and its supporting text can be summarised as follows.

7.67 Those seeking increased housing state that:

i) There is too much reliance on outstanding planning permissions, ‘urban capacity’ and ‘windfall’ in order to meet housing requirements set out in the Regional Spatial Strategy. More allocations should be made in order to avoid under provision and to give flexibility/leeway.

ii) It is stressed that housing requirements in the RSS are minimum figures.

iii) Housing targets should take account of the potential requirements associated with a new nuclear power station at Sizewell.

iv) The review of the RSS is likely to identify a requirement for further land in Suffolk Coastal – an upward revision of the housing figures should be referred to.

7.68 On the other hand objections have been made to the volume of housing proposed:

i) Housing targets in the RSS should not be followed without questioning their validity

ii) Housing requirements should also be reassessed in the current economic climate

iii) Objections are made both to a large proportion of the requirement being in the Ipswich Policy Area (see policy SP3) and also at Felixstowe (see Policy SP4)

iv) Employment sites should not be assumed to represent a potential source of housing land

7.69 It has been suggested that proposed housing numbers be expressed in the form of ranges rather than specific amounts.

7.70 In addition, objectors or promotors of land refer to specific sites or areas. These representations will be considered elsewhere in the LDF process.

SCDC Response

7.71 The policy, and housing numbers, is derived from the need for the Core Strategy to address housing requirements as set out in the Regional Spatial Strategy (RSS). In respect of housing numbers the RSS sets minimum targets for each authority in the region for the period 2001 to 2021. In Suffolk Coastal this minimum figure is 10,200 new dwellings (or 510 per year over the period) of which about 3,200 need to be located within the Suffolk Coastal part of the Ipswich Policy Area.

7.72 Given the fact that the Suffolk Coastal Core Strategy will not be adopted until 2010 and there is a need to enable a supply of housing for a 15 year period the RSS annual completion rate to 2021 has been extrapolated for a further four years.
The base date for the Core Strategy is 2008. The housing that has been constructed in the period 2001 to 2008 has been removed from the requirement.

The primary source of new housing in the initial period of the Core Strategy will be land with a current planning permission, including dwellings under construction. It has been assumed that some planning permissions will lapse and not be renewed. In response to suggestions that the current economic recession will mean that more permissions will not be implemented, the Council should assume that the start date may be delayed or the construction period be extended and not that development will not take place.

The Core Strategy looks towards 2025 and the economic recession has to be assumed to be a temporary phenomenon. Households are still being formed during it, adding to the need for new housing (see earlier section). The deliverability of outstanding planning permissions is being assessed in order to be confident that they will actually be constructed.

The Regional Spatial Strategy has been the subject of public consultation and an examination in public by an independent panel. One of the tests of soundness of the Core Strategy will be its conformity with the RSS. It is, therefore, difficult and impractical at this stage to challenge the housing requirements contained within it.

The proposed numbers in Felixstowe and the Ipswich Policy Area will be considered under the topic of housing distribution.

‘Windfall’ will occur – we can be confident of that – but it is accepted that the nature, location and scale of it is unpredictable. It should not be taken into account as a source of supply in the first 10 years of the Core Strategy and this can be made clearer. However, it is perfectly legitimate to avoid, at this stage, allocations of ‘greenfield’ land until the occurrence of ‘windfall’ has been monitored. If it has failed to appear then allocations of housing land can be made in a subsequent review.

When it comes to making allocations in order to meet housing requirements, sites will be carefully chosen and appraised against sustainability criteria. The current use will be a consideration.

The Way Forward

A revised Core Strategy should contain the following amendments in respect of the subject of housing numbers:

a. To make the arithmetic used in order to calculate housing requirements to 2025 (ie beyond the period of the RSS) clearer
b. To reassess the contribution of outstanding planning permissions
c. To explain and clarify the role of ‘windfall’
d. To introduce the phasing of allocations in order to comply with national policy
e. To stress that housing numbers are expressed as minimum figures. This would negate the need for ranges.

Main Issues Raised

In the Ipswich Policy Area the preferred strategy has generated concern from local residents and the two local parish councils. Issues raised include:

i) The existing quarry land is earmarked for return to natural vegetation and this strategy should be upheld.
ii) There has been a historical policy of restraint to development east of the A12 – this should be maintained.
iii) There are other alternative strategic land areas closer towards the centre of the Ipswich Policy Area – these should be taken up first.

iv) The infrastructure and facilities (including roads, schools, shops, healthcare) in this area are not sufficient to support a large housing expansion.

v) Development east of the A12 would significantly impact upon the quality of the AONB and Deben Estuary.

vi) Development at this location would have significant impacts upon the communities of Waldringfield and Martlesham Heath.

vii) Further employment and retail development at this area would likely have a negative impact upon the vitality and viability of Woodbridge Town Centre which is 4 miles away.

viii) The area has poor public transport connections and journey times into Ipswich Town Centre are very long.

ix) Concentrated development around Adastral Park would enable the creation of a sustainable community with supporting facilities

x) There is an identified need for allotment provision in the area and this should be factored into development plans.

xi) A significant development would likely require major reinforcement works to the local electricity supply network. A major upgrade of electricity infrastructure works would have a lead time of 2 – 3 years from acceptance on quotation.

7.82 In the Felixstowe area this preferred strategy received objections from local action groups and local residents. Felixstowe Town Council, Trimley St Martin Parish Council and Trimley St Mary Parish Council all raised issue with regard to the scale of development proposed. The Town Council supported growth but advocated a rate of about 70 new dwellings per year in Felixstowe.

Other issues raised included:

7.83 Housing

i) Lack of consistent argument and inadequate evidence to support strategy chosen i.e. population forecasts, jobs, highways etc.

ii) Dispersed strategy was not tested in terms of supporting evidence base and against the other options.

iii) Too many houses for peninsula location; Forcing expansion on existing residents unfair.

iv) Lack of justification provided for numbers proposed. House prices do not indicate a shortage of properties in the area.

v) Too much reliance put on port for employment and as reason for providing new housing – no guarantee that new residents will work at port.

vi) Ageing population not seen as a major issue elsewhere e.g. Woodbridge/Aldeburgh. Felixstowe could be developed as a specialist retirement town and for young families that choose that environment.

vii) Support for some small scale development of affordable housing, linked to local needs (size, type and tenure.

viii) Support for better use to be made of existing stock – vacant properties; under-occupation etc.

ix) Support for brownfield sites to be developed before greenfield. Brownfield potential should not be underestimated.

7.84 Settlement Hierarchy

i) Loss of separate identities of settlements – notably both Trimleys’ and Walton.

ii) Felixstowe should be classified as a “Town” and not a “Major Centre”.

iii) The Trimleys should not be considered to form part of a Felixstowe “Major Centre”.

SCDC Core Strategy & Development Management Policies:
Reg 27 - Statement of Consultation
7.85 Transport/highways infrastructure

i) Volume – specific concern regarding A14 and current and known increases in traffic linked to the Port.
ii) Elsewhere concern over impact on Walton High Road and Main Road.
iii) Lack of /limited public transport alternatives.

7.86 Other infrastructure issues

i) Electricity – could require major re-inforcements.
ii) Sewerage system,
iii) Leisure facilities,
iv) Additional burial space,
v) Allotments.

7.87 Countryside/environmental issues

i) Concerns at loss of countryside,
ii) Access to countryside becomes more difficult – loss of quality of life,
iii) If area not built on want it designated as extension to AONB and retained for wildlife,
iv) A buffer zone must be maintained between AONB and any new development,
v) Loss of countryside to housing will detract from tourism offer,
vi) Damage to wildlife, eco-systems, water supply and water table,
vii) Any development other than on brownfield sites will impact on facilities for horse riders,
viii) If small sites cannot be identified then the Council must accept that Felixstowe has reached its boundaries,
ix) Concern at the loss of any agricultural land valuable for food production,
x) Noise pollution from A14 and rail line; light pollution from docks,
xii) Felixstowe is a radon active area.

7.88 Issued raised in respect of the Market Towns have been summarised in the respect of the specific policies SP5, 6, 7, 9 and 10.

SCDC Response

7.89 The total number of houses is derived from the Regional Spatial Strategy. This sets a minimum target that the Core Strategy must seek to achieve. In terms of the distribution of the new housing this is left to local authorities. The only guidance offered is that:

i) Distribution must adhere to principles of sustainability;

ii) The larger centres should be the main recipients of growth, where employment, commerce, cultural facilities etc are located, as well as transport ‘hubs’;

iii) Ipswich is a “Key Centre for Development and Change” and “about” a specified number of new dwellings should be located on the edge of Ipswich within a policy sub-area known as the Ipswich Policy Area spanning Ipswich and adjacent parts of Babergh, Mid-Suffolk and Suffolk Coastal;

iv) Market towns with the potential to increase their economic and social sustainability through such measures as appropriate amounts of new housing should be identified; and

v) Other settlements with the ability to accommodate new development sympathetic to their local character should also be identified.
The Council’s preferred strategy, as put to the public, was to direct housing predominantly towards the major centres of Felixstowe and the Ipswich Policy Area. Such an approach remains one that is sustainable in that these are the locations where employment, commerce, leisure and cultural facilities are located. Public transport is also present and there is the ability to transfer travel from the private car to other modes.

Ipswich is recognised in the RSS as a location for growth as well as designated as a Growth Point. The Council’s strategy reflects the presence of a substantial employment centre there. Indeed, the Regional Spatial Strategy promotes the urban area of Ipswich as a major centre of employment. In this respect Adastral Park at Martlesham is recognised as an established and expanding ICT cluster, with reference made to a proposed Innovation Centre.

In the Ipswich Policy Area the RSS indicates that ‘about’ 3200 new dwellings should be located there in the period 2001 to 2021, which has been extrapolated to 2025. In order to achieve a revised minimum target, allocations will need to be made, only a small proportion of which might be on previously developed land. The Council’s preference for the remaining ‘greenfield’ allocations that need to be made is on land to the east of the A12 at Martlesham. A figure of about 1000 new dwellings was referred to in the Core Strategy Preferred Options public consultation document.

However, in the Ipswich Policy Area there is the opportunity, by increasing the proposed housing numbers east of the A12 at Martlesham, to create a self-contained and sustainable community to include community, leisure, education and health facilities as well as employment. This might not be achieved if the number of new houses is restricted to 1000, particularly in respect of local education provision.

The achievement of the objective of creating a community that integrates with the existing Martlesham community might be enhanced by the production of an Area Action Plan by the Council. This might also address concerns such as the impact on wildlife and the AONB, access, and traffic. It would be accompanied by a delivery plan that sets out the infrastructure that is required and a timetable for its delivery.

Felixstowe is accorded Major Centre status because of its size and role as an employment and commercial centre. The Port is a major employer and its regional significance is recognised in the RSS. Further expansion has commenced (the Felixstowe South Reconfiguration project) and it is predicted that this will create 600 new jobs at the Port and 860 elsewhere as a result of it.

However, housing growth has not kept pace with employment growth. In the 5 years April 2003 to April 2008 (i.e. pre-recession) the average annual construction rate was only 36 dwellings per year. As a result commuting into the town exceeds commuting out and affordable housing has not been achieved in any significant numbers.

An independent study of the town in 2005 revealed some negative aspects of the town:

  i) Ageing population,
  ii) The reliance on one major employer,
  iii) The threat to services and facilities,
  iv) A failing resort,
  v) The fragility of the town centre,
  vi) Lack of affordable housing.

The study advocated growth, with a range of scenarios put forward. The preferred option as set out in the Core Strategy consultation document was to locate 27% of the total new housing in the district in the period 2008 to 2025 at Felixstowe, some of which might be located within the Trimleys given the Council’s preference for a
dispersed approach. This would amount to about 2000 new homes or 120 per year on average. Given the lack of previously developed ‘brownfield’ land over 1600 of these would need to be on ‘greenfield’ land.

7.99 Consultation has revealed that:

a) Although limited growth for the right reasons has some support there are doubts at this time about the ability of the town’s infrastructure to accommodate it;

b) There is concern for the environmental setting, and

c) There are doubts about the predicted jobs occurring at a rate that would complement the proposed housing growth.

7.100 The study completed in 2006 did show that Felixstowe would benefit from growth in that certain negative trends would be addressed by it. However, given the uncertainties over employment growth and infrastructure provision it might be more practical in the earlier period of the Core Strategy to manage growth. This should be distributed across settlements of Felixstowe, Trimley St Martin, Trimley St Mary and Walton in locations within or abutting the built up areas avoiding as far as possible prime agricultural land for essential food production. The environmental setting of the town and access to the countryside will, therefore, remain undisturbed until such time as an increase in the pace and scale of change is demonstrated to be in the best social and economic interests of the town.

7.101 Monitoring would examine factors like employment growth, town centre viability, the creation of affordable housing, population balance and the effect of the resort regeneration project.

7.102 In the market towns the Core Strategy consultation document recognised that not all of the towns had the environmental capacity to absorb significant growth. Some Town Councils had previously expressed concern that their communities had expanded very rapidly over recent years. As a consequence, the consultation document advocated further development but with an emphasis on the use of previously developed land. Only three were considered suitable for modest ‘greenfield’ development – Leiston, Woodbridge and Saxmundham, where an allocation still remained in the current Local Plan.

7.103 Overall, about 21% of all new housing was proposed to be located within the five market towns in the District.

7.104 Whilst it may not, at this stage, be necessary to increase the proportion significantly, the market towns in the District will need to be examined during the lifetime of the Core Strategy in order that the long term needs of the town can be assessed and planned for. It is not possible to be precise as to which towns might benefit from growth. However, the proportion allocated to market towns could be increased, with an indication that it be implemented at the latter end of the period of the Core Strategy. By this time any ‘settling down’ as desired by individual town councils will have taken place and a fresh examination of the town can take place.

7.105 The preferred options consultation also indicated that some of the Key Service Centres might be appropriate for modest development. This could still be the case given the benefit of affordable housing. The choice of settlement and scale of development would be the subject of consultation through the preparation of the Site Specific Allocations and Policies development plan document.
The Way Forward

7.106 In response to the consultation responses the Task Group should:

i) Reconsider the number of new dwellings proposed to be located at Felixstowe, identifying the need to monitor the economic and social vitality of the town and consider further allocations in a future review of the Core Strategy;

ii) Consider the benefits of a larger allocation of new dwellings east of the A12 within the Ipswich Policy Area; and

iii) In the market towns retain the same proposed numbers of dwellings in the short and medium terms but consider the need to make further allocations in the long term in the interests of specific market towns. These would be identified in further research.

SP19: AFFORDABLE HOUSING

Main Issues Raised

7.107 Comments submitted in respect of affordable housing cover the following broad issues:

i) It is preferable to have a single overarching policy rather than a combination of strategic and development control policies

ii) The overall % requirement is unclear – the text refers to 24% of all new housing being affordable but the policies seek a third or two thirds

iii) A 24% requirement is too low and is inconsistent with the RSS; Shelter considers the need to be more like 40%

iv) The 24% requirement is based on a survey that is over two years old and does not take into account increased demand arising from the economic downturn

v) The affordable housing policies have not been tested for their economic viability

SCDC Response

7.108 The Core Strategy must be based on a robust evidence base. The Housing Needs Assessment, completed in 2006, is the most up to date for the whole District. It came to the conclusion that the overall need for affordable housing in a 5 year period was 24% of the total housing provision. This percentage has been applied to the whole period of the Core Strategy. In the absence of more up to date research this should continue to apply.

7.109 Although the overall need is for 24% the policies seek a higher proportion of affordable housing. This is because not all developments will be required to provide affordable housing. Single dwelling developments for example, or those consisting of just two units.

7.110 The RSS seeks 35% affordable housing provision across the region as a whole. The need within individual authorities should be assessed on the basis of need and not the application of such a wide standard. A lower percentage in Suffolk Coastal would be compensated by higher ones elsewhere in the region.

7.111 The economic viability of the policies has been carried out as part of the Strategic Housing Market Assessment, and completed in 2009. For Suffolk Coastal the results provide strong support for the current target of one-in-three dwellings. Indeed, they might permit a higher proportion to be considered although there is no evidence of need in order to support it.
The Way Forward

7.112 No case has been made to make significant changes to the strategic policy although it may benefit from minor changes in the interests of clarity.

**SP20: ALLOCATIONS IN KEY SERVICE CENTRES**

**Main Issues Raised**

7.113 Whilst there was general support for the provision of affordable housing comments on this specific policy related to:

- i) Its inconsistency and parity with SP19,
- ii) Confusion in applying it – in some schemes 1 in 3 affordable units will be required but in others it will be 2 in 3,
- iii) The absence of a viability test in accordance with PPS3,
- iv) It is unduly prescriptive.

**SCDC Response**

7.114 Some of the comments are valid ones. There is confusion in terms of the requirement for affordable housing but, more importantly, there is a lack of firm evidence to justify a differentiation in the affordable housing requirement. In one settlement – a market town say – an allocation would comprise one in three units of affordable housing but in a nearby key service centre the allocation would require two in three.

7.115 The objective of the policy remains a sound one – to create affordable housing in rural areas. What is perhaps required is evidence that villages have a greater need than towns and a different proportion should be applied to each.

The Way Forward

7.116 Consider the deletion of policy SP20.

7.117 If the provision of affordable housing is to be accelerated in rural areas and a ‘carrot’ is required in order to encourage landowners to release land, then consider permitting open market housing as part of ‘exception’ sites – 1 in 3 units for example.

**DC10: GYPSIES, TRAVELLERS AND TRAVELLING SHOWPERSONS**

**Main Issues Raised**

7.118 The following issues were raised by respondents:

- i) The criterion (h), which relates to flooding, seems to duplicate PPS25 and does not give any particular local flavour to this policy.
- ii) Policy DC10 does not appear to accord with the requirements of the RSS,
- iii) There is no indication of what the Council’s strategy is to achieve accommodation in accordance with national and regional policy.

**SCDC Response**

7.119 The comments are noted. It is recognised that the policy as worded represents more of a ‘reactive’ policy rather than being ‘proactive’ in enabling the achievement of accommodation of gypsies, travellers and travelling showpersons. However, the Council is always going to be faced with a challenge due to the nature of the need – new travellers rather than gypsies leading a nomadic lifestyle.
7.120 Nevertheless, it may be possible to make amendments in order to produce a proactive approach to the issue, and to create a new strategic policy.

**The Way Forward**

7.121 Consider the creation of a new strategic policy setting out the Council’s approach.

7.122 Consider the deletion of a criterion as requested.

7.123 The main other issues raised at this consultation were as follows:

[as presented and debated at committee: LDFTG 22nd June 2009 – Appendix 1. Topics covered Vision & Objectives, Sustainable Development, Nuclear Energy, Accessibility, A12/A14, the Economy, the Environment, Community Well-Being and Development Management policies]

### DISTRICT PROFILE

#### Main Issues Raised:

7.124 Many of the comments related to others made on the specific policies, often seeking emphasis of a particular point (the quality of the landscape, biodiversity, local distinctiveness) in order to support an expression of objection or support. Looking at each of the headings the main issues raised in respect of the factual accuracy of the Profile included:

7.125 **Population and Housing**

   i) Lack of supporting evidence in relation to statements about first time buyers; homelessness and the impact of the recession on house prices.
   
   ii) Lack of definition of Decent Homes Standard

7.126 **Economic Profile**

   i) Minor text change required in relation to lorry movements on rural roads
   
   ii) Additional reference sought to the impact of the recession and possible changes which may occur to the economic profile
   
   iii) EEDA wish to see greater emphasis placed on the role of the district within the Haven Gateway.

7.127 **Transport Profile**

   i) Minor correction in relation to rail service provision
   
   ii) Clarification required regarding reference to lorry parking at Felixstowe and the impact of Operation Stack
   
   iii) Additional reference required to the right of way network

7.128 **Environmental Profile**

   i) Additional reference sought in relation to the possible channelling of more funding towards ongoing repairs to the Blyth Estuary flood defences
   
   ii) Minor textual corrections in relation to geodiversity
   
   iii) Additional reference should be included to protecting the Heritage Coast.
   
   iv) Additional reference required in relation to the presence of high quality agricultural land and its importance for food production
SCDC Response:

7.129 Not all points require a response because, as stated earlier, they occur later in respect of specific policies and do not relate to fact but represent a subjective opinion. However, some additions can be usefully made eg.

i) Amend and clarify factual statements where relevant.
ii) Add a reference in the current recession
iii) Expand text to refer to the role of the District within the Haven Gateway
iv) Add a reference to the presence of the MOD within the District.
v) Add a definition of Decent Homes Standard

The Way Forward

7.130 Minor amendments to the text

VISION

Main Issues Raised:

7.131 The issues in respect of the Vision are:

7.132 Issue 1. Growth point status and what it means for the district and the wider Haven Gateway:

i) EEDA has requested that the Vision explicitly recognises the district’s position within the Haven Gateway Sub-Region and the national significance of it as a key economic driver. Explicit reference is also required to the expansion of the ICT clusters at Martlesham, the need for 3,200 homes to be provided to the East of Ipswich and an indicative target of 30,000 jobs in the Suffolk part of the Haven Gateway.

ii) One further respondent supports the need for more account to be taken on Felixstowe’s strategic role in the Haven Gateway. Also with reference to Felixstowe additional reference is sought to the Felixstowe Port Study and the need to allocate additional land for further distribution facilities.

iii) One individual questions whether growth point status will bring any benefits.

7.133 Issue 2 Consistency with the rest of the document and minor wording changes.

i) Suggested wording change to overarching vision to refer to “….people of all ages want to, and can live…”

ii) Suffolk Coast and Heaths wish to see specific reference included to the AONB

iii) Save Felixstowe Countryside seek an additional reference under Climate Change and the Environment to include protection of high quality agricultural land as being needed as a result of climate change. Also under Housing and the Economy, removing Felixstowe as a focus for growth.

iv) Suffolk Preservation Society suggests amending paragraph 2.04 to read “An integrated and holistic….

v) Suffolk County Council supports the Vision but notes in relation to paragraph 2.03 that there needs to be a commitment to both renewable energy generation and higher aspirations in the design of new development if the Council wants to be a “leader”.

SCDC Response:

7.134 The Council’s response is:
7.135 **Issue 1**  The Vision currently refers to the Haven Gateway but more as a passing reference than a positive comment. The role of the district within the Haven Gateway is however significant and is a key driver behind the scales (and location) of growth the district is required to achieve within the plan period. The Haven Gateway Partnership is also a key source of external funding to support new infrastructure provision. It is appropriate therefore that a more specific, positive reference be included within the text (housing and economy) to reflect the role the district will be playing within the wider sub-region by 2025 and to ensure that the community and economic benefits which can come with Growth Point status are secured. Such a reference would accord and give added weight to, the overarching vision as currently expressed and should be included.

