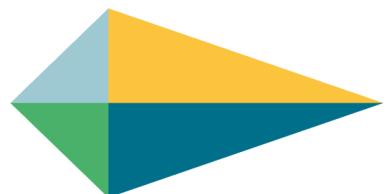


East Suffolk Council – Suffolk Coastal Local Plan

Statutory 5 year Review Assessment



EASTSUFFOLK
COUNCIL

September 2025

Contents

Introduction.....	1
PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment.....	2
Appendix A - Suffolk Coastal Local Plan Review Screening.....	22
Appendix B – Standard method housing need calculation	150

Introduction

The East Suffolk Council – Suffolk Coastal Local Plan was adopted on 23 September 2020. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 introduced in 2017, states that local planning authorities must review their plans within five years from the date of adoption. Review in this context means an assessment to determine whether updates to the plan are currently necessary. The National Planning Policy Framework (2024) states that “Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary.”

The Council has completed the review assessment using the Planning Advisory Service (PAS) Toolkit Part 1, supported by an assessment of each policy contained in the Suffolk Coastal Local Plan.

The review assessment concludes that a Local Plan review is needed.

PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT:</p> <p>As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the 'content' requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>The policies have been considered in relation to the most recent National Planning Policy Framework (NPPF) (December 2024), as well as changes in the national Planning Practice Guidance (PPG) and Written Ministerial Statements, and other national policy as appropriate including the National Model Design Code.</p> <p>The Suffolk Coastal Local Plan was prepared and examined under the 2019 NPPF. Whilst there have been changes to the NPPF, many of the overall aims of the NPPF remain consistent with the Suffolk Coastal Local Plan. Any relevant areas of change are explained in answering the questions in this matrix, and identified against individual policies in the detailed assessment table at Appendix A where relevant.</p> <p>However, a key area of change in national policy is the introduction of the new standard method for calculating local housing need, which was introduced through revised Planning Practice Guidance alongside the December 2024 NPPF. This is explained in more detail in response to A2 below.</p> <p>Paragraph 21 of the NPPF sets out that plans should make explicit which policies are strategic policies. The NPPF has not changed in this regard</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			since the 2019 version against which the plan was examined, and Appendix M of the Local Plan makes clear which are strategic policies.
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT:</p> <p>Look at whether your local housing need figure, using the standard methodology, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth ambitions linked to economic development or infrastructure investment, strategies such as Housing Deals, or formal agreements to meet unmet need from neighbouring authority areas.</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Changes to the standard methodology for assessing housing need were introduced in December 2024 in an updated PPG on Housing and Economic Needs Assessment. The housing need calculated under the new standard method equates to 1,667 dwellings per year for East Suffolk, as set out in Appendix A (as calculated at June 2025). The new standard method does not directly provide a separate local housing need figure for the Suffolk Coastal Local Plan area however the Council has calculated this as 981 dwellings per year using a suitable alternative approach which has regard to the data available and the guidance in the Planning Practice Guidance. This is substantially higher than the 542 dwellings per year planned for in the adopted Suffolk Coastal Local Plan. Therefore, under paragraph 34 of the NPPF, it is concluded that strategic policies relating to housing supply require a review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025, and published an updated Local Development Scheme (March 2025).</p> <p>The Council have consulted the authorities adjoining the Suffolk Coastal Local Plan area. At this point in time there are no formal agreements in place to meet unmet housing need, however it is noted that housing need has increased for adjoining authorities also and any matters of</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>unmet need would need to be considered and addressed through local plan reviews.</p> <p>There is no evidence to suggest that over the plan period the Local Plan housing requirement in the current plan is not deliverable. Notwithstanding this, completions have overall decreased per year since the adoption of the Plan, from 660 dwellings in 2019/20 to 533 in 2023/24. The plan contains an over-allocation of 16.5% to provide a buffer against some sites not coming forward or coming forward more slowly than anticipated.</p>
A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT:</p> <p>Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Agree / Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Housing Land Supply position as at 31.3.2024 was published in November 2024. This sets out a housing land supply of 6.39 years for the Suffolk Coastal Local Plan area. The December 2024 NPPF re-introduces a requirement to apply a buffer to housing land supply calculations. This on its own would reduce the housing land supply to 6.08 years. Whilst there is currently over five years of supply in place, the housing land supply position will be further affected by the outcome of this assessment, and will need to be assessed against the housing need calculated under the new standard method. Given the significant increase in housing need this would most likely result in lower than five years of housing land supply.</p>

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A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT:</p> <p>Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	Agree	<p>The 2023 Housing Delivery Test was published in December 2024 and the result for East Suffolk is 103%. There are therefore no consequences for East Suffolk as a result of the most recent (2023) Housing Delivery Test.</p> <p>Housing delivery figures are set out below. Whilst the annual requirement of 542 dwellings per year has only been met in 2018/19 and 2019/20, wider matters beyond the Local Plan have had an impact on housing delivery including the Covid pandemic, high inflation, some significant cost increases for (and availability of) materials. Although not necessary as the Housing Delivery Test has been passed, the Council updates its Housing Action Plan each year to identify ways in which the Council can further support the delivery of housing.</p> <p>Housing delivery since the start of the Plan period:</p> <p>2018/19 - 588</p> <p>2019/20 - 660</p> <p>2020/21 - 511</p> <p>2021/22 - 499</p> <p>2022/23 - 450</p> <p>2023/24 – 533</p> <p>Over the plan period from 1st April 2018 to 31st March 2024 a total of 3,252 dwellings should have been completed to meet the requirement of 542 per year, however 3,241 have been completed (excluding residential institutions - 3,311 have been completed including</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>equivalent dwellings for residential institutions). Overall, the requirement is broadly being met however it is noted that completions in recent years have been lower. Data for 2024/25 is being finalised at the time of writing.</p> <p>The change to the standard method and resultant increase in the housing need figure is likely however to impact on future Housing Delivery Test results.</p>
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	Agree	<p>Affordable housing</p> <p>Policy SCLP5.10 of the Suffolk Coastal Local Plan sets out that sites of 10 or more dwellings or 0.5ha or more should provide 1 in 3 dwellings as affordable housing. Affordable housing has been delivered as follows:</p> <p>2018/19 – 588 (125 affordable)</p> <p>2019/20 – 660 (197 affordable)</p> <p>2020/21 – 511 (90 affordable)</p> <p>2021/22 – 499 (114 affordable)</p> <p>2022/23 – 450 (113 affordable)</p> <p>2023/24 – 533 (191 affordable)</p> <p>26% of all dwellings completed between 2018-24 were affordable housing (830 of 3,241 new homes), demonstrating that affordable housing is being delivered under SCLP5.10. The figure of 26% relates to the proportion of all housing completions, which will include those on</p>

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			<p>sites of 9 or fewer dwellings where affordable housing is not required by policy.</p> <p>Whilst policy SCLP5.10 includes provision for the level and tenure of affordable housing to be varied in exceptional circumstances, in reality this part of the policy is rarely applied.</p> <p>Commercial development</p> <p>The policy aims to deliver more than the baseline requirement of 11.7ha of employment land. Since the Plan baseline date of 2018, a total of 22.37ha of employment land has come forward within allocated sites and existing employment areas within the Local Plan, along with 2.03ha in other locations. However other employment allocations are still to come forward. It is anticipated that some sites will come forward later in the plan period, noting that this runs to 2036 and that the Plan over-allocates employment land. The Council prepared an Employment Land Action Plan in 2024 to consider ways in which the delivery of allocated sites could be further supported.</p>
A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT:</p> <p>A key employer has shut down or relocated out of the area.</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>In terms of housing delivery, economic conditions are monitored through the annual updates to the Housing Action Plan. There have been impacts on the economy from a range of external factors including the Covid pandemic, costs and availability of materials and the cost of living crisis during the plan period to date since 2018. Housing delivery has decreased overall in recent years in the Suffolk Coastal Local Plan</p>

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	<p>Unforeseen events (for example global economic shock) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>		<p>area, however there is nothing to suggest that long term delivery of the housing growth set out in the Local Plans could not be achieved.</p> <p>Since adoption of the Plan, a number of Nationally Significant Infrastructure Projects (NSIPs) have been proposed and are coming forward in the area. Development of the Sizewell C new nuclear power station has recently commenced, with much of the associated development also proposed within the former Suffolk Coastal Local Plan area. As covered in the assessment of policies at Appendix A, effects of Sizewell C are being seen in terms of accommodation pressures and need for employment space, as well as transport related matters. A number of off-shore wind energy developments are also coming forward, and cumulative impacts are therefore relevant. Decisions on NSIPs themselves are taken by the Secretary of State and are informed by National Policy Statements which are produced by Government outside of the Local Plan process, and the Local Plan does not therefore need to set the full policy framework for consideration of NSIPs.</p> <p>Alongside this, the housing number calculated under the standard method has substantially increase (see A2 above), however a Local Plan review would need to consider how this increased number relates to employment demands in future years.</p>
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT:</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Since adoption of the Suffolk Coastal Local Plan, the Council undertook and adopted a review of its Community Infrastructure Levy Charging Schedule. The new rates, which came in from August 2023, have been</p>

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	<p>You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>		<p>informed by viability evidence which considered the policy requirements of the Local Plan.</p> <p>Policy SCLP5.10 Affordable Housing on Residential Developments provides for the level and tenure of affordable housing to be varied where it can be satisfactorily demonstrated that a lower level is needed for viability reasons. There have been very few occasions where this or provision of a commuted sum in lieu of provision on site has been agreed.</p> <p>The Council regularly engages with the development industry, in particular through its annual Housing Land Supply surveys and also through developer forums. Strategic economic challenges highlighted are considered through the annual Housing Action Plan.</p>
A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Local Plan allocated land for 5,331 houses (additional to sites with planning permission already as at 1.4.18). Of those, a number now have permission or are being developed, as indicated in the policy assessment table in Appendix A. As mentioned above, the Suffolk Coastal Local Plan area currently has a Housing Land Supply of 6.08 years (as published in March 2025) demonstrating that sites are coming forward. A2 above assesses the implications of the housing number now being significantly increased.</p> <p>The Local Plan contains three strategic sites – Brightwell Lakes, North Felixstowe Garden Neighbourhood and South Saxmundham Garden Neighbourhood. The Council's Major Sites team provides a dedicated</p>

