

# Consultation Statement

Housing in Clusters and Small Scale  
Development in the Countryside  
Supplementary Planning Document

October 2022



## Contents

1 Introduction .....	1
2. Who was consulted? .....	1
3. How were they consulted? .....	2
Appendix 1: Initial Consultation Summary .....	4
Appendix 2: Initial Consultation Bodies .....	11
Appendix 3: Initial Consultation Workshop Presentation.....	12
Appendix 4: Draft Consultation Bodies .....	22
Appendix 5: Draft Consultation Promotion Material.....	24
Appendix 6: Draft Consultation Responses .....	28

# 1 Introduction

The draft Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document (SPD) will provide guidance on the application of the following policies:

- SCLP5.4 Housing in Clusters in the Countryside - Suffolk Coastal Local Plan (2020) and
- WLP8.7 Small Scale Residential Development in the Countryside - Waveney Local Plan (2019).

The document includes further guidance on how the individual criteria of each policy will be applied and how each of the relevant criteria are to be met for development to be considered acceptable. Guidance will also be provided on how policies SCLP5.4 and WLP8.7 relate to other policies in the Local Plans.

This Consultation Statement was first produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the Draft SPD which was held between 17<sup>th</sup> June and 5<sup>th</sup> August and has subsequently been updated to reflect the consultation responses received during that consultation.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement<sup>1</sup>.

## 2. Who was consulted?

Consultation was split into two stages: an initial stage that informed the preparation of the Draft Supplementary Planning Document; and a formal stage of consultation that sought views on the Draft SPD.

### **Initial consultation**

The initial consultation was undertaken using online workshops (via Microsoft Teams or Zoom) for specific groups or organisations to provide feedback on their experience of using the policies:

- Town and Parish Councils in East Suffolk (31<sup>st</sup> March 2022)
- Agents and developers working in East Suffolk (28<sup>th</sup> March 2022)

---

<sup>1</sup> [How to get Involved in Local Planning – Statement of Community Involvement \(April 2021\)](#)

- East Suffolk Councillors (9<sup>th</sup> May 2022)

Discussion to inform the proposed content was also had with a meeting of the Planning Committee Chairs and Vice Chairs and with the Local Plan Working Group.

### **Consultation on the Draft SPD**

Consultation on the Draft SPD was held between 17<sup>th</sup> June and 5<sup>th</sup> August 2022 (7 weeks). At the formal stage of consultation, all of those registered on the Council's Local Plan and other Policy Documents mailing list were directly consulted. Steps were undertaken to advertise the consultation to others, as set out below.

## **3. How were they consulted?**

There were two stages to the consultation process, which are set out below.

### **Initial consultation**

All Town and Parish Councils in East Suffolk and agents and developers registered on the East Suffolk Local Plan and other Policy Documents Mailing List were invited to attend their respective online workshop:

- Agents and Developers (28<sup>th</sup> March 2022) – 9 attendees
- Town and Parish Councils (31<sup>st</sup> March 2022) – 22 attendees

All East Suffolk Councillors were invited to attend the Councillor workshop session on Monday 9<sup>th</sup> May 2022 (16 attendees).

The format of each workshop included an overview of each of the policies; the scope and timescales of the SPD followed by an interactive session in which questions, issues and suggestions for the SPD could be raised along with discussion around whether particular slides did or didn't show a cluster/settlement in the countryside and whether particular spaces are likely to be suitable. The Members workshop session outlined the feedback from the earlier workshops and sought further feedback on how the SPD could provide further guidance.

Appendix 1 provides a summary of the comments / issues raised through the workshops and how the comments were taken into account in the drafting of the SPD. Appendix 2 lists the consultation bodies invited to the workshops. Appendix 3 provides the presentation slides used at the Town and Parish Workshop on 31 March 2022. Slides of a similar content were also used at the other workshops.

### **Consultation on the Draft SPD**

The Draft Housing in Clusters and Small Scale Development in the Countryside SPD consultation ran for seven weeks from 17<sup>th</sup> June to 5<sup>th</sup> August 2022. The consultation documents were made available on the East Suffolk Council website via the pages below:

[Draft Housing in Clusters and Small Scale Residential Development in the Countryside - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

The consultation was advertised on the Council's website, as well on social media. 4,231 emails and 441 letters were sent out at the start of the consultation to the consultees on the Local Plan and other Policy Documents Mailing List. This includes town and parish councils, and individuals, and organisations including those who were previously contacted at the informal stage of the consultation. Appendix 4 lists the consultation bodies.

The consultation was advertised through the use of posters (provided to Town and Parish Council's, all libraries in the district and the Council's Customer Service Centres at The Marina (Lowestoft) and hosted within Felixstowe and Woodbridge libraries), a press release and social media posts. The poster, press release and social media posts are contained in Appendix 5.

Physical copies of the draft SPD and accompanying Consultation Statement were made available at all libraries in the district and the Council's Customer Service Centres at the Marina, and Felixstowe and Woodbridge libraries.

In total 55 individuals and organisations responded to the consultation. Between them they made 106 comments. Some comments were duplicated, and some were divided to be put into the relevant sections of the document, hence why the comment IDs go up to 113. The summary of comments made and the Council's response to these are in Appendix 6.

Full copies of the responses have been published on the Council's website at [Draft Housing in Clusters and Small Scale Residential Development in the Countryside - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

## Appendix 1: Initial Consultation Summary

The table below provides a summary of the main comments, issues and questions raised in the workshops, which session(s) the comment arose from and how these comments have informed the preparation of the draft SPD.

Summary of Comment	Workshop session	How comment has been taken into account
<b>Key areas for the guidance to address (Slide 7)</b>		
Is there any intention to review settlement boundaries?	Town and Parish Councils	The Settlement Boundaries have been determined by policies SCLP3.3 and WLP1.2 of the Local Plans. These can only be reviewed through a review of the Local Plans. The draft SPD does not have the remit to review the Settlement Boundaries.
Will the SPD elaborate on cumulative effects?	Town and Parish Councils	The draft SPD provides further guidance on all elements of SCLP5.4 and WLP8.7, including the parts of the policies referring to cumulative effects.
How soon does a property built within a cluster become part of the cluster?	Town and Parish Councils	Chapters 2 and 3 of the draft SPD outline the requirements for an area to be considered a 'Cluster' or a 'Settlement in the Countryside'. This includes paragraphs 2.9 and 3.8 which state that a development with planning permission will be considered part of such an area only if there is clear evidence that the permission will be implemented.
What criteria is used to define whether a dwelling is within a cluster or a settlement in the countryside?	Town and Parish Councils	Chapters 2 and 3 of the draft SPD outline the requirements for an area to be considered a 'Cluster' or a 'Settlement in the Countryside'. This includes further guidance on the various criteria outlined in both policies to determine whether a dwelling is within a 'cluster' or 'settlement in the countryside' and illustrations are used to show the circumstances where a dwelling could be considered to be part of a cluster or settlement in the countryside.
How will infrastructure be supported i.e. doctors surgeries, schools, social services. If all these clusters are increased there could be a huge cumulative increase in the population.	Town and Parish Councils Members	This draft SPD focusses on the application of policies SCLP5.4 and WLP8.7 and does not have the remit to determine how infrastructure will be provided. It should be noted that the quantum of development that will come forward through these policies, when compared to other policies and site allocations, is relatively small. Therefore, the

Summary of Comment	Workshop session	How comment has been taken into account
		infrastructure to support development through these policies will likely be delivered through Community Infrastructure Levy.
How much weight is given to an SPD as opposed to policy when it comes to an appeal?	Town and Parish Councils	Once it is adopted, the draft SPD will be a material consideration in determining planning applications. The purpose of the draft SPD is to provide further guidance on the application of policies SCLP5.4 and WLP8.7, therefore the SPD will assist in the decision making regarding these policies. However, the reason for the decision must rely on the policies.
How does SCLP 5.4 relate to industrialisation of the countryside which may have more impact on the landscape character?	Town and Parish Councils	Chapter 6 of the draft SPD provides further guidance on how the potential impact on character should be considered in relation to policies SCLP5.4 and WLP8.7.
The SPD needs to set out how the policies relate to other policies in the Local Plans.	Developers/agents	Chapter 8 of the draft SPD provides guidance on how SCLP5.4 and WLP8.7 work alongside and relate to other policies in the Local Plans.
Question around how the conversion of buildings in the countryside relates to the policies.	Town and Parish Councils	Chapter 1 of the draft SPD explains that there are other policies relating to housing in the countryside such as conversions however this SPD is focused on policies SCLP5.4 and WLP8.7.
Illustrations are useful but to be fully effective must give interpretation to words: 'cluster', 'group', 'gap'.	Members	Following the feedback received during the various workshops, the illustrations have been prepared to make them relatively realistic and to provide representations of various elements of the policies. Annotations have been added to the illustrations to provide further clarity on the content of the draft SPD.
What defines meaningful and effective engagement?	Members	Chapter 7 of the draft SPD outlines the requirements for public engagement on relevant proposals, including what is meant by the community and how it should be demonstrated that planning impacts identified by the community have been addressed (under policy WLP8.7).
<b>What further guidance might assist in considering whether a group of buildings is in a cluster/Settlement in the Countryside? (Slides 9 – 11)</b>		
Do gardens have to be conjoined or can they have farmland between them to be a cluster?	Town and Parish Councils	Chapter 2 of the draft SPD outline the requirements for an area to be considered a 'Cluster'. This includes further guidance on the various criteria outlined in the policy to determine the appropriate areas, including how closely related dwellings need to be. Although WLP8.7 does not include such criteria, Chapter 3 of the draft SPD provides

Summary of Comment	Workshop session	How comment has been taken into account
		guidance on how dwellings might make up a settlement in the countryside. The draft SPD states and shows through illustrations that dwellings can be separated by small spaces such as gardens and driveways, and therefore do not need to be conjoined. However, extensive open areas such as agricultural fields are not appropriate.
The fundamental aim of the policy is for the infilling of clusters not extending clusters into the countryside. This needs to be maintained in the policy by reinforcement rather than weakening the policy.	Town and Parish Councils	(Note – although raised in this section the comment relates to the appropriateness of a site rather than the identification of a cluster or settlement in the countryside). Chapters 4 and 5 of the SPD outline the requirements for sites to be considered appropriate for development under the Local Plan policies. These chapters clearly state that sites should not extend further into the Countryside than the existing development. The illustrations in the SPD also provide guidance on this criterion.
It is dependent on scale	Members	The illustrations in Chapters 2 and 3 of the Draft SPD show features that are likely to exist in reality to provide an indication of scale, and provide an example of groups of dwellings that are considered to be close and those which are not.
Illustrations are useful but terms must give full interpretation to words such as 'cluster' and 'group'	Members	The use of annotations show where the illustrations are showing a 'cluster' or 'group'. 'Cluster' is also defined in Policy SCLP5.4.
SCLP5.4 – can a rural cluster have more than one gap?	Developers/agents	Paragraphs 4.6 and 5.3 of the draft SPD both state that areas can have more than one gap.
SCLP5.4 – is frontage relevant to cluster? For example, round the corner on a side road could also meet the definition. Policy needs clarifying what is considered adjacent to highways.	Developers/agents	Chapter 2 of the draft SPD outlines the requirements for an area to be considered a 'Cluster'. The text and the illustrations show that such an area must be made up of a continuous line of existing dwellings or a close group of dwellings, and that these areas must be adjacent to a highway.
What are the roles of roads and private drives?	Developers/agents	Highways are key features of 'Clusters' and potentially appropriate sites. The draft SPD shows that existing dwellings must be adjacent to a highway and provides a link to the Suffolk County Council website which defines highways.



Summary of Comment	Workshop session	How comment has been taken into account
SPD needs to define a 'close group' of dwellings i.e. how to define whether a particular dwelling is or isn't part of a close group (relevant to SCLP5.4).	Developers/agents	Chapter 2 of the draft SPD outlines the requirements for an area to be considered a 'Cluster'. This includes further guidance on what is meant by a 'close group' of dwellings and how the Council will consider these closely related or not. Illustrations have also been included in the draft SPD to interpret this.
'Adjacent on two sides' needs guidance.	Developers/agents	(Note – although raised in this section the comment relates to the appropriateness of a site rather than the identification of a cluster or settlement in the countryside). Chapters 4 and 5 of the draft SPD outline the requirements for sites to be considered appropriate for development under these policies. Both sections provide further guidance on how sites should be surrounded by development on two sides, as well as diagrams to demonstrate these principles.
<b>What further guidance might assist in considering whether a space is a 'gap'? (Slides 12 – 16)</b>		
Is there a maximum number of existing properties [to be considered as a cluster]. Example 4 shows 10 existing properties – if the potential gaps are developed this will become a settlement.	Town and Parish Councils	Chapters 2 and 3 of the draft SPD outline the requirements for an area to be considered a 'Cluster' and a 'Settlement in the Countryside'. Both sections outline that there is no maximum number of dwellings in either case.
If proposed dwellings are affordable homes would that influence whether permission is granted?	Town and Parish Councils	There are situations where policies on affordable housing in the countryside (SCLP11.5 and WLP8.6) could also be relevant alongside these policies. Chapter 8 of the draft SPD provides further guidance on how these policies will be applied in these situations.
Example 5 – if plot 2 was fully opposite the existing dwelling opposite what would be the view on extending a garden? If plot 2 has a sufficiently large garden to the south it could potentially open up another site on the opposite side of the road. There needs to be guidance on whether the existing residential properties should extend along the whole length of the proposed site.	Town and Parish Councils	Chapters 4 and 5 of the draft SPD outline the requirements for sites to be considered appropriate for development under these policies. Both chapters clearly state that sites must be completely surrounded by development on at least 2 sides. The illustration in the draft SPD also provide interpretation on this part of the policies.
Example 5 – if plots 3/4/5 and 6 were all dense woodland and considered a 'wildlife corridor' would they be treated differently?	Town and Parish Councils	Any proposals submitted relating to these policies must also meet the requirements of any other relevant policies in the Local Plans, including

Summary of Comment	Workshop session	How comment has been taken into account
		any relating to biodiversity and landscape. This is stated in Chapter 8 of the draft SPD.
What if there is a feature such as a pond or tree in the gap?	Members	Any proposals submitted relating to these policies must also meet the requirements of any other relevant policies in the Local Plans, including any relating to biodiversity and landscape. This is stated in Chapter 8 of the draft SPD.
Infill should be defined	Members	The illustrations in the Draft SPD show sites that may be potentially suitable as infill under the terms of the policies.
What happens with curtilage is an important consideration. How does the nature/features of the curtilage affect the suitability of the site?	Developers/agents	Chapter 6 of the draft SPD provides guidance on considering the potential impact on character. Paragraph 6.10 makes specific reference to the settings of the new dwellings.
Cumulative impact isn't the same in both policies. The Waveney policy (WLP5.4) is worded so the cumulative effect only relates to up to 5 properties.	Developers/agents	Chapter 6 of the draft SPD provide guidance on considering the potential impact on character, which includes guidance on how cumulative impact will be considered for each policy. Paragraphs 6.23 – 6.26 of the draft SPD also provide guidance on how developments coming forward under WLP8.7 will be considered in relation to the strategy of the Local Plan.
How would a site with permission but not built be considered?	Developers/agents	Chapter 6 of the Draft SPD contains guidance on that consideration may be given to these if there is certainty that the site will be developed.
<b>What further guidance might assist in considering if a proposal will impact local character? (Slides 17 – 19)</b>		
Housing needs should be taken into account. A mix of house sizes are needed such as smaller housing to attract younger families who are unable to afford properties in the countryside and for those wishing to downsize. Policy is to meet the needs of the rural area. Big executive houses aren't needed, smaller properties are. Consider the purpose of the policy i.e. to support rural communities.	Town and Parish Councils	The draft SPD acknowledges that the purpose of policies SCLP5.4 and WLP8.7 includes supporting smaller rural communities to meet their housing needs and enable people to stay within their communities. Under SCLP5.4 housing needs should be specifically taken into account for proposals of 4 or 5 dwellings. Paragraphs 7.6 and 7.7 of the draft SPD highlight this. Policies SCLP5.4 and WLP8.7 in the Local Plans set out policy on housing mix and place a focus on smaller dwellings.
What about building an extra house in the large garden of a house that is in the cluster?	Town and Parish Councils	Chapters 4 and 5 of the draft SPD outline the requirements for sites to be considered appropriate for development under these policies. This could include a garden of an existing house if the site and proposal