7.136 **Issue 2**

i) A minor amendment to the wording of the overarching vision to read “want to and can live” is supported A key element of the overall strategy is to enable people to remain within the area. The reference to “all ages” adds nothing to the existing wording.

ii) The additional reference to the AONB and to high quality agricultural land is not supported. The current wording is considered sufficiently strong and strategic in nature to cover both of these issues. No change

iii) Felixstowe is and is intended to remain a focus for growth. See response under Issue 1. No change

iv) The concerns regarding the coast are noted, but the word integrated is considered appropriate in this context. See also comments in respect of Policy SP15 The Coast.

v) The issues raised by SCC are ones of consistency in how this issue is dealt with elsewhere in the document. Noted – No change

**The Way Forward**

7.137 Expand the Housing and Economy section of Vision to reflect the important role of the District to the wider economy of the Haven Gateway Sub-Region and to using that role to secure infrastructure and community benefits.

7.138 Minor wording changes.

**OBJECTIVES**

**Main Issues Raised:**

7.139 The Objectives have been generally well received with a good measure of support, albeit that all of them or their associated Outcomes attracted some comment, mostly minor wording changes as set out below. Objectives 1, 2, 4, 7, 10 and 14 attracted more substantial comment. Comments for the most part seek to strengthen the Objectives and their stated Outcomes by ensuring that they correctly reflect the approach and priorities set out in the Vision and as more specifically detailed elsewhere in the Core Strategy

7.140 **Objective 1 Sustainability** – Suffolk Preservation Society suggests complete re-wording to read “...To deliver sustainable communities and ways of living in order that it is holistic in its approach and comprehensive in its coverage.

7.141 **Objective 2 Housing** - Substitute “needs” for “requirements”. In the Outcomes add additional reference relating housing to “services, employment, transport and infrastructure”. Amend paragraph 2.15 and 2.16 to better reflect the housing distribution (and individual objectors’ comments on them).

7.142 **Objective 3 Local Housing** - Additional reference sought that this should be achieved in tandem with restricting second homes.
7.143 **Objective 4 Economic Development** – Add “diversification” after “growth”. In the Outcomes EEDA suggests expanding the text to reflect the importance of the Port of Felixstowe. Suggestion that Issues of deprivation would be better addressed under Objective 13, Accessibility.

7.144 **Objective 5 The Rural Economy** - Add “sustain” before “strengthen”.

7.145 **Objective 6 Tourism** - Replace “attributes” with “assets”. In respect of the Outcomes comments on consistency – the cultural aspect of tourism is not addressed under SP24.

7.146 Expand text to refer to the economic aspects of tourism, particularly in the more remote rural areas; to recognise the potentially harmful effects of tourism; and add specific reference to the “resort” element of tourism and access to the environment and rights of way network.

7.147 **Objective 7 Market Towns** - in the Outcomes expand text to include reference to programme of renewal for major town centres; add Felixstowe to the list of market towns; add specific reference to restricting competition from out of town retailing.

7.148 **Objective 8 Transport** – in the Outcomes add at beginning “.. to provide an integrated transport system and thereby minimise the need to travel by private car”. Reference to Felixstowe rail line should refer to enhancements for both freight and public use. Add reference to upgrading of rail line from Saxmundham to Leiston to passenger line as set out in Suffolk Rail Plan. Amend text to make specific reference to the movement of freight through the region to access national markets. Additional reference sought in relation to lorry parking.

7.149 **Objective 9 Design** – add reference to local distinctiveness. In the Outcomes refer to energy generation as well energy efficiency.

7.150 **Objective 10 Protecting and Enhancing the Physical Environment** – in the Outcomes, Paragraph 2.43 additional references sought to geological features; to “conserve existing habitats an sites of biodiversity interest” (Natural England) and to “preserve and improve the area’s landscape and biodiversity”. Paragraph 2.44 - expand to reflect the wider urban environment which is very important to the “60%” or more of local residents who live there.

7.151 **Objective 11 Climate Change** – In the Objective re-order wording to “mitigate” before adapt. In the Outcomes add reference to renewable energy generation as this is a primary mechanism in reducing the District’s carbon footprint.

7.152 **Objective 12 Physical and Community Infrastructure** - no change sought but a definition required of “community facilities”.

7.153 **Objective 13 Accessibility** – in the Objective replace “promote” with “encourage” or add additional criterion in the Outcomes - “To co-ordinate access arrangements with other relevant agencies and service providers”. Also in the Outcomes delete the word “connectivity” and replace with plain English alternative.

7.154 **Objective 14 Leisure** - one objector questions whether this objective is already included under Objective 12. If it is retained then replace “ensure” with “encourage”.

7.155 **Objective 15 The Coast** - Suffolk Preservation Society seeks the additional wording “and ensuring that any new development is fully compatible with shoreline and estuary flood management plans”. In the Outcomes Natural England and Suffolk Coast and Heaths require an additional reference to “maintaining coastal access” and, also the planned extension of coastal access under the Marine and Coastal Access Bill.
SCDC Response:

7.156 The Council’s response in respect of each Objective to receive comment is as follows.

7.157 Objective 1 - The wording suggested is considered to be less clear than the objective as currently written. However the reference to sustainable communities could usefully be included.

7.158 Objective 2 - The word “requirements” in the objective is considered to be correct in this context. The growth to be provided for is a requirement of the Regional Spatial Strategy.

7.159 Outcomes – This text will need to be amended to reflect the housing distribution strategy once it is agreed. This could include specific reference to services etc.

7.160 Objective 3 - The sentiment is noted; however, second homes are not a particular issue across the whole of the District and are therefore not an issue for this Objective. Where second homes have proven to be a concern this is addressed under policies relating to tourism.

7.161 Objective 4 – Agree. Achieving a diversified economy both within the rural areas and particularly at Felixstowe is promoted elsewhere in the Core Strategy.

7.162 Objective 5 – Agree. “Sustain” represents the baseline position that the Council would wish to retain.

7.163 Objective 6 – Current wording is considered acceptable. No change. Outcomes - reference to the resort element of tourism could usefully be included. It provides consistency with the vision and strategy for Felixstowe. The economic, linked to the spatial, aspects of tourism are picked up under strategic policy SP24. No change. The consistency point will be addressed under SP24. No change.

7.164 Objective 7 – There is no programme as such for the renewal of the town centres. Much of what is likely to occur during the plan period will be more incremental in nature. However, the Core Strategy acknowledges the issues of deprivation which are present in both Leiston and Saxmundham. These two towns will be the subject of Area Action Plan to address this. In addition, the opportunity to look at all the existing town centre boundaries and any opportunities there may be to re-define them will be undertaken as part of the Site Specific Allocations Development Plan Document. No change.

7.165 Felixstowe is correctly omitted from this Objective as it is identified in the Core Strategy as fulfilling a more strategic role than the other towns. Specific reference to Felixstowe and its role is provided under Objective 2 - Housing Growth and Objective 4 - Economic Development. No change. The suggested reference to out of town retailing is too detailed for this Objective. No change.

7.166 Objective 8 - the Outcomes could usefully be re-worded or expanded to reflect each of the points raised, all of which add substance to the objectives for transport and the associated priorities set out in other Objectives or elsewhere within the Core Strategy or other supporting Strategies.

7.167 Objective 9 - the Objective is currently worded so as not to preclude any good design. It is for this reason that specific reference to Local Distinctiveness is referred to in the Outcomes instead. No change. Reference to energy generation is currently missing from any of the Objectives, but should be if the “Climate Change and the Environment” section of the Vision is to be followed through. It is suggested that this reference is more appropriately included under Objective 11 Climate Change.
7.168 Objective 10 - agree. The Outcomes could usefully be re-worded or expanded to reflect each of the points raised.

7.169 Objective 11 – it is considered that the current phraseology is acceptable, as it is possible to adapt without having to mitigate. No change. Outcomes – Agree. See response to Objective 9

7.170 Objective 12 – agree. A more detailed form of wording could be provided in the supporting text.

7.171 Objective 13 - the use of the word “promote” is appropriate in this context and as such the additional criterion could usefully be included. In the Outcomes an alternative word or phrase to replace the word “connectivity” will be investigated.

7.172 Objective 14 - as currently drafted reference to Leisure is included in Objectives 12 and 13. Objective 14 refers specifically to the provision of “Green Infrastructure” and through that the opportunity for the community to lead a healthier life. On reflection it is recommended that Objective 14 be re-titled “Green Infrastructure” and re-worded as follows “To encourage and enable the community to live and enjoy healthy lifestyle”. Under Outcomes, add an additional cross reference to the role green spaces play in adapting to climate change.

7.173 Objective 15 - the wording suggested is overly detailed and not appropriate for inclusion within the Objective. It is however already included in Policy SP13, The Coastal Zone. In the Outcomes reference will be included to maintaining and extending coastal access.

The Way Forward

7.174 Minor amendments to the Vision and Objectives as set out in SCDC Responses above. Expand text of Housing and Economy section of Vision to reflect the role of Suffolk Coastal in meeting the objectives of the Haven Gateway

SP1: SUSTAINABLE DEVELOPMENT

Main Issues Raised

7.175 This policy attracted few comments; most offer support. A number of minor amendments have been suggested as set out below:

Criterion (a) Concern expressed that the location of new housing should not be driven by the availability of capacity in the existing infrastructure or services or be confined to defined settlements.

Environment Agency notes that infrastructure improvements should be provided prior to development taking place.

Criterion (c) Additional note suggested pointing out that brownfield sites may be affected by contamination issues and that not all brownfield sites may be suitable for re-use.

Criterion (e) Add “and protection of the environment”

Criterion (j) Replace “sense of place” with “local distinctiveness”

Agents for BT suggest an additional criterion (m) – “To deliver new housing areas which bring social, environmental and economic benefits”.

SCDC Response:

7.176 The Council’s response is as follows:

Criterion (a) - With regard to the first comment, It is important that policies are not read in isolation. The concerns raised are dealt with elsewhere in the Plan under
more detailed sections on infrastructure provision and SP12 Countryside. No change. With regard to the timing of new or improved infrastructure, this could be addressed by the addition of the words “Relate and phase new housing….”

Criterion (c) - The additional references suggested are considered too detailed for this general policy. However the criterion could be made more explicit by adding the words “…ahead of development on greenfield sites”

Criterion (e) - This criterion refers to balancing scales of housing and employment provision - i.e. balancing homes and workers as a measure of sustainability. Where they are located is not an issue for this criterion therefore reference to the environment is not relevant under this criterion. No change.

Criterion (j) - The term “sense of place” is considered to be the right phrase in this instance as it has wider application. People can have a sense of place about an area which is not traditionally thought to be locally distinctive. No change.

New criterion (m) - The policy as worded is designed to relate to development of whatever type and scale. It is considered that the additional criterion adds nothing to that already set out. No change

The Way Forward

7.177 Minor amendments as set out in the SCDC response above.

**SP8: NUCLEAR ENERGY**

Main Issues Raised

7.178 Many comments related to the principle of nuclear energy and the factors that should be taken into account when considering whether a further station should be located in the District. Such a decision making process, as clearly stated in the draft Core Strategy, is not one for this Council.

7.179 In terms of the proposed policy the following issues are relevant:

   i) British Energy endorses the local issues for consideration as set out in policy SP8
   ii) The guidance needs to be more specific about the housing required – how much and where will it go?
   iii) The potential impact on tourism in the area and measures to counter any negative impacts associated with it.
   iv) There is a conflict between the last line in para. 3.85, which suggests that support or otherwise for the possibility of a new nuclear power station should not be indicated, and criteria (k) and (n) of the policy which refer to the benefit of such development.
   v) No mention of a new access to the site or the fact that the site may not be large enough to contain the construction equipment or hostel or the lay up if they are to be off-site, where will they go?
   vi) (k) Should also acknowledge disbenefits as well as the benefits
   vii) (n) Should be deleted as this is not achievable within the confines of the site and the housing allocation for Leiston is rules to some extent by the NII HSE
   viii) (h) Rail use whilst welcomed will be considerate of people affected by noise and disturbance. Sea use landing facility will be of an excellent engineering standard so as to minimise the disruption of the north south drift and the consequential damage to the coast.
   ix) Consideration must be given to the free passage of people to the Heritage Coast Walk.
x) The impact of a new nuclear station would be very significant and would justify the preparation of a Development Plan Document (DPD) devoted to Sizewell
xi) The requirement for off-site land throughout Suffolk Coastal district should be listed as one of the “local issues that need to be assessed”.

SCDC Response

7.180 The points are well made, where relevant in that they relate to the factors that the District Council considers need to be taken into account when the decision is taken elsewhere whether or not to locate a third nuclear power station at Sizewell. The policy is not meant to be supportive, particular in respect of its referral to benefits. It is merely acknowledging that if consent is granted opportunities should be exploited.

The Way Forward

7.181 Minor changes to the policy and supporting text.

SP13: THE COASTAL ZONE

The Main Issues

7.182 The main issues raised in respect of this policy and its supporting text are:

i) There should be an overt statement relating to an integrated management approach to the coastal area.
ii) The policy is unclear whether it also refers to the district’s estuaries.
iii) The policy fails to address the need to make provision for communities and homes that will foreseeably be lost through coastal erosion.
iv) The policy needs to address the specific needs of the Port of Felixstowe.
v) A policy should be created in relation to development in South Felixstowe in the flood zone.
vi) A policy should be created so that residential development is not permitted where there is no escape access above ground floor level.
vii) The aims of the policy should be elaborated upon for further clarity – perhaps through the production of a Supplementary Planning Document.

SCDC Response

7.183 The comments are noted and recognised. Policies and strategies for adaptation to coastal erosion would be picked up through the Shoreline Management Plan and subsequently the number of anticipated incidences of properties lost to coastal erosion is expected to be rare. There would not therefore be a need for a policy on this as incidences could be dealt with on a development plan departure basis. The Council will consider this point under review however, and in the future should this instance occur more often, then a suitable policy could be produced.

7.184 Issues relating to the Port of Felixstowe are picked up accordingly in policies SP4 and SP21 in respect of expansion needs. The Council is supportive of the DEFRA initiative on Integrated Coastal Zone Management and appropriate measures will be undertaken so that the strategy is to take a holistic approach to social, economic and environmental issues.

7.185 The aims of the policy are covered in Objective 11 as well as the supporting text to SP13, however, further SPD guidance will be considered. Issues relating to safe access and egress from development are addressed in national Planning Policy Statement 25. The Council will consider the merits for a specific policy on South Felixstowe when producing the Site Specific Allocations & Policies document. Policy SP13 is relevant to both the coast and estuary areas and suitable changes will be made to reflect this.
The Way Forward

7.186 Minor changes to the policies and supporting text.

**SP14: ACCESSIBILITY**

**Main Issues Raised**

7.187 The issues raised by respondents are on the whole either generalised or over elaborate (for example by referring to a specific service route). Most relate to the supporting text. The main issues include:

i) Paragraph 3.124 fails to acknowledge one of the key differences between the LDF and the Local Plan – that the new system should look holistically at ‘what happens in the district’, not ‘what the district council controls’.

ii) Concern that alternative variations of a strategy have not been considered but that the draft policy is acceptable.

iii) Transport and accessibility are separated needlessly in the supporting text.

iv) SP14 focuses on bus and rail travel and no mention is given to the provision of pedestrian and cycle routes or providing key facilities/services within walking and cycling distance of housing developments.

v) There is no mention of the requirements and thresholds for preparing Transport Assessments or the public transport provision requirements for new developments.

vi) Include reference to the right of way network in terms of aiding movement in paragraph 3.124.

vii) For clarity, the strategy might refer to interchanges after links and before notably in the third line of paragraph 3.131.

**SCDC Response**

7.188 Many of the comments can be addressed by minor changes to the supporting text.

7.189 The Council considers that the Core Strategy does look holistically at the future of the district, including when considering accessibility and transport. As the local planning authority does not have direct control responsibility for local transport, it cannot set out a more specific and detailed policy. However, the Core Strategy does set out how it will include and engage with infrastructure providers and other organisations to achieve the Objectives and can operate as a partner in the enhancement of the network and help enable investment to occur.

7.190 The comment regarding the lack of another option has been noted, as has the comment that the policy is also acceptable in its draft form. Comment regarding the separation of transport provision and accessibility has been noted. This was separated for clarity but the Policy combined.

7.191 It has been noted elsewhere that the Core Strategy did not adequately make reference to the promotion of pedestrian and cycle routes. This comment has been taken on board and can be included as part of Objective 8 – Transport.

**The Way Forward**

7.192 One minor wording change to the policy by reference to ‘interchanges’ in the first paragraph. Some minor changes to the supporting text.
SP15: A12 and A14

The Main Issues

7.193 The main issues raised include:

i) There appears to be no policy for road transport other than on the A12 or A14. The Policy should be replaced by one addressing the whole issue of accessibility by car and lorry. It should cover the entire district, not just these two main roads.

ii) The Highways Agency supports the principle of joint working with the local highways and planning authorities to address the Orwell Bridge issues.

iii) The recognition of the need for port facilities to serve Felixstowe is welcomed; however specific sites should be put forward for consideration. The Council should identify potential sites for off port distribution facilities and have a policy committing it to do so.

iv) Objections to development to the east of the A12 due to the increase in vehicular movements on the A12 and A14 that will increase congestion.

v) Suggestion to acknowledge that the A14 and A12 form strong natural boundaries in paragraph 3.137.

SCDC Response

7.194 Policy SP14 and Objective 8 on Transport both refer to improving transport and accessibility, including roads and public transport, throughout the district. Policy SP15 refers specifically to the A12 and A14 as they are the two main routes through the district. It does not mean that there is any less importance placed on other roads in the district.

7.195 If there is a need for additional off site port facilities in the district, these would be indicated within the Site Specific Allocations document. This is referred to in the Vision and Objectives part of the Core Strategy.

7.196 Comments regarding the location of new development in relation to the A12 and A14 are noted. Comments of support are also noted.

The Way Forward

7.197 No change to the policy or supporting text.

SP21: EMPLOYMENT LAND

Main Issues Raised

7.198 This policy is generally supported. A number of the comments raised are couched in terms of support for individual sites that the respondents would wish to see allocated for a variety of uses.

7.199 The general issues raised include:

i) EEDA requires that more explicit reference be given to the significant national importance and role of Felixstowe Port and Martlesham Heath. They note that by addressing these key elements of the Regional Economic Strategy the Core Strategy will provide the context needed to maintain the prosperity of the East of England, enhancing its regional competitiveness and giving support to business growth.

ii) EEDA also notes that additional land is likely to be required for port related use which may or may not be within the district. When looking at potential sites outside the district boundary a commitment to cross boundary working to ensure that sufficient land and sites of the right quality are allocated to
ensure the port's competitiveness should be set out in the strategy. One landowner seeks an additional reference to the fact that sites that meet the necessary criteria exist within the district.

iii) Save Felixstowe Countryside consider that improvements to the docks may result in the loss of jobs not an increase; also that port related jobs may not be centralised on the port.

iv) BT requires a specific reference to be included to the Innovation Martlesham project to develop a high-tech cluster on the Martlesham Adastral Park campus.

v) The reference to the Ransomes Europark as a strategic site should also acknowledge the potential for this to be expanded by up to 25 hectares.

vi) The continuing commitment to the allocation of land at Rendham Road, Saxmundham is questioned as it is not specifically referred to in the policy yet Ransomes, the only other outstanding employment allocation, is.

vii) Concern that the strategy is not realistic in terms of the total number of jobs to be created or that the sites are suitable in terms of the environment or sustainability.

viii) Draft PPS4 stipulates that Local authorities should avoid designating sites for single or restricted use classes wherever possible.

ix) The strategy needs to be clear as to the time frame within which the new jobs are to be provided ie to 2021; or that the level of jobs will be increased in line with the provision of housing ie up to 2025.

x) Highways Agency would like to see an indication of the amount of employment provision identified for the different settlements.

xi) Paragraph 4.31 lacks any reference to the need to plan for future development and potential expansion at Sizewell.

xii) The MOD considers that the policy should recognise the national and local importance of the MOD to the rural and local economy. Rock Barracks should be recognized within the LDF as an important employment area and a positive framework should be provided for the continued operation and sustainable development of the site for new development for military purposes.

SCDC Response

7.200 The importance of the Port of Felixstowe and Martlesham Heath to the sub-regional, regional and national economy as part of the Haven Gateway is an issue that will need to be addressed not just here but throughout the Core Strategy.

7.201 With regard to Martlesham Heath the additional reference to Innovation Martlesham is not necessary. The policy already specifies support for the creation of a high-tech business cluster.

7.202 The comments regarding the amount of land potentially available as an extension to Ransomes Europark and Rendham Road, Saxmundham are noted. The scale of any allocations and their status will be considered in due course and having regard to the findings of the Employment Land Review currently underway.

7.203 The strategy for job creation involves more than the identification of new employment land. Many jobs are created by means of existing businesses taking on more staff without necessarily having to increase the size of their premises. Retention and protection of existing employment land and encouraging diversification to avoid reliance on any single business are therefore equally important. To support this strategy, the imminent Employment Land Review will provide information as to the suitability of both existing and suggested employment sites to determine their suitability or otherwise for different types and scales of employment use; and to inform policy to optimise opportunities to meet the job creation target.

7.204 With regard to job numbers and the time frame for their provision, the Regional Spatial Strategy acknowledges in Policy E1 that the targets for net growth in jobs for
the period 2001-21 are “adopted as reference values monitoring purposes...” It goes on to state “Job growth, its broad alignment with housing and how best to monitor changes in the labour market should be reconsidered as part of a review of RSS..”. It is suggested that the wording to paragraph 4.32 is amended to reflect this fact.

7.205 Given the lack of any decision by Government on the expansion or otherwise of Sizewell the Council can only plan in the likelihood that it may be approved. Criterion (j) refers to “Economic impacts upon the area during and after construction.” In addition, the Employment Land Review will have regard to the possible expansion of Sizewell when assessing existing and potential employment sites within the wider area.

7.206 The presence of the MOD and its contribution to the local economy is recognised. However national defence is a specialist type of employment and not one that is appropriate to include under a more general employment policy such as SP21. A reference to their presence could, however, be included within the District Profile at the beginning.

The Way Forward

7.207 This policy and supporting text will need significant change taking on board the SCDC responses set out above although the thrust of the policy will remain essentially the same. Also add an additional sentence to the District Profile about the MOD presence.

SP22: ECONOMIC DEVELOPMENT IN RURAL AREAS

Main Issues Raised

7.208 Seven respondents have commented on this policy. All welcome it. Strongest support is for diversification which accords with PPS7 and in particular for the role that tourism can play. Specific comments include:

i) Suffolk Preservation Society considers that the starting point of the policy should be to “help retain the local rural economy”.

ii) Whilst supporting farm diversification, others express concern that there should be a mechanism for preventing farms from effectively being closed down and turned into mini industrial estates.

iii) Provision should be made for the identification of new employment land to support the local economy.

SCDC Response

7.209 Policy SP22 has been drawn up in support of Objective 5 – The Rural Economy - that is “To strengthen and diversify the rural economy”. This goes further than just “retaining”. The wording of the policy and the overall approach to development in the rural areas is considered sufficiently strong to prevent the type of scenario described from happening.

