

Suffolk Coastal **Local Plan** **Final Draft Plan**



Scrutiny Committee Version | November 2018

www.eastsuffolk.gov.uk/suffolkcoastallocalplanreview

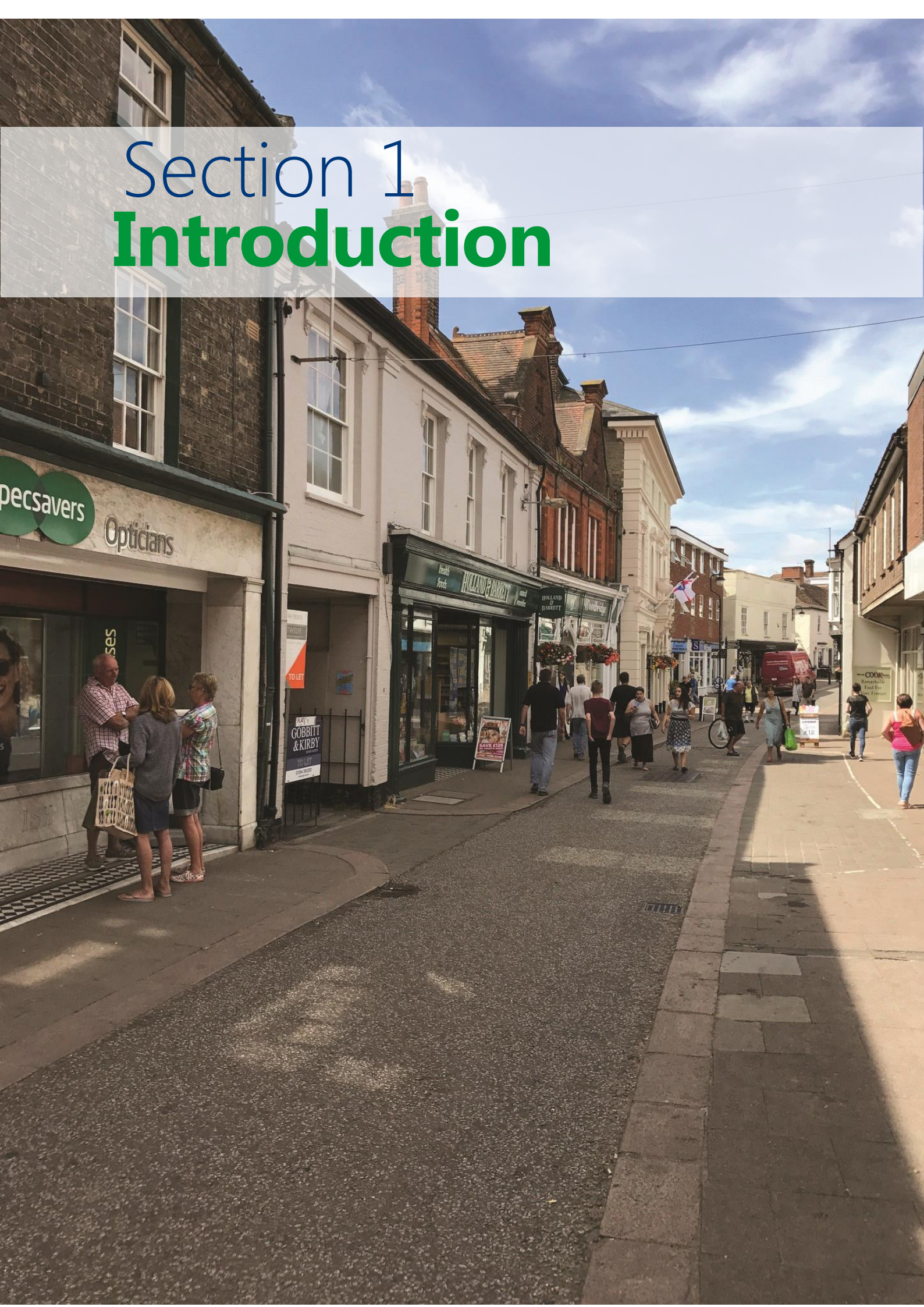


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Section 1

Introduction



1 Introduction

- 1.1 Suffolk Coastal is a uniquely attractive place to live and work, combining a strong economy with a natural and built environment second to none. Those advantages however present the Council with the challenge of balancing the delivery of development that continues to stimulate and support the economy and provides attractive and affordable homes for current and future generations, with the need to preserve and enhance the precious, but sometimes vulnerable environment. This Local Plan seeks to be ambitious in growing the District's economy, in particular recognising the opportunities presented by the Port of Felixstowe, the energy sector and key transportation routes, boosting the delivery of homes to contribute to addressing the national housing shortage and responding to needs for a greater mix of homes and increasing delivery of affordable housing, whilst improving infrastructure provision.
- 1.2 The District Council is preparing a new Local Plan for the District which provides a vision for the communities of Suffolk Coastal up to 2036 and recognises the diversity of the area.



Suffolk Coastal District

Suffolk Coastal Context

- 1.3 Suffolk Coastal is a large District some 892 sq km/344 sq miles in area, much of which is rural in character with 48.8km of open coastline. In 2016 the mid year population was estimated at 127,836 residents with the majority of people living in the urban areas to the east of Ipswich such as Kesgrave, Martlesham and Rushmere St Andrew, the coastal resort town of Felixstowe and the market towns of Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge. The area is a popular destination for visitors and tourists from the UK and abroad with exceptional natural, historic and built environments. Settlements are represented by over 100 parishes which range in population size from a handful of people to several thousand people.

Social context

- 1.4 People are at the heart of Suffolk Coastal and the Local Plan seeks to provide vibrant and healthy communities to meet the needs of all residents.
- 1.5 Suffolk Coastal has one of the oldest populations of any District in the country and this characteristic places additional requirements on the Local Plan, service providers and infrastructure provision. In 2015, 70,800 persons (approximately 57% of the population) were of working age (16-64 years of age). Over the plan period, it is anticipated that the percentage of the population who are working age will continue to decline. An ageing population creates specific requirements for residential dwellings and care provision, although there is often a desire to remain in the existing home rather than to relocate. Adaptation and improvement to the existing housing stock may provide a solution but will not always be possible. The provision of new accommodation suitable for older people will potentially free up larger family housing which will be important alongside new dwellings. Alongside this, affordability of housing is an issue in the District, with house prices being on average 8.95 times the average earnings¹. This presents issues in particular for young people to remain in or move to the District. This includes people growing up in the District who leave for a period of time for further education and other opportunities.