Summary of Comment	Workshop session	How comment has been taken into account
		meets the requirements of SCLP5.4 or WLP8.7, as well as other policy requirements.
Sympathetic design rather than the size of the dwelling. Clusters are much better when there is variation within them, as were built years ago. It is really important that the materials are appropriate to the setting.	Town and Parish Councils	Chapter 6 of the draft SPD provides guidance on considering the potential impact on character. Page 24 specifically highlights considerations relating to the design of new dwellings.
Style, landscaping etc are important as is plot size. Defining character from plot size is only part of the consideration	Developers/agents Members	Following the feedback received during the various workshops, the illustrations have been prepared to make them more realistic and more detailed to provide more accurate representations of all elements of the policies. Annotations have been added to the illustrations to provide further clarity on the content of the draft SPD
Gaps can be an important feature in a Conservation Area.	Developers/agents	Chapter 6 of the draft SPD provide guidance on considering the potential impact on character. Page 25 specifically highlights considerations relating to Conservation Areas.
<b>Other questions and comments</b>		
How much input will the Parish Council have as to whether development in a cluster is acceptable?	Town and Parish Councils	Town and Parish Councils have the opportunity to comment on planning applications that are submitted within their areas. It is not considered necessary to provide further guidance on this in the SPD.
SCLP5.4 – the policy states the proposal is for up to 3 dwellings. Does that mean 1, or 2 or 3?	Developers/agents	Policies SCLP5.4 and WLP8.7 both cover scenarios where the creation of up to 5 dwellings could be appropriate. This means that proposals for either 1, 2, 3, 4 or 5 new dwellings could be proposed under these policies. However, in order to be permitted they would need to meet the criteria of the policies, as well as any others in the Local Plans. The guidance in Chapters 4 and 5 of the draft SPD acknowledges that different scales of sites may come forward, up to 5 dwellings.
SCLP5.4 – appears to be some confusion between the supporting text at para 5.25 with the relevant policy criterion.	Developers/agents	A footnote for paragraph 3.1 of the Draft SPD acknowledges an editing error in the Local Plan which means that paragraph 5.25 refers to criteria c), when it in fact relates to criteria b).
The policies state that the concerns of the community are addressed. Who is the community and what constitutes a concern?	Developers/agents	Chapter 7 of the draft SPD outlines the requirements for public engagement on relevant proposals, including what is meant by the community and how it should be demonstrated that planning impacts

Summary of Comment	Workshop session	How comment has been taken into account
I would prefer a legitimate planning concern.		identified by the community have been addressed (under policy WLP8.7).
The SPD could show features that are in / could be in the cluster and those not appropriate to be within the cluster.	Developers/agents	The draft SPD includes a number of diagrams that highlight the features and characteristics that would be considered as part of 'Clusters' and 'Settlements in the Countryside'. The draft SPD also highlights what would not be considered part of such areas, such as isolated dwellings in the Countryside.
<b>General comments on the diagrams within the presentation(s)</b>		
Diagrams are overly simplistic e.g. roads are straight, existing properties are on same/similar sized plots, need more variation of house types e.g. not just detached properties, boundaries shown are too neat.	Parishes Developers/agents Members	Following the feedback received during the various workshops, the illustrations have been prepared to include a number of features and to portray various elements of the policies.
Need for scale / references to distances between buildings.	Town and Parish Councils Members	Following the feedback received during the various workshops, the illustrations have been prepared to make them relatively realistic and to provide representations of various elements of the policies. Annotations have been added to the illustrations to provide further clarity on the content of the draft SPD. Realistic measurements and sizes have been used for all elements of the illustrations, such as the roads and building sizes, to ensure the scale of the illustrations is appropriate.
Examples need to show the cluster's relationship with the surrounding area.	Town and Parish Councils Members	The illustrations in the draft SPD include the use of inset maps to show the surrounding area to provide context to the clusters.
Need to identify which is the main elevation of the existing properties as some may not front onto the highway.	Members	The illustrations in the draft SPD demonstrate the orientation of buildings.
Do other Council's guidance use illustrative top down diagrams or do they use 3D?	Members	The illustrations in the draft SPD are in 3D, with those showing a wider view in 2D.

## Appendix 2: Initial Consultation Bodies

The following organisations and groups were invited to attend online workshops at the initial consultation stage:

- Town and Parish Councils in East Suffolk (145 no.)<sup>2</sup>
- Agents and Developers working in East Suffolk (198 no.)<sup>3</sup>
- East Suffolk Councillors (55 no.)

---

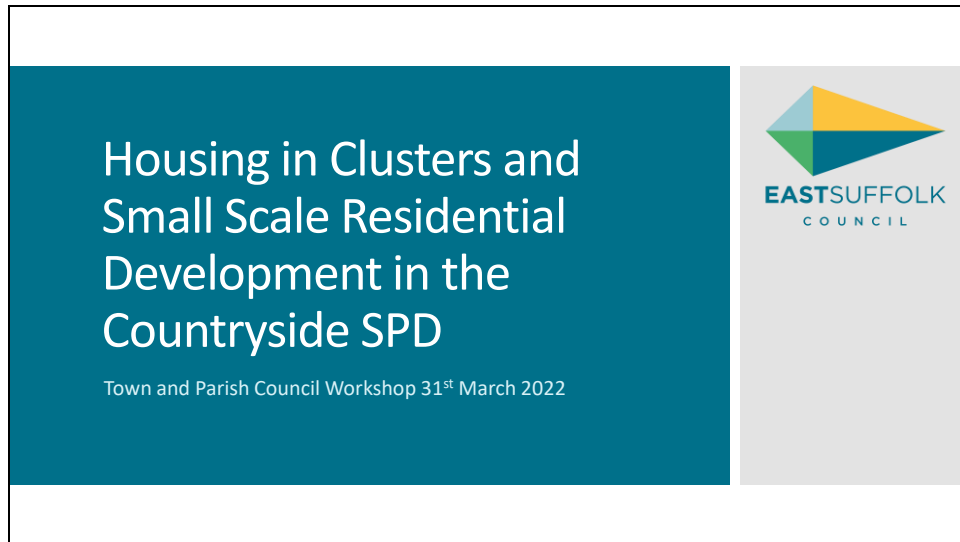
<sup>2</sup> There are 146 Town Councils and Parish Councils/Meetings in East Suffolk, however Covehithe Parish Meeting does not currently have a correspondent.

<sup>3</sup> 194 individuals/organisations from the Local Plan Mailing List identified as planning agents, developers etc. A further four agents were invited as currently working within East Suffolk.

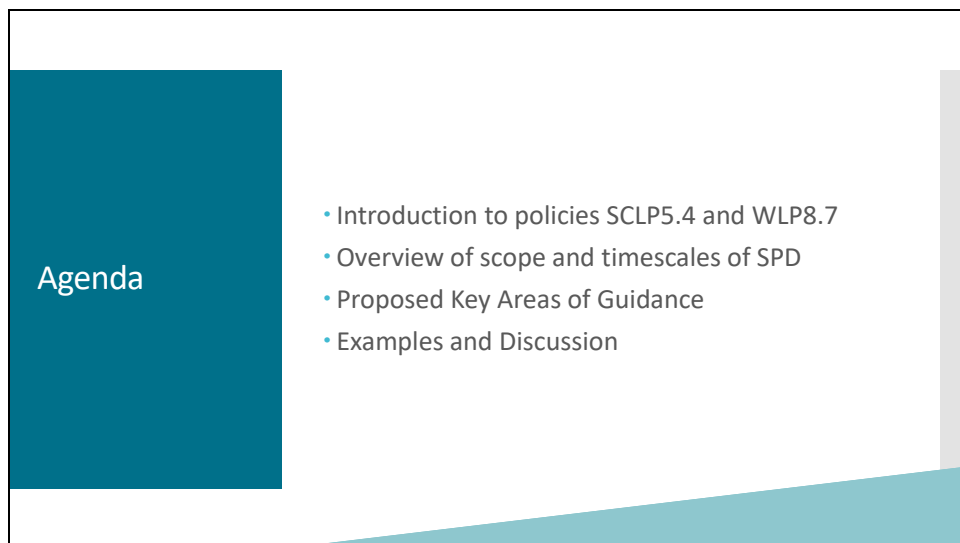
## Appendix 3: Initial Consultation Workshop Presentation

Presentation slides from the Town and Parish Workshop held 31 March 2022.

Slide 1



Slide 2



### Slide 3

## SCLP5.4 – Housing in Clusters in the Countryside

**Policy SCLP5.4: Housing in Clusters in the Countryside**

Proposals for new dwellings within 'clusters' in the countryside will be supported where:

- a) The proposal is for up to three dwellings within a cluster of five or more dwellings;
- Or
- The proposal is for up to five dwellings within a cluster of at least ten existing dwellings which is well related to a Major Centre, Town, Large Village or Small Village;
- And
- b) The development consists of infilling within a continuous built up frontage, is in a clearly identifiable gap within an existing cluster, or is otherwise located adjacent to existing development on two sides;
- c) The development does not represent an extension of the built up area into the surrounding countryside beyond the existing extent of the built up area surrounding, or adjacent to, the site; and
- d) It would not cause undue harm to the character and appearance of the cluster or, result in any harmful visual intrusion into the surrounding landscape.

Where more than three dwellings are proposed under criterion b) above, applicants must be able to demonstrate that meaningful and effective community engagement has taken place in the development of the scheme and that the mix of dwellings proposed would meet locally identified needs.

Particular care will be exercised in sensitive locations such as within or in the setting of Conservation Areas and the Area of Outstanding Natural Beauty. Consideration will also need to be given to the features of Landscape Character Areas in accordance with Policy SCLP10.4.

The cumulative impact of proposals will be a consideration in relation to the criteria above.

A 'cluster' in the context of this policy:

- Consists of a continuous line of existing dwellings or a close group of existing dwellings adjacent to an existing highway; and
- Contains 5 or more dwellings.

### Slide 4

## WLP8.7 – Small Scale Residential Development in the Countryside

**Policy WLP8.7 – Small Scale Residential Development in the Countryside**

Small scale residential development in the Countryside of up to three dwellings will be permitted where:

- The site constitutes a clearly identifiable gap within a built up area of a settlement within the Countryside;
- There are existing residential properties on two sides of the site; and
- The development does not extend further into the undeveloped Countryside than the existing extent of the built up area surrounding the site.

Small scale residential development in the Countryside of up to and including five dwellings will also be permitted where:

- There is clear and demonstrable local support;
- The scheme demonstrates meaningful and robust consultation with the Parish Council, local community and other stakeholders;
- Following consultation, it can be demonstrated that any planning impacts identified by the local community have been fully addressed and therefore the scheme is supported by the community;
- The site is adjacent or within the built up area of the settlement within the Countryside; and
- The scheme when considered cumulatively with other developments in the Countryside would not result in a level of development which would be contrary to the strategy outlined in Policies WLP1.1 and WLP7.1.

For all small scale development in the Countryside the design of the scheme will need to respect and reflect the character of the settlement and existing built up frontage including:

- Housing density is reflective of the density in the village and surrounding built up area; and
- The ratio of the building footprint to the plot area is consistent with existing properties nearby which characterise the village.

## Slide 5

**The Scope**

- Supplementary Planning Document – can provide further guidance on the application of policies but can't establish new policy criteria or requirements.
- Provide guidance on the application of the policies based on the experience to date from planning applications, appeals and consultation.
- Use of examples and diagrams to illustrate scenarios

## Slide 6

**Timescales**

- Initial consultation with Developers and Town and Parish Councils – Early Spring 2022
- Public consultation – Summer 2022
- Adoption – Autumn 2022



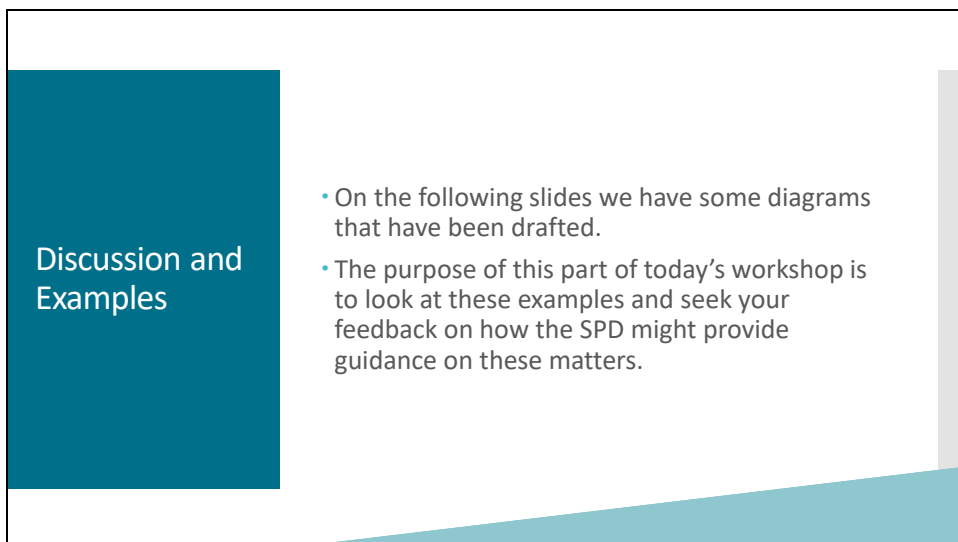
## Slide 7



**Key Areas for the Guidance to Address**

- Some key areas have been identified, such as:
  - What is a 'Cluster'/Countryside settlement?
  - What is a 'Gap'?
  - Relationship with Settlement Boundaries and the Countryside.
  - Relationship with highways and non-residential uses.
  - What is expected from 'meaningful and effective engagement' (SCLP5.4) and 'meaningful and robust consultation' (WLP8.7)?
  - Consideration of impact on local character and landscape.
  - Relationships with other policies, e.g. Strategy for Newbourne (SCLP11.9) and other Countryside policies.
- Are there any key areas of guidance it would be useful to include?

## Slide 8



**Discussion and Examples**

- On the following slides we have some diagrams that have been drafted.
- The purpose of this part of today's workshop is to look at these examples and seek your feedback on how the SPD might provide guidance on these matters.