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			resource to facilitate and support these sites in coming forward, such as ongoing liaison in regards to masterplanning. Strategic sites were not anticipated to deliver significant completions in the early part of the plan period, and the current focus on supporting these sites in coming forward under the Local Plan policies remains appropriate.
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT:</p> <p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special</p>	Agree / Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There have been no changes in relation to international designations (Special Protection Areas and Special Areas of Conservation). The Habitats Regulations Assessment for the Local Plan concluded that the housing development within 13km of some Special Protection Areas and Special Areas for Conservation will cause recreational disturbance. In accordance with the policy, a Recreational disturbance Avoidance and Mitigation Strategy and accompanying Supplementary Planning Document were prepared and a Delivery Manager and Rangers have been recruited to manage the delivery of the mitigation measures through the partnership agreement with other relevant authorities, and this is being delivered under the Wildlife Wise brand.</p> <p>The Environment Agency published updated flood risk maps and data in early 2025 (for surface water, rivers and the sea), which shows increased risks in some parts of the district.</p> <p>A Coastal Adaptation Supplementary Planning Document was adopted in 2023, providing guidance on implementing the coastal change policies in the plan. The underlying data on which the Coastal Change Management Area is based, as set out in the Shoreline Management Plan (SMP), would benefit from being updated (the short-term risk zone</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider if your area is covered by advice from Natural England on nutrient neutrality and / or water neutrality which could impact on the delivery of housing. Nutrient neutrality is a means of ensuring that a development plan does not add to existing nutrient burdens within catchments. Water neutrality is a means of ensuring that plans do not increase the rate of water abstraction for drinking water supplies above existing levels in an area.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		<p>(i.e. changes to the coast expected within 20 years) is identified within SMP7 (Lowestoft to Felixstowe) as ending in 2025) but this change is not considered to necessitate review of the policy and is not directly within the control of the Council anyway, as SMPs are prepared on a partnership basis by a number of bodies.</p> <p>All three Air Quality Management Areas in the former Suffolk Coastal area have been revoked.</p> <p>The Zones of Influence for European sites remain as identified in the Recreational disturbance Avoidance and Mitigation Strategy which is being implemented in accordance with the Local Plan. Amendments to SSSI Impact Risk Zones are considered on a site-by-site basis through the development management system, and consultation with Natural England is carried in accordance with the latest advice.</p> <p>The Suffolk Coastal Local Plan area is not affected by nutrient neutrality.</p> <p>There have been changes to the boundaries of some Conservation Areas in the Suffolk Coastal Local Plan area and reviews of the Conservation Area Appraisals and Management Plans since adoption of the Local Plan, as set out in the Appendix A, including Aldeburgh, Thorpeness and Walberswick, and a new Conservation Area at Aldeburgh Park. Paragraph 11.33 of the Local Plan recognises that Conservation Area Appraisals and Management Plans are updated from time to time. Areas of parkland have been nationally listed, as set out in Appendix A. It is not thought that the nature of the revisions would have an impact on the delivery of the Local Plan's housing and employment requirements.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A10.	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>No significant new sites have become available or been granted permission which would affect the delivery of the Local Plan strategy. New sites would be considered through a Local Plan review.</p>
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT:</p> <p>You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates,</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Some major infrastructure projects listed in policy SCLP2.1 have come forward, and whilst others haven't it should be recognised that many of these are long term projects.</p> <p>Local infrastructure such as schools, walking and cycling routes and green infrastructure is being secured and delivered as appropriate on a site-related basis, or via CIL funding.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>		<p>A new East Suffolk Community Infrastructure Levy Charging Schedule was adopted in June 2023 and came into effect on 1st August 2023. This reflects the growth planned and policies in the Local Plan, with CIL rates set accordingly. The Council has a robust CIL Spending Strategy focussed on essential plan-led infrastructure delivery and a rigorous annual Infrastructure Funding Statement process.</p> <p>The Council adopted the East Suffolk Cycling and Walking Strategy in October 2022 and has established a cross-party member working group to progress with improvements.</p> <p>Challenges with water supply and waste water infrastructure capacity have become more recent matters. In relation to water supply, a moratorium on new employment development has been put in place in the Hartismere water resource zone until new supply solutions are delivered. This is largely outside of East Suffolk other than a very marginal area, albeit that supply is challenging across other areas.</p>
A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT:</p> <p>Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan's strategy.</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Whilst there are discrete parts of development management policies that would benefit from being updated, for example due to changes in the Use Classes Order, these largely remain operational and do not affect the overall delivery of the Local Plan strategy. Whilst they may be desirable, in most cases updates are not therefore considered necessary. However, some policies related to housing are identified as requiring a review in the context of considering housing supply in light of the new increased standard method housing need figure.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>		<p>Supplementary Planning Documents have been prepared or updated to assist in the implementation of a number of Development Management policies. These SPDs are:</p> <ul style="list-style-type: none"> • Recreational Disturbance and Avoidance Mitigation Strategy SPD (2021) • Historic Environment SPD (2021) • Sustainable Construction SPD (2022) • Affordable Housing SPD (2022) • Housing in Clusters and Small Scale Residential Development in the Countryside SPD (2022) • Coastal Adaptation SPD (2023) • Custom and Self Build SPD (2024) • Healthy Environments SPD (2024) • Rural Development SPD (2024) <p>Appeals performance – 31 out of 40 appeals in the Suffolk Coastal Local Plan area were dismissed in 2023/24 (78%) indicating the Local Plan is performing well and being upheld in appeals.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A13.	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT:</p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> • Review emerging and adopted neighbouring authority development plans and their planning context. • Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. • Review any relevant neighbourhood plans. • Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. • Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council regularly liaises with authorities adjoining the Suffolk Coastal Local Plan area (Babergh and Mid Suffolk District Councils and Ipswich Borough Council). Currently no matters that would materially impact the Suffolk Coastal Local Plan have been identified in adjoining authority's plans. The authorities have broadly aligned timetables for preparing their next Local Plans, and East Suffolk Council is liaising with those authorities on early preparation such as evidence gathering. Through the Ipswich Strategic Planning Area Board, it is expected that continued consideration will be given to alignment on shared strategic priorities.</p> <p>The district has good levels of neighbourhood plan activity including made plans; plans under review; and plans being prepared. It is not considered that any of these plans would have a material impact on the Local Plan or the planning context in general. In general, Neighbourhood Plans are coming forward to deliver the housing requirements identified in SCLP12.1, noting that the housing identified under SCLP12.1 is not crucial to the delivery of the Local Plan strategy.</p> <p>The Suffolk Coastal Local Plan covers the part of East Suffolk formerly covered by Suffolk Coastal District. East Suffolk Council was created on 1st April 2019, very shortly after the adoption of the Waveney Local Plan and prior to the adoption of the Suffolk Coastal Local Plan. The future East Suffolk Local Plan would cover the full district (outside of the Broads which is its own planning authority).</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			Suffolk has been selected for the devolution priority programme, under which a mayoral authority would be put in place across Suffolk and Norfolk, with responsibilities for preparation of a Spatial Development Strategy. Alongside this, proposals for local government reorganisation are also underway which will see the current two tier system of local government replaced with a unitary / unitaries structure. The 'Local Government Reorganisation Interim Plan Feedback: Suffolk' letter from MHCLG to Chief Executives dated 2.5.2025 states that "The legal status of local plan is not impacted by local government reorganisation. Where reorganisation occurs, new unitary authorities are expected to promptly prepare a local plan covering the whole of their area. Until that new local plan is adopted, existing constituent local plans remain in force as part of the development plan for their area. New unitary authorities have the discretion to progress any emerging constituent local plans."
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT:</p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council declared a climate emergency in July 2019, after the Submission of the Suffolk Coastal Local Plan but prior to its adoption.</p> <p>Following the election of the current Administration in May 2023, a new Strategic Plan 'Our Direction 2028' was adopted. This sets out four themes – environmental impact, sustainable housing, tackling inequalities and thriving economy. This assessment has considered the Local Plan in terms of whether the new Strategic Plan requires a change to the approach in the Local Plan.</p> <p>The Local Plan complements the ambitions set out in the Strategic Plan in many respects, including through the provision of affordable housing,</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/regeneration strategies and so on.		<p>delivery of sustainable transport infrastructure, preserving heritage and enhancing biodiversity. The Council seeks to be ambitious in addressing climate change, including through the 2019 Climate Emergency and the new Strategic Plan, and the Local Plan is not inconsistent with this including through policies on, for example, flood risk, sustainable construction and sustainable transport. Through a future review consideration could be given to whether there are further opportunities consistent with national planning policy and other considerations such as viability.</p> <p>Reflecting some of its wider ambitions, the Council published a Developers Charter in December 2024. Whilst this is not policy or a material consideration in planning decisions, it is a tool to proactively encourage development going over and above policy requirements in relation to key ambitions.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR LOCAL PLAN	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	No	<p>If no go to question A16.</p> <p>If yes, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the</p>

			<p>requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	<p>You DISAGREE with one or more of the statements above and the issue can be addressed by an update of your local plan</p>	Yes	<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to the local plan is necessary in section A17 below and complete Section B below.</p>
A17.	<p><u>Decision: Update local plan / No need to update local plan</u> (delete as necessary)</p> <p>Reasons for decision on whether or not to update local plan (clear evidence and justification will be required where a decision not to update has been reached):</p> <p>The Government introduced a new standard method for assessing housing need in December 2024, through amendments to the Planning Practice Guidance on Housing and Economic Needs Assessment. The housing need calculated under the new standard method equates to 1,667 dwellings per year for East Suffolk (981 for the Suffolk Coastal Local Plan area based on an equivalent calculation) as set out in Appendix A. This represents a significant change in housing need. Therefore under paragraph 34 of the NPPF, it is concluded that strategic policies relating to housing supply require review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025, and has published an updated Local Development Scheme (March 2025).</p>		

	<p>The assessment also identifies a small number of other policies or parts of them which require updating and a number of policies that remain effective as drafted. There are also a number of policies where future updates would be desirable however under present circumstances these are not considered necessary, and through the application of planning judgement these policies remain effective.</p> <p>Other actions that may be required in addition to or in place of an update of the local plan</p> <p>In addition to the Local Plan, the Council continues to produce additional guidance to support the implementation of planning policies. This includes Supplementary Planning Documents, guidance documents, strategies and topic specific action plans as detailed in the table at Appendix A in relation to specific policies.</p> <p>In addition to the ongoing implementation of the Suffolk Coastal Local Plan in advance of a new Local Plan being in place, the Council will also continue to monitor the delivery of the Plan.</p>		
	B. LOCAL PLAN UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your local plan update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	Yes	The Local Development Scheme (March 2025) proposes a full Local Plan review.
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your local plan update is likely to involve a change to this.	Yes	The Local Development Scheme (March 2025) proposes a full Local Plan review.
B3	Your local plan update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	Yes	The Local Development Scheme (March 2025) proposes a full Local Plan review.
	You have answered yes to one or more questions above.	Yes	You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.

	<p>You have said no to <u>all</u> questions (B1 to B3) above</p>	N/A	<p>If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of some local plan policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.</p>
B4	<p>Decision: Full Update of Local Plan /Partial Update of Local Plan (delete as necessary)</p> <p>Reasons for scope of update:</p> <p>The Local Development Scheme (March 2025) proposes a full Local Plan review. The housing need assessed under the revised standard method will require a significant uplift in the amount of housing planned for, which is a fundamental part of the Local Plan strategy.</p>		

Date of assessment:	July 2025
Assessed by:	Planning Policy and Delivery Team
Checked by:	Andrea McMillan – Planning Manager (Policy and Delivery)

Comments:

Appendix A - Suffolk Coastal Local Plan Review Screening

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Vision	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This contains the theme 'Thriving Economy' which includes ensuring 'local plans work for local people', as well as other themes covering Environmental Impact, Sustainable Housing and Tackling Inequalities, which are considered in relation to the specific policies throughout the assessment.</p>	No.	<p>As a high-level vision, no implications from changes to the NPPF since adoption of the plan. Specific amendments to the NPPF are considered against relevant policies below, including the significant increase in housing numbers.</p>	<p>Range of legislation changes covered under specific topics.</p> <p>Environment Act 2021 – brought in mandatory Biodiversity Net Gain from February 2024.</p> <p>Changes to the Use Classes Order and Permitted</p> <p>Development rights are considered in relation to relevant policies.</p>	<p>The vision covers the relevant topics and is broadly aligned with more recently adopted strategies, including the Council's new Strategic Plan. The Council seeks to be ambitious in addressing climate change, including through the 2019 Climate Emergency and the new Strategic Plan, and whilst the Local Plan is not inconsistent with this through a future review consideration could be given to whether there are further opportunities consistent with national planning policy and other considerations such as viability.</p> <p>The place specific elements of the Vision are realised through implementation of relevant policies for those places.</p> <p>As the Local Plan policies reflect the vision, the analysis of policies below are also relevant to consideration of the vision.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Climate Emergency declared by East Suffolk Council in July 2019.</p> <p>East Suffolk Economic Strategy adopted in 2022 – Lowestoft identified as an area of focus in the former Waveney area. The Visitor Economy Strategy (2022 – 2027) and Clean Hydrogen Strategy (2023 – 2028) also adopted.</p> <p>The Housing Development Strategy (2020 – 2024) and Housing Enabling Strategy (2020 – 2025) have been published</p>				

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>since the Local Plan was prepared.</p> <p>Environmental Impact Strategy adopted July 2024.</p>				
Strategic Priorities and Objectives	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023.</p> <p>Climate Emergency declared by East Suffolk Council in July 2019.</p> <p>Other strategies as referenced in the row above on the Vision.</p>	No.	<p>Whilst the priorities are high level, reference is made to delivering 9,756 homes over the plan period. With the increase in housing number the detail of this priority is out of date whilst the ambition remains consistent.</p>	<p>Range of legislation changes covered under specific topics.</p> <p>Environment Act 2021 – brought in mandatory Biodiversity Net Gain from February 2024.</p> <p>Changes to the Use Classes Order and Permitted Development rights are considered in relation to relevant policies.</p>	<p>The Strategic Priorities and Objectives cover the relevant topics and are broadly consistent with more recently adopted strategies, including the Council's new Strategic Plan. The Council seeks to be ambitious in addressing climate change, including through the 2019 Climate Emergency and the new Strategic Plan, and whilst the Local Plan is not inconsistent with this through a future review consideration could be given to whether there are further opportunities consistent with national planning policy and other considerations such as viability.</p> <p>As the Local Plan policies reflect the strategic priorities, the analysis of policies below are also relevant to consideration of the priorities.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
SCLP2.1: Growth in the Ipswich Strategic Planning Area	Whilst the latest version of the ISPA Statement of Common Ground was signed in March 2021 (version 7), after the adoption of the adoption of the Suffolk Coastal Local Plan, the broad areas of agreement remain the same in that SoCG. Each of the LPAs in the ISPA have published a Local Development Scheme with broadly aligned timetables for Local Plan reviews. The Terms of Reference for the Board were updated in March 2025.	No.	<p>The housing requirement of 542 dwellings per annum is based the Government's standard method at the time of adoption. The Standard Method was changed in the December 2024 update to the PPG on Housing and Economic Needs Assessment, resulting in an increase to 981 dwellings per annum (calculated for the Suffolk Coastal area).</p> <p>Amendments to the NPPF in the December 2024 NPPF updates</p>	None.	<p>Changes to the standard methodology for assessing housing need were introduced in December 2024 in an updated PPG on Housing and Economic Needs Assessment. The housing need calculated under the new standard method equates to 1,667 dwellings per year for East Suffolk. A figure for the Suffolk Coastal area has not been published however the Council has calculated this as 981 dwellings per year representing a significant change in housing need. Therefore, under paragraph 34 of the NPPF, it is concluded that strategic policies relating to housing supply require review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025.</p> <p>The most recent Housing Delivery Test result for East Suffolk was 103% (published December 2024).</p> <p>Whilst the broad areas of agreement between the ISPA authorities remain in the latest (March 2021) version of the Statement of Common Ground, a review</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This contains the theme 'Thriving Economy' which includes ensuring 'local plans work for local people' and the theme 'reduce health inequality and improve wellbeing' which includes ensuring residents have access to services.</p> <p>Climate emergency declared by East Suffolk Council in July 2019</p> <p>East Suffolk Economic Strategy adopted in 2022 with Sizewell and</p>		<p>paragraph 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p>		<p>of the Local Plan is needed due to the increase in housing number (see policy SCLP3.1 below).</p> <p>The policy states that an agreement to accommodate unmet need would trigger a review. At this point in time there are no formal agreements in place to meet unmet housing need, however it is noted that housing need has increased for adjoining authorities also and any matters of unmet need would need to be considered and addressed through local plan reviews.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Leiston, Adastral Park and Innovation Martlesham and, Felixstowe and the Freeport East Zone identified as an area of focus in the former Suffolk Coastal area.</p> <p>New Water Resource Management Plans have been prepared by Essex and Suffolk Water and Anglian Water. There is currently a moratorium in place in the Hartismere water resource zone (mostly Mid Suffolk) affecting employment development coming forward. A</p>				

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>new reservoir in the northern part of East Suffolk is proposed in the WRMP to address future supply.</p> <p>Sizewell C approved which alongside other energy projects are expected to provide significant investment into the area as well as provide challenges.</p> <p>Freeport East established in 2023 covering the port of Felixstowe amongst other locations.</p> <p>The role of retail in town centres has generally reduced in recent years, due to</p>				