The Way Forward

7.210 Minor changes to the wording of the supporting text.

SP23: REGENERATION

Main Issues Raised

7.211 Four respondents commented on this policy. Felixstowe and Leiston Town Councils support the need for Area Action Plans. One respondent supports the use of local plans produced just for a town and agreed by the people of the town.
7.212 One respondent seeks the inclusion of the word “sustainable”. Another considers that the wording of the policy is too vague, particularly in relation to Felixstowe. It should be more explicit in relation to the type of tourist to be attracted and what resources they would need. Furthermore the section on economic development lacks vision, is obsessed with economic development but fails to consider quality of life of residents or visitors, and fails to recognise that most people work for small companies of less than 4 employees.

SCDC Response

7.213 The changes sought are too detailed for a strategic policy or are covered elsewhere. For example there is an overarching policy SP1 on sustainability and the District Profile specifically states that 70% of businesses employ 5 people or less.

The Way Forward

7.214 No changes.

SP24: TOURISM

Main Issues Raised

7.215 Only eight respondents have commented on this section. All support the policy including EEDA, Natural England and Suffolk County Council Suffolk Coast and Heaths. The others seek minor amendments. For example there is no reference to “environmental, cultural or social attributes”, cross referencing to other policies is inadequate or in (e) the word ‘minor’ is too restrictive.

SCDC Response

7.216 These comments can in the main be addressed by minor changes to the text. With regard to (e) the reference to minor is deliberately included as the emphasis is on smaller scale development is more appropriate in these sensitive locations. This would not preclude applicants arguing for larger scale extensions on their individual merits.

The Way Forward

7.217 Minor changes to the policy and text.

SP25: RETAIL CENTRES

Main Issues Raised

7.218 Five respondents have commented on this policy. Most of the issues raised are relatively minor and include:

i) The revised draft should include the updated information from the 2008 Retail Study and provide a breakdown of new floorspace for each town

ii) Greater support should be given to existing town / lower order centres. Suggestions include - more encouragement should be given to increasing turnover from existing retail floorspace rather than committing to increases in new floorspace provision; the issue of parking charges should be addressed to stop leakage to out of town stores/supermarkets; and retaining public transport provision from the more rural areas to the towns is vital to addressing issues of rural isolation/social exclusion.
7.219 The future approach to Martlesham Heath is the most significant issue raised. In particular how it should be defined and what future role it might be expected to play. Tesco and the main landowner argue that Tesco and the surrounding area should be identified as a District Centre given the range of services and uses already present, including the adjacent community facilities.

7.220 In contrast it is questioned whether Beardsmore Park is correctly identified as an out-of-town retail centre when there are few realistic opportunities for it to expand? It is also argued that here currently exist a range of other smaller scale facilities distributed around Martlesham and Martlesham Heath. It is important that local neighbourhood facilities are retained if access for local residents is not to be worsened.

**SCDC Response**

7.221 It is acknowledged that headline floorspace figures only were available at the time of consultation. These can be updated as appropriate.

7.222 At present it is arguable whether Tesco functions as a district centre given that the majority of its customers arrive by car and its catchment extends beyond the local communities. However, given the proposal in the Core Strategy for significant housing growth in the Martlesham Heath area the provision of local facilities such as retail will need to be examined, perhaps as part of an Area Action Plan for the area. This can also examine Beardsmore Park.

**The Way Forward**

7.223 Minor changes to the text.

**SP26: BIODIVERSITY AND GEODIVERSITY**

**Main Issues Raised**

7.224 The main issues raised in respect of policy SP26 include:

i) National planning policy is sufficiently thorough and robust for environmental protection.

ii) Additional consideration should be given to the protection of high quality agricultural land.

iii) It is unclear how geodiversity features will be enhanced and protected.

iv) The policy needs to be used as a strong ground for promoting and protecting environmental assets.

**SCDC Response**

7.225 The comments are noted and recognised. The district includes a large number of designated environmental sites and the Council wishes to make a strong commitment towards the protection and enhancement of these. In addition, there should be recognition of the need to protect relevant species and habitats that may be identified outside of designated sites. It is acknowledged that geodiversity issues should be given stronger recognition and guidance.

7.226 The Council recognises the need to protect prime agricultural land and soils and this is reflected in the approach to Felixstowe. There is already sufficient national and regional planning policy in order to justify this, primarily through PPS1 and PPS7.

**The Way Forward**

7.227 Minor changes to the text.
**SP27: LANDSCAPE AND TOWNSCAPE**

**Main Issues Raised**

7.228 The main issues raised in respect of policy SP27 include:

i) The policy is not strong enough to protect areas of the district previously identified as Areas to be Protected from Development (AP28) due to their local contribution to character – most notably this has been in relation to area of Martlesham Heath.

ii) The policy should include greater flexibility to allow for innovative design in acceptable locations.

iii) There is insufficient recognition of the role the AONB plays in the district.

iv) The policy should give greater emphasis to the role of the Landscape Character Assessment which has been undertaken in Suffolk.

**SCDC Response**

7.229 The comments are noted and recognised. It is agreed that the policy should not stifle innovative new design in suitable locations. Suitable design policies are accordingly set out elsewhere in Development Control Policies (DC23 and DC24). The AONB is a nationally important feature and the policy and document should adequately recognise this status.

7.230 The Suffolk Landscape Character Assessment has now been completed and is available (www.suffolklandscape.org.uk) as a reference for the various landscape types across the district. However, further LCA guidance is being undertaken in order to establish more detail in particularly sensitive landscapes and therefore Special Landscape Area designations are proposed to remain designated until suitably replaced by the LCA.

7.231 The policy is district wide and strategic in nature by establishing the framework for which local areas to be protected from development can be designated. These policies relating to areas to be protected from development will be specifically designated as part of the production process for the Site Specific Allocations & Policies document.

**The Way Forward**

7.232 Minor changes to the text.

**SP28: CLIMATE CHANGE**

**Main Issues Raised**

7.233 The majority of comments were provided from Suffolk County Council. Most relate to SP28 and DC25 and include:

i) The policy needs to specifically highlight sustainable construction methods.

ii) The links between SP28 and DC25 should be more explicit, or the policies combined.

iii) The policy should be requiring a minimum standard of construction quality – for example Code for Sustainable Homes Level 4.

iv) The policy should take into consideration the need to retain development viability in sites. If total developer requirements are too onerous, then development will be stifled.

v) The policy should be extended to include the issues of resource efficiency (water, waste etc) in addition to energy efficiency.

vi) Consideration should be given towards the production of a climate-sensitive development checklist.
vii) The relevant thresholds and subsequent renewable energy requirements for new development are too weak and should be extended.

viii) The policy should go further to deal with criteria for renewable energy schemes in nationally designated areas.

ix) The Council may wish to consider the potential for allocating suitable areas for renewable and low-carbon energy sources.

x) The Council should consider greater flexibility in the policy to allow for off-site renewable energy provisions where a scheme can be demonstrated to be not viable or feasible on site.

xi) In order to maximise sustainable construction techniques and investments the policy could also seek reductions in estimated CO₂ emissions and consider the use of a Carbon Offset Fund contribution scheme, used to generate renewable energy projects off-site.

SCDC Response

7.234 The comments are noted and recognised. However, it would be unduly prescriptive of the Council to state which sustainable construction techniques should be required as developments will vary in appropriateness on a site by site basis. Such a policy would be likely to cause a lack of creativity and innovation in design for developments.

7.235 Support is acknowledged for the ‘Code for Sustainable Homes’ building standards which includes addressing all forms of resource efficiency measures in housing. The Council is aware that viability is a factor and that development schemes may be delayed due to these considerations. However, the Council has evidence from the Ipswich, Babergh, Mid-Suffolk & Suffolk Coastal: Affordable Housing Site Viability Study – April 2009 which demonstrates site viability based on the application of Code level 3 and also including 33% affordable housing requirements. In exceptional cases, there may be particular difficulties in progressing a site with very high environmental standards while the relevant industry establishes a larger grounding and the Council may consider negotiating on building performance levels.

7.236 Renewable energy schemes in nationally designated areas will be considered on their merits in accordance with established national, regional and local policy.

7.237 The potential allocation of any land for renewable or low-carbon energy sources will be a matter for the Site Specific Allocations & Policies document in due course.

7.238 The requirement for improved environmental building standards and renewable or low-carbon energy sources will be expected to make a significant contribution to reducing predicted and actual CO2 emissions. Further work, for example viability, would need to be considered in relation to the feasibility of a Carbon Offset Fund scheme.

SCDC Response

7.239 The comments are noted and recognised. It would be unduly prescriptive of the Council to state which sustainable construction techniques should be required as developments will vary in appropriateness on a site by site basis. Such a policy would be likely to cause a lack of creativity and innovation in design for developments.

The Way Forward

7.240 Retain the policy.

SP29: SPORT AND PLAY

Main Issues Raised

7.241 The main issues raised in respect of policy SP29 include:
Support generally for the general principle of providing leisure and amenity sites locally so that residents do not need to use their cars to access them.

ii) Sport England would prefer the wording to be clearer and firmer. They suggest the use of “The appropriate provision, protection and enhancement of formal and informal sport and recreation facilities will be supported, particularly where shortfalls in local provision can be addressed, and the needs of new development met.”

iii) Suggestions for a cross reference to DC36.

iv) Felixstowe Town Council suggests an additional strategic policy concerning the promotion of and facilities for other leisure activities including arts, heritage and social interaction.

v) Objection to the omission of specific reference to noisy sport and recreational activities in relation to the protection of residential amenity.

vi) Felixstowe Council for Sport and Recreation suggest including “and is updated annually” to the end of paragraph 4.92.

SCDC Response

7.242 The supportive comments have been noted and the suggestion to cross reference this Policy to DC36 Sport and Play is agreed.

7.243 Sport England’s comments have been taken on board and the policy wording can be adapted to include its suggestions while also retaining the links to the local strategy.

7.244 Felixstowe Town Council’s comments regarding the need for a further Policy are noted; however, it is considered that applications for other leisure activities including arts and heritage are covered elsewhere within the Core Strategy. Objective 6 refers to the promotion of cultural and social attributes and the outcomes of Objective 12 require that cultural needs, including art, are supported. Further details can be included within Policy SP24. Proposals for Strategic Cultural Facilities will be considered under Policy C2 of the RSS.

7.245 The issue of residential amenity in relation to an application for sport or recreational uses for any relevant application would be covered by Policy DC27 – Residential Amenity.

7.246 Playspace provision is currently and will continue to be updated annually so that the local planning authority is aware of the provision in each Parish and where the shortfalls are located.

The Way Forward

7.247 Policy SP29 to be amended.

SP30: GREEN SPACE

Main Issues Raised

7.248 The main issues in respect of Green Space are:

i) The strategy is grossly deficient in identifying the scale and nature of land provision for allotments.

ii) Unclear how “access to and involvement in green spaces” will be managed or maintained once they are provided as part of a new development.

iii) Welcome the endorsement of the Haven Gateway Green Infrastructure Strategy.

iv) Policy does not take a sufficiently strategic approach, not adequately recognising the important role of green space to tourism and leisure.
v) Core Strategy should address that coastal sites are shrinking due to coastal retreat and provide green infrastructure sites inland.

vi) Green Infrastructure should be implemented by means of a tariff approach rather than according to priority for S.106 agreement contributions sought from individual schemes that have to relate to the local area they serve.

vii) Policy should address the importance of Suffolk Coastal's Green Infrastructure in delivering sustainable growth beyond the regional context.

viii) The need for offsetting the negative impacts of development on biodiversity and public health/quality of life should be included.

SCDC Response

7.249 The provision and retention of allotments is dealt with elsewhere in the Core Strategy - Policy DC37 - Allotments.

7.250 The management of Green Spaces would normally be dealt with by a Management Plan and controlled by a condition as part of a planning application for the development.

7.251 The comments regarding the strategic nature of the policy have been considered and it is thought that the Core Strategy does cover the strategic role of green space. Objective 14 recognises the district wide requirements for play spaces, sport and recreation facilities for the local population and tourists. Objective 6 seeks to promote all year round tourism based partly on the environmental attributes of the area, of which Green Spaces are considered an important part.

7.252 The loss of any green spaces as a result of coastal retreat will be considered by SP30 when providing green space in and around communities. The Shoreline Management Plan will also cover such issues and the Council will be able to identify if there are any such sites at risk. It is also recognised in Objective 15 which aims to secure the continuing prosperity of coastal communities and respond to natural coastal processes.

7.253 Supportive comments have been noted.

The Way Forward

7.254 Comments are noted. No change to the Policy

SP31: INFRASTRUCTURE

Main Issues Raised

7.255 Many comments were received on the subject of infrastructure. The main issues arising include:

i) Needs reference to the importance of engagement with existing communities including parish plans prior to starting detailed negotiations with developers for contributions.

ii) Suggestion for greater flexibility in the wording of the policy to ensure that the requirement for developer contributions does not result in prejudice against development. This requirement should be viewed against viability and feasibility of a proposal.

iii) Suggestion to state exactly what is included within the term ‘infrastructure’.

iv) No mention of the Community Infrastructure Levy (CIL) or ‘future-proofing’ the policy to respond to it.

v) Evidence base should include Haven Gateway Water Cycle Study.

vi) Policies should include a clear exposition of what level and quality of healthcare is expected.
vii) Community infrastructure should include the provision of space for and protection of allotments.

viii) Does not provide sufficient certainty in terms of what, how and when infrastructure requirements and financial contributions will be sought.

ix) No link between the policy and the implementation section of the plan.

x) Expect clearer indication of which services and facilities are priority items for the Council and if there are any specific, strategic projects worthy of reference in the policy.

xi) Policy does not address current deficiencies in infrastructure provision e.g. road network, sewerage.

xii) “for which alternative sources of funding are the most difficult to find” and “where alternative sources of funding are not available” are not considered a sound basis for securing contributions.

SCDC Response

7.256 The Statement of Community Involvement sets out how communities will be involved in the LDF process and consideration of planning applications. The requirements set out in Objective 12 and within the supporting text to SP31 will involve engagement with communities. A further sentence could be added into the supporting text to include reference to community engagement.

7.257 The infrastructure that the Policy refers to is stated in paragraph 4.95 as part of the supporting text to the policy.

7.258 The point regarding the Haven Gateway Water Cycle Study being included within the Evidence Base has been noted.

7.259 The Primary Care Trust sets out the standard of health care required and provides the Council with information setting out exactly what infrastructure would be needed to reach that level. Objective 13 sets out the Council’s aim to provide better access to services and facilities, including health care, for all and therefore it is not considered that the Policy needs to go into specific detail regarding health care.

7.260 The issue of allotments is covered under Policy DC37.

7.261 The Council feels that the first sentence of the Policy is clear in that development could not proceed without the infrastructure being in place beforehand or provided with the development. Further more specific details will be included within an SPD to follow. Policy wording will be adjusted when the results of the infrastructure study currently being carried out have been received. Utility providers will advise the Council what level of infrastructure is required for different developments in different areas.

7.262 The suggestion for a link from the Policy to the Monitoring and Implementation section has been noted and can be included.

The Way Forward

7.263 Minor changes. More specific details will be included in the text when the results of the Infrastructure studies being carried out have been received. Include a link to the Implementation and Monitoring Section.

PART TWO – DEVELOPMENT MANAGEMENT POLICIES

DC1 – AFFORDABLE HOUSING ON EXCEPTION SITES

Main Issues Raised

7.264 The following issues were raised by respondents:
i) Policy DC1 is welcomed particularly as its requirements are controlled through a legal agreement.

ii) There is support for limiting the building of affordable housing within and not outside the village envelope.

iii) It is better to have affordable housing provided through ‘exception’ sites and by 1 in 3 units in Key Service Centres (KSC) as set out in DC2 instead of DC1. Requiring 66% affordable housing in KSC is likely to render every single site unviable in KSC.

iv) PPG3, paragraph 29, states that local planning authorities will need to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including the likely impact upon overall levels of housing delivery and creating mixed communities. It is currently unclear whether the Authority has undertaken an economic viability assessment of its affordable housing thresholds and targets in the Core Strategy.

v) Policy DC1 seems to exclude the possibility of providing affordable homes in Martlesham or similar places and contradicts policy DC32.

vi) While supporting policy DC1, it should use wording similar to existing saved policy AP57 which states ‘Proposals likely to set a precedent for ribbon development on the edge of villages will be resisted’.

**SCDC Response**

7.265 The comments of support are noted.

7.266 The Council is currently undertaking a joint strategic housing market assessment with Babergh and Mid-Suffolk District Councils and Ipswich Borough Council. This is near completion and will inform the Council’s proposed submission Core Strategy.

7.267 Any proposal will need to comply with all the criteria set out in this policy, which has been assessed in respect of its viability.

**The Way Forward**

7.268 No change to the policy.

**DC2 – AFFORDABLE HOUSING ON RESIDENTIAL SITES**

**Main Issues Raised**

7.269 The main issues include:

i) Policy DC2 is vague and unnecessarily wide as to the circumstances when the affordable housing is increased from 1 in 3 to 2 in 3 and does not give effect to Objective 3.

ii) The circumstances where it is stated that a 1 in 3 affordable housing provision will not be required are vague and unnecessarily wide. In particular they should not extend to “suitability” (in para. (b)) or the proximity of local services and facilities (in para. (c)) or prejudice the realisation of other planning objectives (in para. (d)). Rather, they should be limited to economic non-viability.

iii) The requirement of developer contributions must be viewed against the viability and feasibility of a proposal so as to ensure that it does not result in prejudicing against development.

**SCDC response**

7.270 This is a policy that was established in the current Local Plan and has been in force, successfully, since. It has been assessed for its viability. The comments are noted.
The way forward

7.271 No change.

**DC3 – RETENTION OF SMALL DWELLINGS**

Main Issues Raised

7.272 The issues raised include:

i) There are differing views as to whether policy DC3 should be retrospective

ii) One suggestion is to revisit option (ii) of DC3 and produce a policy which tackles the issue of the conversion of existing dwellings. If this were to become effective after a defined cut-off date (e.g. 1 or 2 years after adoption of the LDF), it should not be considered unfair.

iii) Policy DC3 is inconsistent with SP16.

iv) What Policy DC3 is seeking to do is questioned. It appears to allow a 2-bed house to be extended by over 50% if the extension was for any purpose other than to create a bedroom. An extension of over 50% is likely to take properties outside the affordable bracket.

SCDC Response

7.273 The aim of this policy is to try to ensure the retention of small units to meet the needs of the community as a whole. However, applicants frequently cite the need for the extension being to meet a need to accommodate an expanding family. To require these people to move home could be unreasonable for a number of reasons (cost, movement of schools, loss of friends, etc). The basis for the policy needs to be extremely robust.

7.274 The ability of DC3 to ensure a stock of smaller houses can be better achieved at a strategic level through policy SP16, which address an identifiable need for a range of house sizes in the provision of strategic housing ‘...to meet the needs of existing or future population’. Also, given the density of housing being built at present the number of small houses that could be extended to provide additional bedrooms, in a way that would satisfy other criteria (for example residential amenity), is fairly limited.

The Way Forward

7.275 Remove policy DC3 on the basis that the issue is covered under policy SP16.

**DC4 – HOUSING IN THE COUNTRYSIDE**

Main Issues Raised

7.276 There was general support for this policy. However, the following issues were raised:

i) Some concerns that Policy DC4 is too restrictive. Opportunities could be missed to remove eyesores and commercial traffic generators from villages. It should be reworded to provide guidance only and permit Parish Councils to support proposals where significant planning gain can be achieved.

ii) No justification is given in Policy DC4 for the 150 or 300 metre limitation from the existing settlement. Planning recognises that in terms of walk distance, 400metres is appropriate and should be substituted into the policy.

iii) The AONB and the need to protect the landscape should be cited in policy DC4.

iv) Policy DC4 is too restrictive with regard to criterion (b). The policy should acknowledge that merely more prominent should not necessarily make development unacceptable and could lead to an improvement in the quality of the
built form. The words ‘or where they represent an improvement in the quality of the built form’ should be added to criterion (b).

v) It should not be the case in Policy DC4 that replacement of buildings is more acceptable than sympathetic extension of the original building.

vi) In Policy DC4 (e) the word ‘suitable’ should be inserted between ‘of’ and ‘existing’. This is because not all existing buildings in the countryside are suitable or desirable for conversion.

vii) The functional need requirement in the paragraph in Policy DC4, following the list of types of housing development, should only apply to the erection of a new building and should not apply to items b, c, d, e and f.

SCDC response

7.277 A balance needs to be struck between allowing for some housing while seeking to protect the character of the countryside for its own sake in accordance with PPS7. It is important to be clear about where and what type of housing development would be supported in the countryside.

7.278 Development in the countryside need to be strictly controlled in order to safeguard the character of the countryside for its own sake. The AONB is covered under national policy contained in PPS7 and need not be repeated in this policy.

7.279 The walking distance of 300 metres is regarded as ‘easy walking distance’ referred to in PPS6 when discussing types of centre locations (town centre, edge of centre, local service centre etc).

7.280 Criterion (b) need only to consider whether a proposal; is visually intrusive. If the replacement dwellings is of a better design this will be taken into account.

7.281 Not all existing buildings in the countryside are suitable for conversion. The suggestion to insert the word ‘suitable’ in criterion (b) is noted.

The Way Forward

7.282 Amend Policy DC4.

DC5 – HOUSING IN CLUSTERS

Main Issues Raised

7.283 The issues in respect of this proposed new policy include:

i) Policy DC5 is too restrictive and should be reworded to provide guidance only and permit Parish Councils more say, particularly on the question of how many houses can be permitted, appropriate to a particular location.

ii) The inclusion of the final definition of Clusters in Policy DC5 based on distance should be deleted as it would be detrimental to protecting settlement sites close to local and key service centres.

iii) Policy DC5 is welcomed in so far as it places significant weight on new development not harming the character and appearance of the existing cluster (i.e. hamlet) and takes account of the cumulative nature of individual proposals.

iv) It is unclear where “clusters” lie in the settlement hierarchy – Appendix 1.

v) The vegetable farming that takes place in the eastern part of the district relies to a very significant extent on having seasonal workers who are often employed for quite a few months at a time. It is often suggested that the accommodation should be provided for them in the form of caravans which are moved off the land at periods when the seasonal workers are absent. This is not a satisfactory means of provision both because of the need to be constantly moving the caravans but also because it does not necessarily provide the proper standard of accommodation to which the workers are entitled. It is suggested that there needs
to be a positive policy on the provision of accommodation for these workers in Policy DC5.

vi) Housing in clusters should deliver local need housing and retain and add to the local distinctiveness.

vii) Clusters must be commensurate to the general character and appearance of an area.

**SCDC response**

7.284 The Parish Councils will have an opportunity to express their views on a case by case basis.

7.285 There are many clusters of settlements throughout the District and there has to be some control if the character of the countryside is not to be eroded by the cumulative impact of development within such clusters. In addition, the relevance of climate change and sustainable development as material considerations has increased. The amount of development will be restricted to infilling by a single or pair of semi-detached dwellings only and within the cluster. This should prevent any ribbon development emerging from the cluster.