Slide 9

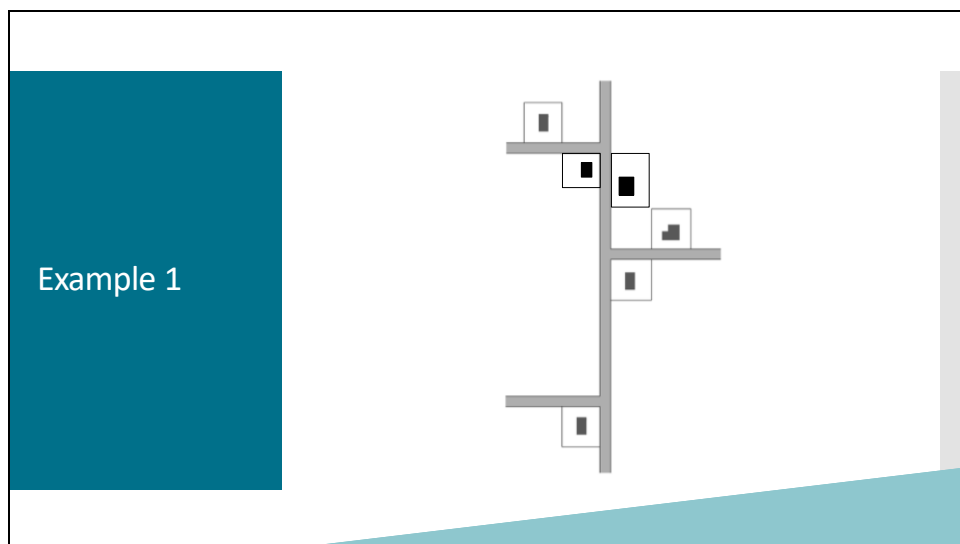


Question

What further guidance might assist in considering whether a group of buildings is a cluster/countryside settlement?

This slide features a teal header box on the left containing the word 'Question'. The main content area is white with a light blue gradient at the bottom. The text asks for further guidance to determine if a group of buildings constitutes a cluster or countryside settlement.

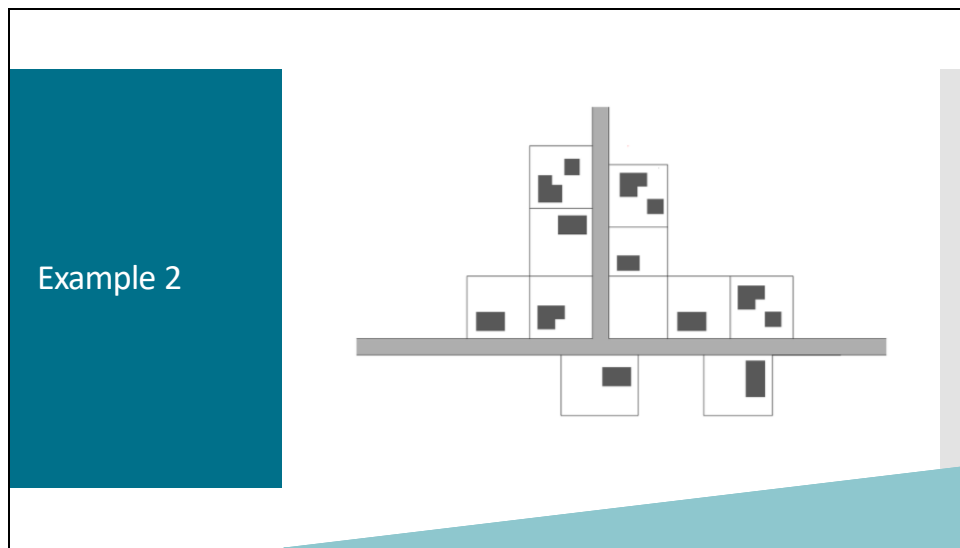
Slide 10



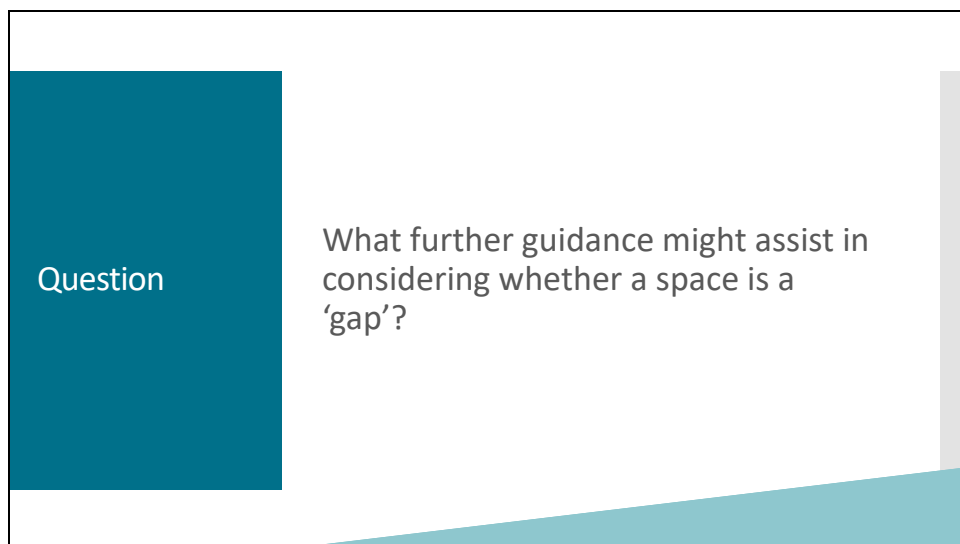
Example 1

This slide features a teal header box on the left containing the text 'Example 1'. The main content area is white with a light blue gradient at the bottom. It displays a diagram of a cluster of buildings arranged around a central vertical axis, with some buildings having horizontal extensions, illustrating a potential countryside settlement.

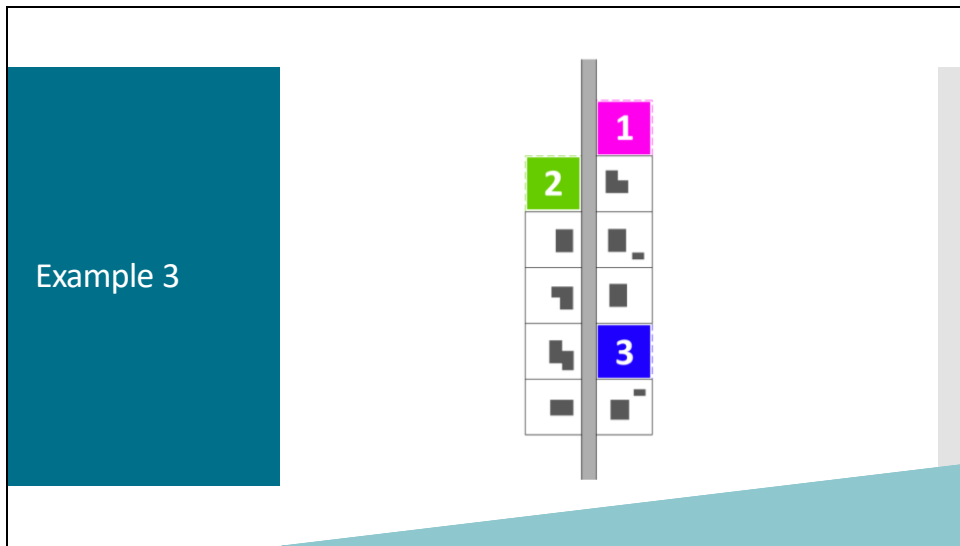
Slide 11



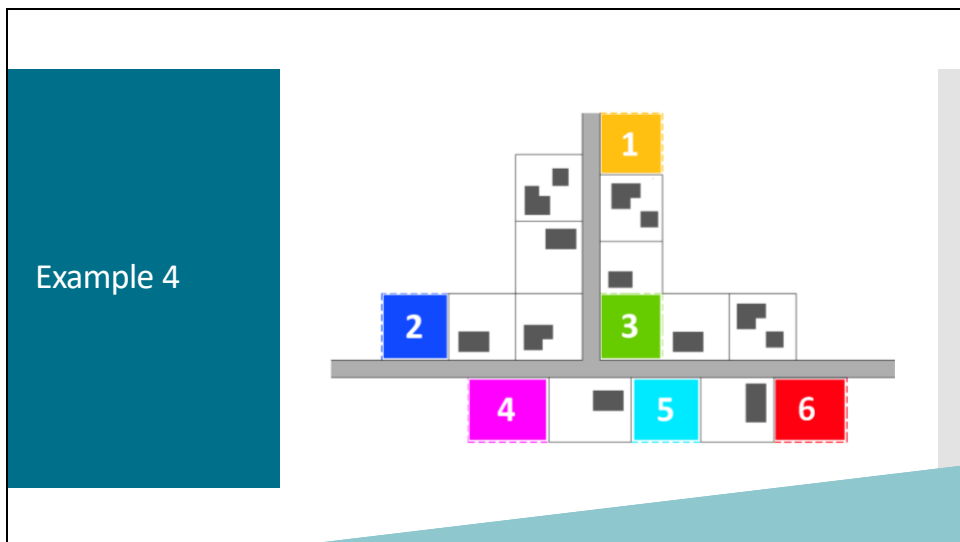
Slide 12



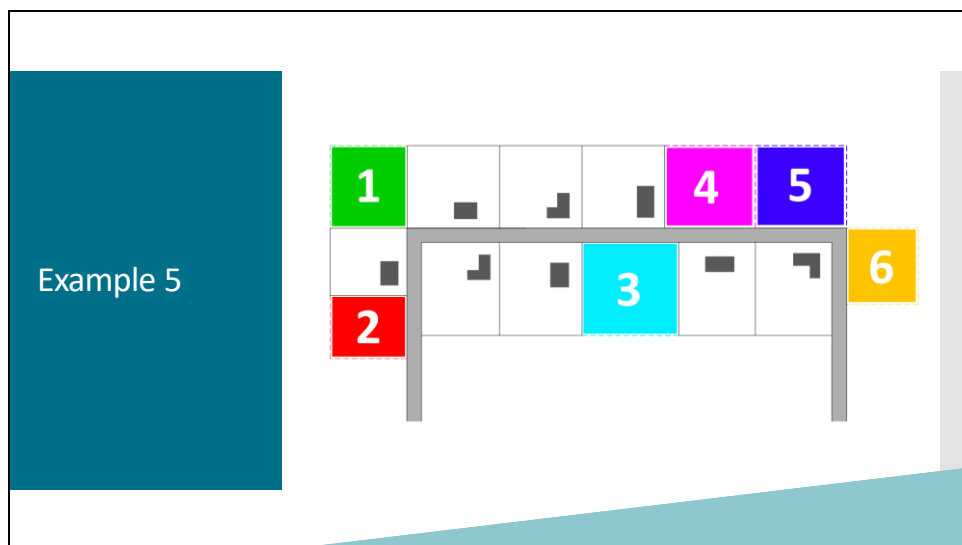
Slide 13



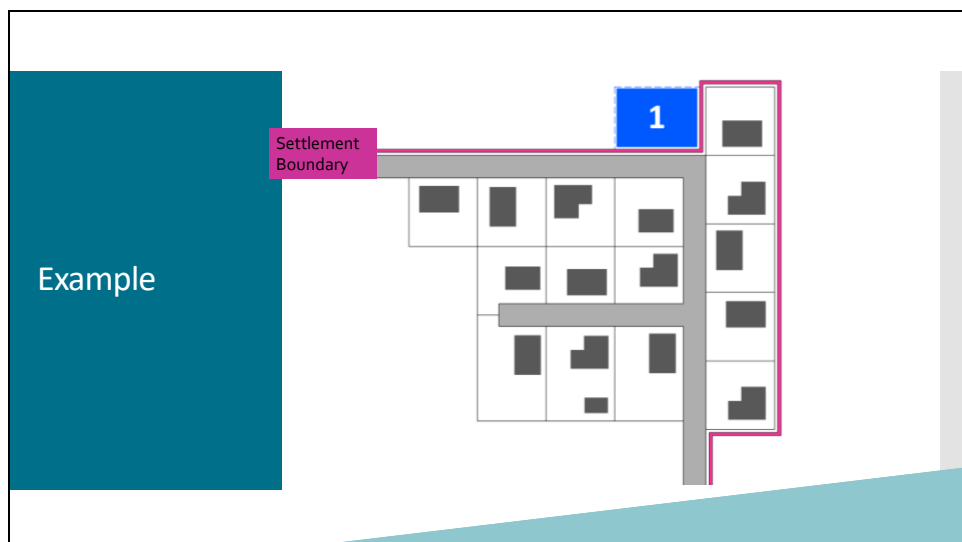
Slide 14



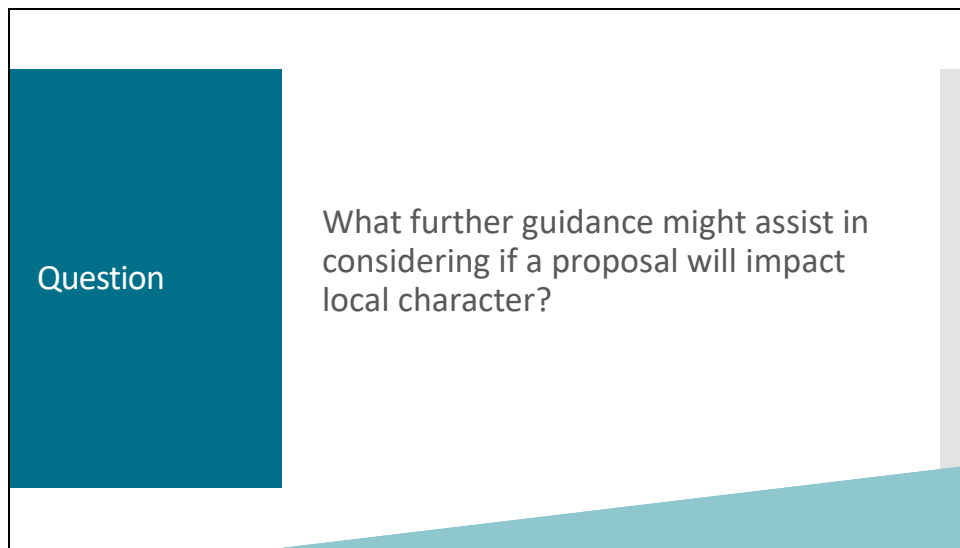
Slide 15



Slide 16



Slide 17

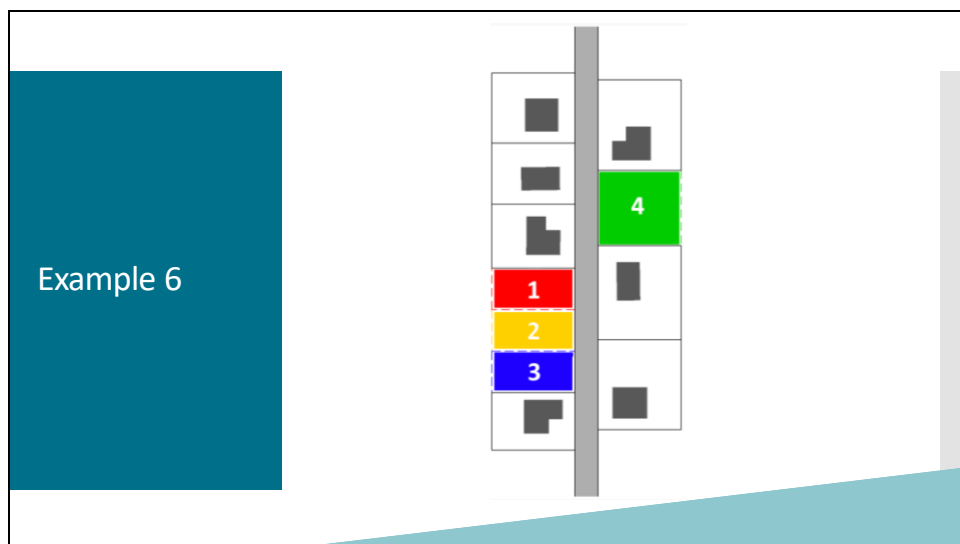


Question

What further guidance might assist in considering if a proposal will impact local character?