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	the increase of internet selling and a general move to more out-of-town locations for larger food retailers in particular.				
Policy SCLP2.2: Strategic Infrastructure Priorities	Whilst the latest version of the ISPA Statement of Common Ground was signed in March 2021 (version 7), after the adoption of the adoption of the Suffolk Coastal Local Plan, the broad areas of agreement remain the same in that SoCG in relation to infrastructure. New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023.	No.	Implications of 2024 NPPF changes, promoting strategic economic growth for key areas like data centres and storage & distribution.	None.	The continued cross-boundary approach to infrastructure provision remains an important matter. Strategic infrastructure opportunities or requirements would need to be considered collectively as part of new Local Plans. Future Local Plans will need to have regard to the Local Nature Recovery Strategy, once in place, however this is currently under preparation. Whilst revisiting the policy approach may be desirable through a future Local Plan review, updates are not considered necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>This contains the theme 'reduce health inequality and improve wellbeing' which includes ensuring residents have access to services.</p> <p>ESC Cycling and Walking Strategy adopted in 2022.</p> <p>A12 MRN bid submitted by SCC in 2024 (some improvements being delivered at Brightwell Lakes in 2024/25).</p> <p>Government funding reconfirmed on 8.7.2025.</p> <p>Improvements to the Copdock junction (A14 J55) have not</p>				

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>substantially progressed.</p> <p>Setting up of Freeport East in 2023 – includes the Port of Felixstowe and surrounding area.</p> <p>A Transport Mitigation Strategy was produced by Suffolk County Council in 2019, setting out a package of modal shift measures.</p> <p>Whilst an agreed approach to funding has not been established, some modal shift measures have come forward, however the approach would also</p>				

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>need to be considered as part of a Local Plan review.</p> <p>Strategic rail improvements such as at Haughley junction have not yet taken place.</p> <p>Various specific development schemes have delivered infrastructure improvements.</p> <p>Adoption of Healthy Environments SPD, 2024, which includes guidance for the provision of Suitable Alternative Nature Greenspace (SANG) for the protection of</p>				

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	European Sites from recreational pressure, and development of the Draft Suffolk Local Nature Recovery Strategy (due for adoption later in 2025).				
Policy SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'environmental impact' which aims to deliver positive climate, nature and environmental impacts.</p> <p>The Recreational disturbance Avoidance and Mitigation Scheme SPD has been</p>	No.	None.	None.	<p>This remains recognised as a strategic cross-boundary matter.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	adopted. The governance of the RAMS project has been established, and the funding of mitigation projects is underway. The RAMS partnership launched the public-facing brand 'Wildlife Wise' in 2025.				
Policy SCLP3.1: Strategy for Growth	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This contains the theme 'Thriving Economy' which includes ensuring 'local plans work for local people', as well as other themes covering Environmental	All appeals relating to this policy have been dismissed: AP/22/0045/REFUSE AP/22/0067/REFUSE AP/22/0030/REFUSE AP/22/0012/REFUSE AP/22/0026/REFUSE	The policy references the delivery at least 542 new dwelling per annum. Changes to the NPPF published in December 2024, and the update to the PPG on Housing and Economic Needs Assessment, increase this figure to 981 dwellings per	None.	Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies (including the Council's new Strategic Plan), the significant change to the housing need figure means that the strategic policies relating to housing supply require review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025. The approval of the Sizewell C development has created additional demand for accommodation for its

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Impact, Sustainable Housing and Tackling Inequalities, which are considered in relation to the specific policies throughout the assessment.</p> <p>Climate Emergency declared by East Suffolk Council in July 2019.</p> <p>East Suffolk Economic Strategy adopted in 2022.</p> <p>The Visitor Economy Strategy (2022 – 2027) and Clean Hydrogen Strategy (2023 – 2028) also adopted.</p> <p>The Housing Development</p>		<p>annum (calculated for the Suffolk Coastal area).</p> <p>Amendments to the NPPF in December 2024 updates paragraph 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p>		<p>construction and operation workforce. These requirements will need to be considered through a Local Plan review.</p> <p>The Local Plan's employment strategy is focused around the delivery of employment land to deliver significantly more than the baseline of 11.7ha, supporting the Port of Felixstowe, development of a new business park and supporting the rural economy and town, district and local centres. Whilst these aims remain appropriate, employment needs related to Sizewell C have become more apparent, for example with the take up of Orwell Logistics Park. These needs, alongside wider needs including those related to new sectors set out in the NPPF, will need to be considered through a Local Plan review. Strategic / cross-boundary employment needs would be considered as part of the Duty to Co-operate through a local plan review.</p> <p>The policy aims to deliver more than the baseline requirement of 11.7ha of</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Strategy (2020 – 2024) and Housing Enabling Strategy (2020 – 2025) have been published since the Local Plan was prepared.</p> <p>Environmental Impact Strategy adopted July 2024.</p> <p>New Water Resource Management Plans have been prepared by Essex and Suffolk Water and Anglian Water. Whilst a moratorium has been introduced on new employment development in the Hartismere Water Resource Zone (in E&SW area) until new supply</p>				<p>employment land. Since the Plan baseline date of 2018, a total of 22.37ha of employment land has come forward within allocated sites and existing employment areas within the Local Plan, along with 2.03ha in other locations. However other employment allocations are still to come forward. It is anticipated that some sites will come forward later in the plan period, noting that this runs to 2036 and that the Plan over-allocates employment land. The Council prepared an Employment Land Action Plan in 2024 to consider ways in which the delivery of allocated sites could be further supported.</p> <p>The situation regarding water supply will continue to be monitored through engagement with the water companies.</p> <p>Overall, the conclusion is that a Local Plan review is needed.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>solutions are delivered, this is largely outside of East Suffolk other than a very marginal area, albeit that supply is challenging across other areas. A new reservoir in the northern part of East Suffolk is proposed in the WRMP to address future supply.</p>				
Policy SCLP3.2: Settlement Hierarchy	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the</p>	<p>The majority of appeals relating to this policy have been dismissed:</p> <p>AP/21/0028/REFUSE AP/21/0054/REFUSE AP/21/0063/REFUSE AP/21/0047/REFUSE AP/21/0039/REFUSE AP/22/0031/REFUSE AP/22/0058/REFUSE</p>	<p>None.</p>	<p>None.</p>	<p>Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies (including the Council's new Strategic Plan), the significant change to the housing need figure means that the strategic policies relating to housing supply, including spatial distribution, require review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>right locations based on all residents housing needs.</p> <p>Supplementary Planning Document on Housing in Clusters and Small Scale Residential Development in the Countryside was adopted in 2022</p>	<p>AP/22/0001/REFUSE</p> <p>AP/23/0017/REFUSE</p> <p>AP/22/0059/REFUSE</p> <p>AP/22/0060/REFUSE</p> <p>AP/23/0012/REFUSE</p> <p>AP/22/0072/REFUSE</p> <p>AP/22/0055/REFUSE</p> <p>AP/22/0030/REFUSE</p> <p>AP/22/0012/REFUSE</p> <p>AP/22/0019/REFUSE</p> <p>Conditionally allowed as inspector considered that the scheme met the requirements of Policy SCLP5.4 Housing in Clusters in the Countryside.</p> <p>AP/23/0024/REFUSE</p> <p>Conditionally allowed. Difference of planning judgement</p>			

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		associated with design.			
Policy SCLP3.3: Settlement Boundaries	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs.</p> <p>Supplementary Planning Document on Housing in Clusters and Small Scale Residential Development in the Countryside was adopted in 2022.</p>	<p>Whilst the policy has been mentioned in a few appeals, it is more for contextual reasons i.e. a particular appeal site is inside or outside the development boundary. The principle of the policy therefore hasn't been seriously challenged.</p>	None.	None.	<p>Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies (including the Council's new Strategic Plan), the significant change to the housing need figure means that the strategic policies relating to housing supply, including spatial distribution, require review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects	<p>The Council engages fully in the pre-application and formal application stages of major energy infrastructure projects (Nationally Significant Infrastructure Projects). This includes Sizewell C (granted consent in 2022) and various offshore windfarm proposals. There are also cable and connector projects (Nautilus and SeaLink).</p> <p>The same principles apply to those projects beneath national thresholds, for which the</p>	<p>Not relevant for most projects, as NSIPs go through the formal Development Consent Order process, whereby the Secretary of State is the ultimate decision-maker.</p>	<p>National Policy Statements (NPSs) exist on a variety of topics, including nuclear power (EN-6). Some of these were designated (updated) in 2024 and the nuclear power NPS is being updated at the time of writing.</p> <p>The 2024 NPPF update increases the weight to be given to low-carbon energy projects</p>	<p>Not directly relevant.</p>	<p>The principle of the policy – working with the various parties to maximise the benefits and minimise negative impacts of major energy projects – remains sound.</p> <p>The out-of-date reference to AONB is a minor change that is not considered to warrant review of the policy.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Council is the determining authority.</p> <p>Policy refers to the Area of Outstanding Natural Beauty which is now known as National Landscapes (albeit AONB remains the statutory title).</p>				
Policy SCLP3.5: Infrastructure Provision	<p>The East Suffolk CIL Charging Schedule came into effect in August 2023, superseding the two separate CIL Charging Schedules for Waveney and Suffolk Coastal.</p> <p>Suffolk County Council are currently revising the Developers Guide to</p>	<p>The policy has only been mentioned once, in a contextual way, in one appeal decision, therefore no issues identified</p>	<p>There is the requirement to produce annual Infrastructure Funding Statements, with the first produced for the 2019/20 year.</p>	<p>Some of the elements of the policy have been superseded by changes in Building Regulations, on broadband infrastructure, for example.</p>	<p>Amending the policy would be desirable due to the passage of time but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Infrastructure Contributions.</p> <p>Suffolk County Council has reported falling birth rates, affecting future education needs.</p>				
SCLP4.1: Existing Employment Areas	No.	No significant appeal decisions.	Amendments to the NPPF in the December 2024 NPPF updates paragraph 87 adding that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high	B1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	<p>Whilst through a future Local Plan review, revisiting the policy approach may be desirable, updates are not considered necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			technology industries.		
SCLP4.2: New Employment Development	The UK's modern industrial strategy adopted in June 2025.	A number of appeals were dismissed on the basis that the need had not been adequately demonstrated or that it had not been adequately demonstrated of that no sequentially preferable sites were available: AP/21/0011/REFUSE AP/23/0021/REFUSE AP/22/0072/REFUSE AP/23/0071/REFUSE One appeal decision AP/23/0028/REFUSE was allowed on the basis that the inspector was satisfied that	The following was added to the NPPF in 2018 'and for storage and distribution operations at a variety of scales and in Suitably accessible locations.' Amendments to the NPPF in December 2024 updated para 86 to say that policies should have regard to the national industrial strategy and have particular regard to meeting the needs of a modern economy including identifying suitable locations for	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	Whilst through a future Local Plan review, revisiting the policy approach may be desirable, updates are not considered necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		adequate justification that no other suitable, available or achievable sites on sequentially preferable land could be identified AP/24/0019/REFUSE was allowed as the Inspector considered that the requirements of policies SCLP4.5 and SCLP4.7 had been met and these were the most dominant policies, as they specifically address development in rural areas.	laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. Para 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail to the requirement to make provision for storage and distribution facilities and to expand industries of local,		

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			regional or national importance.		
SCLP4.3: Expansion and Intensification of Employment Sites	The UK's modern industrial strategy adopted in June 2025.	AP/23/0028/REFUSE Appeal allowed on the basis that the proposed use would help to make the existing farm business more viable.	The following was added to the NPPF in 2018 'and for storage and distribution operations at a variety of scales and in suitably accessible locations.' Amendments to the NPPF in December 2024 updated para 86 to say that policies should have regard to the national industrial strategy and have particular regard to meeting the needs of a modern economy including identifying suitable locations for	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	Whilst through a future Local Plan review, revisiting the policy approach may be desirable, updates are not considered necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p> <p>Para 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail to the requirement to make provision for storage and distribution facilities and to expand industries of local,</p>		

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			regional or national importance.		
SCLP4.4: Protection of Employment Premises	None.	AP/22/0009/REFUSE Appeal Allowed. The inspector concluded that, 'policy does not elaborate on the nature of any substantial planning benefits arising from an alternative use; and I agree that such benefits should be proportionate to the scale of alternative use proposed.'	None.	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	Whilst through a future Local Plan review, revisiting the policy approach may be desirable, updates are not considered necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary.
SCLP4.5: Economic Development in Rural Areas	Rural Development SPD adopted 2024 provides further guidance on economic development in rural areas.	Two appeals have been dismissed on the basis that the proposals did not accord with criteria b) of this policy AP/22/0026/REFUSE	None.	None.	The Rural Development SPD was adopted in 2024 which provides further guidance on economic development in rural areas. Policy remains effective.