- 1.6 Over the plan period, the Local Plan will deliver an ambitious level of housing to meet the needs of the current population through increased provision of units targeted at meeting specific needs (including those of Gypsies, Travellers and Travelling Showpeople), the provision of affordable housing and deliver the housing needed in a timely manner through a plan led approach.
- 1.7 The 2011 Census showed that across the District there were 58,227 dwellings which increased to 61,157 as at the end of March 2018. Housing delivery across the District has always been positive and rates of construction have, in recent years, returned to the levels experienced before the economic downturn that

¹ Ratio of Median House Price to Median Workplace Earnings 2017 (Office for National Statistics, 2018)

started in 2008. Like other parts of the country, residential completions dropped to a low level which reflected the economic conditions faced by all parts of the country at that time. Despite the drop in delivery and subsequent upturn of completions the Council is well placed to continue to deliver significant housing opportunities for all over the plan period. In recent years, the Council has taken a positive approach to the delivery of housing and through site allocations, planning permissions already granted and a good rate of delivery, the Local Plan will deliver the dwellings required to meet the needs of the local community.

- 1.8 Despite the good rate of housing delivery across the District, property prices continue to be above the national and regional averages as outlined by information from the Land Registry. In 2017, the median property price in Suffolk Coastal was £274,995 compared to the median of £230,000² for England.
- 1.9 The District also faces challenges in respect of residential accommodation being taken up as second homes or units for tourism accommodation. In 2015 there were over 2,500 dwellings registered as second homes within the District. Suffolk Coastal is a popular tourist destination and this demand in some areas can deny local people the opportunity to buy or rent properties as demand raises prices to levels which are often outside of the budget of local residents. Seasonal and holiday let demand can also affect the availability of properties for longer term private rent.
- 1.10 Suffolk Coastal is a relatively affluent District with some areas demonstrating high levels of affluence but some parts of the District are amongst the most deprived in the country. Within Felixstowe there are pockets of deprivation, as well as rural areas in the north of the District. These locations need further attention over the plan period to ensure that issues relating to communities in deprived areas are supported and enhanced.