This slide features a teal rectangular box on the left containing the word "Question". To its right, the text "What further guidance might assist in considering if a proposal will impact local character?" is displayed. The slide has a light blue gradient at the bottom and a grey vertical bar on the right side.

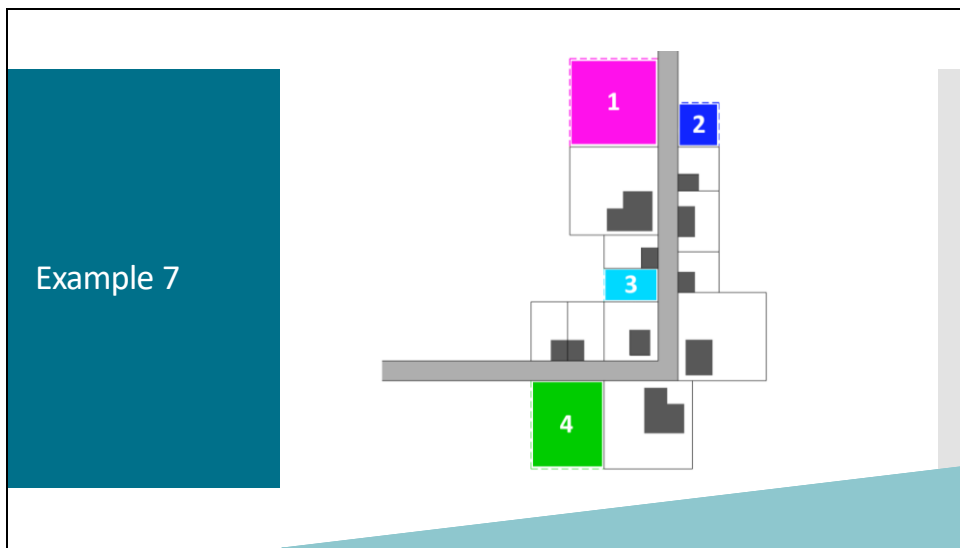
Slide 18



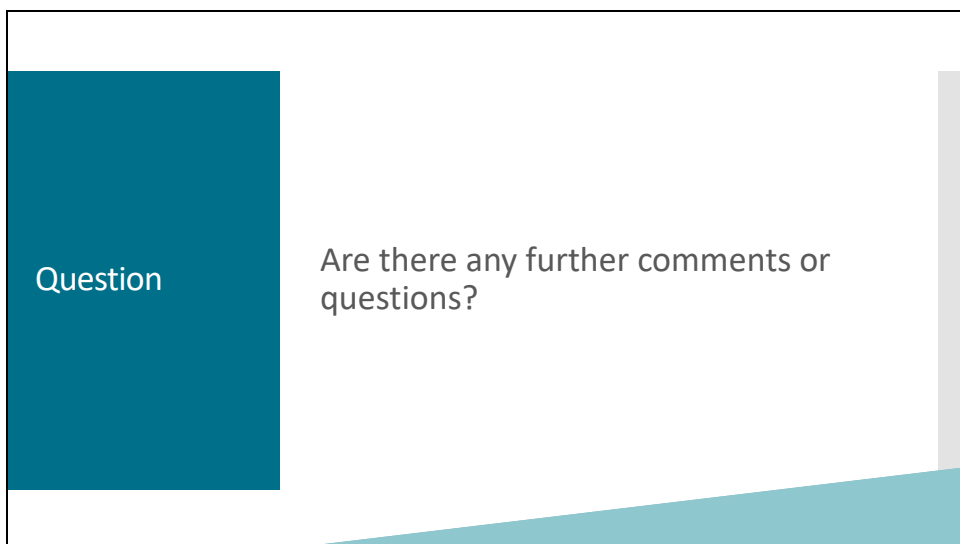
Example 6

This slide illustrates a housing layout example. On the left is a teal box labeled "Example 6". To its right is a diagram showing two rows of housing units separated by a vertical grey line. The left row contains five units, with the bottom three highlighted in red (1), yellow (2), and blue (3). The right row contains four units, with the top one highlighted in green (4). Each unit is represented by a grey silhouette of a house. The slide includes a light blue gradient at the bottom and a grey vertical bar on the right.

Slide 19



Slide 20



## Appendix 4: Draft Consultation Bodies

The following organisations and groups were consulted during the preparation of the Supplementary Planning Document:

- Elected members
- Developers / landowners / agents
- Suffolk County Council
- Broads Authority
- Historic England
- Natural England
- Environment Agency
- Members of the public

### **Specific consultation bodies**

- The Coal Authority
- Environment Agency
- English Heritage
- Marine Management Organisation
- Natural England
- Network Rail
- Highways Agency
- Suffolk County Council
- Parish and Town Councils within and adjoining East Suffolk
- Suffolk Constabulary
- Adjoining local planning authorities – Ipswich Borough Council, Mid Suffolk District Council, Babergh District Council, Great Yarmouth Borough Council, Broads Authority, South Norfolk District Council
- Anglian Water
- Essex and Suffolk Water
- Homes England
- Electronic communication companies who own or control apparatus in the Suffolk Coastal District
- Relevant gas and electricity companies
- NHS England
- Ipswich and East Suffolk Clinical Commissioning Group
- Great Yarmouth and Waveney Clinical Commissioning Group

### **General consultation bodies**

- Voluntary bodies some or all of whose activities benefit any part of the District
- Bodies which represent the interests of different racial, ethnic or national groups in the District
- Bodies which represent the interests of different religious groups in the District
- Bodies which represent the interests of disabled persons in the District
- Bodies which represent the interests of persons carrying on business in the District
- Bodies which represent the interests of environmental groups in the District



**Other individuals and organisations**

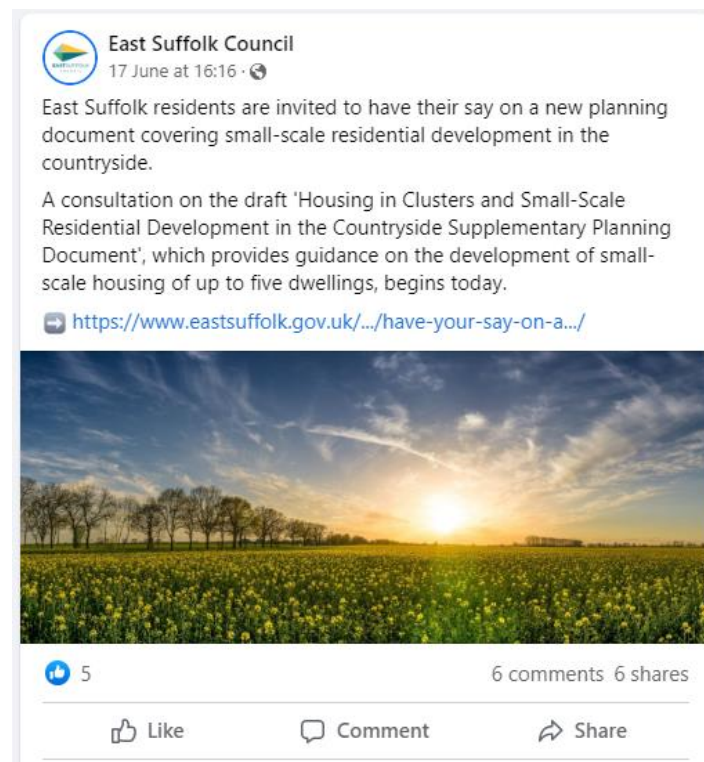
Includes local businesses, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the Local Plan mailing list.

## Appendix 5: Draft Consultation Promotion Material

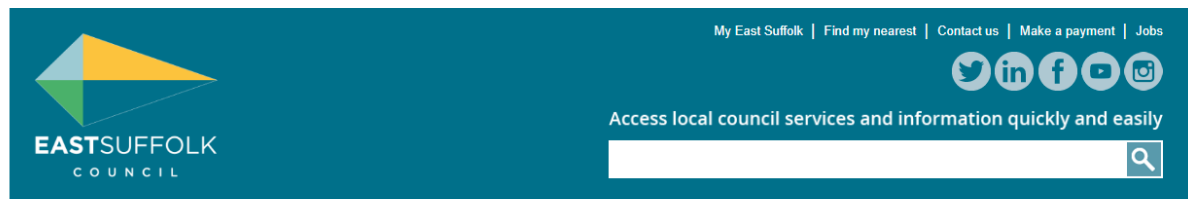
Twitter – 17<sup>th</sup> June 2022



Facebook – 17<sup>th</sup> June 2022



## Press Release – 17<sup>th</sup> June 2022



[Home](#) > [News](#) > Have your say on a new planning document

### Have your say on a new planning document

Posted by on 17 June 2022 | [Comments](#)

East Suffolk residents are invited to have their say on a new planning document covering small-scale residential development in the countryside.

A consultation on the draft Housing in Clusters and Small-Scale Residential Development in the Countryside Supplementary Planning Document (SPD), which provides guidance on the development of small-scale housing of up to five dwellings, begins on Friday 17 June.

The Suffolk Coastal Local Plan and the Waveney Local Plan each contain a policy which allows for a limited amount of new housing in the countryside. The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides further guidance on the application of these policies:

- Policy SCLP5.4 Housing in Clusters in the Countryside (Suffolk Coastal Local Plan, 2020)
- Policy WLP8.7 Small Scale Residential Development in the Countryside (Waveney Local Plan, 2019)

The draft SPD covers a range of topics including an outline of the necessary characteristics for sites to be appropriate for development, considerations on the potential impact on character of the area, the requirements for public engagement and how these policies relate to other policies in the Local Plans.

Cllr David Ritchie, Cabinet Member for Planning and Coastal Management said: "We welcome any feedback on this new Supplementary Planning Document which will enable us to make decisions on future developments in rural areas."

Comments on the Draft Housing in Clusters and Small-Scale Residential Development in the Countryside Supplementary Planning Document must be submitted by 5pm on Friday 5 August 2022.

[View and comment on this consultation.](#)

Comments can also be emailed to [planningpolicy@eastsuffolk.gov.uk](mailto:planningpolicy@eastsuffolk.gov.uk) or sent to East Suffolk Council, Planning Policy and Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ.

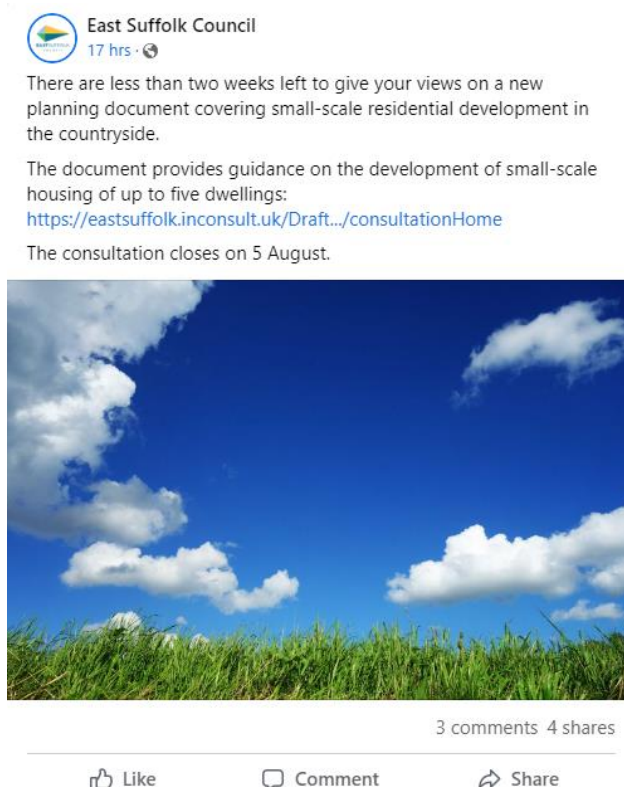
Paper copies of the draft Supplementary Planning Document and accompanying Consultation Statement have been made available for inspection at all libraries in the district and the Council's Customer Service Centres. For information on locations and opening hours please see [www.suffolklibraries.co.uk](http://www.suffolklibraries.co.uk) and [www.eastsuffolk.gov.uk/contact-us/customer-services/](http://www.eastsuffolk.gov.uk/contact-us/customer-services/).

All comments received will be considered and taken into account when finalising the Housing in Clusters and Small-Scale Residential Development in the Countryside SPD, which will be adopted later in 2022. Once adopted, the SPD will be a material consideration in determining planning applications.

## Twitter – 27<sup>th</sup> July 2022



## Facebook – 27<sup>th</sup> July 2022



## Consultation Poster



# Have your say

## Draft Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document

Consultation period  
Friday 17<sup>th</sup> June to 5pm Friday 5<sup>th</sup> August 2022

### What are we doing?

East Suffolk Council is inviting comments on a new planning document which provides guidance on the development of small scale housing, of up to five dwellings, in the countryside.

The Supplementary Planning Document (SPD) provides further guidance on the application of Local Plan policies SCLP5.4 Housing in Clusters in the Countryside (Suffolk Coastal Local Plan, 2020) and WLP8.7 Small Scale Residential Development in the Countryside (Waveney Local Plan, 2019).



### How can you get involved?

#### GIVE YOUR VIEWS

Visit the website below to view and comment on the draft document. Paper copies of the draft SPD and Initial Consultation Statement are also available to view in libraries and the Council's Customer Service Centres. Please contact us if you need any assistance in viewing the documents.

All comments received will be considered and taken into account when finalising the SPD, which will be adopted later in 2022. Once adopted the SPD will be a material consideration in determining planning applications.



**HOUSING IN CLUSTERS AND SMALL SCALE RESIDENTIAL DEVELOPMENT IN THE COUNTRYSIDE**  
DRAFT SUPPLEMENTARY PLANNING DOCUMENT  
June 2022

Guidance on implementing local plan policies  
SCLP5.4 Housing in Clusters in the Countryside  
WLP8.7 Small Scale Residential Development in the Countryside

**Find out more and give your views:**  
[www.eastsuffolk.gov.uk/  
planning-policy-consultations](http://www.eastsuffolk.gov.uk/planning-policy-consultations)

Alternatively, please send comments to:  
East Suffolk Council, Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ

 [planningpolicy@eastsuffolk.gov.uk](mailto:planningpolicy@eastsuffolk.gov.uk)  
 01394 444557 / 01502 523029

## Appendix 6: Draft Consultation Responses

Please note that in the Comment Summary column any page and paragraph numbers relate to the Draft Housing in Clusters and Small Scale Development in the Countryside Supplementary Planning Document (June 2022)

Please note that due to a technical issue respondents who submitted their comments online before 22<sup>nd</sup> June were not requested to submit their name and contact details, and these respondents appear as 'anonymous'.