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		and AP/23/0021/REFUSE AP/24/0019/REFUSE was allowed as the inspector found that the proposal accorded with policies SCLP4.5 and 4.7, and these most dominant policies as they specifically address economic development in rural areas.			
SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use	Rural Development SPD adopted 2024 provides further guidance on economic development in rural areas.	No significant appeal decisions.	Amendments to the NPPF in the December 2024 updated para 116 to state 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact	None.	<p>The Rural Development SPD was adopted in 2024 which provides further guidance on economic development in rural areas.</p> <p>The policy states that proposals will be permitted where it does not have an unacceptable impact on highway safety, local roads or the living conditions of local residents and exploits opportunities to make the location more</p>

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			on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'		<p>sustainable by walking, cycling or public transport. The amendments to the NPPF suggests mitigation should be factored in to any future policy.</p> <p>Amending the policy would be desirable but is not necessary.</p>
SCLP4.7: Farm Diversification	The Rural Development SPD adopted in 2024 providing further guidance on economic development in rural areas.	AP/24/0019/REFUSE Appeal allowed. The inspector concluded under criterion a) that the term 'site' can be unclear.	Amendments to the NPPF in the December 2024 NPPF updates paragraph 116 to state 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts		<p>The Rural Development SPD was adopted in 2024 which provides further guidance on economic development in rural areas.</p> <p>The policy states that proposals will be supported where it does not compromise highway safety to the local road network or free flow of traffic. The amendments to the NPPF suggests mitigation should be factored in to any future policy.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'		
SCLP4.8: New Retail and Commercial Leisure Development	<p>The role of retail in town centres has generally reduced in recent years, due to the increase of internet selling and a general move to more out-of-town locations for larger food retailers in particular.</p> <p>ESC guidance 'Shops in Historic Town Centres' provides guidance about the repair and renovation of historic shopfronts.</p>	No significant appeal decisions.	<p>The NPPF paragraph 90 b) still requires local plans to define the extent of town centres and primary shopping areas and still promotes the sequential approach to new town centre development i.e. to be located in town centres, then edge of centres and only out of centre if not suitable sites available. Paragraph 90c) also states that local plans should</p>	<p>Changes to Permitted Development through new use Class E. This includes converting both retail and office uses to residential. Use Class E also includes industrial processes, which are not normally considered consistent with town centres.</p>	<p>Key areas of the policy remain appropriate including the sequential approach and impact assessment.</p> <p>Changes to the Use Classes Order means that updating references to use classes in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. A future review of the Local Plan would consider the appropriateness of the location of town centre boundaries and the approach to new uses within them.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	Guidance is also provided in the Historic Environment SPD (2021).		retain and enhance existing markets and create new ones where appropriate.		
SCLP4.9: Development in Town Centres	<p>The role of retail in town centres has generally reduced in recent years, due to the increase of internet selling and a general move to more out-of-town locations for larger food retailers in particular.</p> <p>East Suffolk Council Visitor Economy Strategy 2022-27 Shift towards turning town centres into destinations, rather than purely retail centres. The aim is</p>	No significant appeal decision.	<p>The NPPF paragraph 90 b) still requires local plans to define the extent of town centres and primary shopping areas and still promotes the sequential approach to new town centre development i.e. to be located in town centres, then edge of centres and only out of centre if not suitable sites available. Paragraph 90c) also states that local plans should retain and enhance existing markets and</p>	<p>Changes to Permitted Development through new use Class E. This includes converting both retail and office uses to residential. Use Class E also includes industrial processes, which are not normally considered consistent with town centres.</p>	<p>Key areas of the policy remain appropriate including the sequential approach and impact assessment.</p> <p>Changes to the Use Classes Order means that updating references to use classes in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>A future review of the Local Plan would consider the appropriateness of the location of town centre boundaries and the approach to new uses within them.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>to contribute to the tourist economy.</p> <p>Leiston Town Centre Masterplan provides the vision and a template for regeneration, land use and movement in Leiston town centre. Seeks to promote Leiston as a visitor destination.</p> <p>ESC Guidance Shops in Historic Town Centres provides guidance about the repair and renovation of historic shopfronts.</p>		<p>create new ones where appropriate.</p>		
SCLP4.10: Town Centre Environments	None.	No.	None.	None.	Policy remains effective.
SCLP4.11: Retail and Commercial	There have been a number of	No.	None.	Changes to Permitted	This policy is specific to a single area – works are ongoing so remains an

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Leisure in Martlesham	permissions for external works to the existing retail units alongside a number of advertisement consent applications.			Development through new use Class E. This includes converting both retail and office uses to residential.	<p>effective and valid policy, however it may need reviewing in the new local plan depending on progress on site.</p> <p>Changes to the Use Classes Order means that updating references to use classes in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>Whilst updates would be desirable, they are not considered to be necessary.</p>
SCLP4.12: District and Local Centres and Local Shops	ESC Guidance Shops in Historic Town Centres provides guidance about the repair and renovation of historic shopfronts	No.	None.	Changes to Permitted Development through new use Class E. This includes converting both retail and office uses to residential.	<p>Changes to the Use Classes Order means that updates to the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>Whilst updates would be desirable, they are not considered to be necessary.</p>
Policy SCLP5.1: Housing Development in Large Villages	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023.	No significant appeal decisions.	Changes to the standard methodology for assessing housing	None.	Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies and with policies for housing in the countryside in

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	Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs.		need were introduced in December 2024 in an updated PPG on Housing and Economic Needs Assessment. No relevant changes in the NPPF in relation to rural housing.		the NPPF, the significant change to the housing need figure means that the strategic policies relating to housing supply, including distribution, require review. In the context of all policies relating to housing supply the policy requires updating.
Policy SCLP5.2: Housing Development in Small Villages	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based	No significant appeal decisions.	Changes to the standard methodology for assessing housing need were introduced in December 2024 in an updated PPG on Housing and Economic Needs Assessment. No relevant changes in the NPPF in	None.	Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies and with policies for housing in the countryside in the NPPF, the significant change to the housing need figure means that the strategic policies relating to housing supply, including distribution, require review. In the context of all policies relating to housing supply the policy requires updating.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	on all residents housing needs.		relation to rural housing.		
Policy SCLP5.3: Housing Development in the Countryside	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs. Rural Development SPD adopted in April 2024.	No significant appeal decisions.	None.	None.	Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies and with policies for housing in the countryside in the NPPF, the significant change to the housing need figure means that the strategic policies relating to housing supply, including distribution, require review. In the context of all policies relating to housing supply the policy requires updating.
Policy SCLP5.4: Housing in Clusters in the Countryside	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme	Policy generally upheld: 8 dismissed, 3 conditionally allowed.	None.	None.	Supplementary Planning Document on Housing in Clusters and Small Scale Residential Development in the Countryside was adopted in 2022, which

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	<p>'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs.</p> <p>Supplementary Planning Document on Housing in Clusters and Small Scale Residential Development in the Countryside was adopted in 2022, which is assisting in the interpretation and implementation of the policy.</p>	<p>A number of the appeal decisions have related to the interpretation of whether the site is within a 'cluster'.</p>			<p>is assisting in the interpretation and implementation of the policy.</p> <p>This policy takes a positive approach to the delivery of housing in the countryside, however it's uncertain as to what extent this policy will contribute to the delivery of our higher housing need figure.</p> <p>In the context of all policies relating to housing supply, the policy requires updating.</p>
Policy SCLP5.5: Conversions of Buildings in the	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023.	AP/23/0019/REFUSE dismissed and supported the case officer's view that	None.	Changes to Class Q Permitted Development Rights introduced in May	The NPPF policy has not substantially changed since the 2019 NPPF (was para 79, now para 84c) and therefore it is considered the policy remains as

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Countryside for Housing	<p>Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs.</p> <p>The Rural development SPD (April 2024) provides further guidance on this policy.</p>	<p>the scheme had a neutral impact, not a positive impact.</p> <p>AP/23/0033/REFUSE dismissed on the basis of impacts on character and street scene.</p> <p>AP/22/0010/REFUSE conditionally allowed. Raised the issue with lack of ref to extensions as part of conversion to residential.</p>		<p>2024. Increase in the number of dwellings allowed from five to ten, an increase in total combine area converted to dwellings from 856sqm to 1,000sqm, with a maximum of 150sqm per dwelling.</p>	<p>appropriate as when it was examined and adopted.</p> <p>The Rural development SPD which provides further guidance on this policy was adopted in 2024.</p> <p>The policy still operates alongside any changes to Permitted Development rights as it still applies in those situations where planning permission is needed.</p> <p>Amending the policy to address changes to Class Q permitted development rights would be desirable but is not necessary.</p>
SCLP5.6: Rural Workers Dwellings	<p>Rural Development SPD adopted in 2024 providing further guidance on economic development in rural areas.</p>	<p>The policy has been upheld at appeal with four cases dismissed on the basis of lack of evidence of a functional need for a worker to live on site.</p>	<p>None.</p>	<p>None.</p>	<p>Rural Development SPD adopted in 2024 providing further guidance on economic development in rural areas</p> <p>This policy addresses a specific accommodation need as opposed to contributing to housing supply more generally.</p> <p>Policy remains effective.</p>

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		AP/22/0013/REFUSE dismissed AP/22/0055/REFUSE dismissed. AP/22/0030/REFUSE dismissed. AP/22/0012/REFUSE dismissed.			
Policy SCLP5.7: Infill and Garden Development	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs.	The majority of appeals relating to this policy have been dismissed: AP/23/0014/REFUSE AP/23/0062/REFUSE AP/23/0016/REFUSE AP/23/0042/REFUSE AP/22/0002/REFUSE AP/23/0030/REFUSE AP/22/0070/REFUSE AP/22/0040/REFUSE AP/21/0066/NONDET Appeal conditionally allowed. The	None.	None.	This policy relates to design matters related to infill rather than the principle of housing development. Policy remains effective.

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		<p>inspector found that the proposal would not have a significant negative impact on neighbouring properties.</p> <p>AP/21/0060/REFUSE conditionally allowed as inspector was satisfied with parking access.</p> <p>AP/21/0068/REFUSE conditionally allowed as inspector satisfied with residential amenity.</p>			
Policy SCLP5.8: Housing Mix	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims	AP/21/0039/REFUSE dismissed due to several issues including insufficient 1 bed homes.	The December 2024 NPPF includes specific reference to assessing needs for retirement housing, housing-with-care and care homes.	M4(2) is expected to become the new minimum Building Regulation standard for dwellings, though this change	The policy is delivering a mix of housing based on assessed needs set out in the Strategic Housing Market Assessment (key Local Plan evidence underpinning this policy) and based on the overall need at the time. An updated Strategic Housing Market Assessment would

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	to deliver and support the right housing developments in the right locations based on all residents housing needs.			has not yet come into force.	<p>consider the needs for different types of housing under paragraph 63 of the NPPF.</p> <p>Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies, the significant change to the housing need figure means that the strategic policies relating to housing supply require review.</p> <p>In the context of all policies relating to housing supply the policy requires updating.</p>
Policy SCLP5.9: Self Build and Custom Build Housing	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'encourage more self-build housing in East Suffolk'.</p> <p>Demand from the Self-Build Register has continued to grow each year. The register covers the</p>	<p>Two appeals on the same site have challenged the Council's delivery of custom/self-build homes (AP21/0047/REFUSE & AP/24/0023/NONDET). In each case, the Inspector gave significant positive weight to the</p>	<p>Updates to the NPPF in 2023 and 2024 have introduced specific reference to delivering custom/self-build homes on mixed tenure and/or small sites.</p>	<p>The Levelling Up and Regeneration Act has introduced strict criteria around calculating demand and identifying permissions to meet demand.</p>	<p>The Self-build and Custom Housebuilding Act 2015 (as amended) places a legal duty on local planning authorities to grant enough planning permissions to meet the demand arising from the Register.</p> <p>Paragraph 63 of the NPPF states that in establishing the need for housing, the size, type and tenure of housing should be assessed for different groups, including those wishing to build or commission their own homes. The PPG on self and custom build housing</p>

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	<p>whole of East Suffolk (former Waveney area and former Suffolk Coastal area).</p> <p>Custom and Self Build Housing SPD adopted 2024.</p>	<p>provision of custom/self-build homes. The Inspector for the second appeal concluded: “the approach in the SCLP at Policy SCLP5.9 is not yet yielding the number of serviced plots ...to meet the level of registered interest.” Ultimately, both appeals were dismissed due to other factors.</p>			<p>(paragraph 11) states that the custom and self-build register and evidence from secondary sources should be used in assessing demand.</p> <p>The Council continues to maintain the Self-Build register including adding and removing entries as required.</p> <p>The policy has been tested at appeal and the Inspector has twice concluded that insufficient planning permissions for custom/self-build homes have been granted. They have accordingly given significant positive weight to provision of custom/self-build homes.</p> <p>Supplementary Planning Document on Custom and Self Build Housing was adopted in 2024, which is assisting in the interpretation and implementation of the policy.</p> <p>The policy is providing a pipeline of plots as intended, but they are not coming through quickly enough to meet the rising demand.</p>

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					<p>Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies, the significant change to the housing need figure means that the strategic policies relating to housing supply, require review.</p> <p>In the context of all policies relating to housing supply the policy requires updating.</p>
Policy SCLP5.10: Affordable Housing on Residential Development	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs.	No significant appeal decisions.	First Homes were introduced from June 2021 as a form of discounted market housing however the 2024 NPPF has removed the requirement that 25% of affordable housing secured as part of residential development is First Homes.		<p>26% of all dwellings completed between 1 April 2018 - 31 March 2024 were affordable housing (830 of 3,241 new homes), demonstrating that affordable housing is being delivered under SCLP5.10. The figure of 26% relates to the proportion of all housing completions, which will include those on sites of 9 or fewer where affordable housing is not required by policy.</p> <p>The Affordable Housing SPD explains how the First Homes policy was applied under SCLP5.10, however the Council's Interim Housing Position Statement</p>

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	Affordable Housing SPD adopted in 2022 which provides additional detail and guidance to support the implementation of the policy.				<p>(March 2025) explains this NPPF policy no longer applies.</p> <p>A full viability appraisal would be needed for any Local Plan review, which would help determine future affordable housing thresholds and amounts.</p> <p>Amending the policy would be desirable but is not necessary.</p>
Policy SCLP5.11: Affordable Housing on Exception Sites	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs.</p> <p>An Affordable Housing SPD was</p>	No significant appeal decisions.	Changes to the NPPF in December 2024 allow for development of community-led housing to support small sites to come forward and support exception sites.	None.	<p>The policy remains appropriate in light of national policy on affordable housing exception sites.</p> <p>The updated policy in the NPPF can be applied alongside this policy.</p> <p>Amending the policy would be desirable but is not necessary.</p>

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	adopted in 2022 which provides additional detail and guidance to support the implementation of the policy.				
Policy SCLP5.12: Houses in Multiple Occupation	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs. The need for affordable housing to rent, such as beds in HMOs, remains high, due to	This policy has only been mentioned in a single appeal decision, in which the Inspector concluded that the proposal was contrary to the policy and the appeal was dismissed.	None.	There have been changes to the Use Classes Order which make it easier to convert office and retail buildings to residential accommodation. However, only small-scale HMO conversions (with 6 or fewer occupants) can use these rights – anything above this size must go through the normal planning application route.	Through a Local Plan review consideration would need to be given to housing needs and increasing demand for HMOs, alongside appropriately addressing potential impacts – amending the policy would be desirable but is not necessary.