7.286 To clarify where the clusters fit within the settlement hierarchy, the title of the policy could be amended to ‘Housing in clusters in the countryside’.

7.287 This policy relates to permanent housing and is not aimed at accommodating caravans. Such accommodation for seasonal vegetable workers would be considered on a case-by-case basis using the criteria in the policies on caravans. Exceptions could be made where justified but the Council would need to be satisfied that other options have been explored eg a private bus service for workers.

**The Way Forward**

7.288 Amend title to ‘Housing in Clusters in the Countryside’

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**DC6 – Houses in Multiple Occupation**

**Main Issues Raised**

7.289 Few comments were submitted. One issue raised was that policy DC6 should refer to the undesirable potential loss of front gardens for parking.

**SCDC Response**

7.290 The comment is noted. In sensitive locations, such as within a Conservation Area or within the curtilage of a listed building, a higher standard of design and layout for parking will be required. Such locations are protected under national planning policy. Outside these areas a proposal will have to satisfy Policy DC23 Design Aesthetics.

**The Way Forward**

7.291 No change.

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**DC7 – Residential Annexes**

**Main Issues Raised**

7.292 The main issues raised include:
i) While Policy DC7 is broadly welcomed, especially the restriction to prevent future use as a separate dwelling, it is difficult to reconcile this with the acceptance of new building within the curtilage, which seems identical to Infilling and backland development (see DC8). The option to restrict to conversion or extension would appear to be preferable.

ii) Policy DC7 is an interesting solution to an increasing problem of care of elderly family members.

iii) Residential annexes for elderly, disabled etc are acceptable providing they are an annex to the existing or original dwelling. They must be attached or incorporated and have their access via the existing dwelling.

SCDC Response

7.293 The comments are noted. The option to restrict development to an extension to the main dwelling or the conversion of existing buildings only was considered. However, it does not permit flexibility to allow for situations where a new building would not have an adverse impact on residential and visual amenity.

The Way Forward

7.294 Retain the policy unchanged.

DC7 – Infilling and Backland Development

Main Issues Raised

7.295 The main issues raised include:

i) A sequential test approach for Policy DC8 might deliver better outcomes. At the very least, the draft policy should read ‘will only be permitted if’

ii) Reference should, in any event, be made in Policy DC8 to the impact of cumulative proposals and on local traffic.

iii) Private Green space must be preserved, when considering infill and backland development in cases where public open space is not present.

iv) Infilling and backland development should be closely monitored and controlled according to the needs and available facilities of the local area concerned.

v) It is agreed that the type of development covered under Policy DC8 accounts for a significant proportion of windfall residential development, particularly in towns. However, in villages, with tightly drawn physical limits boundaries, it is important to prevent cramped development, and to respect the character of the surrounding area. This is particularly so in villages where mid-twentieth century council (and other) council housing had traditionally very long gardens, which will become increasingly valuable again for vegetable growing.

vi) There is no indication in Policy DC8 of what represents a “reasonable size curtilage”.

SCDC Response

7.296 The comments are noted.

7.297 The wording of the policy requires an applicant to satisfy all the criteria. Highway safety is a material consideration and will therefore be taken into consideration.
7.298 In villages new development will have to have regard to the existing pattern of development which can vary. A reasonable size curtilage is not specifically defined in term of site area. It will depend on the size and type of dwelling and character of the immediate area. The impact on residential amenity will also, to some extent, influence the size and relationship of the curtilage to any existing and new dwelling.

**The Way Forward**

7.299 Retain the policy.

**DC9 – EXTENSIONS TO RESIDENTIAL CURTILAGES**

**Main Issues Raised**

7.300 Little comment received on this policy. The only issue emerging is that reference should be made in Policy DC9 (b) to retaining or enhancing local distinctiveness.

**SCDC Response**

7.301 The issue is covered by the other criteria in the policy and other policies.

**The Way Forward**

7.302 Retain the policy

**DC11 – PROTECTION OF EMPLOYMENT SITES**

**Main Issues Raised**

7.303 The main issues raised include:

i) While supporting the policy a further criterion is needed to ensure the sustainability or sustainable patterns of living of a community is not adversely affected by the proposal if approved.

Supporting comments:

ii) Retaining local employment is a critical part of keeping communities truly sustainable.

iii) Consideration should be given to applying it to employment sites where change of use to residential sites has been granted but not implemented (e.g. GAH site in Melton)

iv) This policy requires careful examination in the context of the encouragement in the document to utilise brownfield sites for residential development. Because of the importance of the protection of employment sites for the viability and vitality of the area, there should not be any substantial easing of the current protection of employment sites.

Objecting comments:

v) The policy is too restrictive and fails to recognise the importance of residential development to the local economy.

vi) It fails to consider whether the site remains appropriate for employment use or that residential development may, in planning terms, represent an appropriate and sustainable form of development.
vii) The word “excluding residential” should be deleted from paragraph (a) iii

viii) The final sentence of the policy should be deleted.

SCDC Response:

7.304 The issue of sustainability is addressed in other policies in the Core Strategy, principally SP1 – Sustainability, as well as in national planning policy.

7.305 Where consent has already been given on a site, it is not possible to deal with the application retrospectively. If, however, the consent has expired or not been started then if a new application is submitted after the adoption of this document, then it will be considered under the policies in this new document.

7.306 The Council will seek to carefully assess supporting information (i.e. marketing efforts). As the financial value of land for residential is greater than for other uses there is a need to make special policy provision to ensure the availability of employment sites in the immediate and long term. This is what this policy is trying to achieve.

7.307 Criterion (b) of this policy acknowledges that there may be a situation whereby there would be a substantial planning benefit where the intensification of use would make the resulting use no longer appropriate. In such cases, the policy does make some provision for residential development on such sites.

7.308 The support for this policy is noted.

The Way Forward

7.309 Retain the policy. Make specific reference to the need to agree with the planning authority the details of any marketing or other exercise that an applicant intends to carry out to support the application prior to the application being submitted.

7.310 Minor changes to clarify the policy.

DC12 – WAREHOUSING AND STORAGE

Main Issues Raised

7.311 The main general as opposed to site-specific issues raised include:

i) The reference to “locations well related to the primary route network” needs to be strengthened to take account of the specified issues

ii) This policy should be strengthened with positive action taken to relocate distribution centres / warehousing away from the B class road network to close proximity to the A class road network. The size and number of HGV’ using the B class network needs to be restricted.

iii) The AONB and the need to protect the landscape should be cited in this policy.

iv) The policy needs to make it very clear that only local distribution is acceptable on C class roads. Perhaps this policy could be extended to cover locations for the keeping of goods vehicles and trailers, licensed by the Traffic Commissioners.
SCDC Response

7.312 The access in and out of a particular site is a highway safety issue which is taken into account when considering a planning application and therefore does not need to be specifically mentioned in this policy.

7.313 Given the size and rural character of the District, it might not always be possible to restrict B8 uses to sites close to the A class road network, particularly where this might be linked to local agriculture. This policy makes it clear that such uses outside identified LDF sites and other sustainable locations will only be considered where it is required for local distribution.

7.314 The AONB is protected under national policy and need not be repeated in this policy.

The Way Forward

7.315 Minor changes to the policy, eg clarify that outside sites identified in the LDF, such uses will only be allowed in sustainable locations and locations where it is needed for local distribution purposes.

DC13 – EXPANSION AND INTENFICATION OF EMPLOYMENT SITES

Main Issues Raised

7.316 There was support for this policy. Other comments included:

i) Change the qualitative term ‘overriding’ in point (a) to a more quantifiable term such as ‘significant’ or ‘demonstrable’.
ii) Change the qualitative term ‘material’ in point (b) to a more quantifiable term such as ‘significant’ or ‘demonstrable’.
iii) The option to delete reference to measures to mitigate generated traffic movements should be rejected.
iv) The AONB and the need to protect the landscape should be cited in this policy.

SCDC Response

7.317 The words suggested to replace various existing words are not considered to be so different as to warrant making the changes.

7.318 The AONB is protected under national planning policy and need not be repeated within this policy.

7.319 The other points raised are noted.

The Way Forward

7.320 Add wording to emphasise the need to consider whether a more sustainable location would be appropriate.

DC14 – CONVERSION AND RE-USE OF REDUNDANT BUILDINGS IN THE COUNTRYSIDE

Main Issues Raised

7.321 Substantial comments received, from which the main issues raised include:

i) The policy context should include the Regional Spatial Strategy policies SS2 and E2 and PPS1.
ii) The wording should be clarified to make it clear that all the criteria must be satisfied

iii) Suggest changing in criterion (c) the qualitative term ‘materially’ with a quantitative term such as ‘significant’

iv) Suggest changing the wording in criterion (f) to ‘Applications structurally affecting buildings ..’ because if there were only aesthetic changes a full structural survey would not be required.

v) Clarification is required. Suggest changing the wording of the last sentence to ‘Where substantial reconstruction is necessary because of structural concerns ..’

vi) It is important to clarify whether or not proposals that seek to make the best use of a sound structure with external improvements such as re-cladding are captured by this policy.

vii) The option not to permit residential use (subject to safeguards outlined) should be rejected.

viii) This policy is too restrictive. In particular, paragraph (e) requires businesses to be “small” and “well related to sustainable settlements” may only frustrate development taking place that would benefit the local economy, sustain rural areas and conserve / preserve buildings that make a contribution to the character of the countryside

ix) Recommend a more sympathetic approach to residential conversions as they are less of a problem than businesses as they generate less traffic, noise etc.

x) This policy does not reflect Government policy as set out in PPS7 (paragraphs 17 – 20) which positively encourage the reuse and conversion of such buildings in the countryside.

xi) Paragraph (g) ignores the contribution that residential use can make to the sustainability of local rural communities. This narrow approach to sustainability was recently firmly criticized by the Taylor Report. The words “subject to it being well related to the higher hierarchy of settlements” should be deleted from paragraph (g)

xii) Not all redundant buildings in the countryside are suitable for conversion nor, in some cases, is retention desirable or in accordance with other objectives etc

xiii) Support this policy especially where survey work is required with adequate provision for any protected species.

xiv) Welcome this policy especially the reference to the ability of the local road network to accommodate the amount and type of traffic generated by the proposed use.

SCDC Response

7.322 The RSS policies referred to relate to town and other service centres as opposed to countryside locations.

7.323 The words suggested to replace various existing words are not considered to be so different as to warrant making the changes.

7.324 The comment on criteria (e) and (g) are noted and amendments could be considered.

7.325 The other comments are noted.

The Way Forward

7.326 The policy to be reworded

7.327 However, such rewording should be considered in the context of the current consultation document for a new national planning guidance on economic development, which includes a specific decision making policy for this type of development in the countryside.

DC15 – FARM DIVERSIFICATION
Main Issues Raised

7.328 The main issues raised include:

i) While there may be sites which may not be suitable in terms of highway matters, the planning gain that can be achieved by finding alternative uses for such sites is considerable and needs to be a policy consideration.

ii) Criterion (d) should be deleted as it will be a matter of fact whether residential accommodation is required for the particular farm diversification activity.

iii) This policy is welcomed particularly the reference to the new use and scale relating to the setting, traffic and living conditions of local residents.

iv) Reference should be made in this policy to the need to protect the AONB.

v) Reference should be made that proposals that involve a sustainable development, are commensurate with the character of the general area and are consistent with the larger rural economy.

SCDC Response

7.329 Criterion (d) provides clear guidance and deflects any assumption that residential development would be allowed as a matter of course. This criterion does not rule out residential use entirely given that it refers to other policies which explain the circumstances by which such development would be allowed as part of a farm diversification scheme.

7.330 The other points raised are covered under other policies and / or noted.

The Way Forward

7.331 Retain without change.

DC16 – LARGE AGRICULTURAL BUILDINGS AND STRUCTURES

Main Issues Raised

7.332 The main issues raised include:

i) The policy is too restrictive and expressed in a way that presumes against large agricultural buildings and structures in the countryside. It is contrary to PPS7 and the sustainability of the countryside. Criteria (a) displays little regard to the efficient operation of the agricultural sector which is at the heart of the rural economy. It is impractical to force such agricultural development to General Employment Areas or existing employment sites in defined settlements.

ii) This policy needs to reflect permitted development rights for agriculture and guidance in PPS7.

iii) Traditionally agricultural buildings have been located in the countryside on farms where they are needed. It is suggested that it will be fairly rare for a site to be found which is not affected by the three exceptions listed of non-viability, non-viable location and greater visual/traffic generating impact. Could this paragraph not be worded rather more positively so as to encourage agricultural buildings where these are required?

iv) Paragraph (c) seems to rule out the possibility of agricultural buildings in areas of the district where the primary road network is absent. Is this sensible?

v) Requirements that agricultural buildings of any type be related to “the agricultural unit on which it is grown” appear outdated. Particularly in the eastern half of the district on lighter soils farming is largely organised within groups of farms which are independently owned but which combine, in one way or another, to form the larger unit necessary unit necessary for the effective large scale growing of crops, particularly vegetables.
vi) Support the reference to the AONB
vii) Suggested changes to individual words and phrases within the criteria

SCDC Response

7.333 It is recognised that PPS7 and the draft PPS4 require LDF polices to be more supportive rather than restrictive in approach. However, a balance has to be struck between the protection of the countryside for its own sake and the needs of agriculture. In respect of large buildings that do not have to be located close to agricultural production, these should be situated within more appropriate and accessible locations.

7.334 However, given the size and rural nature of the District, it is not always possible to locate buildings close to the primary road networks. The responses received highlight current agricultural practices where buildings serve many farm units and not just one. While being in sustainable locations for the first stage of the distribution process, journey distances from the buildings to the retailers will involve further distances. A balance needs to be achieved to ensure that the size of the distribution activities have regard to the ability of the local road network to accommodate large transport vehicles. Criterion (e) needs to be amended to reflect this.

7.335 The words suggested to replace various existing words are not considered to be so different as to warrant making the changes. The reference to existing permitted development rights could be referred to in the justification.

7.336 The other points raised are noted.

The Way Forward

7.337 Change first sentence to emphasise the support rather than the restrictive approach to new agricultural development in the countryside. Amend criterion (e) to reflect current agricultural practices where a building may serve a number of farms in an area and not just one.

DC17 – FARM SHOPS

Main Issues Raised

7.338 This policy is generally welcomed. One issue emerging is that retail sales should not be restricted to food. Many farm shops provide the only outlet for small local producers of non-food goods such as greetings cards and toiletries. Such outlets are a cost-effective means of supporting the rural economy.

SCDC Response

7.339 The concern is addressed in the policy.

The Way Forward

7.340 No change.

DC18 – TOURING CARAVANS AND CAMPING SITES

Main Issues Raised

7.341 The main issues raised include:

i) Support the reference to the AONB.
ii) It is understood that criterion (d) which states “there are services available” includes the provision of mains water and adequate sewage / waste disposal. This requires clarification.

iii) It is the council’s current practice to allow for continuous occupation for up to 56 days for holiday lets. This has been supported on appeal by an inspector and is in accordance with the Government publication ‘The Good Practice Guide on Planning for Tourism’.

SCDC Response

7.342 The comment on criterion (d) is noted.

7.343 The Government publication ‘The Good Practice Guide on Planning for Tourism’, advises that local planning authorities should frame conditions according to local circumstances and they should be reasonable and fair. Amending the time period to align with current practice of 56 days could be considered.

The Way Forward

7.344 Minor amendments to the policy.

DC19 – STATIC HOLIDAY CARAVANS, CABINS AND CHALETS

Main Issues Raised

7.345 The main issues raised include:

i) The term ‘materially’ is qualitative in nature and therefore ambiguous, particularly when the trend is moving towards criteria based policies relying on quantitative assessment, which benefit from robust and defensible methodologies. Replacing ‘materially’ with a term such as ‘significant’ allows for the assessment of development proposals against qualitative landscape capacity appraisal, which is more transparent and robust basis for decision making, thus bringing policy DC19 in line with regional policy on landscape conservation.

ii) Where cabins and chalets are proposed safeguards need to be implemented to stop these developments being used to bypass development in the countryside with cabins being sold off as second homes.

iii) Policy DC19 conflicts with government guidelines that require sites for cabins etc to be accessible by public transport.

iv) It is the council’s current practice to allow for continuous occupation for up to 56 days occupation for holiday lets. This has been supported on appeal by an inspector and is in accordance with the Government publication ‘The Good Practice Guide on Planning for Tourism’.

v) Object to the option to restrict the scale of new sites and number of units to 12, as it should be considered as part of a landscape capacity appraisal.

vi) Under the policy context there should be reference to the RSS policy ENV2 (Landscape Conservation)

vii) Support the reference to the AONB

viii) A criterion on flood risk would be appropriate

SCDC Response

7.346 Unless the term ‘significant’ is defined then it does not achieve any greater clarity then using the term’ material’.

7.347 The current standard condition applied by the Council requires the owners/operators of the holiday units to maintain an up-to-date register of all lettings, which should include the names and addresses of all persons occupying the units during each individual letting. This register has to be available at all reasonable times to the local planning authority.
7.348 While access to public transport is encouraged, given the nature of the use the occupants are more likely to have their own transport. They may also bring bicycles or the operators may rent them to the occupants.

7.349 The Council’s current practice is to allow occupancy for up to a maximum of 56 days. This is in accordance with the Government publication ‘The Good Practice Guide on Planning for Tourism’. Advises that local planning authorities should frame conditions according to local circumstances and they should be reasonable and fair. Specific reference should be made to this time period in the policy.

7.350 The other points raised are noted.

**The Way Forward**

7.351 Minor amendments to the policy.

### DC20 – PARKING STANDARDS

**Main Issues Raised**

7.352 The main issues raised include:

i) There is too little emphasis on public transport and the encouragement of residents to use it.

ii) Reference should be made in this section to the provision of parking at transport interchanges and in particular railway stations (see SP14) to encourage the use of bus, coach and in particular, rail transport.

iii) The reference to developer contributions should be strengthened from "might" to "will".

iv) Without knowing the contents of the proposed Supplementary Planning Document, it is impossible to make informed comment especially as there is no reference to a parking SPD in the LDF timetable adopted in 2007.

v) The linking of parking standards to accessibility levels is supported and it should be noted that many other authorities have introduced such a policy, e.g. Milton Keynes, Fareham. Accessibility maps should be produced so that developers could see clearly which accessibility level their development falls in and look up the standard accordingly. Computer software is available to easily map the accessibility of different locations and produce different accessibility bands, in which different parking standards may apply.

vi) Parking standards should be expressed as a maximum allowing the developer the flexibility in the level of parking provided, subject to satisfactorily demonstrating that demand and supply are at a balance. This would encourage developers to implement travel plans that encourage travel by sustainable modes, thereby reducing parking requirements, and allowing more efficient use of land.

**SCDC Response**

7.353 The Council hopes that, by not requiring a minimum standard for parking, it will encourage developers and ultimately future occupants or users of any development approved to use public transport where it is available.

7.354 The Council will work with Suffolk County Council, as the highways authority, to make provision for parking at transport interchanges and promote the use of public transport. This is set out in policy SP14 – Accessibility.

7.355 The other points raised are noted.
The Way Forward

7.356 No change to the policy

DC21 – TRAVEL PLANS

Main Issues Raised

7.357 The main issues raised include:

i) The policy does not sufficiently define thresholds for which Travel Plans will be required or the scope of what the travel Plan will need to cover.

ii) Although welcomed the policy should include a rather more definite requirement for developer contributions (commensurate with the scale of development) and measures designed to bring about implementation of the Green Travel Plan within a defined period of time.

SCDC Response

7.358 The policy does clarify when green plans are required.

7.359 The other comment made is noted.

The Way Forward

7.360 Retain the policy without any changes.

DC22 – AIRFIELDS

Main Issues Raised

7.361 The main issues raised include:

i) Question the need for this policy in the open countryside.

ii) The policy does not appear to deal with the equally important issue of existing redundant airfields.

iii) Given that at present Suffolk has no licensed airfields the policy on airfields should be rewritten to provide greater support for and fewer obstacles to proposals to develop new or existing sites. Sections (a) and (d) contain conflicting requirements in that residential areas are closely related to public transport links.

7.362 The Highway Authority supports this policy.

SCDC Response

7.363 Questioning the need for the policy is valid given the need to reduce the overall number of policies and not include policies on specific subjects for their own sake, particularly if the issues are covered elsewhere. The criteria within the policy are, indeed, contained elsewhere and proposals could be considered on their individual merits and against the other policies.

The Way Forward

7.364 Delete the policy.
**DC23 – DESIGN: AESTHETICS**

**Main Issues Raised**

7.365 There was considerable support for this policy. Minor comments related to such issues as:

i) There should be specific reference to AONB and other designated areas.

ii) The policy should encourage contemporary and innovative design.

iii) Criterion (b) is too prescriptive and suggests the phrase ‘should encourage’ instead of ‘should create’.

iv) The rear elevations are equally as important as at times they can be seen from the street scene and residential amenity is also an issue.

v) Paragraphs (c) and (d) are too restrictive and should acknowledge that there will always be exceptions.

vi) Suggest it would be improved if reference is made within it to retaining and enhancing local distinctiveness.

**SCDC Response**

7.366 This policy does require development to have regard to the character of an area; this would include its local distinctiveness. However, good contemporary design, which does not relate directly to the local distinctiveness, can also make a positive contribution to the area.

7.367 The AONB is protected under national planning policy and need not be repeated within this policy.

7.368 The other points raised are noted.

**The Way Forward**

7.369 Minor changes to the policy.

**DC24– DESIGN: FUNCTION**

**Main Issues Raised**

7.370 The main issues raised include:

i) Should there be a reference in the supporting text to the Code for Sustainable Homes? Ideally developers should be aiming to reach code 3 pending an update to the building regulations.

ii) It is not apparent whether the reference to permeable soakaways should be taken to include sustainable drainage systems (SUDS). Contrary to popular misconceptions there are a range of SUDS techniques for most ground conditions. The Environmental Agency suggests the following wording: ‘The use of Sustainable Drainage Systems for dealing with surface water run-off from new developments will be required, unless, following an adequate assessment, soil conditions and/or engineering feasibility dictates otherwise’.

iii) DC24 should be combined with DC23 as design needs to be addressed holistically.

iv) Criterion (b) should be clearer as to what the ‘etc’ includes.

**SCDC Response**

7.371 The Setting levels of building performance under The Code for Sustainable Homes was considered as an option for Policy DC25 – Sustainable Construction but was not applied as the Government does not want duplicative regulations and policies, especially between planning policy, Building Regulations and the use of the Code.
7.372 The other points raised are noted.