General Comments				
Respondent Name	Comment ID	Comment Summary	Council Response	Action
Health and Safety Executive	54	The HSE is not a statutory consultee for local and neighbourhood plans. HSE has provided Local Planning Authorities (LPAs) with access to its LUP Web App <a href="https://pa.hsl.gov.uk/">https://pa.hsl.gov.uk/</a> and downloadable GIS consultation zones. These tools alongside HSE's published methodology ( <a href="http://www.hse.gov.uk/landuseplanning/">http://www.hse.gov.uk/landuseplanning/</a> ) can assist you in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations. Your attention is drawn to the planning policy guidance provided by your central planning departments in England, Scotland and Wales. For England: <a href="https://www.gov.uk/guidance/hazardous-substances">https://www.gov.uk/guidance/hazardous-substances</a> in particular paragraphs 65 to 69 which explain an LPAs responsibilities when taking public safety into account in planning decisions and formulating local plans.	Comments noted.	None.
Environment Agency	57	Thank you for consulting us on the below consultation. We have reviewed the document as submitted and can confirm that we have no formal comments to make on the SPD and its contents. We trust this is useful.	Comments noted.	None.
Felixstowe Town Council	36	Having considered the draft document, Members welcome this SPD. We feel that it provides a succinct but valuable interpretation of policy SCLP 5.4 which has proved difficult to interpret in the past.	Comments noted.	None.
Cretingham, Monewden and	21	While allowing limited development is understandable, plans need to be tightened to	Comments noted. The purpose of the SPD is to provide	SPD has been clarified in respect of cumulative effects, in paragraph 6.24

Hoo Parish Council		prevent overdevelopment. SCLP policy does not allow for consideration of cumulative development except in AONB which should be changed. Should be a limit on number of houses that can be developed based on current housing numbers for each settlement. Should be restrictions on how far large areas can be subdivided. SCLP should slow down development if too many come forward in Countryside. Finally, should also be restrictions on who can buy the houses, namely full time residents who live locally.	guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. The changes proposed would constitute policy and the SPD cannot make changes or add additional requirements for applications. Consideration of cumulative effects can be considered outside of AONBs and the SPD has been clarified in this respect, in paragraph 6.22 and new Illustration 10.	and new Illustration 10 as well as throughout the document.
Carl Eastwood	35	I am completely opposed to the concept. Policies have potential to ruin unspoilt countryside. What about the environmental impacts? How are you planning to control the numbers of new developments? Has the potential to spiral out of control. Even small developments can have huge environmental impacts, such as damage to habitats and more traffic. Should focus on existing areas not the countryside.	The purpose of these policies is to provide opportunities for limited development in rural areas. Paragraphs 6.24 to 6.28 outline how the cumulative impact of the proposals approved under policies SCLP5.4 and WLP8.7 will be considered and monitored. Both policies include controls to determine when development could have a detrimental impact on the countryside, and these will be applied by the Council. Any proposals will also need to meet the requirements of the relevant biodiversity and landscape policies in the Local Plans.	None.



Saxtead Parish Council	52	Subject is difficult and complex to understand. Provision of housing and protection of heritage assets vitally important. Object to policy due to ESC failing to consider housing needs of lower and average income households. There is an Exceptions Policy where land in small clusters can be given planning permission provided it is supplied below market value and meets the needs of the local community. It is my opinion that land given planning permission in attractive villages in small clusters will be sold at premium values as highly desirable. This seems to negate the Exceptions Policy as no one will be willing to sell at below market value to address housing needs when all small clusters are likely to attract premium values.	Comments noted. The purpose of this SPD is to provide further guidance on the application of SCLP5.4 and WLP8.7. The SPD does not have the remit to change or remove the use of these policies. Section 7 of the SPD sets out guidance relating to an assessment of local housing need, which would be relevant to proposals for 4 or 5 dwellings under policy SCLP5.4. The Local Plans do provide opportunities, under other policies, for affordable housing development in the Countryside to help meet local housing needs.	None.
Norfolk County Council	58	No specific comments on ecology and support conclusion of SEA Screening Opinion that a full SEA is not required. We are supportive of the policy approach to landscape impacts. Any proposals close to other authorities should consider the Landscape Character Assessments of those areas. Where development is close to other areas, consideration should be given to the impacts on infrastructure and appropriate consultation should be undertaken with neighbouring authorities.	Comments noted. Section 6 of the SPD outlines the considerations relating to impacts on landscape and the wider area.	Paragraph 6.20 has now been expanded to include reference to neighbouring authority landscape character assessments where this is relevant.
Reydon Parish Council	22	This guidance, although unlikely to apply in Reydon, seems helpful and well thought out guidance on the two Local Plan policies and balances the need to protect the countryside with the need for more rural housing.	Comments noted.	None.

Peter Webb	69	Grammatical errors: Capital letters should not be used for common nouns and adjectives (major centres, towns, large villages, small villages, landscape character, countryside, settlement boundaries).	Comments noted. The use of capital letters in the SPD reflects the use of proper nouns in the Local Plans.	None.
Parham Parish Council	75	Primary concern is that local planning officers pay no attention to our comments. Our local knowledge was ignored during a recent application where information was provided on the sites previous use and flooding risks. Recent comments were also ignored on housing need and the impact on local infrastructure. Our suggestions to limit vehicular access to the village from local commercial premises at certain times were also ignored. In order to support this document we would need to feel our voice was being heard. Do planners not appreciate the spaces between buildings are just as important as the buildings themselves? The SPD also states that applicants must show how planning concerns from the community have been addressed. We wonder how this will be interpreted as we will not be asked if we agree.	Comments on applications are considered by planning officers and included in the decision report. In relation to the SPD, sections 4 and 5 of the SPD outlined how spaces or 'gaps' within areas will be considered, including needing to consider the spaces contribution to the character of the area and its use, as highlighted by illustration 9. Section 7 outlines how the Council expects applicants to engage with the local community in relation to the development of 4 or 5 new dwellings. The SPD provides details on what applicants will need to provide in order to show they have met the criteria in the relevant policy. This will likely need to be provided through a Planning Statement.	Guidance on the consideration of spaces within 'Clusters' and Settlements in the Countryside' has been expanded in sections 4 and 5 of the SPD. Reference has also been made to the importance of spaces to elsewhere.
Dennington Parish Council	33	Councillors complimented the document for showing clarity on what would and wouldn't get permission under the scheme. The visuals provided an excellent way of showing the policy and it is	Comments and support noted.	None.

		hoped ESC will continue with this approach with future policies.		
National Highways	49	No comments.	Noted.	None.
Mutford Parish Council	61	Clearer definition of 'Countryside' is needed to avoid extending settlement boundaries. A minimum distance between proposals and settlement boundaries should be set. SPD should be renamed to state 'Open Countryside'. SPD could be at odds with Neighbourhood Plan in that it could allow development that would cause coalescence and erode rural identity. Development that could harm Listed buildings and the AONB should be avoided. There also needs to be further definition on what is a 'gap'. The Parish Council also does not have the resources to appoint agents to guide us and would require further resources from the Council to do this.	Paragraph 3.2 of the SPD defines what constitutes the 'Countryside' according to the Waveney Local Plan. It states that both a proposed site and the 'Settlement in the Countryside' it relates to must be located entirely outside of Settlement Boundaries. The SPD is unable to change or add additional requirements to WLP8.7, therefore a distance from Settlement Boundaries cannot be added. The term 'Countryside' has been defined by the Local Plan, therefore it is not appropriate to change this for this SPD to state 'Open Countryside', as this may be considered differently. Any proposals under policy WPL8.7 that are put forward in the Mutford Neighbourhood Plan area would also be considered against any relevant policies in the Mutford Neighbourhood Plan as part of the development plan for East Suffolk. This also applies to other policies in the	Paragraphs 4.6 and 5.3 have been expanded to provide further clarity on how 'gaps' will be considered.

			Waveney Local Plan including Design (WLP8.29) and Landscape Character (WLP8.35). Section 5 of the SPD outlines what constates a 'gap' according to WLP8.7. The SPD does not have the remit to add further requirements such as minimum or maximum sizes of 'gaps'. Section 7 outlines the requirements for public engagement where relevant.	
Martlesham Parish Council	48	The Parish Council welcomes this guidance. The Martlesham Neighbourhood Plan resists development outside Settlement Boundaries unless they are in accordance with other polices in the Local Plan and development is directed to appropriate areas. The SPD should make specific reference to the importance of Neighbourhood Plans. While it is important to consider the cumulative impacts on sensitive areas, shouldn't this be the case in all proposals? The Parish Council would like to see a more restrictive approach than the SPD currently has and further elaboration on detrimental development would be appreciated. Consideration should also be given to the cumulative impact of major development.	Comments noted. Neighbourhood Plans are referenced throughout the SPD. The SPD does not have the remit to add further requirements than those already included in the policies. Section 6 of the SPD outlines what is expected from development and how detrimental development would be considered. The SPD focusses on the application of policies SCLP5.4 and WLP8.7, it is not the correct arena for considering the impacts of major development.	A new paragraph has been added to the Introduction of the SPD to highlight the importance of Neighbourhood Plans and how these could include policies that may be relevant to applications under SCLP5.4 and WLP8.7.  Paragraph 6.24 has been expanded to include reference to paragraph 5.28 of the Suffolk Coastal Local Plan. This reference highlights that cumulative impacts will be considered in all applications/locations, not just those in sensitive areas.
Easton Neighbourhood Plan	34	The Parish Council considers that the SPD imparts greater detail to underpin Local Plan policies.	Comments and support noted.	None.

Ufford Parish Council	51	The Parish Council support the document and have no specific comments to make.	Comments and support noted.	None.
Natural England	50	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Comments noted.	None.
Suffolk Wildlife Trust	62	While there are references to impact on landscapes, there are no equivalent references to biodiversity. Biodiversity policies should be referenced in the SPD. Such developments could have significant impacts on priority species and habitats as gaps could have been shielded from agricultural practices. The Environment Act 2021 introduces Biodiversity Net Gain and this should be referenced.	Comments noted. The Council will add references to the impacts and considerations for biodiversity. It is not appropriate to include specific guidance on implementing biodiversity net gain in this SPD. This will be a national requirement that is set to be introduced in 2023. As it is not yet a requirement, the SPD cannot include this.	Section 8 of the SPD, relating to other relevant policies in the Local Plans, now includes references to the Biodiversity and Geodiversity policies in the Local Plans.
Norfolk and Waveney NHS Integrated Care System	74	Support the SPD in principle. We would welcome a statement saying that the Council will support the ICS in ensuring suitable and sustainable provision of healthcare services for their residents through CIL contributions should the need arise.	Comments noted. Paragraphs 6.24 to 6.28 outline how the cumulative impact of the proposals under policies SCLP5.4 and WLP8.7 will be monitored. Both policies include controls to determine when development could have a detrimental impact, and these will be applied by the Council. Proposals submitted under policies SCLP5.4 and WLP8.7 may be liable for CIL which will be used to provide	None.

			infrastructure to support development.	
Otley Parish Council	46	Has appropriate parking been considered within Clusters as on road parking can bring drastic changes; Policies do not mention paved footways;	Comments noted. The SPD provides guidance specifically on the application of policies SCLP5.4 and WLP8.7. Parking standards will be applied through the relevant design and transport policies in the relevant Local Plan. The sustainable transport policies in the Local Plans will also be a consideration when determining the need for paved footways.	None.
Dennington Parish Council	56	The illustrations in this planning document are excellent and provide clear examples of what would, and would not, be acceptable under this proposal. These illustrations should be retained in the final document, and we would encourage the further use of these types of illustrations in other planning documents.	Comments and support noted.	None.
Wendy Thomas	53	The definition of 'countryside' is rural open space and farmland with low density population. Joining up groups and ribbon development will be detrimental to this. Rural living relies on private transport and closed businesses unlikely to reopen due to lack of footfall. Rural highways largely single track and other infrastructure had limitations. How can we guarantee that homes will not become holiday homes?	Comments noted. The definitions used in the SPD are defined by the Local Plans and cannot be changed by the SPD. The purpose of policies SCLP5.4 and WLP8.7 is to provide opportunities for limited development in the countryside to meet local housing needs and sustain rural communities. The SPD provides guidance on	None.

			<p>how impacts on landscape and character will be considered. The amount of growth through these policies will be relatively limited and the SPD outlines how the cumulative impacts of these will be considered to ensure the distribution of growth is not detrimental to the character of the area (SCLP5.4) or undermine the overall strategy of the Waveney Local Plan (WLP8.7). The purpose of SCLP5.4 and WLP8.7 is to provide development opportunities for rural areas to retain residents and remain sustainable. Without these opportunities, residents could be priced out of areas due to rising values and possible increases in second homes and holiday homes. The Local Plans do not include policies requiring new dwellings to remain as main residences as this is not appropriate to apply to the whole district. However, where this is required as part of neighbourhood Plans this will be enforced.</p>	
Alan Williams	64	I am responding on behalf of Aldringham-cum-Thorpe Parish Council. The council are happy that	Comments and support noted.	None.

		this document reflects most of the feedback from the online preparation meeting and will help to clarify some of the ambiguity in the original Policy.		
Fiona Cramb	68	Concern that 'clusters' could include farm developments. Conversions could see these areas meeting the requirements. Would need to rigorously enforce criteria relating to impacts on character. SPD does not make reference to affordable housing. The definition of a highway could include bridleways and public footpaths which are not suitable for large volumes of traffic. Why does there need to be development in countryside when it could be accommodated on edge of towns?	Sections 2 and 3 of the SPD outline when areas could be considered as 'Clusters' or 'Settlements in the Countryside', including the minimum requirement for 5 dwellings. The SPD does not provide guidance on conversions as these are covered by other policies in the Local Plans and in some instances by Permitted Development rights. Development of affordable housing is also covered by other policies, although section 8 of the SPD does cover situations where these policies cross over with SCLP5.4 and WLP8.7. The definition of a highway is provided by Suffolk County Council as the highway authority, however the SPD does specify that this must provide vehicular access. The purpose of these policies is to provide opportunities for limited development in rural areas to meet local housing needs and sustain rural	None.



			communities. Other policies in the Local Plans cover situations for development in more urban areas.	
Kettleburgh Parish Council	85	The SPD in many places implies subjective assessments by planning officers, in relation to character and how value of the contribution may be afforded to the area by any new development. It is imperative that parish councils are consulted to inform planning officers when no neighbourhood plans exist.	Comments noted. Parish Councils have the opportunity to comment on planning applications. Section 7 of the SPD also details what is expected from applicants when public engagement is required and encourages engagement with the community in determining local housing needs.	None.
Aldeburgh Society	77	The document would seem to propose an eminently sensible and practical addition to existing policies giving helpful guidance and advice not only to owners of properties in such rural areas, but also to potential developers who will be left with little doubt as to the acceptability or otherwise of their ideas or aspirations. The Society also commends those responsible for the preparation of the draft policy for its thoroughness and clarity.	Comments and support noted.	None.
Sweffling Parish Council	78	Whilst new development may help local housing needs, there are currently no such identified requests made known to Sweffling Parish Council. Importantly, there are no facilities or services within 3 miles that would sustain any further development. We are very much 'Open Countryside' and feel no need to make any changes to the Parish of Sweffling. In the past our	Comments noted. The purpose of these policies is to provide opportunities for limited development in rural areas to help to sustain rural communities, whilst respecting the character of rural areas. This includes protecting	None.