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	increasing house prices. There is also increased pressure for new HMOs (both conversions and new builds) to help accommodate workers for the construction of Sizewell C, especially in and around Leiston (the closest town).				
Policy SCLP5.13: Residential Annexes	The Rural Development SPD was adopted in 2024 which provides additional detail and guidance to support the implementation of the policy.	AP/23/0015/REFUSE conditionally allowed. Despite being in separate ownership, self-contained, and having its own name, other material considerations led the inspector to conclude that it	None.	None.	Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		constituted a residential annexe, and this could be controlled through an occupancy condition. AP/21/0019/REFUSE dismissed. Considered the new unit to be akin to a separate dwelling.			
Policy SCLP5.14: Extensions to Residential Curtilages	The Rural Development SPD was adopted in 2024 which provides additional detail and guidance to support the implementation of the policy.	No significant appeal decisions.	None.	None.	Policy remains effective.
Policy SCLP5.15: Residential Moorings, Jetties and Slipways	None.	No.	None.	None.	The policy has not been used since adoption of the Local Plan, and the needs identified in paragraph 5.81 have therefore not yet been addressed. An update to the needs assessment would

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					<p>be undertaken as part of a Local Plan review.</p> <p>Whilst amending the policy would be desirable it is not considered necessary.</p>
Policy SCLP5.16: Residential Caravans and Mobile Homes	None.	No.	None.	None.	Policy remains effective.
Policy SCLP5.17: Gypsies, Travellers and Travelling Showpeople	<p>The 2023/24 AMR reports that for the period of 2021-2026 there is an unmet need for 3 pitches in the Suffolk Coastal Local Plan area. As at 31 March 2024, there are no planning permissions for additional pitches in East Suffolk.</p> <p>There is therefore not a 5-year housing supply of gypsy &</p>	No.	<p>Planning Policy for Travellers Sites was amended in December 2023, reverting to a definition of Gypsies and Travellers for planning purposes that includes those who have ceased travelling permanently on grounds of education, health or old age.</p>	None.	<p>Any updated Local Plan would need to assess the needs for Gypsy and Traveller accommodation based upon the revised definition. Provision for Gypsy and Traveller accommodation is identified as a cross-boundary matter in the Ipswich Strategic Planning Area Statement of Common Ground, and remains a strategic planning matter.</p> <p>The policy refers to the definition contained in the August 2015 Planning Policy for Traveller Sites – the revised 2023 definition would be a material consideration in decision making.</p>

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	traveller pitches, as reported in the 2023/24 AMR.				<p>A future assessment of needs for Gypsy and Traveller accommodation would need to consider the current definition, and the level of need going forward.</p> <p>There is no five-year supply of housing land for gypsy & traveller pitches.</p> <p>Provision for short-stay stopping sites is considered Suffolk wide.</p> <p>For both those main reasons above, the policy requires updating.</p>
SCLP6.1: Tourism	<p>Visitor Economy Strategy 2022-2027 adopted in 2022 to support the visitor economy.</p> <p>Rural Development SPD adopted 2024 provides further guidance on new tourism accommodation in rural areas.</p>	AP/20/0046/REFUSE Dismissed. The inspector found that policy SCLP6.1 did not conflict with Ministerial Statement- Coronavirus (COVID 19): Planning Update on Cultural Venues and Holiday Parks (2020).	None.	None.	Policy remains effective.

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		AP/20/0103/REFUSE allowed. Inspector concluded that proposed development would be contrary to the development plan but there were material considerations which outweigh that finding.			
SCLP6.2: Tourism Destinations	Visitor Economy Strategy 2022-2027 adopted 2022 to support the visitor economy.	No.	None.	None.	Policy remains effective.
SCLP6.3: Tourism Development within the AONB and Heritage Coast	Visitor Economy Strategy 2022-2027 adopted in 2022 to support the visitor economy. Rural Development SPD Adopted in	No.	None.	None.	The out-of-date reference to AONB is a minor change that is not considered to warrant review of the policy. Amending the policy would be desirable but is not necessary.

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	<p>2024 it provides further guidance on new tourism accommodation in rural areas.</p> <p>Policy refers to the Area of Outstanding Natural Beauty which is now known as National Landscapes (albeit AONB remains the statutory title).</p>				
SCLP6.4: Tourism Development outside of the AONB	<p>Visitor Economy Strategy 2022-2027 adopted in 2022 to support the visitor economy.</p> <p>Rural Development SPD adopted 2024 provides further guidance on new tourism</p>	No.	None.	None.	<p>The out-of-date reference to AONB is a minor change that is not considered to warrant review of the policy.</p> <p>Amending the policy would be desirable but is not necessary.</p>

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	<p>accommodation in rural areas.</p> <p>Area of Outstanding Natural Beauty is now known as National Landscapes (albeit AONB remains the statutory title).</p>				
SCLP6.5: New Tourist Accommodation	<p>Visitor Economy Strategy 2022-2027 adopted in 2022 to support the visitor economy.</p> <p>Rural Development SPD adopted 2024 provides further guidance on new tourism accommodation in rural areas.</p>	<p>AP/20/0055/REFUSE allowed. The inspector found that whilst the amended condition would not comply with the policy, the proposed wording would still ensure that the overarching aims of the policy.</p> <p>AP/20/0046/REFUSE dismissed. The inspector found</p>	<p>None.</p>	<p>None.</p>	<p>No changes required.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		proposal conflicted with the policy as the development could be used by the same person for much of the year, potentially restricting short term use by tourists. AP/22/0039/COND Allowed. The inspector found that there were sufficient provisions to demonstrate that the development would be occupied as holiday accommodation.			
SCLP6.6: Existing Tourist Accommodation	Visitor Economy Strategy 2022-2027 adopted in 2022 to support the visitor economy.	AP/24/0037/REFUSE Dismissed. The inspector concluded unjustified loss of	None.	None.	No changes required. Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	Rural Development SPD adopted 2024 provides further guidance on new tourism accommodation in rural areas.	tourism accommodation.			
SCLP7.1: Sustainable Transport	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This contains the theme 'environmental impact' which includes 'supporting sustainable transport'. The East Suffolk Cycling & Walking Strategy adopted 2022 as East Suffolk's equivalent of a Local Cycling	This policy has been referenced in a number of appeal decisions, the most significant are listed below: AP/23/0059/REFUS conditionally allowed. This inspector found the policy to comply with SCLP 5.4 and therefore not in conflict with SCLP7.1. AP/22/0044/REFUS allowed. The	The December 2024 NPPF amendment placed additional emphasis and prioritisation on sustainable transport. Sites should now be vision led, 'sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location' Paragraph 116 was updated to state	None.	No changes required. Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>and Walking Infrastructure Plan. Suffolk County Council's Suffolk Design: Streets Guide adopted in 2022.</p> <p>Suffolk Guidance for Parking updated October 2023.</p> <p>Suffolk's Local Transport Plan 4 2025-2040 adopted in 2025 to provide Suffolk County Council's long-term ambitions for the transport network. The Plan also included individual implementation plans for the larger settlements.</p>	<p>inspector found that, 'It might be that the construction period would bring some minor disruption, but this is unlikely to lead to unsafe highway conditions because of the configuration of the roads and resultant slow speeds'.</p>	<p>'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'</p> <p>Publication of Department for Transport's 'Gear Change' policy document and technical guidance, Cycle Infrastructure Design: Local</p>		

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	The policy refers to contribution to the delivery of local sustainable transport strategies. ESC adopted a Cycling and Walking Strategy in 2022 which is guiding the provision of cycling and walking infrastructure. See also comments under SCLP2.2 in relation to ISPA modal shift.		Transport Note 1/20 ('LTN 1/20') in July 2020.		
SCLP7.2: Parking Proposals and Standards	Suffolk County Council's Suffolk Design: Streets Guide adopted in 2022. Suffolk Guidance for Parking updated in October 2023.	AP/24/0029/REFUS dismissed. The inspector found no direct conflict with Policy SCLP7.2 but concerns regarding the limited accessibility via a	The 2021 amendment to the NPPF added criterion C to para 115 (now), 'the design of streets, parking areas, other transport elements and the content of	None.	Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	• poor standard of unmade path.		associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code'		
SCLP8.1 Community Facilities and Assets	None.	AP/23/0004/REFUSE dismissed. The inspector concluded that there was negligible conflict with policy SCLP8.1. AP/22/0064/NONDET allowed. Inspector considered that the proposal was consistent with SCLP8.1. AP/21/0026/REFUSE allowed. The Inspector report identified tension	None.	None.	The policy states that community facilities designated as an Asset of Community Value (ACV) cannot be converted to non-community uses. The intention of the policy was to mitigate against inflated values which could frustrate a community's ability to bid for a property, however there is a risk that in certain circumstances it could lead to long term empty properties. There is considered to be sufficient flexibility when taking into account other material considerations to allow for such circumstances if this became needed. Whilst updates would be desirable, they are not considered necessary.

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		between the policy wording and the supporting text, which appeared to take a more flexible approach. The appeal was allowed because the public house had not operated for a significant period of time and evidence had been presented to prove that it could not operate viably and that it had been marketed as a public house without success.			
SCLP8.2: Open Space	Adoption of Healthy Environments SPD, 2024 and East Suffolk Leisure Strategy (supported	No significant appeal decisions.	Paragraph 104 (paragraph 96 in 2018 NPPF) of the December 2024 NPPF included an update to make	None.	No changes required. Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	by the Open Space Report, 2021), 2024.		explicit that 'open space, sport and recreational buildings and land' includes formal play space, which therefore affords makes clear that formal play provision also benefits from the protection from redevelopment this policy provides.		
SCLP8.3: Allotments	Adoption of Healthy Environments SPD, 2024.	No	None.	None.	No changes required. Policy remains effective.
Policy SCLP8.4: Digital Infrastructure	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This contains the theme 'tackling inequalities' which includes 'digitally	No	Paragraph 86 of the NPPF was updated in 2024 to require authorities to "...pay particular regard to facilitating development to meet the needs of a	Some of the requirements for digital connectivity of new dwellings – gigabit infrastructure and connections – is now encompassed	Some of the elements of this topic either now fall outside direct planning control (through Building Regulations) or benefit from increased permitted development rights. The basics of the policy as written remain sound, although a more positive

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	<p>enable our communities to help residents in need’.</p> <p>The rollout of broadband and 5G mobile phone masts/transmitters in recent years has ensured that the number of “not-spots” is now significantly lower than it was, although some particular areas do still suffer from poor mobile phone signal.</p>		<p>modern economy, including by identifying suitable locations for uses such as...digital infrastructure..." in their planning policies.</p> <p>Para 119 also states: "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation</p>	<p>through Building Regulations.</p> <p>Permitted development rights for new/bigger mobile phone masts were increased in 2022 by the Government, thus reducing the ability of the Council to resist inappropriate proposals</p>	<p>policy approach is now required as per the 2024 NPPF update.</p> <p>Whilst updates would be desirable, they are not considered necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).		
Policy SCLP9.1: Low Carbon &	New Strategic Plan 'Our Direction 2028' adopted by Council	AP/23/0005/REFUSE appeal allowed. Inspector found a	The December 2024 NPPF lifts restrictions on	Changes to permitted development rights	There is no requirement for LPAs to identify land suitable for renewable and low carbon energy.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Renewable Energy	<p>in November 2023. Includes the theme 'environmental impact' which aims to deliver positive climate, nature and environmental impacts. Through this the Council is committed to supporting, promoting and implementing green technologies to create energy across the district, contributing to local and national energy infrastructures</p> <p>Adoption of the Sustainable Construction SPD 2022.</p>	<p>conflict between the Local Plan policy and the NPPF regarding how support for wind power should be demonstrated particularly where the local community has been consulted and have shown majority support, even if there is no Neighbourhood Plan.</p>	<p>onshore wind energy projects.</p>	<p>for large-scale renewable energy projects were introduced in the December 2024 NPPF. The threshold for solar farms to be classed as NSIP increased from 50MW to 100MW and will come into force on 31st December 2025. The threshold for onshore wind energy projects to be classed as NSIP is 100MW.</p>	<p>The policy requires updating in light of NPPF changes.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Environmental Impact Strategy adopted July 2024.</p> <p>East Suffolk is seeing increasing demand, through planning applications, for solar farm development.</p>				
Policy SCLP9.2: Sustainable Construction	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This includes the theme 'environmental impact' which aims to deliver positive climate, nature and environmental impacts. Through this the Council is committed to supporting, promoting and</p>	No.	<p>The Written Ministerial Statement dated 13th December 2023 noted that planning policies can set local energy efficiency standards that go beyond building regulation if they are well-reasoned and robustly costed and ensures:</p>	<p>The Future Homes Standard introduced interim measures including updating Building Regulation Approved Documents Part L (conservation of fuel and power) and Part F (ventilation) and publishing new 2021 Part O (overheating). The June 2021 interim uplift</p>	<p>The Council is committed to delivering sustainable housing and supporting, promoting and implementing green technologies. A Sustainable Construction SPD was adopted in 2022 which provides additional detail and guidance to support the implementation of this policy. Whilst the Council may wish to go further, under current national policy and guidance the policy remains appropriate and is not technically out of date. There is no planning policy reason to change the policy.</p> <p>Whilst updates would be desirable, they are not considered to be necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>implementing green technologies to create energy across the district, contributing to local and national energy infrastructures. A key ambition is the delivery of sustainable housing through tackling fuel poverty and supporting new heating technologies, and promoting developments which enhance wellbeing and protect the environment.</p> <p>Adoption of the Sustainable Construction SPD 2022.</p>		<p>1. That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.</p> <p>2. The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).</p>	<p>introduced changes to Part L of the Building Regulations requiring an approximate 30% reduction in CO2 emissions for new residential buildings relative to the 2013 Part L Building Regulation standards. Local Plan policy SCLP9.2 only requires a 20% reduction in CO2 emissions relative to the 2013 Part L Building Regulation standards. The element of policy SCLP9.2 that refers to energy efficiency standards and CO2 emissions has therefore been superseded by</p>	