The Way Forward

7.373 Minor changes in the interests of clarity.

DC25 – SUSTAINABLE CONSTRUCTION

Main Issues Raised

7.374 The majority of comments were provided from Suffolk County Council. Most relate to SP28 and DC25 and include:

i) The policy needs to specifically highlight sustainable construction methods.
ii) The links between SP28 and DC25 should be more explicit, or the policies combined.
iii) The policy should be requiring a minimum standard of construction quality – for example Code for Sustainable Homes Level 4.
iv) The policy should take into consideration the need to retain development viability in sites. If total developer requirements are too onerous, then development will be stifled.
v) The policy should be extended to include the issues of resource efficiency (water, waste etc) in addition to energy efficiency.
vi) Consideration should be given towards the production of a climate-sensitive development checklist.
vii) The relevant thresholds and subsequent renewable energy requirements for new development are too weak and should be extended.
viii) The policy should go further to deal with criteria for renewable energy schemes in nationally designated areas.
ix) The Council may wish to consider the potential for allocating suitable areas for renewable and low-carbon energy sources.
x) The Council should consider greater flexibility in the policy to allow for off-site renewable energy provisions where a scheme it can be demonstrated to be not viable or feasible on site.
xi) In order to maximise sustainable construction techniques and investments the policy could also seek reductions in estimated CO$^2$ emissions and consider the use of a Carbon Offset Fund contribution scheme, used to generate renewable energy projects off-site.

SCDC Response

7.375 The comments are noted and recognised. However, it would be unduly prescriptive of the Council to state which sustainable construction techniques should be required as developments will vary in appropriateness on a site by site basis. Such a policy would be likely to cause a lack of creativity and innovation in design for developments.

7.376 Support is acknowledged for the Code for Sustainable Homes building standards which includes addressing all forms of resource efficiency measures in housing. The Council is aware that viability is a factor and that development schemes may be delayed due to these considerations. However, the Council has evidence from the Ipswich, Babergh, Mid-Suffolk & Suffolk Coastal: Affordable Housing Site Viability Study – April 2009 which demonstrates site viability based on the application of Code level 3 and also including 33% affordable housing requirements. In exceptional cases, there may be particular difficulties in progressing a site with very high environmental standards while the relevant industry establishes a larger grounding and the Council may consider negotiating on building performance levels.

7.377 Renewable energy schemes in nationally designated areas will be considered on their merits in accordance with established national, regional and local policy.
7.378 The potential allocation of any land for renewable or low-carbon energy sources will be a matter for the Site Specific Allocations & Policies document in due course.

7.379 The requirement for improved environmental building standards and renewable or low-carbon energy sources will be expected to make a significant contribution to reducing predicted and actual CO2 emissions. Further work, for example viability, would need to be considered in relation to the feasibility of a Carbon Offset Fund scheme.

**The Way Forward**

7.380 Retain the policy with minor amendments.

**DC26 – ART**

**Main Issues Raised**

7.381 The policy has been generally welcomed.

**SCDC Response**

7.382 The response is noted. However, some minor changes to the text might aid clarity.

**The Way Forward**

7.383 Minor changes, including the addition of a footnote to define “major development” - residential development of 10 or more dwellings and for other developments where the floor area to be built is 1000m² gross or more.

**DC27 – RESIDENTIAL AMENITY**

**Main Issues Raised**

7.384 General support.

**SCDC Response**

7.385 Noted. However, a slight rephrasing in order to make the policy positive in tone would accord with national guidelines on policy drafting.

**The Way Forward**

7.386 Minor rewording.

**DC28 – SHOP FRONTS**

**Main Issues Raised**

7.387 There was general support for this policy with one suggestion calling for a change of one word.

**SCDC Response**

7.388 The response is noted.

**The Way Forward**
7.389 Given the emphasis placed by the Government Office on reducing the overall number of policies it is felt that Supplementary Planning Guidance and the design policies, along with national guidance, sufficiently address the issues.

7.390 Delete this policy.

**DC29 – ADVERTISEMENTS**

**Main Issues Raised**

7.391 The policy is broadly welcomed.

**SCDC Response**

7.392 The comments are noted.

**The Way Forward**

7.393 Given the emphasis placed by the Government Office on reducing the overall number of policies, an examination of the need for the policy has taken place. The Advertisement Regulations make it clear that advertisements are subject to control only in the interests of ‘amenity’ and ‘public safety’. PPG19 together with generic LDF design policies provide the necessary policy framework against which to assess advert applications. Supplementary Planning Guidance will be able to address the issue of distinctiveness and cover the different types of signs. For these reasons, a specific LDF policy on adverts is therefore not essential.

7.394 Delete the policy.

**DC30 – LIGHTING**

**Main Issues Raised**

7.395 This policy was broadly welcomed. There was particular support for the reference to minimising pollution of areas of nature conservation importance from glare.

**SCDC Response**

7.396 The comments are noted.

**The Way Forward**

7.397 It is considered that further clarification is required as to what technical information needs to be submitted with an application. The following sentence should be inserted after the second sentence: ‘It should include position, height, aiming points, lighting levels and a polar luminance diagram’.

**DC31 – BIODIVERSITY AND GEODIVERSITY**

**Main Issues Raised**

7.398 General support for inclusion of a policy on these subjects. The main issues raised include:

i) Suffolk Coast and Heaths AONB Project strongly recommend that this be extended to include landscape character to link with SP27 and that mention be
made of the protected status of the AONB landscape. Failing that, an additional environmental policy should be added for landscape character.

ii) The Suffolk Wildlife Trust suggests the policy is expanded to include a requirement for ecological surveys to access ecological interest, as well as for the effectiveness of mitigation.

iii) Recommend The Suffolk Geodiversity Action Plan is included in the evidence base.

iv) Environmental Agency (EA) is not convinced that the Council has taken on board the thrust of Paragraph 4.43 in Planning for Biodiversity and Geological Conservation – A Guide to Good Practice’, which supports PPS9. It states that planning authorities should develop guidelines for protecting and enhancing population of protected species to assist in determining the location and design of development.

v) The EA is of the view that given the rich spread of biodiversity and Geodiversity across the District, there may be merit in producing a Supplementary Planning Document on Biodiversity which would be aimed at describing and setting out the role that the planning process can play in protecting and enhancing the areas natural resources.

vi) A number of suggestions on how the wording could be improved.

SCDC Response

7.399 If issues are covered under other policies or national guidance it is not necessary to repeat them in this policy.

7.400 Where there are concerns about the impact on habitats and species, the onus will be on the applicant to provide evidence to support his application, which will normally include ecological surveys.

7.401 The reference to ‘geological features’ is covered under SP26 - Biodiversity and Geodiversity. The Council will investigate the possibility of producing a SPD on biodiversity and Geodiversity.

7.402 Amendments can be made to the text where appropriate.

The Way Forward

7.403 Minor changes to the policy. Consider the benefits of Supplementary Planning Guidance.

DC32 – FLOOD RISK

Main Issues Raised

7.404 The main issues raised include:

i) The Environment Agency (EA) supports this policy but does not entirely agree with the wording as the first paragraph appears to state that a development proposal needs only to satisfy the sequential test requirements under PPS25. Qualification of the requirement is then provided under the subsequent paragraphs dealing with affordable housing and open market housing respectively. Although more than a matter of presentation can the reference to passing the Exception Test be dealt with within the first paragraph rather than be repeated further on in the policy wording?

ii) The EA would prefer to see the supporting text make it clear that in the first instance development should be steered away from the medium to high risk flood areas. There is reference in the policy to wording to Flood Zones but no mention of the Environment Agency Flood Maps. They consider that the supporting text should make reference to the Flood Maps.
iii) This policy should include a reference that there should not be development in a flood plain without an escape access to a first floor.

iv) It is neither equitable nor ethical to use a Flood Zone as an exceptional site for affordable housing if it is not suitable for open market housing development.

v) This policy should be modified positively to positively encourage regardless of the flood zone designation, a mix of non residential and residential on Brownfield sites in town centres and edge of town sites that are in (or adjacent to) Conservation Areas, provided the developer delivers wider benefits, and the scheme incorporates mitigation to ensure no net increase in flood risk. In doing so it would recognise the benefits that development in such sustainable locations have in helping to sustain the viability of the area, preventing Brownfield sites in such areas being left undeveloped and impacting on the appearance of the Conservation Areas.

vi) Make reference to paragraph 4.36 of PPS25 Practice Guide that makes it clear that the consideration of alternative sites is not likely to be a realistic option where an individual proposes to redevelop their property in an existing flood risk area. The policy should acknowledge in such cases that the applicant will need to show that the development has been “made safe through design and flood resistant and resilient construction and that it does not increase flood risk elsewhere”.

vii) Delete policy and replace it with: ‘There shall be no development permitted in areas at flood risk’. The institute of mechanical Engineers recently issued a report “Climate Change Adapting to the Inevitable”. It emphasises the risks facing us where development in flood risk increases the population numbers and makes rescue more difficult thus endangering lives.

viii) Consideration should be given to refusing all applications for development in Flood Zone 3b.

ix) The adopted Suffolk Coastal Strategic Flood Risk Assessment will play an important role in the consideration of development proposals in the flood plain, particularly in the context of climate change.

**SCDC Response**

7.405 Ideally, new development or intensification of existing development should be located in areas at least risk from flooding. This is national policy and it is not necessary to repeat it, an objective of many of the submitting comments.

7.406 In respect of affordable housing, the positive benefits have to be weighted against flooding. Only in exceptional circumstances would development be permitted, such circumstances being within communities where there are no other opportunities to create affordable housing whether for rent or shared ownership. In any event the applicant will have to show, by submitting a flood risk analysis, that there is no risk to life.

7.407 Paragraph 4.36 of PPS25 Practice guide states that where an individual has property within a flood risk area he will need to show how the development passes the exception test. This could be achieved by submitting a flood risk assessment. As this is set out in PPG25, it is not necessary to repeat it in this policy.

7.408 The other points raised are noted.

**The Way Forward**

7.409 Retain the policy with minor changes.

**DC33- TELECOMMUNICATIONS**

**Main Issues Raised**

7.410 This policy is broadly welcomed.
The Mobile Operators Association, which represents five mobile operators, support this policy which they consider to be an alignment with PPG8 in that they positively support network rollout whilst safeguarding the environment.

SCDC Response

The comment is noted.

The Way Forward

Retain the policy unchanged.

DC34 – KEY FACILITIES

Main Issues Raised

The policy is very much welcomed in its entirety and issues raised include:

i) Cemeteries are key community facilities. Existing cemeteries are almost full but no provision has been made for new or extensions.
ii) A paragraph stating that allotments will be protected or replaced without detriment to the plot holders should be added.
iii) It should be made clear that the applicant has carried out suitable research and marketing and evidence should be provided for this.
iv) The policy should spell out the need for liaison with the local community over the retention of facilities.

SCDC Response

The issues raised do not require a change to the policy itself and can be addressed in the supporting text.

The Way Forward

Retain the policy unchanged.

DC35 – PUBLIC BUILDINGS

Main Issues Raised

The policy is broadly welcomed and issues raised include:

i) The policy should include the likely effect on residential amenity.
ii) The District Council can very often play an important role in retaining the community use if possible, by working with the owners of the redundant public buildings who have a duty in law to obtain the best price for the building.

SCDC Response

The comments are noted.

The Way Forward

Retain the policy. However, consider an amendment to give emphasis to the importance of considering a recreation or community use as a priority before residential and commercial uses.
DC36 – SPORT AND PLAY

Main Issues Raised

7.420 The main issues raised include:

i) Woodbridge Football Club comments: when considering the possibility of providing an equivalent facility to replace the existing one, it would be essential to take into account the needs of the current users. A football club, for example, would need to satisfy the requirements of the FA, and in order that the Club could continue to provide for existing users and cater for further demand a site within the town could be essential.

ii) The evidence base (i.e. the open space assessment) should be cited.

iii) Existing sports facilities and playing space should be robustly defended against loss.

iv) There should be a cross reference in this policy to the Parish Play Space Schedule.

SCDC Response

7.421 The points raised are noted.

The Way Forward

7.422 Minor changes for clarification purposes.

DC37 – ALLOTMENTS

Main Issues Raised

7.423 The main issue raised relates to the provision of allotments, whether it be protecting existing ones or providing new facilities. Supporters of allotments comment that:

i) The social spectrum of plot holders is wide with all ages from teenagers and young parents, upwards.

ii) The demand is unquestionable as demonstrated by long waiting lists. Particular need is identified in Felixstowe, Kesgrave and Martlesham.

iii) Felixstowe and District Allotment Association states that there will be a need for nearly 4 hectares of new allotment land as it is a statutory right of inhabitants to demand a plot, and a statutory duty on the lowest level of Government i.e. Town and Parish Councils to provide, with statutory powers to acquire land for the purpose. The Allotment Associations in Felixstowe and Martlesham are concerned at the lack of future provision of land for allotments and refer to the long waiting lists.

iv) The Council is not being active in the provision of new allotments

SCDC Response

7.424 The District Council will consider sites put forward by local communities as part of the preparation of the ‘Site Specific Allocations and Policies’ document.

7.425 The other comments are noted.

The Way Forward

7.426 Retain the policy with minor amendments to aid clarity.
8.01 The Housing Distribution – Updated Preferred Option 7/09 document was published for public consultation for a period of 8 weeks between 23rd September 2009 and 18th November 2009. The document was a specific targeted consultation based upon a revised housing distribution from the previous Preferred Options document. The document also contained further information in relation to potential infrastructure requirements in the major centre areas of the IPA and FP.

8.02 During the consultation period, the Council also arranged for some additional LDF exhibitions which were open to the public. The exhibitions took place in Martlesham and Felixstowe areas as these areas were identified as the major centres where the most change was proposed/expected. Material presented at the exhibitions covered the LDF background, further detail on the housing distribution proposals and detail relating to strategic infrastructure requirements in the major centres. Council officers were present to answer questions.

8.03 Comments were invited via post, and electronic communications from the specific and general consultation bodies and key stakeholders as identified in Appendix A as well as those additional organisations and individuals who had requested to be added to the Council’s LDF consultation database. The consultation responses were collected and analysed by the Council before being presented to committee for decisions on any policy changes. A summary of the main comments and responses can be found below. Full consultation transcripts can be viewed on the Council website at www.suffolkcoastal.gov.uk

[as presented and debated at committee: CPP 21st January 2010 – Appendix 5, CAB 24th February 2010 – Appendix 4, CL 18th March 2010. Topics covered Housing Numbers, Housing Distribution and Infrastructure requirements].

Main issues raised

8.04 The main issues raised at this consultation were as follows:

General:

ALL AREAS – GENERAL ISSUES

The Consultation Process

8.05 Comments:

i) The time to respond was too short,
ii) The ‘drop-in’ sessions were insufficient,
iii) No maps were displayed,
iv) There should have been public meetings.

8.06 SCDC Response 1: These comments are noted. Eight weeks is longer than the minimum required for this type of consultation. Early warning that the consultation was due to take place during September was provided to all parish and town councils immediately following the Cabinet meeting in July.
8.07 A significant number of people did attend each ‘drop-in’ and this number compared favourably to other LDF sessions run previously. With regard to information on display, this was limited due to the nature of the consultation. A number of people were under the misapprehension that what would be on show would be actual sites. This was not the purpose of the consultation at this stage.

8.08 The reason for holding “drop-in” sessions as opposed to public meetings was to attract a wider range of people and particularly those who would not feel comfortable in a public meeting environment. The view was also taken that town and parish council meetings would provide a further opportunity for people to express their views locally.

Base data

8.09 Comments:

i) The base information is out of date.

8.10 SCDC Response 2: The base date for the housing figures in the consultation document was deliberately kept at 31st March 2008. This was to enable people to make a straight comparison with housing information provided as part of the previous consultation that took place over the winter 2008.

8.11 The Core Strategy will be revised to contain housing figures based on the position on the 31st March 2009 and with an end date of 2026.

ALL AREAS – HOUSING NUMBERS AND DISTRIBUTION

Numbers of Houses

8.12 Comments:

i) The numbers proposed are unjustified

ii) The Council should not accept government proposals for the district

8.13 SCDC Response 3: The amount of new housing to be provided across the District between 2001 and 2021 is set out in the Regional Spatial Strategy – the East of England Plan, adopted in May 2008. This is set at 3200 for that part of the district within the Ipswich Policy Area and 7000 dwellings for the rest of the district for the period to 2021. These figures are minimums and the Council has no choice but to provide them.

8.14 In addition, the government through Planning Policy Statement 3 Housing requires Local Planning Authorities to identify in their LDF’s a 15 year housing land supply from the expected date of adoption of the plan. With the additional round of consultation which has just taken place, the anticipated adoption date for the Core Strategy has now moved to 2011, therefore the end date of the plan will now be 2026.

8.15 In order to arrive at the housing requirement post 2021, government advice is that the annual housing requirement should be added to that total figure. For Suffolk Coastal this amounts to an additional 510 per year.

8.16 If the Council did not accept government proposals for the district, an Inspector would find the plan ‘unsound’. This could lead to speculative planning applications which the Council would then struggle to resist.

Distribution of Houses

8.17 Comments:

i) the housing should be more evenly distributed across the district,

ii) there should be a wider distribution across the whole of Suffolk,
iii) more development should be directed to the market towns and smaller villages to secure their long-term viability,
iv) support from some rural communities that the numbers are acceptable,
v) some additional housing could be allocated around Saxmundham and Leiston in association with any new Sizewell C development

8.18 SCDC Response 4: The housing numbers that the Council is required to provide are set out in the Regional Spatial Strategy (RSS). Other Councils have housing requirements that need to be met. Within Suffolk Coastal, the RSS housing requirement is split between the Ipswich Policy Area and the remainder of the district. This is the minimum number of houses that the Council is required to provide.

8.19 Beyond this broad split it is for the Council to decide how housing development is to be dispersed across the district. The latest proposed strategy has evolved over time and reflects the very different circumstances of the individual settlements and areas across the district (as reflected in the individual strategies formulated for each market town) and has regard to individual community plans. Throughout the Core Strategy preparation process, a number of different housing distribution options have been considered, and consulted upon to arrive at the latest housing distribution to be consulted upon. The Housing Distribution: Updated Preferred Option 7/09 does propose a dispersed distribution, but one that is in accordance with the principles of sustainability, and is in accordance with an agreed Settlement Hierarchy that directs development to the larger settlements. It also reflects generally the current distribution of the housing stock across the district. This distribution is confirmed as being in conformity with the RSS and follows more general national planning policy advice.

8.20 There are a number of policies suggested in the development management policies that provide flexibility to ensure that rural communities can have the right level of development commensurate with their size, to ensure that these villages and small settlements continue to thrive and support existing service provision. Further opportunities may occur when individual village envelopes are reviewed in consultation with local communities.

The Review of the Regional Spatial Strategy (RSS)

8.21 Comments:

i) What is the relevance of the RSS review and the fact that additional numbers of houses are being discussed?

8.22 SCDC Response 5: the RSS review has no bearing on the current discussion on housing distribution. The figures under discussion relate to the current adopted RSS East of England Plan. When the Core Strategy is reviewed it will take account of any revised housing requirements in the RSS.

Five Year Land Supply of Housing

8.23 Comments:

i) The Council does not have the evidence to demonstrate the availability of sites,
ii) There is no published Strategic Housing Land Availability Assessment (SHLAA).

8.24 SCDC Response 6: Local Planning Authorities through their LDF’s are required to demonstrate a 15 year housing land supply from the expected date of adoption of the plan. They should identify sufficient, specific, deliverable sites to provide the first five years of housing provision.

8.25 For Suffolk Coastal, looking forward to 2015 there are adequate sites considered to be sufficiently well advanced as to have a reasonable chance of coming forward if the Core Strategy justifies the location. The Five Year Housing Land Supply Assessment
published in December 2009 shows the Council to have a District wide supply of 6.9 years, therefore exceeding the minimum 5 year requirement. However, with the adoption of the Core Strategy not due until early 2011 it is essential that its progress is not delayed thereby ensuring that the Site Specific Allocations development plan document can follow shortly after and housing provision can be made up through properly identified and planned housing allocations.

8.26 However, there are sites that have been assessed in terms of their compliance with the draft Core Strategy and in terms of physical and other known constraints. They are identified as such in the Councils (currently) draft Strategic Housing Land Availability Assessment. A number of respondents have commented on the fact that the council does not have a published SHLAA. The information on which it draws is however publicly available. It is, nonetheless, advanced and due for publication and its current absence should not be taken as an indication that early planning decisions on unallocated sites should be taken. Early release of speculative sites could prejudice the overall strategy for the district and more particularly for individual areas.

The Balance Between Housing and Employment

8.27 Comments:

i) Employment numbers generally are reducing due to the recession, home working etc reducing the need for houses,
ii) A reduction in employment at the Port should mean a reduction in the amount of housing at Felixstowe,
iii) The creation of a ‘Growth Point’ should not simply be based on the presence of the Port,
iv) BT is reducing employees, therefore increased housing numbers are not justified.

8.28 SCDC Response 7: With regard to the rural economy, new housing is promoted at those settlements considered most sustainable, i.e. the market towns and the key and local service centres. These are the settlements that already have a range of facilities, where investment is sought in relation to public transport through the identification of key transport links; and where service providers will be encouraged to continue to invest and to concentrate provision.

8.29 With regard to the approaches to East of Ipswich and Felixstowe/Trimleys, both areas are linked to strategic employment sites. With regard to Felixstowe, the strategic objective is for regeneration of the town and for a diversification of the local economy to lessen the reliance on the Port. The scale of new housing proposed is commensurate with this objective, providing for more than locally generated needs and enabling the opportunity for people who currently commute into the town to live closer to their work, thereby lessening the impact on the strategic road network.

8.30 With regard to East of Ipswich the proposed housing is linked to a strategic employment site. Within it BT is a major employer but there are a wider range of businesses operating within this area. BT is also an anchor for attracting other ICT related employment.

ALL AREAS – SUSTAINABILITY APPRAISAL

The Sustainability Appraisal (SA) Methodology

8.31 Comments:

i) Challenges to the methodology and outputs associated with the Sustainability Appraisal (SA) of the Core Strategy & Development Management Policies.
ii) Many public objections in particular were in relation to the assessment under-representing the possible environmental impacts which may occur from development.
iii) Greater mitigation and provision needs to be given towards greenspace provision – and access to it – in order to suitably minimise or avoid any perceived adverse affects of the Core Strategy.

iv) The SA should be updated to reflect the findings of the Water Cycle Study in terms of assessments consistent with SA Objective 10 – water quality.

8.32 SCDC Response 8: The SA was undertaken independently by officers at Suffolk County Council in conformity with the requirements of the Planning & Compulsory Purchase Act, 2004 and using national Government guidance on undertaking SA reports.

8.33 The SA process has been used to inform the planning policy decision making process for the Core Strategy and predict and analyse the potential impact of alternative policy options. It does not determine or define the policy as some respondents assume. As stated in national Government Guidance:

“It is not the role of the SA to determine the option(s) to be chosen as the basis for the preferred options and the draft plan. This is the role of those who have to decide which strategy is appropriate. The role of the SA is to assist with the identification of the appropriate options, by highlighting the sustainability implications of each…”

8.34 Sustainability appraisal is not concerned solely with the environment. It has regard to economic and social matters as well. The Council is satisfied that it has been carried out on an objective basis having regard to all the relevant considerations and utilising all the data available. The methodology for undertaking the SA has been consistent with Government national guidance and best practice. To weight the findings in favour of the environment would not represent an objective appraisal.