		views have not been recognised and we do not want more heritage assets to be lost.	heritage assets as outlined in section 6 of the SPD.	
Henstead with Hulver Street Parish Council	79	The Parish Council were concerned that the SPD would change the current policies, however after discussion with the Council it was confirmed that this is not the case.	Comments noted.	None.
Kettleburgh Parish Council	82	The SPG is not particularly meaty, is repetitive and refers back to policy for most of its substance. It is still quite un-prescriptive in relation to design and consultation.	The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7. It is not appropriate to be prescriptive in relation to design given that the policies apply across the whole of East Suffolk and the character of settlements varies. Likewise in relation to consultation, it is not appropriate for the SPD to be prescriptive as different methods may be appropriate in different locations, however examples are included in chapter 7.	None.
Durrants	100	Both the SCLP and WLP contain instructive and clear policies on rural housing development. These have been adequate bases for numerous applications to be made for homes in the countryside. It is our view that the local authority's interpretation and formed 'Policy Position' of the policies has caused inconsistent decisions, necessitating the SPD by way of explanation. The SPD seeks to provide clarity and guidance on the interpretation of SCLP5.4 and WLP8.7. Whilst this	Comments noted. Responses to detailed comments are set out elsewhere in this schedule.	None.

		is certainly successful in certain areas of the draft, the document has also left some issues unresolved, adding layers of interpretation to formerly objective elements of the policies.		
Sue Seabon	99	The illustrations of acceptable, and unacceptable, gaps in clusters is very clear and helpful. We consider the clarification provided by the SPD to be beneficial. The SPD recognises that some sites add to the character of an area by being undeveloped and should remain so. Ancient character of the land needs to be preserved and can be a special feature of the area. While there are limited services, many accept this for the peaceful lifestyle. Could planning conditions be included to ensure new dwelling remain as a main residence?	Comments and support noted. The purpose of SCLP5.4 and WLP8.7 to provide opportunities for limited development in rural areas to sustain rural communities. The purpose of SCLP5.4 and WLP8.7 is to provide development opportunities for rural areas to retain residents and remain sustainable. Without these opportunities, residents could be priced out of areas due to rising values and possible increases in second homes and holiday homes. The Local Plans do not include policies requiring new dwellings to remain as main residences as this is not appropriate to apply to the whole district. However, where this is required a part of neighbourhood Plans this will be enforced.	None.
Waldringfield Parish Council	97	We consider this to be a well written and very helpful document – the illustrations are of particular value. We would suggest that a similar SPD document is produced to cover “non-	Comments and support noted. Other policies in the Local Plans determine where new employment development can occur, which include specific	None.

		residential” such as commercial/employment development in clusters in the countryside.	requirements for new development in the Countryside. It is not currently considered necessary to prepare an SPD for this issue.	
Anonymous	2	Where is the detail on soil neutrality issues which may impact on these proposals?	The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. Any proposals put forward under these policies will also need to meet the requirements of any other relevant policies in the Local Plans, which include the policies relating to the natural environment. SCLP10.3 states that proposals within the Suffolk Coastal local Plan area will be considered in relation to their impacts on the loss of agricultural land.	None.
S Browns	11	Any development must bring a positive continuing contribution to the local community and NOT second homes, but homes for local people.	The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. The SPD does not have the remit to change to policies or add additional requirements to them. Therefore, the Council is unable to require that homes be bought by local people. For	None.

			proposals of 4 or 5 dwellings, SCLP5.4 expects development to meet a locally identified need, however this would not amount to an occupancy restriction being imposed.	
David Burns	15	<p>I hope that some notice will be taken of the opinions of local people who East Suffolk District Council represent with regard to this planning policy. The opinions of local people and Parish Councils have no effect whatever on planning decisions.</p> <p>This policy will, if implemented, advance the destruction of the countryside. Additional housing permissions will add to environmental damage and will be used by developers as 'Trojan horses' to enable further damaging housing development.</p> <p>The often repeated 'housing for local need' from the District Council and the 'affordable housing' justifications are insulting. Few of these houses are being bought by local people and built houses are being bought as second homes. Most developers seem to avoid the 'affordable homes' requirement by manipulating the numbers of houses being built in developments and other means.</p>	<p>Section 7 of the SPD outlines how the Council expects applicants to engage with the local community in relation to the development of 4 or 5 new dwellings under SCLP5.4. The SPD provides details on what applicants will need to provide in order to show they have met the criteria in the relevant policy. This will likely need to be provided through a planning statement. Parish Councils and local residents are also able to comment on planning applications.</p> <p>The purpose of these policies is to provide opportunities for limited development in rural areas to help to sustain rural communities. Paragraphs 6.24 to 6.28 outline how the cumulative impact of the proposals under policies SCLP5.4 and WLP8.7 will be considered and monitored.</p>	None.

			<p>Both policies include criteria to determine when development could have a detrimental impact on the countryside, and these will be applied by the Council.</p> <p>In relation to the SPD, section 8 outlines how the affordable housing policies interact with SCLP5.4 and WLP8.7 and where opportunities for affordable housing development in the Countryside may exist. The scale of developments that could be supported under SCLP5.4 and WLP8.7 would not trigger the need for affordable housing to be provided.</p>	
Homersfield Parish Council	24	<p>Councillors are the Homersfield Parish Council Meeting on 5<sup>th</sup> July 2022 resolved to make:</p> <p>‘NO COMMENT’ on the Draft Housing in Clusters and Small Scale Residential Development in the Countryside Consultation.</p>	Comment noted.	None.
Cookley and Walpole Parish Council	25	<p>The Parish Council would not support up to five home infills whilst there is inadequate local infrastructure.</p>	<p>Comment noted. Proposals submitted under policies SCLP5.4 and WLP8.7 may be liable for CIL which will be used to provide infrastructure to support development.</p>	None.

Cratfield Parish Council (Sally Chapman)	26	At Cratfield Parish Council's meeting on Tuesday 12 <sup>th</sup> July 2022 at 7:30pm  Councillors discussed and agreed unanimously 'No Comment' to this Consultation.	Comment noted.	None.
Three Saints South Elmham Parish Council	27	Councillors at the Three Saints Parish Council Meeting on 13th July 2022 resolved to SUPPORT the Draft Housing in Clusters and Small Scale Residential Development in the Countryside Consultation.	Support noted.	None.
Melton Parish Council (Pip Adler)	29	Melton Parish Council has two concerns.  1. The definition of a highway. The Council believes that it should be one that currently provides vehicular access.  2. The guidelines need to be clear that this doesn't allow urban sprawl, and that the cumulative effect should be considered with each cluster.	Comments noted.  The term 'highway' is defined by Suffolk County Council as the highway authority as any route in which the public have right of way. This is stated in the SPD and a link to the definition is included in the footnotes.  Section 6, paragraphs 6.24 to 6.28, outlines how cumulative impact will be considered as these policies continue to be applied. This has been expanded in response to consultation comments.	Guidance on considering cumulative effects has been expanded, including the addition of Illustration 10.
C Hoy	37	Comment redacted on advice of ESC legal services.	N/A	None.
Dennington Parish Council	55	The Supplemental Planning Document provides useful clarification for assessment of planning applications outside of village physical limits.	Support noted. Policy SCLP5.4 is already adopted policy.	None.

		<p>Dennington contains 2 hamlets outside of the village, plus other clusters, to which this policy document would apply.</p> <p>Dennington Parish Council supports the proposed wording of SCLP 5.4</p>		
L Fincham	59	<p>I am concerned by these plans. Once additional buildings are approved there will be nothing to prevent landowners for continuing to “bolt on” additional buildings. These properties will only be accessible via car adding to traffic and pollution. These properties will not solve the housing crisis. They are likely to be holiday dwellings. Affordable housing needs to be close to public transport and facilities.</p> <p>ESC should protect the countryside. Allowing countryside developments is not consistent with the stated aim to protect the countryside. Objections by local people seem to carry little weight, in some cases local residents don’t even get a reply.</p> <p>Please build needed homes in existing towns where there are proper facilities.</p>	<p>The purpose of these policies is to provide opportunities for limited development in rural areas to help to sustain rural communities. Paragraphs 6.24 to 6.28 outline how the cumulative impact of the proposals under policies SCLP5.4 and WLP8.7 will be monitored. Both policies include criteria relating to managing the impact on the countryside (such as landscape), and these will be applied by the Council.</p> <p>In relation to the SPD, section 7 outlines how the Council expects applicants to engage with the local community in relation to the development of 4 or 5 new dwellings. The SPD provides details on what applicants will need to provide in order to show they have met the criteria in the relevant</p>	None.



			<p>policy. This will likely need to be provided through a Planning Statement. Residents would not receive an individual reply to comments on a planning application, however these would be considered in the planning officer's report.</p> <p>Most of the development planned in the Local Plans is for the more urban areas, however part of the strategy of the Local Plans is to also support some limited development in the countryside.</p>	
Norfolk and Waveney NHS Integrated Care System	71	<p>We identify and support the extent to which the SPD supports the policies within the adopted Waveney Local Plan.</p> <p>We specifically welcome the statement in the Local Plan page 211 (8.40).</p> <p>One of the concerns is what the cumulative impact of all small-scale residential developments would likely have on local infrastructure, there are a number of GP practices in the Waveney area that currently have constraints, this is without considering known large scale developments. The inclusion of small-scale rural clusters may exacerbate this further.</p>	<p>Comments noted. Proposals submitted under policies SCLP5.4 and WLP8.7 may be liable for CIL which will be used to provide infrastructure to support development.</p>	None.

		It is also noted that the Initial Consultation statement indicates that Town and Parish Council members queried how infrastructure such as GP surgeries will be supported given the potential cumulative increase in population.		
Sutton Parish Council (Linda Gunson)	76	<p>Sutton is currently classified as an “other village” and is wholly contained within an AONB. As such the village has special characteristics and values its status as countryside strongly.</p> <p>Whilst understanding the need for guidance for small villages and above, Sutton Parish Council feel that due to our individual character and size, we are best placed to make planning decisions. Any presumption that “cluster” or “infill” development is automatically acceptable should not be taken, unless contained within a formal adopted Development Plan for the relevant Parish.</p>	Sutton is in the ‘Countryside’, but was formerly an ‘other village’ in the superseded Core Strategy and Development Management Policies (2013). The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. Applications submitted under these policies will be considered against all of the requirements of the relevant policy as well as the requirements of any other relevant policy in the Local Plan.	None.
Henstead with Hulver Street Parish Council	81	SPD states that new development will be limited. Further discussion with the Council has made it clear that the SPD cannot change the policies and that the SPD does not allocate further development. The Parish Council are therefore satisfied that the SPD should give clearer guidance on small developments in the Countryside.	Comments noted.	None.
Anonymous	6	There must be tight supervision to ensure that these policy’s are followed to the letter anyone	Comments noted. The purpose of this SPD is to provide clarity on how policies SCLP5.4 and WLP8.7 will be applied. The	None.

		that does not follow this must be made aware that the property will be removed!	policies will be considered in determining whether a proposal is acceptable. Enforcement action could be taken against any building works that are not in accordance with a permission or for which permission was not obtained.	
Anglian Water	66	Our concerns relate to the long term sustainability of new development in very rural locations considering climate change. The imbedded and operation carbon of dispersed housing in rural locations is likely to be higher. Potential risk of flooding and the need to manage run off may make rural development less and less sustainable over time. Some areas may not be in reasonable proximity to connect to the water recycling network, which may require the necessary permits for sewerage treatment from the Environment Agency. There may also be issues with private water supplies and local water stress.	Comments noted. The purpose of this SPD is to provide further guidance on the application of policies SCLP5.4 and WLP8.7 specifically. These policies provide opportunities for limited new development in the Countryside to help sustain rural communities. While it is acknowledged that these areas rely more on carbon heavy activities such as private car transport, the policies have been prepared to ensure the amount of development being delivered is limited. Other policies in the Local Plans cover issues such as climate change and flooding, and applications will need to meet the requirements of these where relevant.	None.
Martlesham Parish Council	47	We note that policy SLP5.3 recognises that there are many small communities and clusters of housing outside settlement boundaries and in the	Comments noted.	None.

		countryside and that SLP5.4 provides for limited development to come forward in these locations.		
Kettleburgh Parish Council	86	<p>Could the Council confirm if SCLP10.4 has ever been used as a reason for refusal? Our experience has shown this policy being disregarded over the need for housing.</p>	<p>Comments noted. The Council applies all relevant policies when determining planning applications. SCLP10.4 and SCLP5.4, of all of the applications that have been submitted under these, have both been used as reasons to refuse applications in the past (94 and 34 respectfully since the Local Plan was adopted in September 2020). However, other applications have been approved under these policies.</p>	None.
Bromeswell Parish Council	60	<p>Bromeswell has a Village Plan, and within that plan the villagers wish to preserve the nature of this small village.</p> <p>Any potential increase in traffic resulting from small scale residential developments in the village would be detrimental to village life in terms of road safety, and use of the lanes for leisure activities. Such developments would need to be considered in great depth before any permissions are granted.</p> <p>When will infrastructure requirements be assessed?</p>	<p>Transport and movements related to any new development would form part of the consideration of a planning application, however the scale of these developments is unlikely to result in high traffic volumes.</p> <p>Paragraphs 6.24 to 6.28 outline how the cumulative impact of the proposals under policies SCLP5.4 and WLP8.7 will be monitored. Both policies include controls to determine</p>	None

		<p>How much input will a Parish Council have when it comes to a decision around the type of housing and the size of cluster?</p>	<p>when development could have a detrimental impact on the countryside, and these will be applied by the Council.</p> <p>Sections 4 and 5 outline the requirements that sites will need to meet in order to be considered appropriate for development. It is not appropriate for the SPD to define a set distance between buildings as this will be dependent on the character of the area.</p> <p>Infrastructure requirements are considered as a whole considering the growth allocated in the Local Plans. Proposals submitted under policies SCLP5.4 and WLP8.7 may be liable for CIL which will be used to provide infrastructure to support development.</p> <p>Section 7 of the SPD outlines when consultation/engagement by an applicant with the local community, including the Parish Council, is required. A Parish</p>	
--	--	--	--	--

			Council will also have the opportunity to respond to planning applications.	
North Cove Parish Council	65	<p>The proposals in the document are at odds with concerns about climate change, reducing emissions, and many other policies for the following reasons –</p> <p>No local employment so car commuting will be the normal transport method.</p> <p>Most of the housing is bought by people from higher value areas. They find access to medical services poor. Some people have returned to their previous home areas where they have maintained access to their old dentist. (Not conducive to reducing emissions).</p> <p>Access onto the highway is allowed even when dangerous and goes against Suffolk County Council highway visibility requirements. Highways visibility splays required are thus ignored. Parking and turning requirements for house extensions where number of bedrooms increases are ignored resulting in cars reversing out blindly.</p> <p>Light pollution is ignored.</p> <p>Surface water flooding risk is ignored.</p>	<p>The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. The purpose of these policies is to provide opportunities for limited development in rural areas to sustain rural communities.</p> <p>It is acknowledged that rural areas rely on private transport more than urban areas, however a limited amount of development in rural communities will help meet local needs. Both Local Plans do include policies on Sustainable Transport (SCLP7.1 and WLP8.21) which will be considered. Some small rural communities do also have employment uses and a small amount of development may in turn help to sustain these.</p> <p>Any proposals will need to meet the requirements of Suffolk</p>	None.