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	Adoption of Environment Impact Strategy July 2024.			Building Regulations. Further changes to Building Regulations were expected in 2025 but have yet to be introduced.	
Policy SCLP9.3: Coastal Change Management Area	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This contains the theme 'Environmental Impact which includes working 'in partnership to manage coastal adaption and create resilience'. Coastal Adaptation SPD adopted 2023, which provides further guidance on	No.	None.	None.	The policy is consistent with national policy and development plan policy across those authorities that prepared the joint Coastal Adaptation SPD. However, the underlying data on which the CCMA is based, as set out in the Shoreline Management Plan (SMP), would benefit from being updated; The short-term risk zone (i.e. changes to the coast expected within 20 years) is identified within SMP7 (Lowestoft to Felixstowe) as ending in 2025. However, this change is not considered to necessitate review of the policy and is not directly within the control of the Council, as SMPs are prepared on a partnership basis by a number of bodies.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>the implementation of SCLP9.3</p> <p>The Resilient Coast project (led by ESC) commenced in 2023 and will run until 2027. It will create practical tools to help coastal communities plan for their future and it will help inform work for the next Local Plan.</p> <p>Various schemes in Thorpeness in the CCMA have been considered, including demolition of properties. Some schemes also allowed in the CCMA in Felixstowe and other areas.</p>				<p>Whilst updates would be desirable, they are not considered to be necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	Refreshing of the Shoreline Management Plan, and updated coastal erosion mapping and data published by the Environment Agency in 2025.				
Policy SCLP9.4: Coastal Change Rollback or Relocation	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This contains the theme 'Environmental Impact which includes working 'in partnership to manage coastal adaption and create resilience'.</p> <p>Coastal Adaptation SPD adopted in 2023, provides further guidance on</p>	No.	None.	None.	<p>A Coastal Adaptation SPD was adopted in 2023 which provides additional detail and guidance to support the implementation of the policy.</p> <p>It is recognised that issues of the relocation of properties along the coast presents significant and growing challenges.</p> <p>It is expected that outcomes from the Resilient Coasts project will inform future Local Plan policies.</p> <p>Whilst the policy hasn't been significantly applied, due to the worsening erosion issues in places, subject to new evidence it is considered</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>the implementation of SCLP9.4.</p> <p>The Resilient Coast project (led by ESC) commenced in 2023 and will run until 2027. It will create practical tools to help coastal communities plan for their future and it will help inform work for the next Local Plan.</p> <p>One case of the policy being applied for a rock armour revetment.</p>				<p>that the policy would need to be updated.</p>
Policy SCLP9.5: Flood Risk	Storm Babet in 2023 led to major flooding in parts of the district, including Framlingham.	No significant appeal decisions.	NPPF Dec 2024 alters treatment of the sequential test and is a little more flexible in relation to sites where there	None.	The policy remains broadly effective, but given the extent of changes to the NPPF, the implications of how surface water flooding is being treated, the most recent flood risk mapping information (showing elevated risks in some areas)

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	<p>Suffolk CC, as Lead Local Flood Authority, has undertaken various Flood Investigations (under S19 of the Flood and Water Management Act 2010).</p> <p>Various other guidance documents are produced by LLFA. The Environment Agency published updated flood risk maps and data in early 2025 (for surface water, rivers and the sea), which shows increased risks in some parts of the district.</p>		<p>are parts of the site at risk of flooding but parts not (especially where the highest risk parts are not proposed to be developed).</p>		<p>and how recent appeals nationally are treating the sequential test, the policy needs updating.</p>
Policy SCLP9.6: Sustainable	Storm Babet in 2023 led to major	The principle of the policy has not been	The NPPF changes (Dec 2024) includes	None.	Whilst the principles of the policy remain broadly sound, the increased

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Drainage Systems	<p>flooding in parts of the district, including Framlingham. Suffolk CC, as Lead Local Flood Authority, has undertaken various Flood Investigations (under S19 of the Flood and Water Management Act 2010).</p> <p>The LLFA has published more detailed guidance on the use of SuDS, as have Anglian Water and some other bodies.</p> <p>Adoption of Healthy Environments SPD in 2024 took place.</p>	<p>challenged directly, but there are many cases where the details of the SuDS proposed (or not) are an issue at appeal.</p>	<p>a requirement (para 181) for developments in flood risk areas to incorporate SuDS, “unless there is clear evidence that this would be inappropriate”</p> <p>Para 182 also bolsters the requirement for SuDS on developments, which should be proportionate to the nature and scale of the proposal. SuDS on major sites must have appropriate minimum operational standards and “maintenance arrangements in</p>		<p>prominence and importance of sustainable drainage means that the impact on overall site design needs to be considered afresh in the East Suffolk Local Plan.</p> <p>Whilst updates to the specific policy would be desirable, they are not considered to be necessary</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	The increased drainage infrastructure requirements of the Lead Local Flood Authority (especially a move away from piped solutions to surface solutions) means that a greater net amount of many sites now needs to be taken up with drainage.		place to ensure an acceptable standard of operation for the lifetime of the development”.		
Policy SCLP9.7: Holistic water Management	None, although there is an increased need for reduction in water use and greater water efficiency measures due to the changing climate	No.	The 2024 NPPF update has slightly stronger references to the need for further adaptation to climate change, and a proactive approach to water supply and water scarcity should be practised.	None	Whilst updates would be desirable, they are not considered to be necessary

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Policy SCLP10.1: Biodiversity and Geodiversity	<p>Adoption of the Recreational Disturbance Avoidance and Mitigation (RAMS) SPD, 2021.</p> <p>Adoption of Healthy Environments SPD, 2024, which includes guidance for the provision of Suitable Alternative Nature Greenspace (SANG) for the protection of European Sites from recreational pressure, and development of the Draft Suffolk Local Nature Recovery Strategy (due for adoption later in 2025)</p>	No significant appeal decisions.	None.	Introduction of Biodiversity Net Gain (BNG) requirements through enactment of the Environment Act 2021, and associated changes to regulations and planning practice guidance.	<p>Policy does not reflect BNG, however the policy does not need updating to include this as BNG is a statutory requirement rather than policy requirement so is managed separately. The Suffolk LNRS has not yet been finalised and adopted, and therefore the current policy and supporting text are not out of date on this basis.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Policy SCLP10.2: Visitor Management of European Sites	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'environmental impact' which aims to deliver positive climate, nature and environmental impacts.</p> <p>Adoption of the Recreational Disturbance Avoidance and Mitigation (RAMS) SPD, 2021.</p>	No.	None.	None.	No changes required.
Policy SCLP10.3: Environmental Quality	<p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'environmental impact' which aims to deliver positive</p>	No.	None.	None.	<p>No changes required.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>climate, nature and environmental impacts.</p> <p>All three Air Quality Management Areas in the former Suffolk Coastal area have been revoked.</p>				
SCLP10.4: Landscape Character	Policy refers to the Area of Outstanding Natural Beauty which is now known as National Landscapes (albeit AONB remains the statutory title).	Referenced in a number of appeal decisions, but no significant appeal decisions.	None.	None.	<p>The out-of-date reference to AONB is a minor change that is not considered to warrant review of the policy.</p> <p>Amending the policy would be desirable but is not necessary.</p>
SCLP10.5: Settlement Coalescence	No.	No.	No.	No.	<p>No changes necessary.</p> <p>Policy remains effective.</p>
Policy SCLP11.1: Design Quality	Suffolk Design – Streets Guide adopted by Suffolk	Of the most relevant 13 were dismissed and 4 were	Building for Life 12 has been superseded by Building for a Healthy Life, and	The Levelling Up and Regeneration Act 2023 (LURA) will require local authorities to set	East Suffolk Council does not currently have a design code but, reflecting the new requirement introduced by the LURA, is considering how best to progress this for the district. It is

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	County Council in 2022.	conditionally allowed. The majority of decisions focused on the design impacts of development proposals on the character of the area, and/or the amenity impacts on existing nearby occupants and future occupants.	other resources have also been introduced (e.g. National Design Guide and National Model Design Code). The 2024 NPPF states that local design codes should be the primary means of assessing and improving the design of development. Since the adoption of the Local Plan, the Government has published the National Design Guide and National Model Design Code, both of which provide design guidance which can	out design requirements within a development plan document that relate to the whole local authority area.	anticipated that further guidance will be provided by the Government alongside the commencement of this part of the LURA. The design code would in time act alongside any future design policy. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			be applied at the local level.		
Policy SCLP11.2: Residential Amenity	Suffolk Design – Streets Guide adopted by Suffolk County Council in 2022.	AP/23/0016/REFUSE dismissed. Impact on character and appearance of the area and impact on neighbours with particular regard to outlook. AP/22/0036/REFUSE dismissed. Unacceptable noise and odour arising from commercial operations. AP/21/0068/REFUSE conditionally allowed. Inspector found residential amenity issues acceptable. AP/22/0014/COND dismissed. Inspector	Building for Life 12 has been superseded by Building for a Healthy Life, and other resources have also been introduced (e.g. National Design Guide and National Model Design Code). The 2024 NPPF states that local design codes should be the primary means of assessing and improving the design of development. Since the adoption of the Local Plan, the Government has	The Levelling Up and Regeneration Act 2023 (LURA) will require local authorities to set out design requirements within a development plan document that relate to the whole local authority area.	East Suffolk Council does not currently have a design code but, reflecting the new requirement introduced by the LURA, is considering how best to progress this for the district. It is anticipated that further guidance will be provided by the Government alongside the commencement of this part of the LURA. The design code would in time inform future design policy. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		agreed with officer's assessment of extended opening hours on adjoining properties. AP/21/0045/REFUSE dismiss. Loss of privacy.	published the National Design Guide and National Model Design Code, both of which provide design guidance which can be applied at the local level.		
SCLP11.3: Historic Environment	Adoption of Historic Environment SPD, 2021.	There were ten appeals. Of these, nine were dismissed and one was allowed. Where the appeal was allowed, it was not because of policy failures.	None.	Planning and Infrastructure Bill Section 37 – removes provisions regarding listed building consent, scheduled monument consent and notification of operations in areas of archaeological importance for nationally strategic infrastructure projects.	A Historic Environment SPD was adopted in 2021 which provides additional detail and guidance to support the implementation of the policy. Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
SCLP11.4: Listed Buildings	Adoption of Historic Environment SPD, 2021.	There were eight appeals. Of these, six were dismissed and two were allowed. Where the appeals were allowed, it was not because of policy failures.	None.	Planning and Infrastructure Bill Section 37 – Removes provisions regarding listed building consent, scheduled monument consent and notification of operations in areas of archaeological importance for nationally strategic infrastructure projects.	A Historic Environment SPD was adopted in 2021 which provides additional detail and guidance to support the implementation of the policy. Policy remains effective.
SCLP11.5: Conservation Areas	Adoption of Historic Environment SPD, 2021. The Aldeburgh Conservation Area reviewed and extended in 2023. The Aldeburgh Park Conservation area	There were eight appeals. Of these, seven were dismissed and one was conditionally allowed. Where the appeals were allowed, it was not because of policy failures.	None.	Planning and Infrastructure Bill Section 37 – Removes provisions regarding listed building consent, scheduled monument consent and notification of operations in areas	A Historic Environment SPD was adopted in 2021 which provides additional detail and guidance to support the implementation of the policy. Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>designated in 2023, which includes the Garrett era area of the town.</p> <p>A new Thorpeness Conservation Area Appraisal was produced in 2022.</p> <p>Walberswick Conservation Area reviewed and extended in 2024.</p>			<p>of archaeological importance for nationally strategic infrastructure projects.</p>	
SCLP11.6: Non-Designated Heritage Assets	<p>Adoption of Historic Environment SPD, 2021.</p> <p>East Suffolk Council Shopfronts Best Practice Guidance leaflet.</p>	No.	None.	None.	<p>A Historic Environment SPD was adopted in 2021 which provides additional detail and guidance to support the implementation of the policy.</p> <p>Policy remains effective.</p>
SCLP11.7: Archaeology	Adoption of Historic Environment SPD, 2021.	No.	None.	Planning and Infrastructure Bill Section 37 – Removes provisions	A Historic Environment SPD was adopted in 2021 which provides additional detail and guidance to support the implementation of the policy.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
				regarding listed building consent, scheduled monument consent and notification of operations in areas of archaeological importance for nationally strategic infrastructure projects.	Policy remains effective.
SCLP11.8: Parks and Gardens of Historic or Landscape Interest	<p>Adoption of Historic Environment SPD, 2021.</p> <p>The Park and Garden of Cockfield Hall became nationally listed in 2024.</p> <p>Thorpeness Meare became nationally listed in 2024.</p>	No.	None.	Planning and Infrastructure Bill Section 37 – Removes provisions regarding listed building consent, scheduled monument consent and notification of operations in areas of archaeological importance for nationally strategic infrastructure	<p>A Historic Environment SPD was adopted in 2021 which provides additional detail and guidance to support the implementation of the policy.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Broke Hall Park became nationally listed in 2024.</p> <p>Staverton Park became nationally listed in 2024.</p> <p>Glemham House park and garden became nationally listed in 2023.</p>			<p>projects. It is not clear how this would be applied or if there are any equivalent safeguards.</p>	
SCLP11.9 Newbourne – Former Land Settlement Association Holdings	<p>Adoption of Historic Environment SPD, 2021.</p> <p>Adoption of Housing in Clusters and Small-Scale Residential Development in the countryside SPD (2022).</p>	<p>There were ten appeals. Of these, seven were dismissed and three were allowed.</p> <p>Where the appeals were allowed, it was not because of policy ‘failures’ but the inspectors’ planning judgement.</p>	<p>None</p>	<p>None.</p>	<p>A Historic Environment SPD was adopted in 2021 and ‘Clusters’ SPD in 2022 which provides additional detail and guidance to support the implementation of the policy.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
SCLP12.1: Neighbourhood Plans	<p>Grant funding and technical support for neighbourhood plan groups has been ended by the Government. This will make it more difficult for groups to prepare a neighbourhood plan in the future, especially ones which involve the extra steps required to allocate new homes.</p> <p>East Suffolk Council has prepared Neighbourhood Plan Housing Guidance and Neighbourhood Plan Climate Change Guidance, to assist NPs coming forward in accordance with</p>	No.	None.	None.	<p>There is a mixed outcome for neighbourhood plans planning for the housing numbers in the policy. Some neighbourhood plans have over-provided in this respect, whereas others have allocated a smaller number or no housing at all. Some identified neighbourhood areas have not progressed their neighbourhood plans. Overall, the total number of homes allocated by neighbourhood plans to date comfortably exceeds the aggregate number in the policy.</p> <p>The majority of sites allocated in neighbourhood plans have been granted planning permission. Development on these sites is at varying stages.</p> <p>Whilst the overall aims of the policy are broadly consistent with more recently adopted local strategies, the significant change to the housing need figure means that the strategic policies relating to housing supply, including distribution, require review.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	adopted Local Plans. Suffolk County Council is preparing guidance on Local Green Spaces.				In the context of all policies relating to housing supply alongside the withdrawal of Neighbourhood Plan funding, the policy requires updating.
SCLP12.2: Strategy for Felixstowe	<p>The Port of Felixstowe was given freeport status in 2021, which has encouraged greater investment.</p> <p>The North Felixstowe Garden Neighbourhood has been partly delivered through the development of Trelawny Place.</p> <p>East Suffolk Cycling and Walking Strategy (2022) and East Suffolk Play Area Strategy (2023), include</p>	No.	None.	The Port of Felixstowe was given freeport status in 2021.	A Local Plan review is identified as needed due to increased housing need figures and this would involve consideration of the spatial strategy, but in the context of this plan a review of this policy is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>specific recommendations for active travel infrastructure and play provision in the peninsula area.</p> <p>Adoption of the Healthy Environments SPD, 2024.</p> <p>East Suffolk Council published a Felixstowe Infrastructure Delivery Framework in 2025.</p>				
SCLP12.3: North Felixstowe Garden Neighbourhood	DC/20/1002/ARM for Phase 1 - Residential (255 Dwellings, open space and supporting services and infrastructure),	No.	None.	None.	<p>Part of the site which achieved outline consent prior to the Local Plan has now obtained reserved matters approval, with phase 1 under construction and phase 2 permitted.</p> <p>East Suffolk Council is leading the production of a masterplan for the remaining allocation. Master planning is</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	land off Candlet Road, Felixstowe. DC/22/3182/ARM for Phase 2 - Residential (305 Dwellings, open space and supporting services and infrastructure), land off Candlet Road, Felixstowe was approved in 2023.				underway and onsite surveys undertaken. Public engagement has also started. There is no indication that the site won't be delivered, at least in part, during the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.4: Land North of Conway Close and Swallow Close, Felixstowe	Application DC/21/2710/OUT for up to 100 dwellings associated infrastructure and open space was submitted in 2021. In the September 2021 planning committee, it was	No.	None.	None.	Allocation remains undeveloped, but there has been progress with the submission of an application and resolution to approve. There is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	given resolution to approve.				
SCLP12.5: Land at Brackenbury Sports Centre	No.	No.	None.	None.	<p>The site currently contains a leisure centre that will be replaced by provision at North Felixstowe Garden Neighbourhood. Development of the site will not come forward until new leisure facilities have been brought into operation as part of the North Felixstowe Garden Neighbourhood.</p> <p>Whilst the site is dependent upon delivery of another allocation it remains effective as part of the strategy to meet housing requirements.</p>
Policy SCLP12.6: Land at Sea Road, Felixstowe	Application DC/17/3967/FUL for the erection of building containing 48 flats over ground floor commercial units. Erection of 11 houses (includes new private access road, parking and	No.	None.	None.	<p>The site has started but has stalled. It is understood, through the Housing Land Supply questionnaire that the site may restart within the next 5 years.</p> <p>Policy remains effective as part of the strategy to meet housing requirements.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	external works) was permitted in 2018 and construction appears to have started.				
Policy SCLP12.7: Port of Felixstowe	<p>The UK's modern industrial strategy adopted in June 2025.</p> <p>Freeport East was established in 2023.</p> <p>A consultation began on a revised national policy statement for ports in June 2025.</p>	No.	<p>December 2024 NPPF updates paragraph 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p> <p>Paragraph 87 adds that planning</p>	None.	<p>Policy remains effective; however, needs associated with the Port would need to be considered through a Local Plan review.</p> <p>.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.</p>		
SCLP12.8: Land at Bridge Road, Felixstowe	The UK's modern industrial strategy adopted in June 2025.	None.	December 2024 NPPF updates paragraph 86 to say that policies should	B1 use class no longer exists and has become part of Use Class E(g) in the	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p> <p>Paragraph 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven,</p>	<p>2020 amendments to the Use Classes Order.</p>	<p>necessary as decisions can be taken with reference to the new Use Classes Order</p> <p>The policy states that proposals which generate a large number of traffic movements will be resisted. The amendments to the NPPF suggests mitigation should be a factor in any future policy.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>creative or high technology industries.</p> <p>Paragraph 116 updates state 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'</p>		
SCLP12.9: Land at Carr Road/Langer	The UK's modern industrial strategy	AP/21/0035/REFUSE Appeal allowed. Council stated that	December 2024 NPPF updates para 86 to say that	B1 use class no longer exists and has become part of Use	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Road, Felixstowe	adopted in June 2025.	the B8 storage element of the appeal proposal was contrary to criterion d). The inspector concluded that, 'that the appeal site would be a suitable location for the proposal as a whole, including the B8 element, particularly as it would not have a harmful effect on the living conditions of nearby residents related to HGV movements to and from the appeal site'.	policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. Para 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven,	Class E(g) in the 2020 amendments to the Use Classes Order.	<p>change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order</p> <p>The policy states that, 'Warehousing or storage activities will be resisted and directed towards land identified under Policy SCLP12.4 or other areas designated for Port and Logistics uses'. The appeal on this site challenged this suggesting that future allocations may remove this stipulation.</p> <p>The policy states that proposals which generate a large number of heavy traffic movements will be resisted. The amendments to the NPPF suggests mitigation should be factor in any future policy.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>creative or high technology industries. This also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.</p> <p>Updates to para 116 state 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following</p>		