Appropriate Assessment (AA)

8.35 Comments:

i) the need to recognise the importance and designation of the environmental sites,

ii) the AA fails to evaluate the effect any potential boating recreational impacts associated with the estuary,

iii) The report appeared to be contradictory stating that it could not be possible to rule out potential harm to designated sites, but also stating that harm would not be caused due to various mitigation measures,

iv) concern has been raised about the methodology used in the report and the type and extent of mitigation proposals,

v) concern about what happens in terms of the monitoring process for potential impacts. Further visitor management plan studies should be undertaken in advance of proposal decisions,

vi) additional attention needs to be paid to the impact of increased recreational trampling and also any chemical fluctuations caused by surface water run off or discharge from additional waste water treatment infrastructure.

8.36 SCDC Response 9: The AA was commissioned by the Council and carried out by specialist consultants, with advice from Natural England (NE). The purpose of AA of land use plans is to ensure that protection of the integrity of European sites is a part of the planning process at a regional and local level. Policies SS8 and ENV1 of the East of England Plan also requires that local authority plans avoid harm to environmental sites of European and international importance and seek to provide networks of accessible green infrastructure linked to urban areas. It is a sequential process including scoping for likely significant effects, assessment of potential significant effects and consideration of suitable abatement/mitigation measures for any identified impacts. The AA assessed all relevant parts of the Core Strategy and Development Management Policies. As agreed in consultation with NE, the AA was undertaken using secondary data and has been scrutinised by NE throughout the whole process. This has been clarified in a document to be published separately and made available on the Council’s web site.
ALL AREAS – TRANSPORT

The Lack of Depth to the Transport Study

8.37 Comments:
   i) Validity of the data used,
   ii) No attention paid to the impact on local roads.

8.38 SCDC Response 10: The transport study that provides input into the choice of housing locations is general and strategic in its nature. Given such a high level context specific transportation measures cannot be identified or costed in detail. However, a broad understanding of the transport mitigation measures required has been identified and modelling work has been carried out to take on board relevant large committed developments that are likely to affect the highway network in the Ipswich Policy Area as defined in the Regional Spatial Strategy.

8.39 The key point to note is the traffic study is designed to provide information on principles and not detail. This is the nature of the Core Strategy. More detailed traffic /highways information will obviously be required in relation to individual sites at the next stage ie when specific allocations are made and parameters are set, eg development area, access points etc. It is also at this stage that alternative options in terms of design and access solutions would be considered and consulted upon.

8.40 In some cases road improvements to the local road network will be necessary insofar as it will be needed to support new housing (and employment) in this area. These will be an important element of the infrastructure to be funded or contributed towards by development.

The Approach Towards Transport

8.41 Comments:
   i) Insufficient/inadequate alternative public transport to support new homes,
   ii) Naivety of assuming that people will live close to their place of work.

8.42 SCDC Response 11: Concern is expressed that existing public transport is insufficient and inadequate and that it is just wishful thinking that residents of the new houses will use public transport or will choose to live close to where they work.

8.43 These types of concern are not new. The LDF cannot force individuals to live close to where they work, what they can do is provide the opportunity for them to do so. What the Transport Study does provide is evidence of new public transport routes that need to be created in order to provide a credible alternative to using cars. It therefore provides the evidence base on which to secure investment from public transport providers and for contributions from developers. It also points to the need for improved foot and cycle links to provide a proper network to encourage movement by these means. Given the issues relating to the capacity of the Orwell Bridge, contributions to and early provision of public transport provision should be identified as an essential and early item of infrastructure.

The A14 and Orwell Bridge

8.44 Comments:
   i) Concern over the capacity of the Orwell Bridge,
ii) The A14 and its junctions have insufficient capacity to support additional housing, particularly given the predicted number of lorries.

8.45 SCDC Response 12: A lot of concern has been expressed that the Transport Study carried out on behalf of the Council makes insufficient reference to the capacity of the A14 and in particular the capacity of the Orwell Bridge. It was not the intention that this should be addressed as part of the Transport Appraisal for the Core Strategy because it is being addressed elsewhere.

8.46 The scale of development required to be provided within Suffolk Coastal is set out in the Regional Spatial Strategy (RSS) East of England Plan, adopted May 2008. This document was itself supported by transport studies which looked specifically at the strategic road network and what impact these strategic levels of development would have upon it. Key studies are the 2005 Newmarket to Felixstowe Corridor Study; and the Haven Gateway Ipswich A14 Corridor Study in 2007. These studies consider scales of development that are proposed in the RSS, regardless of precisely where they will be located.

8.47 It is this second study which of most relevance. This highlights the fact that the Orwell Bridge is a pinch point, and that there is a possibility that it will reach capacity within the plan period. In order to address this issue various possible solutions are being considered. The most cost effective short/medium term solution is likely to be a set of wider traffic management measures to reduce the amount of local traffic using this stretch of road. All relevant local authorities, including Suffolk Coastal, are working together, using the land-use planning system where possible, to implement a variety of measures including siting housing close to employment and other facilities, identifying key public transport links and looking to secure investment in improved or new public transport routes, improving bus and rail stations, the introduction of travel plans etc. Further measures might include high-occupancy vehicle lanes, increased park and ride etc.

The A12

8.48 Comments:

i) Increased traffic will cause gridlock on the A12 and the junctions with the A1214 and A14.

8.49 SCDC Response 13: In respect of the eastern fringe of Ipswich, the primary traffic flows are considered to be north and south along the A12, the A14 to Felixstowe and the A1214 into Ipswich. Maintaining the free flow of traffic on the A12 given its strategic importance as a north south route through the District is a major objective. Securing the necessary road improvements to the A12 as would be needed to serve new housing (and employment) in this area would be a major element of the infrastructure that new development would be expected to fund or contribute towards.

8.50 Encouraging modal shift towards greater use of public transport and providing alternative options of walking and cycling are also important elements in any transport solution.

Other Transport Issues

8.51 Comments:

i) The impact of Sizewell should be taken into account,
ii) The impact on the Woodbridge Bypass.

8.52 SCDC Response 14: Since the Transport Appraisal was completed, the government has confirmed that Sizewell is one of the locations being considered at the national level to provide a new nuclear power plant. One respondent notes that there is a potential
conflict in terms of the A12 if improvements to junctions around Martlesham Heath are undertaken at the same time heavy traffic linked to the construction of a new plant at Sizewell is also on the road and the potential congestion/conflict that this may cause. The point is noted for consideration should Sizewell be selected.

8.53 Other issues, such as Woodbridge, are noted.

8.54 In addition to the above general points, the following broad issues were raised in specific relation to identified strategic growth areas:

MARTLESHAM & EAST OF IPSWICH

The Approach Towards Housing

8.55 Comments:

i) Dispersal is an alternative (why Felixstowe but not here?) that is not explored sufficiently,
ii) Brownfield sites should be allocated and developed before greenfield ones.

8.56 SCDC Response 15: With regard to the infrastructure required to meet the needs of 2000 dwellings it will be the same whether the housing is concentrated or dispersed. However, with a concentrated development its provision would be easier to identify and co-ordinate and there would be economies of scale. 2000 dwellings in a single location is sufficient for example to provide a new health centre. A dispersed option merely puts additional strain on existing premises and GP practices and makes it harder to identify any new sites required. The practical effect is that people will live further from amenities – leisure, health, shops, education etc – with a consequential effect on traffic movements and their quality of life.

8.57 On larger allocations sites can be identified from the outset. The critical mass for securing new public transport routes and thereby alleviating traffic on the primary and local road networks would also be better achieved on large developments. This is borne out in the infrastructure and transport studies.

8.58 Furthermore, large developments present the opportunity to create inclusive and interactive communities rather than dormitory suburbs.

The Principle of Locating 2000 houses at Martlesham

8.59 Comments:

i) Developing east of A12 especially at this scale will set a precedent for further development in this area in the future,
ii) The size of the development compared to Martlesham and other market towns,
iii) The urbanising influence a development of this type will have on the local area.

8.60 SCDC Response 16: Ipswich is recognised in regional plans as a location for growth as well as designated as a Growth Point. Its status is that of a ‘Key Centre for Development and Change’ with the clear objective of encouraging people to live close to work and facilities. The Council’s draft strategy for new housing to be developed east of the A12 is clearly consistent with this, largely due to the presence of a substantial employment centre there. A figure of about 1000 new dwellings has been suggested in a previous public consultation document. However, there is the opportunity, by increasing the proposed housing numbers, to create a self-contained and sustainable community to include community, leisure, education and health facilities as well as employment. This might not be achieved if the number of new houses is restricted to 1000, particularly in respect of local education provision.
8.61 No inference should be taken re the future location of housing beyond the current plan period. Those decisions will be made as part of the proper planning process led by a review of the Core Strategy.

8.62 The layout and form of the housing development will be carefully planned from the outset so that the impact and perception can be mitigated through careful design and the provision of boundary planting. The area to be developed will contain space for community facilities and infrastructure. The proposed allocation will not subsume existing settlements into a larger development. The existing settlements would retain their rural character. What this allocation would provide for is for the opportunity to plan a development that would be well integrated into the existing landscape and related to existing communities without adversely impacting upon them. All of these principles will be clearly set out in an Area Action Plan to be the subject of public consultation.

The Environmental Impact of 2000 Houses at Martlesham

8.63 Comments:

Key concerns include:
- Impact on the environment - especially the Deben estuary and villages,
- Loss of agricultural land,
- Impact on the AONB,
- Impact on flora/fauna,
- The mineral working should be restored to greenspace.

8.64 SCDC Response 17: There is no doubt that developing 2000 dwellings in a single location east of the A12 will represent a significant challenge to ensuring that the character of the area will not be adversely affected, and can be delivered in a planned way to meet all the competing planning demands. It will create a community roughly equivalent to the communities of old Martlesham and Martlesham Heath combined. Key to achieving a successful development will be to define the area within which development can take place, but which includes land required for the provision of strong strategic landscaping to contain built development, to construct new boundaries to development and to limit its impact on the AONB and surrounding rural area, including the estuary which is designated for its national and international importance for wildlife. The National Trust make specific reference to any development needing to respect the Anglo Saxon landscape. Any scheme would need to have regard to this.

8.65 With regard to the numbers of visitors to the estuary, it should be noted that in overall terms the addition of 2000 houses up to 2026 will only increase the housing stock by a relatively small percentage (16.5% across the Ipswich Policy Area) such that this development would not significantly exacerbate existing issues. Waldringfield is a visitor honey-pot, visited by many residents of Ipswich and beyond and has for example a thriving sailing club frequented by people who live outside the village etc. A range of mitigation measures is possible in any event. Early implementation of these mitigation measures such as those relating to warden provision would help address existing as well as future issues.

The Impact of 2000 Houses on Neighbouring Communities

8.66 Comments:

- Development will change what is a rural aspect/ambience/character to an urban one,
- Waldringfield will be swamped.

8.67 SCDC Response 18: Developing in the area suggested in the Core Strategy will bring development somewhat closer to the village of Waldringfield than is currently the case. Setting a minimum distance and creating strong development boundaries will be required to mitigate this impact in terms of visual impact, noise, light, etc. The design of the road, foot and cycle path layouts will be critical to directing the bulk of traffic
movement away from the rural area more generally, and providing good links in particular to alternative areas for recreation.

**The Transport Impact of 2000 Houses at Martlesham Heath**

8.68 Comments:

i) Impact on the local road network, including Waldringfield,

ii) Impact on local highway safety,

iii) Pollution,

iv) Missing data on individual junctions such as A12/Eagle Way/Barrack Square roundabout.

8.69 SCDC Response 19: Concerns in relation to the impact additional development would have on the local road network are to be expected. The Transport Study considers potential trips across a wide area based on impacts on key junctions but does not look, and is not designed to specifically look at, individual more minor roads. However, securing the necessary road improvements to the local road network insofar as it would be needed to serve new housing (and employment) in this area would be an important element of the infrastructure to be funded, or contributed towards, by development.

8.70 With regard to the A12/Eagle Way/Barrack Square junction this is considered in the Traffic Study albeit not singled out. The report deals with the section of road between A12/Foxhall Road/Newbourne Road and the A12/Tesco roundabout as a corridor. When looking at the potential impact of traffic from 2000 dwellings on land south and east of Adastral Park as suggested in the draft Core Strategy it has been assumed that the majority of traffic will enter and exit this area from those two main roundabouts. The A12/Eagle Way roundabout will effectively then deal with through traffic.

8.71 With regard to highway safety and emergency service provision, it is thought that this is more relevant at the detailed stage rather than being an issue for the Core Strategy.

**Infrastructure**

8.72 Comments:

i) If development has to occur it should be accompanied by the guarantee of new or improved infrastructure provision up front,

ii) Lack of schools, health provision and other infrastructure to support the additional population,

iii) 2000 dwellings is not sufficient to provide a new secondary school,

iv) Adastral Park is not the best location for a new school,

v) Existing communities will struggle in the early phases with access to services such as doctors until new facilities are in place,

vi) Impact on emergency vehicles on the A12,

vii) Ipswich Hospital is struggling and unlikely to receive funding from developers,

viii) Broadband speeds are below government targets,

ix) Impact on waste recycling centre,

x) Simplistic and misleading assumptions of water supply and waste water treatment capacity.

8.73 SCDC Response 20: The provision of appropriate infrastructure, at the right time, is fundamental to the successful implementation of the Core Strategy. The Council intends that the Local Development Framework for Suffolk Coastal will include an Area Action Plan for Martlesham. This will address infrastructure and its delivery to ensure that requirements are identified as well as the means of achieving them, including the use of developer funding.
**Deliverability**

8.74 Comments:

i) The Council is putting ‘all its eggs in one basket’ by identifying one site,

ii) Over-reliance on that one site could prejudice housing land supply,

iii) Development at Martlesham is reliant on the extraction of minerals from the site therefore concern that land will not be available within the first phase of the plan to provide housing in this area so additional sites should be investigated.

8.75 SCDC Response 21: This issue is raised primarily in relation to housing land supply. Whilst a number of respondents express concern that development on this site is unlikely to take place within the first phase of the plan (to 2015), the Council is satisfied that some early on-site provision could take place. In any event, it should be noted also that this is not the only area where development will take place during the plan period in the wider Ipswich Policy Area. There are a number of outstanding planning permissions and other brownfield opportunities. It is considered that any concerns in this regard can be addressed.

**FELIXSTOWE & TRIMLEYS**

**The Approach Towards Housing**

8.76 Comments:

i) A reduction in housing numbers is unjustified and not backed up by a sound evidence base,

ii) The Council is simply responding to objections rather than considering the evidence,

iii) There is nothing wrong with being a ‘retirement town’ – this may be Felixstowe’s ‘niche’.

8.77 SCDC Response 22: In Felixstowe housing growth has not kept pace with employment growth. In the 5 years April 2003 to April 2008 (ie pre-recession) the average annual construction rate was only 36 dwellings per year. As a result commuting into the town exceeds commuting out and affordable housing has not been achieved in any significant numbers. An independent study of the town in 2005 revealed some negative aspects of the town – a population age imbalance, an ageing population, the reliance on one major employer, the threat to services and facilities, a failing resort, the fragility of the town centre and a lack of affordable housing. The study advocated growth, with a range of scenarios put forward. It also promoted the need to support jobs

8.78 The Council has responded to public consultation and recognised that, although limited growth for the right reasons has some support, there are doubts at this time about the ability of the town’s infrastructure to accommodate it. There is concern for the environmental setting, and there are doubts about the predicted jobs occurring at a rate that would complement the proposed housing growth. A commitment to securing the regeneration of the town nonetheless remains a key objective of the Strategy.

8.79 Therefore, it might be more practical in the earlier period of the Core Strategy to manage growth. This should be distributed across settlements of Felixstowe, Trimley St Martin, Trimley St Mary and Walton in locations within or abutting the built up areas avoiding as far as possible prime agricultural land for essential food production. The environmental setting of the town and access to the countryside will, therefore, remain undisturbed until such time as an increase in the pace and scale of change is demonstrated to be in the best social and economic interests of the town.
Environmental Impact

8.80 Comments:

i) Potential detrimental impact on the countryside and landscape setting of Felixstowe and the Trimleys.
ii) There will be an unnecessary loss of high quality agricultural land.
iii) Too much greenfield land is being developed unnecessarily.

8.81 SCDC Response 23: With regard to greenfield sites, the strategy remains clearly one where brownfield sites should be developed first. Additional work has already been commissioned to identify what brownfield opportunities exist within the town, but will also include “developed” areas of greenfield land e.g. redundant farm buildings, where such opportunities exist within the distribution strategy as currently framed.

Relationship With the Port

8.82 Comments:

i) A reduction in employment at the Port should mean a reduction in the amount of housing.
ii) The creation of a ‘Growth Point’ should not simply be based on the presence of the Port.

8.83 SCDC Response 24: The Port is an important economic driver within the Haven Gateway sub-region and within the national context e.g. around 40% of all UK food imports enter the country via Felixstowe. The strategy is both to support the continued growth of the Port as well as to encourage greater diversification within the local economy. The Core Strategy has to plan for the longer term beyond the current economic recession. More people currently commute into the town to work than commute out. Providing an additional level of housing to begin to address this imbalance will have added benefits of providing potentially more spending within the town and reducing private motor traffic on the A14.

Infrastructure

8.84 Comments:

i) There is an obvious lack of infrastructure to support new housing,
ii) Additional infrastructure should be in place first before houses are constructed.

8.85 SCDC Response 25: The provision of appropriate infrastructure, at the right time, is fundamental to the successful implementation of the Core Strategy. The Council intends to prepare a ‘Delivery Plan’ in some form to ensure that requirements are identified as well as the means of achieving them, including the use of developer funding. The Community Infrastructure studies provide the evidence base to underpin this.

Transport

8.86 Comments:

i) The A14 junctions (Dock Spur, Trimley, Seven Hills, etc) do not have the capacity,
ii) Walton High Street and Trimley High Road will be overloaded (gridlocked?).

8.87 SCDC Response 26: Continuing concern is expressed that scales of development are still too much given the fact that it is a peninsula, with limited road and rail access. In particular there is a lack of alternative road access for HGV traffic during ‘Operation Stack’. The Transport Study commissioned by the Council makes clear that for this area the impact of development on the transport network has been much more difficult to define than for elsewhere due to the draft strategy which is for one of dispersed rather
than concentrated development. The findings are cautioned on this basis. It concludes that the most impact is likely to be on the local road network rather than the A14. The exact nature of this impact is difficult to assess as no individual sites are identified. Broad assumptions have been made in relation to individual areas in terms of development potential for guidance only. They do not and cannot confirm the level of development of any potential development site as this is not its role.

8.88 Relief to Walton High Street and Trimley High Road may be ensured by the construction of a new link road from the High Road to Candlet Road. However, pending further assessment, there is currently considerable concern as to whether acceptable access from / egress to Candlet Road can be achieved. Furthermore, there is a significant risk of any through road acting as a “rat-run” from Felixstowe to the A14. The selection of sites to be allocated in order to implement a strategy of dispersal will need to be made with this in mind.

OTHER SETTLEMENTS

The Settlement Hierarchy

8.89 Comments:

8.90 Few comments received. Key concerns of those submitted:

i) Orford & Gedgrave, Otley, Westleton and Yoxford confirm capacity to absorb further development but do not request a change in their status,
ii) Darsham Parish Council has evidence to support upgrade to Key Service Centre,
iii) Bucklesham Parish Council requests downgrading to Other Village,
iv) Impact of development at market towns on rural roads,
v) Warning of over-development of market towns.

8.91 Woodbridge - concern that 200 new dwellings on greenfield sites could be too much

8.92 Early phases of development should be spread across the market towns and not concentrated.

8.93 SCDC Response 27: Noted.
Reviewed Core Strategy & Development Management Policies
[October 2010 - January 2011]

9.01 The Core Strategy Issues & Options document was published for public consultation for a period of 13 weeks between 23rd October 2010 and 23rd January 2011.

9.02 Comments were invited from the specific and general consultation bodies and key stakeholders as identified in Appendix A. Comments were also invited from all those additional organisations and individuals who had requested to be added to the Council’s LDF consultation database.

9.03 Material was advertised through an article in the Coastline magazine which is delivered to every household in the district and through the production of a leaflet for distribution to all homes and businesses within the District.

9.04 Comments were invited via post, and electronic communications. The consultation responses were collected and analysed by the Council before being presented to committee for decisions on any policy changes. The results and findings from this consultation were also shared and used to inform the revision process to the Council’s Community Strategy.

Main issues raised

9.05 The main issues raised primarily relate to 3 main subject areas - the overall housing numbers, the Ipswich Policy Area and the Felixstowe Peninsula. A summary of the main responses and key issues are set out below. Full consultation transcripts can be viewed on the Council website at www.suffolkcoastal.gov.uk

Housing Numbers

9.06 The main points raised are as follows:

i) The idea that households are becoming smaller is outdated

ii) "Pepper-potting" should be appraised more fully and consideration should be given to the wider needs of villages over the entire district.

iii) If the best evidence suggests the annual new housing rate should be 610, then this is the correct number which should be planned for.

iv) The priority for building new houses should be given to urban areas where there is a greater requirement and facilities.

v) Supportive of larger developments with improved and adequate infrastructure, rather than geographically dispersed smaller developments, which may well not have adequate support services.

vi) There is no evidence that this number is correct and there is no evidence that so many should be built in a single location. Many local villages would welcome additional housing to inject activity.

vii) Uncertainty of the affordable housing requirement.

viii) The council has clearly over-estimated economic growth in the district

ix) The government have said that they are going to remove the Regional Spatial Strategies and the house building requirement.

x) We should not be building any new homes unless the services and infrastructure needed to support the increasing number of households can be made available.

xi) The road infrastructure, including the Orwell Bridge, is not sufficient to accommodate the proposed levels and locations of growth.
xii) The AONB should be given greater priority in the measurement of likely harm caused to smaller communities within it and near it.

xiii) Local views have not been adequately considered.

**SCDC response to issues raised regarding housing numbers.**

9.07 The council opted to review its housing requirement for a number of good reasons including the Government’s intention to abolish the Regional Spatial Strategies (RSS) and transfer the responsibility of identifying housing numbers to meet the needs of the districts to the local authorities (i.e. SCDC).

9.08 The RSS figures required only an additional 100 homes over the plan period, than the figures identified locally and the figures were derived from a single local input. Therefore the Council could have determined to continue with the adopted RSS housing figures. However, the Council had campaigned for a single housing requirement for the district rather than a split between the Ipswich Policy Area and the rest of the District. This would have resulted in greater flexibility in determining where development should go.