		<p>East Suffolk is a very low rainfall area. farmers are struggling to irrigate crops. More housing to use water is not sensible.</p> <p>Houses are being destroyed in fires We are a drought area!</p> <p>Much of the area is low lying and prone to surface water flooding in heavy rainfall. Green areas are needed to absorb carbon not built on using valuable resources.</p> <p>This consultation document totally contradicts East Suffolk's policy aims to become carbon neutral in the declared climate emergency (declared in June 2019).</p>	<p>County Council as the highway authority to ensure access is safe.</p> <p>Any proposals will also need to meet the requirements of any flooding policies and sustainable construction policies in the Local Plans.</p> <p>The policy forms one part of the strategy of the Local Plan. The Council must, in accordance with national policy, set out policies in its Local Plan to meet its housing need. However, the Local Plan also contains policies aimed at addressing climate change such as WLP8.28 on Sustainable Construction. The Council also recently adopted a Sustainable Construction Supplementary Planning Document which can be viewed at <a href="#">Supplementary Planning Documents and other guidance » East Suffolk Council.</a></p>	
--	--	---	--	--

Introduction				
Respondent Name	Comment ID	Comment Summary	Council Response	Action
Anonymous	3	This would appear to be a more appropriate mode of building in the countryside. Could SCC comment as to how this is compatible with their Lowestoft Garden Village?	Comments noted. This SPD relates specifically to policies SCLP5.4 and WLP8.7 and does not have the remit to provide guidance on other policies or site allocations in the Local Plans. The North of Lowestoft Garden Village is a key part of the strategy of the Waveney Local Plan, and provision for a limited amount of development in the countryside also forms part of the strategy, as explained in paragraph 1.1 of the SPD.	None.
Anonymous	5	This looks very sensible. Allows villages to grow a little and not die but stops any large development where it is unsuitable either aesthetically or because the infrastructure is not adequate.	Comment noted.	None.
Anonymous	8	Policies leave opportunity for ribbon development which can considerably extend a small village and open up areas which then become vulnerable to major development. LPA's will need to take a 'long' view on each application to ensure this does not happen.	Comments noted. The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. The SPD cannot make changes or add additional requirements for applications e.g. by limiting the number that can come forward in each cluster or on each site. SCLP5.4 does state that applications should not cause	Additional guidance on cumulative impacts has been added throughout the document, including new Illustration 10.



		Add in each policy that only 'one' of these types of development could ever happen within each cluster or site.	undue harm to the character of the area, therefore inappropriate development will not be supported. Applications will also need to meet the requirements of any other relevant policy in the Local Plan.	
Anonymous	9	We are now supposed to be discouraging car use and encouraging sustainable transport methods. Will the availability of public transport for the proposed developments be a consideration as to whether they are appropriate? If public transport is not convenient, it would still be unwelcome additional driving contribution to emissions.	The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans.. Both Local Plans do include policies on Sustainable Transport (SCLP7.1 and WLP8.21) which relevant proposals will need to be considered against, however the purpose of these policies is to help to support smaller rural communities and it is therefore acknowledged that some car use would inevitably take place.	None.
Wyndam Bucknell	10	This sounds like a very sensible proposal – many of the parishes around here are scattered and low-key sensible development of new houses will allow them to grow. We have an acute housing shortage and it is very difficult for local people to find homes in their local areas and many do not want to move from the villages to the countryside.	Support and further comments noted.	None.
Philip Chadwin	14	I own, purchased and have land deeds for a 4000sq ft plot at Southwold	Comment noted. However the SPD is not a mechanism for marketing sites.	None.

		which I would be willing to sell for small scale development.		
Cretingham, Monewdon and Hoo Parish Council	16	<p>Policy SCLP5.4 states the cumulative impact of proposals will be a consideration in respect to the criteria above. It is important that the cumulative impact of proposals in all cases including areas outside AONB. There could be settlements with a large number of infill gaps resulting in overdevelopment. A limit per settlement should be included under this scheme. Such a limit could be based on the number of dwellings prior to the SPD being adopted.</p>	<p>The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. The SPD cannot make changes or add additional requirements for applications such as setting a limit per settlement. Amendments to paragraph 6.24 (was 6.22) clarify that cumulative impact is relevant outside of the AONB too under SCLP5.4.</p>	<p>Paragraph 6.24 (was 6.22) has been amended to clarify that cumulative impact is relevant outside of the AONB under SCLP5.4.</p>
Christopher Stratton	23	<p>The title of policy SCLP 5.4 is misleading and could be misinterpreted. A re- wording - "<u>Housing clusters adjoining and within existing towns and villages</u>" would be clearer.</p> <p>5 or more dwellings is open to abuse and should be more specific as to what number would be acceptable and within what time frame.</p> <p>The terms "Well related" is vague and open to misinterpretation. "Without adverse impact" is preferable.</p>	<p>The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the local plans. The SPD cannot make changes to the policies or add additional requirements, such as changing the title of the policy or prohibiting development outside of Settlement Boundaries. The policy is specific that a cluster should have five or more existing dwellings (for development of up to 3 new dwellings) – it wouldn't be appropriate to set a maximum however the policy only applies to settlements that are not defined as</p>	<p>None.</p>

		<p>To suggest that every "Identifiable gap" could be filled would be promoting "Town cramming" and make open spaces more vulnerable.</p> <p>It would be preferable to make any additional housing in minor settlements an exemption and restrict new housing there to affordable or up to five dwellings. It is important to prohibit new housing within the countryside outside settlement boundaries.</p> <p>These amendments would ensure that the Plan is more sustainable and will result in less pressure on rural services, biodiversity and the landscape.</p>	<p>Small Villages, Large Villages, Market Towns or Major Centres.</p> <p>Illustrations in chapter 4 provide examples of 'well related' (and not 'well related').</p> <p>Ch4 makes it clear that not every gap would necessarily be suitable as consideration needs to be given to the character of the settlement.</p> <p>The policy does set a limit of up to five dwellings for each development, and guidance on cumulative impacts is set out in Ch6.</p> <p>The purpose of the policy is to help to sustain rural communities by allowing some limited development.</p>	
Three Saints South Elmham Parish Council	30	<p>Councillors at the 13th July 2022 Meeting discussed and agreed unanimously to Support this Consultation.</p>	<p>Support noted.</p>	<p>None.</p>

Waldringfield Parish Council	89	<p>Below are our comments for your consideration, which we hope you find useful:</p> <p>Section 1 Useful introduction and background information.</p>	Comments noted.	None.
------------------------------	----	---	-----------------	-------

<b>Suffolk Coastal Local Plan Policy SCLP5.4 – What is a ‘Cluster’?</b>				
<b>Respondent Name</b>	<b>Comment ID</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Little Bealings Parish Council	28	The Parish Council considers that in paragraph 2.7 in respect of Clusters being adjacent to an existing highway, ‘which carries public vehicular rights’ should be inserted after 'highway'.	Comment noted. The term ‘highway’ is defined by Suffolk County Council as any route in which the public have right of way. This is stated in the SPD and a link to the definition is included in the footnotes.	None.
Otley Parish Council	38	Relationship of policies with Settlement Boundaries and if they will remain; Understanding role of non-residential uses in a cluster	Paragraph 2.12 of the SPD states that the site and the ‘Cluster’ must be entirely located outside of Settlement Boundaries. The Settlement Boundary policy will remain in place. Section 2 of the SPD outline the requirements for areas to be considered ‘Clusters’ and states that non-residential uses can exist within them, however the area as a whole must have a residential function (Paragraph 2.6)	Paragraph 2.6 and Illustration 1 have been modified to provide further context as to how non-residential uses in ‘Clusters’ and Settlements in the Countryside’ will be considered. Paragraph 4.7 has also been amended to provide guidance on how non-residential uses could affect if a site is appropriate for development. This has also been expanded through new paragraph 4.12. A new illustration (illustration 10) has also been added to provide further guidance on the consideration of non-residential uses.
Durrants	104	No clarity on when permitted but not constructed dwellings will form part of a cluster or settlement. Would suggest that once an application is approved the principle of development should be accepted. It is not necessary in our view to consider deliverability or commencement.	Paragraph 2.9 outlines how dwellings that are permitted but not yet constructed will be considered when determining whether a location is a ‘Cluster’ or ‘Settlement in the Countryside’. The Council considers that there needs to be clear evidence that the new dwelling or dwellings will be delivered in order to appropriately consider them as part of the	Paragraphs 2.9 and 3.8 have been amended to provide clearer guidance on the expectations of the Council as to the evidence that is needed to show that a permitted dwelling will be delivered.

			‘Cluster’ or ‘Settlement in the Countryside’. Without this the Council cannot be certain that the dwellings will come forward. No evidence or reasons have been given as to why this is not necessary.	
Waldringfield Parish Council	90	Section 2 is clearly written, as are the illustrations. However, it would be helpful if illustrations were inserted into the relevant paragraphs.	Comments noted. The Council considered how to appropriately display the various illustrations during the preparation of the SPD. It was considered that they should be placed on individual pages in order to maintain their level of detail. Also, the illustrations represent various aspects of both policies, therefore placing them in one section would not be appropriate.	Hyperlinks have been included in the text of the SPD that link to the illustrations.
Woodbridge Town Council	108	It is unclear if SCLP5.4 only considers existing housing in the Countryside. Criteria a, b, c and d do not clearly state this. In Woodbridge there are locations where houses lie within the settlement boundary but the immediate countryside has a house discrete from those houses and thus in considering whether a cluster principle applies would you include the houses that are not in the countryside i.e. those within the settlement boundary. Further in places the settlement boundary is the highway and thus	Section 2 of the SPD outlines how an area would be considered a ‘Cluster’ according to SCLP5.4. Paragraph 2.12 states that the entire ‘Cluster’ and the proposed site must be outside of Settlement Boundaries, i.e. in the Countryside. Anything within Settlement Boundaries’ cannot be considered under policy SCLP5.4.	None.

		houses to one side are in the countryside and the other in the settlement. Does the cluster principle in those cases include the house within the settlement boundary?		
Woodbridge Town Council	109	In Woodbridge there is housing that abuts Manor Road and Russell Close, however a significant portion only abuts a private road, Prentice Lane. Paragraph 2.7 confirms that Clusters can only be where existing housing directly abuts a highway. Development however has been approved in 2017 (DC/17/1302/FUL) on Prentice Lane and did not even meet the criteria of being surrounded by development on two sides. How will this be dealt with in the future?	Comments noted. This SPD is not the appropriate arena to discuss previous approvals. However, the referenced application was granted before the adoption of the Suffolk Coastal Local Plan and therefore before SCLP5.4 was being used. The purpose of this SPD is to provide further guidance on the application of this policy.	None.
Bromeswell Parish Council	112	How soon does a property built in a cluster become part of that cluster?  Where is the guidance on distances between buildings in large gardens when considering allowing building clusters and small scale residential developments in the countryside?	Comments noted. Paragraph 2.9 of the SPD outlines when an approved but not yet built dwelling will be considered as part of a 'Cluster'. The Council will need strong evidence that the dwelling will be delivered to be considered. Sections 4 and 5 also provide guidance on the requirements for sites to be considered appropriate for development.	Paragraphs 4.6 and 5.3 have been expanded to provide further clarity on how 'gaps' will be considered.

<b>Waveney Local Plan Policy WLP8.7 – What is a ‘Settlement in the Countryside’?</b>				
<b>Respondent Name</b>	<b>Comment ID</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Henstead with Hulver Street Parish Council	80	SPD states that new development will be limited. Further discussion with the Council has made it clear that the SPD cannot change the policies and that the SPD does not allocate further development. The Parish Council are therefore satisfied that the SPD should give clearer guidance on small developments in the Countryside.	Comments noted.	None.
Durrants	105	No clarity on when permitted but not constructed dwellings will form part of a cluster or settlement. Would suggest that once an application is approved the principle of development should be accepted. It is not necessary in our view to consider deliverability or commencement.	Paragraph 3.8 outlines how dwellings that are permitted but not yet constructed will be considered when determining whether a location is a ‘Cluster’ or ‘Settlement in the Countryside’. The Council considers that there needs to be clear evidence that the new dwelling or dwellings will be delivered in order to appropriately consider them as part of the ‘Cluster’ or ‘Settlement in the Countryside’. Without this certainty, the Council will not be able to consider the overall impacts on development that has occurred, which is a key consideration of both policies. No evidence or reasons have been given as to why this is not necessary.	Paragraphs 2.9 and 3.8 have been amended to provide clearer guidance on the expectations of the Council as to the evidence that is needed to show that a permitted dwelling will be delivered.



Waldringfield Parish Council	91	Section 3 not applicable to Waldringfield.	Comments noted.	None.
------------------------------	----	--	-----------------	-------

<b>Suffolk Coastal Local Plan Policy SCLP5.4 – Site Characteristics</b>				
<b>Respondent Name</b>	<b>Comment ID</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Otley Parish Council	40	Clearer guidance needed to determine what is a 'Gap'	Section 4 of the SPD provides guidance on what potential development sites must include to be considered for development within 'Clusters'.	None.
Durrants	102	Further clarity over the meaning of a 'gap' would be welcomed. The SPD resists quantifying large and small. One could argue illustration 2 shows a large open field. Also appears to be resistance of gaps of agricultural nature with no justification. The SPD also contradicts the requirement for development on two sides as this could mean any size.	Section 4 of the SPD goes into great detail as to how the Council will consider if a proposed site is a clearly identifiable gap. Due to varying nature of 'clusters', it is not possible to quantify the size of a 'gap' as some areas may have larger gaps between dwellings than others that form part of the character of an area. Illustration 2 was designed to show how a site could potentially include more than one new dwelling. The SPD does not state that 'gaps' of an agricultural nature will be resisted. The use and nature of the 'gap' must be considered as it may contribute to the character of the area or may be used by the community for a specific purpose. However, the SPD does not resist the use of agricultural areas.	Paragraphs 4.6 and 5.3 have been expanded to provide further clarity on how 'gaps' will be considered.  The annotations on Illustration 5 (which expands on Illustration 2) have been expanded to explain that this illustration shows when a site may be appropriate for more than a single dwelling.
Waldringfield Parish Council	92	Section 4 – would suggest that illustrations are embedded in text.	Comments noted. The Council considered how to appropriately display the various illustrations during the preparation of the SPD.	Hyperlinks have been included in the text of the SPD that link to the illustrations.

			It was considered that they should be placed on individual pages in order to maintain their level of detail. Also, the illustrations represent various aspects of both policies, therefore placing them in one section would not be appropriate.	
Anonymous	7	It is not made clear if there is an existing line of buildings on one side whether the other side could be developed.	Comments noted. SCLP5.4 and WLP8.7 state that sites must be surrounded by development on at least two sides. If this criteria is not met, then the proposal will not be considered acceptable.	New illustration 10 provides some further guidance on the potential effect on the character and from cumulative development where the existing dwellings are along one side of the road in a linear form.
Durrants	110	We would like to draw your attention to a recent appeal (3277322) which overturn the Council's refusal for 3 new dwellings. It was concluded by the Inspector that the site was bounded by development on two sides (North and West). Therefore no further guidance is required as the Inspector was able to draw his conclusion using the policies alone.	Appeal decisions referring to policies SCLP5.4 and WLP8.7 did form part of the initial scoping of this SPD. It was concluded that this SPD was needed to show how all aspects of the policies will be applied. The SPD, when adopted, will be a material consideration in the determination of planning applications and provide clarity and certainty as to the Council's (rather than an Inspector's) position.	None.