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			mitigation, would be severe, taking into account all reasonable future scenarios.'		
SCLP12.10: Land at Haven Exchange, Felixstowe	The UK's modern industrial strategy adopted in June 2025.	APP/073/2019 Appeal Dismissed. Related to a certificate of Lawful Development and whether a development had commenced.	December 2024 NPPF updates para 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. Para 87 adds that planning policies	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.		
SCLP12.11: Felixstowe Ferry and Golf Course	The area covered by this policy has seen only relatively minor development through applications	No.	None.	None.	Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	relating to matters such as replacement dwellings, commercial improvements, and local infrastructure improvements such as to flood defences, car park resurfacing and the public conveniences.				
SCLP12.12 Felixstowe Ferry Golf Club to Cobbolds Point	DC/19/5049/FUL permitted - Redevelopment of site to provide new clubhouse and new public facilities improved access, parking, 5 detached dwellings and associated landscaping, relocation of existing watch tower-existing clubhouse	No.	None.	None.	Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>and pro-shop buildings to be demolished.</p> <p>DC/21/5102/FUL permitted– Formation of 18 new beach hut sites for the proposed repositioning of existing beach huts from the spa area.</p>				
SCLP12.13: Cobbolds Point to Spa Pavilion	Draft Felixstowe Seafront Development Strategy published for consultation June 2025.	No.	None.	None.	Policy remains effective.
SCLP12.14: Spa Pavilion to Manor End	Draft Felixstowe Seafront Development Strategy published for consultation June 2025.	No.	None.	The Class MA (E to C3) permitted development right has been introduced., Changes to Use Class Order and	Whilst through a future Local Plan review, revisiting the policy approach may be desirable, to address the potential for inappropriate, unplanned Class MA development in a high intensity tourism area, updates are not considered necessary as decisions can be

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>DC/21/2444/FUL - Development of a 'beach village' area with 27 traditional wooden huts, accessible pods to hire and new public conveniences- plus movement of trim trail to new activity park area, comprising of three petanque rinks, table tennis tables and exercise space.</p> <p>DC/21/0971/FUL - Proposed seasonal erection of a Ferris wheel attraction and associated Hot / Cold food and drink kiosk with raised decking area for public seating.</p>			Permitted Development rights.	<p>taken with reference to the new Use Classes Order.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	Various minor applications related to commercial operations.				
SCLP12.15: Manor End to Landguard	Draft Felixstowe Seafront Development Strategy published for consultation June 2025.	No.	None.	None.	Policy remains effective.
SCLP12.16: Felixstowe Leisure Centre	Draft Felixstowe Seafront Development Strategy published for consultation June 2025.	No.	None.	None.	Policy remains effective.
SCLP12.17: Tourism Accommodation in Felixstowe	Draft Felixstowe Seafront Development Strategy published for consultation June 2025.	No.	December 2024 NPPF updated para 116 to state 'Development should only be prevented or refused on highways grounds if there	None.	Policy remains effective. Consideration could be given to the wording, 'They do not have a detrimental impact on highway and access arrangements' in light of the NPPF changes. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'		
SCLP12.18: Strategy for Communities Surrounding Ipswich	Development of the site at Brightwell Lakes DC/17/1435/OUT (currently under construction)	Appeal in progress and has not yet been determined. AP/24/0059/REFUSE	None.	None.	A Local Plan review is identified as needed due to increased housing need figures and this would involve consideration of the spatial strategy, but in the context of this plan a review of this policy is not necessary.
SCLP12.19: Brightwell Lakes	Planning permission DC/17/1435/OUT for up to 2000 dwellings, employment land, a	No.	None.	None.	The site is currently being developed according to outline permission DC/17/1435/OUT and subsequent discharge of conditions and variations of conditions.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	primary local centre, secondary centre, a school, green infrastructure, public footpaths and cycle ways, vehicle access and associated infrastructure (currently under construction)				Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.20: Land at Felixstowe Road	DC/23/4699/OUT Planning application for a business park, including B2, B8 and E(g) uses alongside ancillary uses. Currently awaiting decision.	No.	December 2024 NPPF updated para 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories,	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	<p>Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order</p> <p>This allocation is currently subject to a planning application, which has yet to be determined.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>gigafactories, data centres, digital infrastructure, freight and logistics.</p> <p>Para 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This paragraph also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of</p>		

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			local, regional or national importance.		
SCLP12.21: Ransomes, Nacton Heath	DC/17/4257/OUT Class B8 Storage and Distribution and Ancillary Class B1 Office Uses including associated infrastructure, car and lorry parking. The UK's modern industrial strategy adopted in June 2025.	No.	December 2024 NPPF updated para 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. Para 87 adds that planning policies and decisions should make provision for new, expanded or	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order This allocation is largely built-out in accordance with application DC/17/4257/OUT. Policy is effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This paragraph also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.		
SCLP12.22 Open Space and Recreation in Rushmere	DC/24/4102/FUL Redevelopment of Ipswich Town FC training facilities. Application permitted.	No.	None.	None.	Site subject to two planning permissions to redevelop Ipswich Town training and youth academy site with improved facilities. Policy is effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
SCLP12.23 Land Off Lower Road and Westerfield Road (Ipswich Garden Suburb Country Park)	<p>Development of the Ipswich Garden Suburb under Ipswich Borough Council Planning Permission refs IP/16/00608/OUT IP/14/00638/OUTFL IP/22/00013/OUTFL (pending consideration) & ESC DC/16/2592/OUT. DC/24/0771/OUT was refused and an appeal is pending.</p> <p>Westerfield Neighbourhood Plan made in 2025.</p>	<p>Appeal in progress and has not yet been determined.</p> <p>AP/24/0059/REFUSE</p>	None.	None.	<p>Part of Country Park, which is allocated through Henley Gate Development. Subject to planning permission DC/16/2592/OUT.</p> <p>Policy is effective.</p>
SCLP12.24 Land at Humber Doucy Lane	<p>DC/24/0771/OUT Hybrid application. Full Planning Permission for the means of external access/egress to and from the site.</p>	<p>Appeal in progress and has not yet been determined.</p> <p>AP/24/0059/REFUSE</p>	None.	None.	<p>An application on this site was submitted but subsequently refused and the decision appealed against. The decision is awaited at the time of writing.</p> <p>The planning application for the site came forward sooner than anticipated in</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	Outline planning application for a mixed use development for up to 660 dwellings. This application was refused and an appeal is pending.				<p>the Local Plan trajectory, however this does not affect the policy itself.</p> <p>Policy remains effective as part of the strategy to meet housing requirements.</p>
SCLP12.25: Suffolk Police HQ, Portal Avenue, Martlesham	DC/20/0902/OUT Demolition and removal of all necessary existing buildings and structures to enable the residential development for up to 300 dwellings, with access from Portal Avenue, associated open space and landscaping, drainage and infrastructure. (refused).	No.	None.	None.	<p>An application was received but refused in 2022. The development of the site is dependent on the relocation of the Suffolk Police HQ however there is no indication that the site won't be delivered in the Local Plan period.</p> <p>Policy remains effective as part of the strategy to meet housing requirements.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Policy SCLP12.26: Strategy for Aldeburgh	New 'Aldeburgh Park' conservation area designated in 2023 covering the Garrett Era Area referred to in the policy.	No.	None.	None.	A Local Plan review is identified as needed due to increased housing need figures and this would involve consideration of the spatial strategy, but in the context of this plan a review of this policy is not necessary.
SCLP12.27: Land Rear of Rose Hill, Saxmundham Road	None.	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
Policy SCLP12.28: Strategy for Saxmundham	Saxmundham Neighbourhood Plan (2023) made. The East Suffolk Cycling & Walking Strategy was adopted in 2022 as East Suffolk's equivalent of a Local Cycling and Walking Infrastructure Plan. This includes	No.	None.	None.	A Local Plan review is identified as needed due to increased housing need figures and this would involve consideration of the spatial strategy, but in the context of this plan a review of this policy is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	recommendations for Saxmundham to enhance pedestrian and cycle connectivity.				
SCLP12.29: South Saxmundham Garden Neighbourhood	Saxmundham Neighbourhood Plan (2023) adopted, although this only applies to the northern most part of the site. Neighbourhood Plan under review to cover all of site.	No.	None.	None.	Developer led master planning for the site is underway including public engagement on proposals. There is no indication that the site won't be delivered during the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.30: Land North-East of Street Farm, Saxmundham	Site completed for 59 dwellings (DC/18/0702/FUL)	Site completed.	Site completed.	Site completed.	Site completed.
SCLP12.31: Strategy for Woodbridge	Active Travel Woodbridge proposes cycling and walking improvements to	No.	None.	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	Woodbridge, went to consultation in 2025.			to the Use Classes Order.	necessary as decisions can be taken with reference to the new Use Classes Order A Local Plan review is identified as needed due to increased housing need figures and this would involve consideration of the spatial strategy, but in the context of this plan a review of this policy is not necessary.
SCLP12.32: Former Council Offices, Melton Hill	DC/19/2641/FUL Residential development (100 no units) including 32 no affordable housing units plus a community space (Class D1) and a retail unit (A1/A2/A3), car parking, means of access and landscaping.	No.	None.	None.	The site has full permission and demolition of the existing buildings is partially complete. There is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.33: Land at Woodbridge	The policy requires that the development will	No.	None.	None	No permission has been granted. The football club now has a 25 year lease at