9.09 In taking the decision to review, the Council was also aware that whilst the RSS (which has a base date of 2001) and the evidence base behind it had been found “sound” up to 2021, the RSS itself, including the housing targets was under review before the General Election. It was already known that the 510 adopted RSS annual housing requirement for Suffolk Coastal District was likely to change, with 510 almost certainly becoming a minimum figure on an updated RSS base date of 2011.

9.10 A further consideration has been the impact of the recession on housing completions across the district. The Council’s annual monitoring confirms that housing completions across the district have plummeted in the last 2 or 3 years. It was sensible therefore for the review to re-assess the suggested phasing of new housing provision to take account of current circumstances.

9.11 As explained above, there are good reasons why the Council has opted to review its housing requirement, any delay in progressing the Core Strategy to adoption, carried with it an element of risk. With former housing allocations all but built out, and no Core Strategy in place, the council is currently unable to meet either the 5 or 15 year housing land supply requirements set out under national guidance as these calculations do not allow the inclusion of sites which are not yet allocated or which do not have the benefit of planning permission. The adoption of the Core Strategy as soon as possible is therefore critical to this. Any delay to the progression of the Core Strategy and therefore to the Site Specific and Area Action Plan documents has not been taken lightly.

9.12 A five stage process was undertaken to determine new scales of housing provision, which was:

i) Identify changes within the population – Births, deaths, people moving in and out of the areas, changes in household size and make-up, life expectancy, changing average age of the population and so on.

ii) Identify and understand what is happening in the local economy, as well as how national issues will affect use

iii) Combine that data into a range of estimates of the likely number of homes to be needed. There are specialised mathematical models which can help with this

iv) Make the best judgements we can on which those ranges fits best with the vision and priorities we have for the quality of our area.

v) Test those numbers against the availability of land suitable for new homes and make new plans accordingly.

9.13 The methodology employed by the consultants (Oxford Economics) appears to have been generally accepted, with few queries raised in response to the consultation. Of the queries that have been raised, these relate to the strength of economic growth assumed; migration; and household size.
9.14 The modelling assumes that the full economic potential of the district is achieved over the plan period, taking into account the latest information to phasing of investment. In so doing it concludes that the economic base of the district is relatively narrow, but low risk, based in large part on the port and associated transport and logistics, ICT and energy generation. However, it also concludes that these areas are sectors which are expected to grow, remaining strong over the longer term.

9.15 Two main issues relating to migration were raised in the comments received. The first related to national policies in terms of immigration which see only very limited restrictions in numbers at the national level. There appears to be some confusion as to what is meant by migration. “In-migration” relates to anyone moving into the area to live wherever they are from, whether that is neighbouring districts (e.g. Ipswich), from elsewhere in Great Britain or from abroad.

9.16 The second issue raised related to the ‘natural population’ profile for the district which actually shows a decline over the plan period. A small excess of deaths over births does not however equate to a direct decline in the number of households. It is very well documented that significant numbers of people move into the area for retirement, and hence in due course contribute to the statistics for deaths. There is no evidence that this trend is likely to decline and homes are needed for the retired population.

9.17 Linked to the economic expansion and in-migration, a number of social trends contribute to the need for new homes including:

i) the district has an ageing population, even compared to the national average and other neighbouring authorities. These means there are few people of working age to support the local economy. Suffolk Coastal has an economy which is of more than local significance and is expected to grow and contribute significantly to national economic success. If the district is to contribute appropriately to national economic success, then additional workers will be required. With an ageing population, additional workers can only be achieved by attracting people in to the area to work.

ii) In accordance with the principles of sustainable development, it is appropriate that housing should be provided close to employment opportunities, schools, leisure and other facilities. In a changing social and economic climate having the opportunity to reduce travel costs is a factor which may well become increasingly important to people in the future.

iii) The expansion of the elderly population, alongside increasing emphasis on the ‘care at home’ philosophy, indicates that an increasing number of jobs will be created in the “caring” professions. Accordingly, one essential strand of housing policy must be to ensure sustainability of this trend, namely that mixed communities are created where the elderly, their carers and of course other groups can find appropriate accommodation within short distances.

iv) The composition and average size of household are changing. As well as the ageing issues above, young people are becoming socially mobile at an earlier age, and there are increasing proportions of divorce and separation. Together these contribute to an ongoing reduction in the average household size and consequently an increased demand for homes.

v) The changes in household size and composition also leads to a change in the type of accommodation required. This underlines the need to ensure the right type, size and tenure of home are available in the right location to meet these needs.

9.18 The modelling exercise undertaken to help inform the review is sound. Concerns regarding scales of economic growth are noted, but the clear indications are that over the plan period the district is uniquely placed to achieve significant levels of economic growth. In particular, the district contains three economic sectors which are specifically identified by Government as key to national economic success. Nonetheless, the scales of growth have been tempered by local factors including the economic recession, and information direct from companies as to their anticipated investment plans and environmental capacity. The distribution of housing proposed under the Interim Core
Strategy and re-confirmed under the RCS continues to be appropriate in meeting social, economic and environmental considerations. There is a clear indication however that scales of new housing are likely to increase in the longer term at which point important decisions will need to be taken regarding an alternative distribution – i.e. the identification of additional directions for housing growth. Any such decision should however be taken in the context of important updated baseline information, namely the 2011 Census data. In the overall context, the proposed annual housing requirement of 446 is about right.

Ipswich Policy Area

9.19 The main issues raised regarding this subject were:

i) The jobs suggested at BT are not guaranteed
ii) There will be an adverse impact on the River Deben, AONB and SSSI and the mitigation measures proposed are not workable or effective.
iii) The numbers for the District as a whole have been reduced but the Martlesham proportion remains unchanged.
iv) The other 5 potential locations of growth for the Ipswich East Area have not been properly considered.
v) Concerns over viability and the level of developer contributions that will be realised.
vi) No attempt has been made to work with neighbouring authorities and look across the Ipswich East Area as a whole.
vii) Development at this level will damage the tourist industry and in particular Woodbridge. The infrastructure capacity (roads, environment, schools etc) is insufficient to accommodate growth at this level in this location.
viii) The development of this site would be harmful to the living conditions of the residents in Waldringfield.
ix) BT has not guaranteed jobs will automatically follow on by having 2000 houses built. The number of jobs being created include construction workers, teachers, health care staff etc, these will be required wherever development takes place.
x) Why have the other 5 potential locations of strategic growth within the EIPA not been properly considered?
xii) Adastral Park would only be possible if the proportion of affordable housing were increased to the point where either it became financially unviable for developers or SCDC /SCC were forced to accept significant reductions in developer contributions towards the cost of providing infrastructure
xii) No attempt has been made to find out the need for housing across the whole Eastern Ipswich Plan Area. The figure of 446 homes per annum seems to be based on supply.

SCDC response to issues raised regarding the Ipswich Policy Area

9.20 In Section 2 of the Core Strategy, which has evolved through a number of versions and a long series of consultations, it has been established that sustainable development for this District means that areas where there is the most opportunity for economic growth are best placed to house larger settlements. Policy SP20 deals with such a settlement area. It has been estimated that 2,320 new homes can be provided in the eastern Ipswich area and that to ensure that infrastructure like schools and road improvements are delivered, that the majority of these should be built as a new community, close to existing main highways retail services and employment opportunities.

9.21 The economy of Ipswich has a significant influence on southern part of the district and it was recognised as far back as 2006, during the development of the council’s ‘Vision and Objectives’ consultation for the Core Strategy, that housing would be required adjacent to Ipswich to ‘support its role as the county town’. As a major centre for economic and housing growth, it was also recognised that any allocation of housing for eastern Ipswich, would inevitably be predominantly ‘greenfield’.
9.22 To help select the best location for a new community the Council looked at a number of factors. These included making sure the settlement was not built on any land designated for its natural beauty or scientific interest; to ensure that sustainable travel could be made within the Ipswich urban hierarchy; to have minimal impact on the landscape; to avoid high quality agricultural land and to have good access to employment opportunities.

9.23 After careful consideration, five options were consulted upon in 2008. The consultation sought to establish both the positives and negatives of each of the options. Land east of the A12 immediately abutting Adastral Park (Option 4) was considered to be the preferred option as it could host a population that was large enough to create a sustainable community well related to Ipswich. This means enough homes to support the provision of schools, play areas, road, electricity, gas, and water infrastructure as well as community and health care provision.

9.24 Development in close association with the commercial development of a high-technology and IT cluster at Adastral Park, taking advantage of the cultural and physical infrastructure surrounding the existing BT businesses provides a unique opportunity for a genuinely sustainable community with a high quality of life and minimum needs to travel. The latter in particular reduces the likely impact on local roads significantly in relation to other more dispersed options, which by definition could only create travel needs and resulting increases in traffic and hence worsening congestion.

9.25 It is considered that other options would lead to 'bolt-ons' to existing communities but without enough land to secure the needs of the new community. Justification for the selection of this option also included the ability for effective and implementable master planning; the ability to extract minerals from the site prior to development; the benefits of it being in close proximity to employment generating activities; the land being well contained within its low lying landscape, with acceptable mitigation measures for the eastern part of the site; accessibility to services Martlesham Heath and its accessibility by road and by public transport.

9.26 This strategy was formally endorsed by the task group set up to assist the progress of the Core Strategy in June 2008 and subsequently confirmed through a large number of meetings of Task Group, Cabinet and Council, and several consultation rounds. The latter, although generating significant volumes of objections to this solution, failed to make any convincing case for an alternative.

9.27 This process culminated in it becoming part of the Interim Core Strategy (as Strategic Policy SP20), which was adopted in June 2010. Following the change in government the Council was required by Cabinet to review and consult again on its strategy in the event of major changes to government policy. In regards to SP20 the RCS amends Strategic Policy SP20 by the removal of references to the Regional Spatial Strategy, through the focussing of the policy setting the strategy for a Martlesham Area Action Plan and by the addition of a reference to Ransomes Europark.

9.28 Policy SP20 received the highest number of objections during the consultation on the RCS. Objections included: the sensitivity of the land in parts of the Martlesham Area Action Plan area; the potential impact on infrastructure; the justification in terms of employment opportunities and the possibility of a wider dispersal of housing growth in the district. These matters were all taken in to account when selecting Option 4, and have been debated very fully throughout the subsequent stages, as above.

9.29 Moreover, in terms of the sensitive nature of the area: the Sustainability Appraisal identifies that any Area Action Plan should be subject to a specific Sustainability Appraisal. This will be undertaken, as is required by law, and any major application for development within this area prior to the production of an Area Action Plan, is likely, in any case to require an Environmental Impact Assessment. Both these appraisals and assessments will reflect the mitigation, enhancement and avoidance measures to protect the areas national and international designation.
9.30 In terms of the impact on infrastructure: the size of the settlement envisaged for the area is established so as to be big enough to finance the infrastructure required, as outlined above. In addition, development of this area can bring road travel benefits to existing communities. The transport assessment for a planning application for a new community at Adastral Park clearly establishes that without the funding for major road improvements secured as part of the development of a new community, journey times on the A12 through Martlesham will increase significantly by 2018. This assessment also clearly indicates that the improvements to the junctions required for this development will ensure that the vast majority of journeys will take less time in the peak hours than they did in 2007. This is because roundabouts will be removed and junctions will benefit from additional turning lanes and traffic signals with modern computer control. The journeys southwards on the A12 at Barrack Square will see significant improvement.

9.31 In summary, the district faces a challenge in accommodating the growth needs of the district and the impact of Ipswich. This challenge has been addressed through consultation and research with the Council determining that SP20 was the right location for growth in the interim Core Strategy. No overwhelming evidence contrary to its approach has been established during the consultation on the revised Core Strategy and therefore Cabinet is requested continue with its settlement policy.

Felixstowe Peninsula

9.32 The main issues raised relating to the Felixstowe Peninsula related to:

i) The Felixstowe housing requirement has increased despite a District wide reduction.
ii) The job predictions arising from the Port are not guaranteed or realistic.
iii) The level of housing growth cannot be sustained unless infrastructure improvements can be secured and guaranteed.
iv) Brownfield land should be developed before the release of greenfield sites
v) Any vacant properties or second homes should be used before new houses are built.
vi) There should be no new building north of A14/Candlet Road
vii) New houses are needed, especially affordable housing and for the elderly, but the scale proposed is too great.
viii) The Trimley villages should not be looking to expand westwards. Growth should take place eastwards where land is closer to the key facilities in Felixstowe.
ix) The Felixstowe area is better able to support a large scale development. The sustainability arguments for Felixstowe, in terms of geographical relationship with the employment hubs at the Port of Felixstowe and Ransomes Europark, are far more compelling.

SCDC Response:

9.33 The comments received raise no new significant planning issues which have not already been subject to previous discussion and debate in relation to the Interim Core Strategy.

9.34 In parallel with Martlesham, the economy of Felixstowe is of national importance given the status and growth of the port and, very importantly its associated support businesses. As the major commercial gateway to the UK there is major economic potential for the area and it is right in planning terms to link economic growth with housing growth as far as possible. However a number of comments have been received which raise concern at the overall level of provision for Felixstowe and also the lack of justification for the level proposed.

9.35 Against this background there are some negative trends in the population make-up that hinder the aims of the government to promote economic growth and this strategy. The 2001 census indicated that 22.8% of Felixstowe’s population were over 65 and there was an increase in this age bracket from 21.7% from 1991. The 60 plus age group
makes up 28% of town’s population which is significantly greater when compared to 23% in Suffolk and 20% nationally.

9.36 Whilst the population of Felixstowe is increasing the household size is falling. So despite slow population growth, there are even more people looking for homes, and Felixstowe has more and more smaller households – single people or couples particularly those that are key workers or first time buyers. This increase in demand for homes is not matched by the number or type of homes which are currently provided within the Felixstowe area.

9.37 For the Felixstowe peninsular, even should the population remain stable, there will be a greater demand for homes from the existing population. If new homes are not built then the reality is that people will be forced to move away in the search of new homes. This fall could potentially be as much of the order of 3,000 people, a large proportion of which will be young families and children, i.e. those currently and soon to be educated and employable.

9.38 It is fact that the growth of jobs in the Felixstowe peninsular, driven by the expansion of the Port, is out of balance with the availability of housing. In the last 10 years only 328 new homes have been built in the Felixstowe peninsular. Until the completion of the Grange Farm development housing development had kept pace with the increases in local employment. However, the Port has continued to expand and to create more jobs, both directly and indirectly through the businesses that support its operation. This expansion is due to increase substantially during the life of the plan, as the 2 phases of the Felixstowe South Reconfiguration come on stream over the next 10 years. However this has not been matched by housing growth.

9.39 The 2001 Census revealed that there was a daily net inflow to Felixstowe of 2,719 workers. This comprised an outflow of 3,600 Felixstowe residents to jobs in Ipswich and elsewhere and an inflow of 6,319 non-residents who work in Felixstowe but live elsewhere. In 2001, 10,633 Felixstowe residents were recorded as being in employment with a total number of jobs in the town of 13,451. The census further revealed that 48% of all persons working in Felixstowe commuted from outside. Sustainable development requires that the planning system should make provision for this imbalance to be corrected. With expansion of port related employment, if the necessary new homes are not built then this imbalance will increase, and create more pressure on the highway network, particularly the A14. Ensuring that this route can fully function as a strategic route is essential for the port and its contribution to national economic growth. At a time when planning policy is focused minimising the need to travel and using finite energy resources this pattern is unlikely to be sustainable.

9.40 The above clearly identifies the need to provide more housing within the Felixstowe peninsular so as to, provide the opportunities for people to both live and work in the peninsular, particularly the younger, economically active groups and thus to begin to counter the commuting imbalance. The government encourages sustainable patterns of development and it is good planning practice to locate housing in close proximity to jobs.

9.41 The table below details the changes in housing growth between the Interim Core Strategy and Reviewed Core Strategy.

<table>
<thead>
<tr>
<th></th>
<th>Outstanding Planning Permissions</th>
<th>Urban Potential</th>
<th>New Allocations</th>
<th>Allocations from Current Local Plan</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interim Core Strategy</td>
<td>170</td>
<td>250</td>
<td>1000</td>
<td>0</td>
<td>1420</td>
</tr>
<tr>
<td>Reviewed Core Strategy</td>
<td>290</td>
<td>30</td>
<td>1440</td>
<td>0</td>
<td>1760</td>
</tr>
</tbody>
</table>
9.42 The table above shows that the overall level of new housing proposed is increasing from 1420 to 1760, with new allocations accounting for 1440. However, it should be noted that paragraph 4.35 of the Interim Core Strategy also indicated that in Phase 3, further allocations may be needed. The allocations in the Revised Core Strategy are calculated to cover the whole review period (ie upto 2027).

9.43 It is appropriate that Felixstowe peninsula should take strategic levels of growth. The policy of restraint over the last decade has led to this area taking just 6% of housing growth over the past 10 years despite being both the largest town within the district and having a very significant local and national employer.

<table>
<thead>
<tr>
<th></th>
<th>Existing Stock 2010</th>
<th>New Housing</th>
<th>Total Housing 2027</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Units</td>
<td>%</td>
<td>Units</td>
</tr>
<tr>
<td>Felixstowe/Walton @</td>
<td>13,763</td>
<td>24%</td>
<td>1,760</td>
</tr>
<tr>
<td>Trimley’s</td>
<td></td>
<td></td>
<td>15,523</td>
</tr>
</tbody>
</table>

9.44 The table above shows that as of 1 April 2010 the Felixstowe area contains 24% of the District’s housing stock. With all the allocations proposed through the Core Strategy the total housing stock in the peninsular will remain at 24% of the District total, which represents an equitable share of new housing (much less if the low growth over the past 10 years is taken into account).

9.45 The role of the Core Strategy is to set out the strategy for the Felixstowe peninsula in terms of overall housing numbers and strategy for growth. It is not the role of this document to physically allocate sites. However, important new wording has been introduced in paragraph 4.44 of the Revised Core Strategy which identifies the Grove, land to the north and east thereof, and the area to the north and east of Ferry Road as areas whose retention and enhancement for formal and informal recreation will be important and should be preserved, particularly where views exit to the Deben Estuary and the Coast and Heaths AONB. This amendment addresses a number of concerns which have been raised through previous consultations.

9.46 Otherwise, site allocation, amongst other matters, will be undertaken in the Area Action Plan (AAP) which will follow adoption of the Core Strategy. That will also need to address the issues of infrastructure in and around the town, not least the road system. The production of that document will involve substantial consultation and involvement with stakeholders and interested parties in due course.

Other issues raised

9.47 Other new specific objections or comments included:

- i) The Council has not followed the correct procedure in relation to the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) processes;
- ii) Why the reduction in brownfield land targets,
- iii) A review of Blaxhall and its position within the Settlement Hierarchy,
- iv) A more detailed consideration of policy DM24 Sustainable Construction; and
- v) Sizewell (a variety of issues raised).

SCDC Response

The comments received regarding the Council’s Sustainability Appraisal (SA)

9.48 The Council acknowledges receipt of letters submitted by Richard Buxton solicitors (on behalf of the NANT group) dated 22nd January and 16th February 2010, and notes the contents. The matters which have been raised are procedural concerns relating to the Council’s consultation on its Reviewed Core Strategy and Development Management
Policies. Specifically, the comments refer work undertaken on Strategic Environmental Assessment SEA and HRA.

9.49 The Council has sought external opinion on these matters and is confident that the Core Strategy production process has legitimately been undertaken in the correct manner.

9.50 The Sustainability Appraisal (SA) process (including SEA) has been an iterative one spanning a number of years and the findings have contributed to the decision making process regarding the content of the Core Strategy. The AA document was formally published in September 2009 and accompanied the Council's consultation document entitled "The Housing Distribution – Updated Preferred Option 7/09". A further Clarification Summary was published in January 2010 to supplement the original document. Natural England, as the appropriate nature conservation body, have confirmed their broad support for the Core Strategy as a whole, as well as the findings of the AA document.

Brownfield Land Supply

9.51 Some representations have stated that there has been a lack of explanation for the dramatic drop in brownfield potential. Since 1 April 2009 there has been a reduction of urban brownfield potential. The reduction for this reduction is two-fold:

i) The government has changed the designation of garden land from brownfield to greenfield land and therefore any assumptions made in the Interim Core Strategy of potential garden development sites need now be removed from the brownfield assumption and included within the greenfield element.

ii) Since the Interim Core Strategy a number of some of the brownfield sites which were down as having brownfield potential have been granted planning permission and therefore those numbers have moved from the brownfield potential section of the table to the outstanding planning permissions section. The Strategic Housing Land Availability (SHLAA) which sits behind the CS as evidence base and is a 'shopping list' of all potential development sites which have been submitted by landowners or agents, shows a lack of brownfield sites available or suitable for development.

Blaxhall

9.52 Blaxhall Parish Council state that the village is firmly on the border between a 'local service centre' and 'other village' and would like this matter to be reviewed again prior to the LDF being finalised and adopted.

9.53 Policy SP19 (Settlement hierarchy) shows Blaxhall as a Local Service Centre and hence a location which provides at least 3 key facilities. Clarification has been sought from Blaxhall Parish Council as to whether they are seeking to remain as a Local Service Centre or be downgraded to an Other Village. There are no immediate plans to review the settlement hierarchy, however if the Parish Council can provide evidence to support their request then this will be looked at. It is proposed to conduct a review of the Core Strategy by 2015 once we have a clearer picture of the economic position in the district and the latest census data, and it would seem appropriate that any amendments to the hierarchy are considered at this time.

DM24: Sustainable Construction

9.54 Policy DM24 is one which attracted general support from the Green Issues Task Group, however they did express a number of concerns as set out in paragraph 3.8 and Appendix 3. Recent outcomes from the Inspectors Report of Waveney District Council's Development Management Policies have prompted a need to look at Policy DM24 in the Suffolk Coastal Reviewed Core Strategy. Waveney’s Policy, DM04 is similar in terms to Suffolk Coastal Policy DM24. Both policies were supported by a technical study on renewable and low carbon technology as evidence.
9.55 When concluding on Waveney’s Policy DM04, the Inspector cited a lack of viability evidence tested to apply the policy to all non-residential developments. Instead, the Inspector recommended that residential, school and office developments only could apply to the policy as these had been tested in the Evidence Base. Suffolk Coastal’s policy DM24 has been viability tested for residential and B1, B2 and B8 use classes and it is recommended that the policy (part b) should therefore be updated as appropriate.

9.56 In addition, some responses have questioned whether the Council should have a new policy requiring contributions for a ‘Carbon Buyout Fund’. This was identified in the Suffolk Coastal Renewable and Low Carbon Technical Study and Waveney also had such a policy (DM05) in their Submitted Development Management Policies document. However, the Inspector stated that “In the absence of clear indications as to a programme of likely schemes the case for the fund has not been made and it would not conform with national policy…”. The Council does not have a detailed schedule of likely schemes which such monies may be spent on and therefore cannot reasonably propose this approach.

9.57 It is more appropriate that if deemed necessary, a tariff approach for a carbon mitigation fund could be dealt with through a Suffolk Coastal Community Infrastructure Level (CIL) approach in due course.