Environmental Context

- 1.11 Suffolk Coastal is a District heavily influenced and characterised by the natural, built and historic landscapes. High quality and international designations covering large areas of land are found across the District which is interspersed by settlements and countryside. The coastline has also played a significant role in developing the area and will continue to do so in the future.
- 1.12 The District contains over 48km of open coastline as well as over 139km of estuaries. The estuaries of the Alde and Ore, Blyth, Deben and Orwell Rivers help shape the District and the communities which surround these estuaries. Estuary Plans have been prepared for the Deben Estuary and the Alde and Ore Estuary in recent years. Approximately a third of the District based around the coast and its hinterland is designated as an Area of Outstanding Natural Beauty and 11,200 hectares of the District is designated as Sites of Special Scientific Interest. In addition, Natura 2000 is a network of protected sites that represent European and International designations.

² Office for National Statistics

- 1.13 Suffolk Coastal's landscape is diverse, including large areas of farmland, which support a rich biodiversity and contain features of geodiversity. In terms of its built environment, there are 36 Conservation Areas with over 2,700 listed buildings alongside a rich archaeological interest, historic parks and gardens and a military history, all of which combine to form the historic landscape.
- 1.14 The exceptional quality of the natural, built and historic environment makes Suffolk Coastal a very special place to live and work and a popular destination for visitors and tourists. This resulting high quality of life brings with it the responsibility of preserving this heritage as the utmost priority, for its own intrinsic value as well as for the health, prosperity and well-being of the residents.
- 1.15 East Anglia is recognised by Environment Agency as an area of 'serious water stress'. As one of the driest parts of the country, water resources need to be carefully managed through partnership with water companies, Environment Agency, landowners and Suffolk County Council as Lead Flood Authority.
- 1.16 Two Air Quality Management Areas have been declared in Suffolk Coastal, one in Woodbridge and one in Stratford St Andrew. Both of these areas are monitored by the Council as they exceed annual mean Air Quality Objectives for nitrogen dioxide. Outside of these areas the air quality is generally very good and levels of air pollutants are below national limits.
- 1.17 The District has a significant network of public rights of way, including nationally promoted walking trails such as the Stour and Orwell Walk, and the Sandlings Walk. Public rights of way not only act as walking and cycling links between communities, education sites and workplaces, but also contribute to the economic prosperity of the District through the tourist trade that they attract."

Economic context

- 1.18 The East of England is one of the fastest growing regions and Suffolk Coastal is a key contributor to this growth. The District is home to a number of key economic drivers such as the Port of Felixstowe, Sizewell Nuclear Power Station, along with offshore wind energy developments and BT operations at Adastral Park. These large scale employers have a local presence but contribute significantly to the national and international economies and the Local Plan seeks to support this contribution.
- 1.19 The East Suffolk Business Plan identifies these major employers and sectors as being of huge benefit to the District. The Local Plan will seek to ensure that appropriate provision of land, associated infrastructure and supply chain networks are promoted over the plan period to maintain the contribution made by these key economic drivers.
- 1.20 The District's economy is supported by a high proportion of small and medium sized businesses which are vital to the local economy and rural communities. Economic evidence highlights the importance of these businesses across a range of sectors which provide a variety of employment opportunities. Suffolk Coastal has a higher number of businesses than compared to neighbouring authorities which shows that enterprises in the District sustain activity and reach maturity.