<b>Waveney Local Plan Policy WLP8.7 – Site Characteristics</b>				
<b>Respondent Name</b>	<b>Comment ID</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Broads Authority	31	Section 5.8 needs to reference the Broads here as well as there could be schemes that affect the Broads. Needs to refer to Broads Landscape Character Assessment. Also needs to refer to impact on the Broads and setting of the Broads. Needs to refer to dark skies and lighting and impact on the dark skies of the Broads.	Comments noted.	Paragraph 5.8 has been expanded to include reference to the Broads Landscape Character Assessment and to the dark skies of the Broads. General references to lighting and dark skies have also been added to paragraph 6.20.
Durrants	103	Further clarity over the meaning of a 'gap' would be welcomed. The SPD resists quantifying large and small. One could argue illustration 2 shows a large open field. Also appears to be resistance of gaps of agricultural nature with no justification. The SPD also contradicts the requirement for development on two sides as this could mean any size.	Section 4 of the SPD goes into great detail as to how the Council will consider if a proposed site is a clearly identifiable gap. Due to varying nature of 'clusters', it is not possible to quantify the size of a 'gap' as some areas may have larger gaps between dwellings than others as this forms part of the character of an area. Illustration 2 was designed to show how a site could potentially include more than one new dwelling. The SPD does not state that 'gaps' of an agricultural nature will be resisted. The use and nature of the 'gap' must be considered as it may contribute to the character of the area or may be used by the community for a specific purpose. However, the SPD	Paragraphs 4.6 and 5.3 have been expanded to provide further clarity on how 'gaps' will be considered.

			does not resist the use of agricultural areas.	
Waldringfield Parish Council	93	Not applicable to Waldringfield.	Comments noted.	None.
Durrants	106	We would like to draw your attention to a recent appeal (3277322) which overturn the Councils refusal for 3 new dwellings. It was concluded by the Inspector that the site was bounded by development on two sides (North and West). Therefore no further guidance is required as the Inspector was able to draw his conclusion using the policies alone.	Appeal decisions referring to policies SCLP5.4 and WLP8.7 did form part of the initial scoping of this SPD. It was concluded that this SPD was needed to show how all aspects of the policies will be applied. The SPD, when adopted, will be a material consideration in the determination of planning applications and provide clarity and certainty as to the Council's (rather than an Inspector's) position.	None.
Shadingfield, Sotterley, Willingham and Ellough Joint Parish Council	98	Concern that the current wording opens a 'back door'. Regarding sites of 4 or 5 dwellings, the reference to a site being adjacent to a settlement seems to give developments of dwellings outside of settlements.	Comments noted. The purpose of this part of WLP8.7 is not to allow exponential growth of 'Settlements in the Countryside' but provide opportunities for growth in the Countryside. Any proposal will still need to meet the other criteria in the policy as well as other policies in the Waveney Local Plan.	None.

<b>Illustration 6</b>				
<b>Respondent Name</b>	<b>Comment ID</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Cretingham, Monewden and Hoo Parish Council	17	Many areas in the countryside have several houses on one side of the road with a single house opposite which would open up large amounts of land to potential development. In such cases it may be that landowners could release the land in several tranches resulting in overdevelopment in the settlement. In this case the area could be split in two with the first tranche having 3 houses and then the second tranche having another 3 houses. This is not what is intended by the planning document but there does not seem to be anything to prevent this from happening.	Comments noted. The Council acknowledges that there will be situations like those presented in Illustration 6 where there could be potential for multiple homes to be delivered. When this occurs, the Council will consider the impact on the local character such as density to determine if the number of dwellings being proposed is appropriate. Section 6 of the SPD provides guidance on the consideration of cumulative impacts.	A new illustration (Illustration 10) has been prepared to provide further context on how cumulative impacts and incremental growth will be considered by the Council. Further guidance on cumulative development has also been added throughout the document.

<b>Illustration 9</b>				
<b>Respondent Name</b>	<b>Comment ID</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Durrants	101	Neither development plan contains any policies which allow rural settlements with development boundaries to grow. While the policies apply to areas outside the Settlement Boundaries, it would be beneficial for policies to allow development adjacent to them. Illustration 9 shows this situation when a site outside the Settlement Boundary is prejudiced for being outside, when a site within the Settlement Boundary would benefit. Given development within a Settlement Boundary is acceptable in principle, as is a site within a cluster, sites adjacent to Settlement Boundaries should be doubly compliant.	The purpose of policies SCLP5.4 and WLP8.7 is to provide opportunities for limited development in rural areas to help sustain rural communities. These policies have not been prepared to allow the growth of larger settlements. Larger settlements have been considered in principle appropriate for growth through the strategy of the Local Plan, through Settlement Boundaries and site allocations. To enable some limited development to come forward in the countryside, policies SCLP5.4 and WLP8.7 form a further part of that strategy to support these rural locations. Allowing development adjacent to Settlement Boundaries would not meet this aim. This is the strategy of the adopted Local Plans and the national policy supports a plan-led approach to development.	None.

<b>Character and Appearance</b>				
<b>Respondent Name</b>	<b>Comment ID</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Cretingham, Monewden and Hoo Parish Council	18	SCLP5.4 only considers cumulative impact only considered in sensitive areas. This should be extended to the entire countryside. Many areas have large number of sites that could be developed which could destroy the character if not controlled.	Comments noted. The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. Paragraph 5.28 of the Suffolk Coastal Local Plan states that as SCLP5.4 has been prepared to support limited growth, consideration should be given to cumulative impacts. This does not specify that this will only occur for sensitive areas. The SPD has been edited to reflect this.	Paragraph 6.24 (was 6.22) now clarifies that cumulative impacts will be considered outside of sensitive areas as well as within them.
Cretingham, Monewden and Hoo Parish Council	19	SCLP5.4 seems to have fewer restrictions than WLP8.7. SCLP5.4 should include these restrictions if too many applications come forward.	Comments noted. The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. The SPD cannot make changes or add additional requirements to policies.	None.
Broads Authority	32	Section 6.18 needs to mention the Broads and its setting. Section 6.19 Needs to refer to Broads Landscape Character Assessment.	Comments noted.	Paragraphs 6.18 and 6.19 have been expanded to include reference to the Broads and the Broads Landscape Character Assessment.
Otley Parish Council	41	In relation to WLP8.7, how is footprint : plot ratio considered in a varied area; Consideration on potential impact on character and landscape;	Comments noted. Section 6 provides guidance on the impact on the character of areas. The parking requirements for applications will be determined through the design	None.



		Will consideration be given to vehicle parking and how will plots be monitored and measured.	and transport policies in the Local Plans.	
Historic England	70	Welcome section on Conservation Areas and Listed Buildings, however we recommend that the section is expanded to include Scheduled Monuments and Registered Parks and Gardens. Assessing impacts should not be limited to distance or intervisibility as there could be opportunities for enhancements and sites some distance away can still cause harm. Strongly advise applicants seek advice from Councils Design and Conservation Team. These comments do not affect our obligation to provide further advice.	Comments and support noted.	A new paragraph has been added to the Introduction of the SPD to highlight the importance of consultation with the Council's planning service. This includes references and links to the Councils pre-application advice service. Paragraph 6.17 (was 6.15) now includes references to Scheduled Monuments and Registered Parks and Gardens.
Suffolk Preservation Society	63	SPS welcomes the references to heritage and landscape considerations. Sites which might otherwise meet the criteria of an infill site may contribute to the character of the cluster or to the setting of a heritage asset in their undeveloped state.	Comments noted. Paragraphs 4.11 and 5.8 of the SPD make reference to considering the existing uses and values of spaces before they can be considered for development.	None.
Kettleburgh Parish Council	87	Paragraph 6.3 only deals with density and ratio. This should include respecting height and skylines. Who defines if a scheme is 'appropriate'? Section on character is particularly non	Comments noted. Paragraph 6.3 directly quotes policy WLP8.7. The SPD does not have the remit to make changes to the policy. The Council will determine if the various	None.

		prescriptive and should encourage contemporary design within a defined design style that works with existing character, provision of affordable 4+ bedroom homes, best practice in eco-friendly building technologies and methods and climate friendly 'passive heating' and cooling.	elements of the design and scale of any scheme is appropriate based on the policies in the relevant Local Plan. Paragraph 6.9 of the SPD details that any scheme, whether they are traditionalist, contemporary or innovative should be of the highest quality design. Affordable housing and sustainable design are subject to other policies in the Local Plans. The Council cannot require that homes that comes forward under SCLP5.4 meet the definition of 'affordable', but there is provision under Policy SCLP5.11 for affordable housing to come forward on 'exception sites' outside of adjacent or well related to Settlement Boundaries or Clusters.	
Waldringfield Parish Council	94	Section 6 is clearly laid out and cross referenced to the relevant Local Plan Policies.	Comments and support noted.	None.
John Cary	12	Important to think of maximum support and least harm for wildlife, rainwater drainage and management, minimal hard standing, countryside darkness, minimal visual impact on surroundings, barring things like solar panels, preserve trees and hedgerows, and favour applications that will have a positive impact on wildlife and plant life. Should not exclude applications	SCLP5.4 states that to be supported, development should not cause undue harm to the character and appearance of the cluster or, result in any harmful visual intrusion into the surrounding landscape. WLP8.7 states that for all small-scale development in the Countryside the design of the scheme will need to respect and	None.

		for small housing as this may be affordable for local young people while not appealing to the second home market.	reflect the character of the settlement and existing built-up frontage. Section 6 of the SPD provides further guidance on these issues. Any proposals will also need to meet the requirements of the relevant biodiversity and landscape policies in the Local Plans.	
Badingham Parish Council	13	Badingham are concerned about small scale developments i.e. clusters turning into larger developments. We currently have an approved site for 3 dwellings which we opposed and fear this will then increase into 5 or more houses once the initial 3 houses are built. We have to consider small villages and the people who live in them when looking at planning applications.	The purpose of these policies is to provide opportunities for limited development in rural areas to meet local housing needs and sustain rural communities. Paragraphs 6.24 to 6.28 outline how the cumulative impact of the proposals under policies SCLP5.4 and WLP8.7 will be considered and monitored. Both policies include controls to determine when development could have a detrimental impact on the countryside, and these will be applied by the Council.	None.
Norfolk and Waveney Integrated Care System	72	WLP8.7 states that when the overall strategy is met the Council will not support further development which cumulatively would undermine the overall distribution of development. It should be noted that the quantum of development delivered by this policy will be relatively small, therefore infrastructure is likely to be delivered through Community Infrastructure Levy.	Comments noted. Paragraphs 6.24 to 6.28 outline how the cumulative impact of the proposals under policies SCLP5.4 and WLP8.7 will be considered and monitored. Both policies include controls to determine when development could have a detrimental impact, and these will be applied by the Council. Proposals submitted under policies SCLP5.4 and WLP8.7 may	None.

			be liable for CIL which will be used to provide infrastructure to support development.	
North Cove Parish Council	113	Maintaining green corridors are usually ignored, as is tree and hedge retention.  The houses are huge and do not fit into the local scene at all.	Section 6 of the SPD outlines how proposals should respond to local built and natural characteristics and reinforces that proposals will need to meet the requirements of relevant policies in the Local Plans, including on landscape and biodiversity and lighting.	None.

<b>Public Consultation</b>				
<b>Respondent Name</b>	<b>Comment ID</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Cretingham, Monewden and Hoo Parish Council	20	Concern amongst residents that new dwellings would become second homes. Should be provision that new houses are for full time residents with local connections.	Comments noted. The purpose of the SPD is to provide guidance on the application of policies SCLP5.4 and WLP8.7 as they are written in the Local Plans. The SPD cannot make changes or add additional requirements to policies, including imposing a local occupancy restriction.	None.
Otley Parish Council	44	What is expected from engagement or consultation How will engagement be considered under SCLP5.4?	Section 7 of the SPD provides guidance on what the engagement the Council would expect to see from applicants. This includes the potential need for planning statements to show how comments have been considered.	None.
Kettleburgh Parish Council	88	Paragraph 7.5 – it is recommended to approach Parish Councils to determine consultation but is not required. Past experience shows that early engagement with the Parish Council is beneficial. It would be our preference that this is required. Climate change factors must be included, as well as impacts on drainage and sewerage.	The policies do not require consultation with Parish Councils in all cases, however this would be encouraged. Sustainable construction and drainage and sewerage issues are covered by other policies in the Local Plans, the requirements of which proposals under policies SCLP5.4 and WLP8.7 will need to meet where relevant.	None.
Shadingfield, Sotterley, Willingham and	107	Robust consultation may invite applicants to confront Parish Councils and there is no indication that support from the Parish Council is needed.	The SPD provides guidance on what is expected from applicants to show that robust consultation, as specified by policy WLP8.7, has	None.

Ellough Joint Parish Council		Robust has many definitions and may just result in the exchange of conflicting views. Putting such wording in is contrary to creating a coherent framework. Section referring to up to and including 5 dwellings should be deleted.	taken place during the preparation of a relevant planning application. An SPD cannot change the policy wording or add/remove criteria. WLP8.7 specifies that clear and demonstrable local support is needed for proposals for 4 or 5 dwellings. This can therefore not be required for proposals of 3 or less.	
Waldringfield Parish Council	95	Section 7 gives a clear description of the evidence of community engagement required within application documents.	Comments and support noted.	None.
Kettleburgh Parish Council	83	SCLP5.4 Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document the Countryside doesn't make consultation with Parish council a requirement, whereas WLP8.7 Small Scale Residential Development in the Countryside does.	Public engagement is required under both policies where 4 or 5 new dwellings are being proposed. This is stated in paragraph 7.1 of the SPD.	None.
Bromeswell Parish Council	111	Another broader consideration is that villages need houses that are marketed at affordable prices for youngsters to be able to stay local. There seem to be plenty of 3-5 bed houses when there is the need for 2-bed semi-detached properties.	Comments noted. Section 8 outlines how the affordable housing policies interact with SCLP5.4 and WLP8.7 and where opportunities for affordable housing development in the Countryside may exist. Paragraph 8.2 of the SPD explains that Policies SCLP5.8 and WLP8.1, both titled 'Housing Mix', of the	None.

			<p>Local Plans provide a focus on smaller dwellings.</p> <p>Section 7 of the SPD outlines when consultation/engagement with the local community, including the Parish Council, is required. However, the Council will encourage this for all applications.</p>	
--	--	--	--	--

Other Policies				
Respondent Name	Comment ID	Comment Summary	Council Response	Action
Anonymous	4	The policies are missing opportunities for affordable housing. Developers tend to build large houses and add nothing to the locality except additional cars etc. It would be good to see the local authority supporting young people remaining in villages. It would also be good to see some sustainability requirements.	The purpose of this SPD is to provide clarity on how policies SCLP5.4 and WLP8.7 will be applied. WLP8.7 does include opportunities for affordable housing to be developed on the edge of Settlements in the Countryside. SCLP5.4 also highlights the need to consider local housing needs for proposals of 4 or 5 dwellings. The Local Plans contain other policies that support the development of affordable housing as 'exception sites' in the countryside (SCLP5.10 and WLP8.6).	None.
Otley Parish Council	45	How policies relate to other policies in the Local Plans; Can we assume SCLP10.5 Settlement Coalescence remains in place?	Section 8 of the SPD provides guidance on other Local Plan policies that could be directly relevant to policies SCLP5.4 and WLP8.7. All other policies within the Local Plans will still be applied where relevant.	None.
Waldringfield Parish Council	96	Section 8 is clearly laid out and cross referenced to the relevant Local plan policies.	Comments and support noted.	None.