**Sizewell**

9.58 Due to the lack of an up to date transport assessment concerning the impacts of Sizewell C on the highway network, it is considered inappropriate for the Core Strategy to link the Sizewell C development with a potential four village bypass (paragraph 3.106). The last sentence of said paragraph to be replaced with ‘In this regard the impact of major development in particular the planned new nuclear power station development at Sizewell, will be carefully assessed and, in the context of Circular 05/05 tests and Government policy as expressed in PPG13, a bypass or alternative solution(s) will be negotiated with the developer’. It is considered that the suggested wording is more robust and is in line with the CIL regulations which will be in force at such time.

9.59 Other respondents consider that the nuclear power policy should be strengthened to explicitly recognise and support the strategic importance of the Sizewell site. In response to this, it should be noted that this is only one of the identified potential sites to deliver nuclear power and the Council will only be a statutory consultee. The proposal will be subject to the submission and consideration of a Development Consent and therefore in advance of this formal process, the Council through this document is unable to indicate support or otherwise for the proposal, but must consider what local issues there are and how they can be addressed. Should the site be approved, then it will come on stream within the plan period and therefore policies and mechanisms need to be put in place to deal with the issues, hence the strategic policies contained.

9.60 In addition to policies SP13 and SP24 and supporting text, the Council will be producing an Area Action Plan for Saxmundham and Leiston which will commence in summer 2012. It is this document which will deal with Sizewell at the more micro level and set specific policies for different elements of the scheme together with the Sizewell legacies.
10.01 The [Reviewed Core Strategy] Updated Sustainability Appraisal (SA) and Appropriate Assessment (AA) documents were published for public consultation for a period of 6 weeks between 30th August 2011 and 14th October 2011. The consultation was restricted to comments upon these technical documents and not on the Reviewed Core Strategy policies themselves.

10.02 Comments were invited from the specific and general consultation bodies and key stakeholders identified in Appendix A as well as every individual or organisation who have expressed an interest or took any part in the LDF process previously. Material was also published in the local newspaper advertising the consultation and closing date.

10.03 Comments were invited via post, and electronic communications. The consultation responses were collected and analysed by the Council before a decision being taken as to whether to commence formal Pre-Submission Core Strategy consultation, or consider the Core Strategy further at committee. On the 15th December 2011, the decision was made by full Council that the Core Strategy be published for Pre-Submission consultation, and thereafter be Submitted for Examination by an independent Planning Inspector. When taking this decision, the Council had regard to the main SA and AA consultation responses, a summary of which is set out below. Full consultation transcripts can be viewed on the Council website at www.suffolkcoastal.gov.uk

10.04 Main issues raised on the Sustainability Appraisal:

<table>
<thead>
<tr>
<th>SA Issue</th>
<th>SCDC response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The SA has not addressed matters previously raised in consultation and the responses have been insufficient.</td>
<td>The SA has been produced as an iterative process and has been an element of the numerous consultations over the past 4 years. The specific comments made on the SA have been fully considered and document updates made as relevant and necessary. It is not the role of the SA to consider if the Council has properly taken account of previous stakeholder responses on the plan itself – that is a separate requirement for the RCS.</td>
</tr>
<tr>
<td>2. Many of the concerns for potential adverse impact (traffic, environment, infrastructure etc) have been dismissed too easily or left for mitigation to resolve.</td>
<td>The purpose of the SA is to assist with the production of the RCS, by ensuring that consideration has been given to the potential impacts of the plan upon social, environmental and economic interests. It is perfectly reasonable to use mitigation methods in order to reduce adverse impacts to an acceptable level, and that is established good practice.</td>
</tr>
<tr>
<td>3. The overall methodology used for undertaking the SA is insufficient and confusing.</td>
<td>The broad methodology for producing the SA document has been derived from the national practical guidance on producing a SA.</td>
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<tr>
<td>SA Issue:</td>
<td>SCDC response:</td>
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<tr>
<td>The SA process has been undertaken over a number of years in consultation with the SEBs and the wider public. The SA Framework has also been produced in general partnership and agreement from all Suffolk wide planning authorities. The latest presentational changes have been made to incorporate suggested new best practice derived from recent inquiry outcomes. A number of other minor amendments have been made with a view to improve clarity and consistency.</td>
<td></td>
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<tr>
<td>4. Many of the conclusions include a high degree of subjectivity.</td>
<td>The SA document has been produced giving consideration to the best available information. The assessment of predicted impacts has been conducted based upon professional judgement taking into account the best available evidence. This is consistent with the national practical guidance on producing a SA.</td>
</tr>
<tr>
<td>5. The document contains many contradictions and flaws in reasoning.</td>
<td>The SA has been carried out with regard to the national practical guidance on producing a SA. In addition, it is inevitable that some objectives and policies will seek to satisfy competing interests. It is correct that the SA highlights any potential conflicts so that they can be minimised where possible. It is important to remember also that the RCS should be read as a whole.</td>
</tr>
<tr>
<td>6. The full extent of traffic generation impacts has not been considered – congestion, noise, air quality etc.</td>
<td>Transport issues have been taken into account in the SA. The role of the document is considering strategic policies and the assessment is therefore proportionate to this. Where relevant, potential for issues concerning congestion, noise and air quality have all been highlighted. Matters of specific impact will be raised in more detail when dealing with the more local assessments e.g. the Martlesham Area Action Plan, or any specific planning application.</td>
</tr>
<tr>
<td>7. The baseline data used has been produced with inaccurate information.</td>
<td>The baseline data has sought to gather information from the best available and most reliable sources. In many instances, this involves using official Government published data e.g. for demographics. The data source is clearly identifiable.</td>
</tr>
<tr>
<td>8. Further consideration needs to be given to the impact of freight by rail. Data from the 2007 Public Inquiry into the Felixstowe Branch Line could be used.</td>
<td>The SA has considered the impacts of freight by rail. It has mainly been considered as a positive outcome as it will help to reduce freight on the roads e.g. pages 59/60 of the SA document. It has also been considered as an indicator for the SA objective 22. Current and newly authorised developments at the Port of Felixstowe and further afield are already resulting in significant increases in rail container capacity. However,</td>
</tr>
<tr>
<td>SA Issue:</td>
<td>SCDC response:</td>
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<td>-------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
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<tr>
<td>9. The SA gives inappropriate weight to out of date reports and data.</td>
<td>The SA document has been produced giving consideration to the best available information. The assessment of predicted impacts has been conducted based upon professional judgement taking into account the best available evidence.</td>
</tr>
<tr>
<td>10. The evidence base and baseline data would benefit from including more information to demonstrate that the historic environment has been suitably considered.</td>
<td>Noted. A number of updates to the RCS document were previously agreed by Cabinet and Council which will help demonstrate this. These changes will be implemented for a Pre-Submission version of the document. Clarification has also been undertaken in the SA to reflect this (Appendix F).</td>
</tr>
<tr>
<td>11. The SA does not go into enough depth regarding analysis of impacts and mitigation required – it devolves this down to other documents and processes.</td>
<td>The SA has been undertaken in relation to a strategic planning document. The analysis which has been carried out is proportionate to this. It is reasonable that the matters of specific detail should be considered in documents proposing specific detail – e.g. the Area Action Plans or individual planning applications.</td>
</tr>
<tr>
<td>12. The SA has not considered sufficient alternative options for housing, across the district and in the Ipswich Policy Area.</td>
<td>The development of the RCS policy options has been an iterative process, a summary of which is provided in Appendix 6 of the SA. It shows that a number of options were considered, in relation to the overall housing requirements and the distribution across the district and the Ipswich Policy Area. Consideration of these options subsequently led to the proposals contained in the RCS. Early on in the decision making process, the Council expressed a preference for one, or at most two strategic sites in order to best deliver infrastructure, as well as to seek to locate new housing close to new jobs. At each stage, the SA has assessed the impact of those proposals having regard to social, economic and environmental factors in isolation and in combination.</td>
</tr>
<tr>
<td>13. The mitigation required to compensate for environmental damage is insufficient.</td>
<td>The mitigation identified has been put forward in the context of the evidence base and is considered as sufficient to reduce predicted adverse impacts to an acceptable level. A wide range of statutory consultation bodies, including NE, EA and EH have been fully engaged in the process, and have expressed their general satisfaction with the RCS proposals and subsequent mitigation. It is acknowledged that further detailed assessment will be required at the Area Action</td>
</tr>
<tr>
<td>SA Issue:</td>
<td>SCDC response:</td>
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<tr>
<td>14. The mitigation of recreational impacts from new development at Martlesham will need to apply to both the Deben estuary and the Suffolk Sandlings area.</td>
<td>Noted. The AA acknowledges this. Mitigation proposals will be expected to be considered for both Deben and Sandlings areas.</td>
</tr>
<tr>
<td>15. There is confusion regarding the role of Foxhall Country Park – the SA says that it is not considered, but also states accessibility could be improved to it.</td>
<td>Foxhall Tip Country Park is a long-term proposal which is predicted for delivery outside of the plan period (i.e. after 2027). The documents highlights that green infrastructure links can be made to recognise this future potential, so that if and when the site becomes a country park, then accessibility is immediately available.</td>
</tr>
<tr>
<td>16. Development will put excess pressure on water resources which is not adequately recognised.</td>
<td>The SA has had due consideration to pressures on water resources and relevant evidence base documents such as the Water Cycle Study have informed this process. The Environment Agency (EA) has also considered matters of water resource and expressed their satisfaction that the issues have been considered and can be addressed (see p.7 of EA letter November 2011 in Appendix C. Some further clarification has been made, particularly to the baseline data and policy assessment tables to help demonstrate water impacts have been explicitly considered (Appendix F).</td>
</tr>
</tbody>
</table>

10.05 Main issues raised on the Appropriate Assessment:

<table>
<thead>
<tr>
<th>AA Issue:</th>
<th>SCDC response:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The AA has not addressed matters previously raised in consultation.</td>
<td>The AA has been produced as part of an iterative process and each revision has been made having had consideration to all of the previously made comments. The document is a strategic assessment of the RCS and is therefore proportionate to this.</td>
</tr>
<tr>
<td>2. The AA does not consider the cumulative impact upon European sites.</td>
<td>The AA document clearly demonstrates consideration for cumulative impacts. Most notably it considers the in-combination impacts from both Suffolk Coastal and Ipswich Borough housing proposals.</td>
</tr>
<tr>
<td>3. The document contains many contradictions and flaws in reasoning.</td>
<td>The AA document follows a sequential stage by stage approach as advocated by NE [formerly English Nature] Habitats Regulations Guidance Notes HRGN1 to HRGN4. The document has established which Natura 2000 sites may be affected, whether there is likely to be significant adverse effects, and whether (through policy</td>
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<td>AA Issue:</td>
<td>SCDC response:</td>
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<td>adaptation or mitigation) any adverse effects can be avoided or reduced to an acceptable level. NE have been fully engaged and consulted throughout the process and have expressed their broad satisfaction with the report.</td>
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<td>4. No survey has been undertaken of visitor numbers and impact on the Deben estuary. A further summertime survey should also be undertaken.</td>
<td>Reference and consideration has been given to the best available data on visitor numbers, which includes relevant studies at national and local levels. Whilst no specific wide-scale study is available for the Deben, the principles of predicted impact, and necessary mitigation has been considered. Part of the mitigation package involves the production of a visitor management plan for the Deben and neighbouring areas. Natural England has been part of the iterative process and confirmed their broad agreement with the method and findings of the AA commensurate with a strategic document - the RCS.</td>
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<td>5. The data and findings of the recent NANT Deben estuary visitor survey have been ignored.</td>
<td>The AA clearly gives consideration to the NANT Deben survey in section 5.8.</td>
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<td>6. The AA gives inappropriate weight to out of date reports and data.</td>
<td>The AA is based upon the best available evidence. NE has been part of the iterative process and confirmed their broad agreement with the method and findings of the AA commensurate with a strategic document - the RCS.</td>
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<td>7. There are no specific details over the delivery of the necessary Country Park. What measures will be undertaken if the mitigation is deemed to be failing.</td>
<td>Both the Suffolk Coastal District Council and Ipswich Borough Council RCSs acknowledge and set out a need for additional provision of green infrastructure. This is one of a range of mitigation measure to conclude that development will not be expected to have an adverse effect upon Natura 2000 designations. This will mainly be expected to be paid for by development contributions and will be delivered by a partnership between Suffolk Coastal, Ipswich Borough, NE and other relevant local stakeholders. There are two major planning proposals in Suffolk Coastal, Martlesham and Ipswich Borough northern fringe respectively which are including contributions to these objectives within their schemes, and further very detailed work will be undertaken through other development plan documents e.g. Area Action Plans etc. NE have confirmed the package of mitigation measures proposed in the RCS as suitable to conclude no significant adverse impact will occur on Natura 2000 sites.</td>
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<td>8. There are no planned green spaces to mitigate the effects of new</td>
<td>See above. There are no project-level specific proposals set out in the RCS. The AA and RCS</td>
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<td>development.</td>
<td>propose that development mitigation in the form of on-site and off-site provisions will need to</td>
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<td>be made, in combination with other mitigation measures, to offset the potential for adverse</td>
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<td>impact. For example, improvements in green space are proposed as mitigation for development east</td>
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<td>of Ipswich and Felixstowe, as well as a proposed Country Park.</td>
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<td>9. The AA (in section 5.3) predicts a figure of 1.57 ‘new’ people to</td>
<td>The figure represents the predicted ratio increase of people into the district from elsewhere for</td>
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<td>the district per new dwellings. This is unrealistic and is based upon the</td>
<td>each new home (i.e. 17,300 people divided by 11,000 homes). The analysis is based upon the ‘new’</td>
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<td>Oxford Economics forecasts which the Council rejected.</td>
<td>potential impact to the district from people who were not previously resident.</td>
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<td>A proportion of people moving into new homes will be existing residents of the district moving</td>
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<td>out from ‘hidden households’ etc. People in existing households in the district are already</td>
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<td>contributing to the baseline level.</td>
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<td>The prediction is based upon the best available data from the Office of National Statistics and</td>
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<td>Oxford Economics. The Council has not rejected the findings of the Oxford Economics study and it</td>
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<td>forms part of the RCS Evidence Base.</td>
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<td>10. The 1km walking distance assumption is unrealistic for daily walkers</td>
<td>The 1km daily walker assumption is based upon evidence, including the Suffolk Sandlings study</td>
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<td>– most ramblers regularly walk 5-8km.</td>
<td>which is very local. It represents the distance people are prepared to travel by foot before they</td>
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<td>get to the start of their walk. The figure is already more precautionary than is evidenced, for</td>
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<td>example, the Sandlings study suggests that 75% of visitors arriving by foot came from within</td>
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<td>500m. This is consistent with further evidence considered nationally and from Dorset. Evidence</td>
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<td>suggests that the biggest of use visitor areas are for people walking dogs, walkers are the second</td>
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<td>greatest users.</td>
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<td>There is no specific evidence to the extent of ramblers, and it is reasonable to assume their</td>
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<td>walking habits are probably far greater than the average person.</td>
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<td>11. The footpaths of the Deben estuary are regularly used even though they</td>
<td>It is true that some of the footpaths are in a poor condition. This may even lead to them being</td>
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<td>are eroded.</td>
<td>even less attractive to walkers. Some parts of the paths are already broken and impassable</td>
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<td>which deters the majority of people from reaching these points. These issues can be addressed via</td>
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<td>the work to be done on an</td>
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<td>AA Issue:</td>
<td>SCDC response:</td>
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<td>Estuary Flood Strategy, as is happening on the other estuaries. It is also an issue for consideration as part of any visitor management plan.</td>
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<td>The AA document has been produced giving consideration to the best available scientific information. The assessment of predicted impacts has been conducted based upon professional judgement taking into account the best available evidence. NE has been part of the iterative process and confirmed their broad agreement with the method and findings of the AA commensurate with a strategic document - the RCS.</td>
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<td>Water based recreation is considered to be much less of an issue in causing disturbance to wintering birds than land based recreation. (see the Stour &amp; Orwell recreation study) The activity is also limited by boat ownership, limited launching opportunities, and by the capacity of existing facilities. Expansion of these facilities would require permission, and the effects could then be scrutinised. While existing and potentially increased water based recreation could cause localised issues which may require management, it is NE’s view that an increase in water based recreation likely as a result of the LDF does not represent a significant effect overall. The boatyard is an existing facility and already has the potential to impact. Further controls can be placed on these activities should they be deemed to be causing an adverse impact at present. NE have not commented there is a known impact upon the designated areas, and is involved in estuary management. For other estuaries they have worked in partnerships to produce codes of conduct for boaters. This approach could be introduced into the Deben Estuary if there is a need to. Further investigations into estuary management could be helpful. Anecdotal evidence suggests that the boatyard is currently at or near to capacity and therefore increases will be controlled naturally. There are also a limited number of places where boats can be launched for day use which in turn limits an increase in use. However should the boatyard wish to expand the facility, then detailed consideration of all potential issues and impacts including the potential effect of additional disturbance to the estuary would be made at that time.</td>
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<td>12. The AA fails to demonstrate that 2,000 houses at Martlesham will not have a significant adverse impact upon European designations</td>
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<td>13. A large increase in population will result in a large increase in boating activities upon the Deben estuary which would cause harm to wildlife and habitat.</td>
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<td>AA Issue:</td>
<td>SCDC response:</td>
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<td>Notwithstanding the comments above, water based recreation could also be monitored as part of the wardening proposals.</td>
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<td>14. Waldringfield Pitt SSSI should have been mentioned – it is inside the proposed development area.</td>
<td>Sites of Special Scientific Interest (SSSI) designations are not qualifying sites for Habitats Directive and do not require assessment in the AA document. There are no specific project-level proposals, the RCS is a strategic document and does not formally designate development areas. This is would be considered under any relevant planning application or more detailed development plan document e.g. Area Action Plan. An increase in the numbers of people visiting Waldringfield pit is unlikely to cause damage to this geological SSSI.</td>
</tr>
<tr>
<td>15. The AA states that limited parking availability will help limit visitor numbers at Waldringfield. However, most of the time there is plenty of parking available.</td>
<td>Noted. The potential for the car park to reach visitor capacity is an existing problem. Further actions can be undertaken in the area now should the existing visitor situation be deemed to be causing an adverse impact. NE has not commented there is a known impact upon the designated areas. Should the car park become full, then this will act as a natural control of numbers. If there are plans to further expand this, then there will need to be detailed consideration to the potential effect of additional disturbance - planning permission would be required. It is to be expected that parking would be looked at as part of the Visitor Management work. There are no proposals through the RCS to increase parking provision.</td>
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<td>16. The car park at Martlesham Church is rarely empty and used by visitors/walkers</td>
<td>Noted.</td>
</tr>
<tr>
<td>17. The Deben area will be impossible to ‘police’. Dog walkers take little notice of signposting etc.</td>
<td>Mitigation measures will need to include suitable signposting and wardening to educate visitors to be responsible. Many people already act responsibly, although not all. Wardening is currently very limited but can be expanded. In addition, appropriate provisions for controlled ‘dogs of lead’ areas, would help to deflect these activities to the right locations. Mitigation proposals include for on-site provision of green space which should serve to meet the day to day needs of dog walkers.</td>
</tr>
<tr>
<td>18. Consideration needs to be given to the effects of increased surface water run-off and foul-water discharge into</td>
<td>Noted. The AA document could be clarified to demonstrate how this has been considered. The Water Cycle Study does not raise any critical</td>
</tr>
</tbody>
</table>
### AA Issue:

the local area – there may be possible adverse impacts upon designated areas

### SCDC response:

concerns in this respect so it has been assumed not to be a major issue. NE and the EA will be able to monitor the situation on water quality and the effects on Natura 2000 sites can be taken into account when reviewing any authorised discharge licenses with the relevant bodies.

Surface water run-off needs to be considered on a case by case basis, and there is no evidence at a strategic level that there would be any run-off into European sites. For example, a planning application would need to demonstrate that drainage is satisfactory, perhaps using a combination of traditional piped drainage and Sustainable Urban Drainage Schemes.

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### CONSULATION UNDER REGULATION 27

[25th January 2012 – 7th March 2012]

11.01 The Core Strategy and Development Management Policies document is now at the final publication stage before formal Submission to the Secretary of State. The document is available for the statutory 6 week period to enable the public to make comments on the legal compliance and 'soundness' of the document.

11.02 Relevant advertising has been undertaken in locally circulating newspapers and also as per previous consultations, the relevant consultees have been notified.

11.03 Comments must be made by 5.15pm on 7th March 2012 and should ideally be made using the official response form available at the Council Offices or on the Council’s website (www.suffolkcoastal.gov.uk). Alternatively, comments can be made directly into the Council’s online consultation system available at: [http://suffolkcoastal.jdi-consult.net/ldf/](http://suffolkcoastal.jdi-consult.net/ldf/). All responses received will be collated, considered and made available, through the Council’s website.
APPENDIX AA – List of consultation bodies

The following schedule is a list of bodies, organisations and groups who have been consulted in the production of the Core Strategy. The Town & Country Planning (Local Development) (England) Regulations 2004 (as amended) specify there are three types of consultee as below:

Specific consultation bodies (mainly organisations responsible for services and utilities and infrastructure provision)

- Anglian Water
- Association of British Insurers
- Babergh District Council
- British Energy
- British Nuclear Group
- Civil Aviation Authority
- Defence Estate East
- Defence Estates
- Department of Transport
- East of England LGA (EELGA) – formerly the East of England Regional Assembly (EERA)
- EDF Energy
- East of England Development Agency - EEDA
- English Heritage
- Essex County Council
- First Transport
- Forest Heath District Council
- Health & Safety Executive (HSE) Explosives
- Highways Agency
- Homes & Communities Agency (HCA)
- Ipswich Borough Council
- Ipswich Buses Ltd
- Ipswich Primary Care Trust
- Mid Suffolk District Council
- Mitel Telcom Limited
- MMO - Marine Management Organisation
- Mobile Operators Association
- National Grid
- Natural England
- Network Rail
- Nuclear Directorate Health & Safety Executive
- The Planning Inspectorate (PINS)
- St Edmundsbury Borough Council
- Strategic Health Authority
- Suffolk ACRE
- Suffolk Constabulary
- Suffolk County Council
- Suffolk East Primary Care Trust
- Suffolk Fire Service Headquarters
- Suffolk Mental Health Partnership NHS Trust
- Suffolk Primary Care Trust
- The Environment Agency
- The Haven Gateway Partnership
- Town and Parish Councils (Suffolk Coastal and adjoining)
- Waveney District Council

General consultation bodies (voluntary organisations representing certain groups within the community)

- Voluntary bodies, some or all of whose activities benefit any part of the Council’s area
- Bodies representing different ethnic or national groups, religious groups or disabled people in the local authority’s area
- People carrying on business in the local authority’s area

Other consultation bodies (other organisations who may have an interest in the development plan document)

- Individuals and organisations who expressed an interest to be notified of consultations – for example, landowners, pressure groups, wildlife groups
- Other organisations which the Council considers appropriate and may have an interest in the development plan being produced.