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Town Football Club	only be supported should replacement facilities for the football club be established. In 2024 the football club signed a new 25-year lease on the site.				the site which means it is now unlikely to deliver housing in the Local Plan period. The policy may no longer be effective as part of the strategy to meet housing requirements.
Policy SCLP12.34: Strategy for the Rural Areas	Policy refers to the Area of Outstanding Natural Beauty which is now known as National Landscapes (albeit AONB remains the statutory title).	AP/22/0045/REFUSE appeal dismissed AP/23/0021/REFUSE appeal dismissed AP/22/0026/REFUSE appeal dismissed AP/23/0028/REFUSE conditionally allowed. Inspector was of the view that as this is an existing rural business re-locating from a nearby site the	None.	None.	The out-of-date reference to AONB is a minor change that is not considered to warrant review of the policy. A Local Plan review is identified as needed due to increased housing need figures and this would involve consideration of the spatial strategy, but in the context of this plan a review of this policy is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		impact would be minimal			
Policy SCLP12.35: Former airfield Debach	<p>The UK's modern industrial strategy adopted in June 2025.</p> <p>DC/21/5534/FUL – construction of single storey extension to business unit.</p> <p>DC/22/4240/FUL – erection of business unit.</p> <p>DC/24/4101/FUL – erection of new two storey building for new business units.</p>	No.	<p>December 2024 NPPF updated para 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p> <p>Para 87 adds that planning policies and decisions should make provision for new, expanded or</p>	<p>Policy reference to Use Class B1, B2 and B8 out of date following the changes to the Use Class Order in 2020. Use Classes A and B1 now fall within Use Class E.</p>	<p>Changes to the Use Classes Order means that updating references to B1, B2 and B8 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.		
Policy SCLP12.36: Carlton Park, Main Road, Kelsale cum Carlton	The UK's modern industrial strategy adopted in June 2025.	No.	December 2024 NPPF updated para 86 to say that policies should have regard to the national industrial strategy and to have	Policy reference to Use Class B1, B2 and B8 out of date following the changes to the Use Class Order in 2020. Use Classes A and	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>DC/21/2529/FUL – erection of 4 commercial units.</p> <p>DC/21/5742/OUT – erection of 10 commercial units.</p> <p>DC/22/1952/FUL – erection of canopy over existing yard.</p>		<p>particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p> <p>Para 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail</p>	<p>B1 now fall within Use Class E.</p>	<p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.		
SCLP12.37: Levington Park, Levington	The UK's modern industrial strategy adopted in June 2025.	No.	December 2024 NPPF updated para 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	<p>The policy states the Council will continue to resist any significant intensification. Where this relates to impact upon the highways the amendments to the NPPF suggests mitigation should be factored in to any future policy.</p> <p>Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>infrastructure, freight and logistics.</p> <p>Para 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.</p>		<p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Policy SCLP12.38: Land at Silverlace Green (former airfield) Parham	The UK's modern industrial strategy adopted in June 2025.	No	December 2024 NPPF updated para 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. Para 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure	Policy reference to Use Class B1, B2 is out of date following the changes to the Use Class Order in 2020. Use Classes A and B1 now fall within Use Class E.	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.		
Policy SCLP12.39: Former airfield Parham	The UK's modern industrial strategy adopted in June 2025. DC/22/0403/FUL – replacement factory and storage building.	No	December 2024 NPPF updated para 86 to say that policies should have regard to the national industrial strategy and to have particular regard to meeting the needs	Policy reference to Use Class B1, B2 is out of date following the changes to the Use Class Order in 2020. Use Classes A and B1 now fall within Use Class E.	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p> <p>Para 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high technology industries. This also adds further detail to the requirement of policy to make</p>		

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			provision for storage and distribution facilities and to expand industries of local, regional or national importance.		
Policy SCLP12.40: Bentwaters Park, Rendlesham	<p>The UK's modern industrial strategy adopted in June 2025.</p> <p>DC/20/1540/FUL – erection of building for B1C, B2, or B8 use.</p> <p>DC/20/4731/FUL – erect industrial building.</p> <p>DC/21/3661/FUL – erection of building for class E use.</p> <p>DC/22/2659/FUL – erection of building</p>	No.	None.	None.	Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>for E(g), B2, or B8 use.</p> <p>DC/24/0961/FUL – retention of two existing linked shipping containers in use as an art studio and the siting of three additional shipping containers repurposed to form three art studios and one music studio, along with associated landscaping works.</p>				
Policy SCLP12.41: Riverside Industrial Estate, Border Cot Lane, Wickham Market	<p>The UK's modern industrial strategy adopted in June 2025.</p>	No	<p>Amendments to the NPPF in the December 2024 NPPF updates paragraph 86 to say that policies should have regard to the national industrial strategy and to have</p>	<p>Policy reference to Use Class B1, B2 is out of date following the changes to the Use Class Order in 2020. Use Classes A and B1 now fall within Use Class E.</p>	<p>Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>Amending the policy would be desirable but is not necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>particular regard to meeting the needs of a modern economy including identifying suitable locations for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.</p> <p>In addition, paragraph 87 adds that planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven, creative or high</p>		

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			<p>technology industries.</p> <p>This paragraph also adds further detail to the requirement of policy to make provision for storage and distribution facilities and to expand industries of local, regional or national importance.</p>		
Policy SCLP12.42: Land to the East of Aldeburgh Road, Aldringham	Site completed for 40 dwellings (DC/18/2325/FUL)	Site completed.	Site completed.	Site completed.	Site completed.
SCLP12.43: Land to the South of Forge Close between Main	DC/21/2503/OUT for up to 41 dwellings is currently pending.	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Road and Ayden, Benhall					Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.44: Land to the South East of Levington Lane, Bucklesham	DC/21/3832/ARM – Approval of Reserved Matters on DC/19/4510/OUT: The erection of up to 33 dwellings with associated landscaping, vehicular access and parking provision - all matters reserved aside from access.	Site completed.	Site completed.	Site completed.	Site completed.
SCLP12.45: Land to the South of Station Road, Campsea Ashe	None.	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.46: Land behind 15 St Peters Close, Charsfield	DC/21/2319/FUL permitted for 18 dwellings.	No.	None.	None.	Allocation has permission and there is no indication that the site will not be delivered in the Local Plan period.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
					Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.47: Land to the South of Darsham Station	DC/21/4006/OUT permitted for up to 110 dwellings.	No.	None.	None.	Allocation has permission and there is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
Policy SCLP12.48: Land North of The Street, Darsham.	Site completed for 26 dwellings (DC/19/1462/FUL).	Site completed.	Site completed.	Site completed.	Site completed.
SCLP12.49: Land off Laxfield Road, Dennington	None.	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.50: Land to the South of Eyke CoE Primary School	DC/22/4775/FUL and DC/23/0203/FUL permitted for 65	No.	None.	None.	Allocation has permission and is currently under construction. There is no indication that the site will not be delivered in the Local Plan period.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
and East of The Street, Eyke	dwellings currently under construction.				Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.51: Land to the West of Chapel Road, Grundisburgh	DC/20/3363/FUL permitted for 70 dwellings. The site is under construction.	No.	None.	None.	Allocation has permission and is currently under construction. There is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.52: Land South of Ambleside, Main Road, Kelsale cum Carlton	DC/18/2621/FUL permitted for 42 dwellings. The site is under construction.	No.	None.	None	Allocation has permission and is currently under construction. There is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.53: Land North of the Street, Kettleburgh	DC/21/0757/FUL permitted for 16 dwellings.	No.	None.	None.	Allocation has permission and there is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
SCLP12.54: Land to the rear of 31-37 Bucklesham Road, Kirton	None.	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.55: Land at School Road, Knodishall	None.	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.56: Land at Bridge Road, Levington	DC/23/1138/OUT - Erection of 18 with garaging, parking, accesses and landscaping.	No.	None.	None.	Allocation has permission and there is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.57: Land North of Mill Close, Orford	DC/19/2513/FUL permitted 11 dwellings. Under construction.	No.	None.	None.	Allocation has permission and is currently under construction. There is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
SCLP12.58: Land adjacent to Swiss Farm, Otley	None.	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.59: Land adjacent to Farthings, Sibton Road, Peasenhall	None.	No.	None.	None.	The latest Housing Land Supply Statement (Nov 24) states that this site is unlikely to come forward. The policy may no longer be effective as part of the strategy to meet housing requirements.
SCLP12.60: Land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market)	DC/20/3264/FUL permitted for 136 dwellings. Under construction.	No.	None.	None.	Allocation has permission and is currently under construction. There is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.61: Land West of Garden Square, Rendlesham	DC/20/5278/FUL permitted for 75 dwellings.	Yes, APP/121/2019 Appeal dismissed.	None.	None	Allocation has permission and there is no indication that the site will not be delivered in the Local Plan period.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
					Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.62: Land East of Redwald Road, Rendlesham	DC/20/3890/OUT and DC/22/4019/ARM permitted for dwellings. Under construction.	No.	None.	None.	Allocation has permission and is currently under construction. There is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.63: Land opposite The Sorrel Horse, The Street, Shottisham	No.	No.	None.	None.	The landowner's response to the Housing Land Supply questionnaire states there are no plans to develop the site, so it is now unlikely to deliver in the Local Plan period. The policy may no longer be effective as part of the strategy to meet housing requirements.
SCLP12.64: Land off Howlett Way, Trimley St Martin	DC/20/1860/OUT awaiting decision- Phased construction of up to 310 dwellings with open space, a new Early Years Facility, new	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	roundabout access, a foul water pumping station and associated landscaping, trim trail and off-lead dog walking area.				
SCLP12.65: Land adjacent to Reeve Lodge, High Road, Trimley St Martin	DC/20/5279/OUT permitted for 139 dwellings, two-form entry primary school with pre-school, open space, SUDS, meadow and informal path on land south of Gun Lane, and all associated infrastructure provision. Under construction.	No.	No.	None.	Allocation has permission and is currently under construction. There is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.66: Land off Keightley	DC/22/3748/FUL Residential	APP/X3540/W/24/3 352886	None.	None.	The site achieved permission by appeal in 2025. There is no indication that the

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Way, Tuddenham	Development for 25 dwellings.	The application was refused but allowed at appeal.			site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.67: Land South of Lower Road, Westerfield	Westerfield Neighbourhood Plan made 2025.	No.	None.	None.	An application for full permission for this site had been submitted in 2022 but was subsequently withdrawn, whilst there is no current application submitted there is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.68: Land West of the B1125, Westleton	None.	No.	None.	None.	Allocation undeveloped but no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.69: Land at Cherry Lee, Darsham Road, Westleton	DC/20/4709/OUT; and DC/22/4419/ARM permitted for up to 15 dwellings.	No.	None.	None.	Allocation has permission and there is no indication that the site will not be delivered in the Local Plan period.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
					Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.70: Mow Hill, Witnesham	DC/22/0998/FUL Residential development of 32 dwellings, together with areas of new public open space and the provision of a new access to the site from the B1077. Under construction.	No.	None.	None.	Allocation has permission and is currently under construction. There is no indication that the site will not be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
SCLP12.71: Land at Street Farm, Witnesham (Bridge)	DC/21/4111/FUL Application refused in 2024. Permission granted on appeal July 2025.	No.	None.	None.	Allocation has permission and there is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Appendix B – Standard method housing need calculation

The table below sets out the calculation of local housing need using the current standard methodology as set out in the Planning Practice Guidance on housing and economic needs assessments¹.

The calculation set out in the Planning Practice Guidance is as follows:

Step 1 - Set the baseline – The baseline is 0.8% of the existing housing stock for the area using the most recent data published at the time.

Step 2 – Adjustment to take account of affordability – use the median workplace-based affordability ratios published by the ONS, using the formula below

$$\text{Adjustment factor} = \left(\frac{\text{five year average affordability ratio} - 5}{5} \right) \times 0.95 + 1$$

East Suffolk as a whole

Housing Stock ²	0.8% of housing stock	Affordability Ratio ³	Affordability Adjustment	Standard Method Housing Need
123,016	984.128	8.65	1.6935	1,667

Suffolk Coastal Local Plan area

Housing Stock ⁴	0.8% of housing stock	Affordability Ratio ⁵	Affordability Adjustment	Standard Method Housing Need
64,897	519.176	9.68	1.8892	981

¹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

² <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> Table 125

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian> 5C

⁴ https://assets.publishing.service.gov.uk/media/664da823f34f9b5a56adcbf2/LT_125.ods

⁵ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningsforformerlocalauthorities>

Year	2019 (last published)	2019/20	2020/21	2021/22	2022/23	2023/24	Current Housing stock
Housing Stock or completions	62,244	660	511	499	450	533	64,897

Write to us 

East Suffolk Council
Planning Policy and Delivery Team
Riverside, 4 Canning Road,
Lowestoft, NR33 0EQ

Call us 

Planning Policy and Delivery Team (Local Plans)
01394 444557

Development Management (Planning Applications)
01394 444832

Email us 

Planning Policy and Delivery Team (Local Plans)
planningpolicy@eastsuffolk.gov.uk

Development Management (Planning Applications)
planning@eastsuffolk.gov.uk

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