- 1.21 Official Labour Market Statistics show that within Suffolk Coastal 80% of the population were economically active in 2016, which mirrors the position for the East of England and is slightly higher than the national figures. Average earnings are also generally higher than the regional and national averages although there still remains a gender pay gap within the District.
- 1.22 Many young people leave the area for further education and other economic and social opportunities which impacts on both the local community and business sectors in the District. The emergence of The University of Suffolk and expansion of other education providers such as Otley College are important opportunities for the District over the plan period. Improving the education and economic opportunities for young people in the District will be beneficial and reduce the growing numbers of people commuting into the area to fulfil jobs.
- 1.23 The District has a strong and effective relationship with the New Anglia Local Enterprise Partnership (LEP). The LEP is a partnership between local authorities and businesses to help determine local economic priorities and lead economic growth and job creation. The New Anglia LEP seeks to maximise the opportunities currently being supported as well as those areas, such as the Market Towns, where economic activity could be boosted through appropriate intervention.
- 1.24 The town centres across the District perform a valuable retail function and provide services and facilities for their communities and surrounding rural areas. The individual identity of each town centre is a key feature and this makes them attractive as destinations for visitors to the area. Town centres are increasingly a focus for leisure, business and social interaction as well as shopping.
- 1.23 The tourism industry is a key contributor to the local economy. In 2017, £325million was spent as a result of tourism. The Economic Impact of Tourism Report published in 2017 estimated that across the District 6,163 jobs were generated as a result of tourism spend, which equated to 12% of total employment in the District.
- 1.24 People living in, working in, or visiting Suffolk Coastal rely upon the transport networks. The transport networks made up of roads, railways and cycle ways are vital to the creation of healthy communities and serve rural and urban areas of the District. The Council will continue to work in partnership with Highways England, Network Rail and Suffolk County Council to ensure appropriate transport infrastructure is delivered over the plan period.
- 1.25 Travel to work data from the 2011 Census shows the importance of travel by private motor vehicles predominately across the District. Public transport services are varied across the District with most use being seen in the southern parts of the District on routes connecting Ipswich to Felixstowe, Ipswich to Woodbridge and other market towns.
- 1.26 Railway Lines in the District connect Felixstowe, Saxmundham, Woodbridge and some rural areas of the District with Ipswich and Lowestoft as well as on to London, Norwich and Cambridge. Rail capacity is limited and it is a challenge to reconcile demand for passenger and freight services over the plan period. Strategic improvements to the rail lines have taken place in recent years and others are anticipated to come forward in the future.

- 1.27 The only trunk road in the District is the A14 that connects Felixstowe with Ipswich, Cambridge and the Midlands. The A14 is an important freight route and is fundamental to the success of the Port of Felixstowe and communities surrounding Ipswich. At times the A14 can become blocked which creates major impacts for residents, visitors and businesses in the area as there is no suitable alternative route. Over the plan period managing the capacity of the A14 as well as considering alternative strategic routes will be necessary. The Council fully supports the ongoing work of Suffolk County Council in considering potential options for routes to the north of Ipswich.
- 1.28 The A12 provides the main route north and south through the District and is important to many communities. It is a mixture of dual carriageway and single carriageway and serves a number of settlements. Improvements to sections of the road are proposed at various locations, most notably around the villages of Farnham, Little Glemham, Marlesford and Stratford St Andrew.
- 1.29 Besides these A roads, various B and C class roads serve the rest of the District. Many of these local roads are single track with passing places which reflects the rural nature of the District but poses challenges in respect of the accessibility of some settlements.

Key Issues

- 1.30 The table below identifies a series of key issues which the Suffolk Coastal Local Plan will seek to address. These issues have been identified through the Sustainability Appraisal Scoping Report, the evidence base and public consultation responses.

Theme	Suffolk Coastal Issues
Social	
Population	<ul style="list-style-type: none"> ■ Despite relative affluence of the District there is still a need to address pockets of deprivation. ■ Increasing number of young people leaving the District and a large rural population. ■ District's population is older than the county, regional and national averages. ■ Suffolk Coastal expects to see more deaths than births(2014-2024).
Housing	<ul style="list-style-type: none"> ■ High house prices and high numbers of second homes. ■ Impact of ageing population on housing supply and increased demand for specialist housing.
Health & Wellbeing	<ul style="list-style-type: none"> ■ Limited access to health provision in the rural areas. ■ Ageing population with high proportion population with long-term health problems and disabilities. ■ Improving access to opportunities for regular physical activity. ■ Addressing fear of crime.
Education	<ul style="list-style-type: none"> ■ Distance to both primary and secondary schools in rural locations. ■ Ensuring the local population can access employment opportunities.

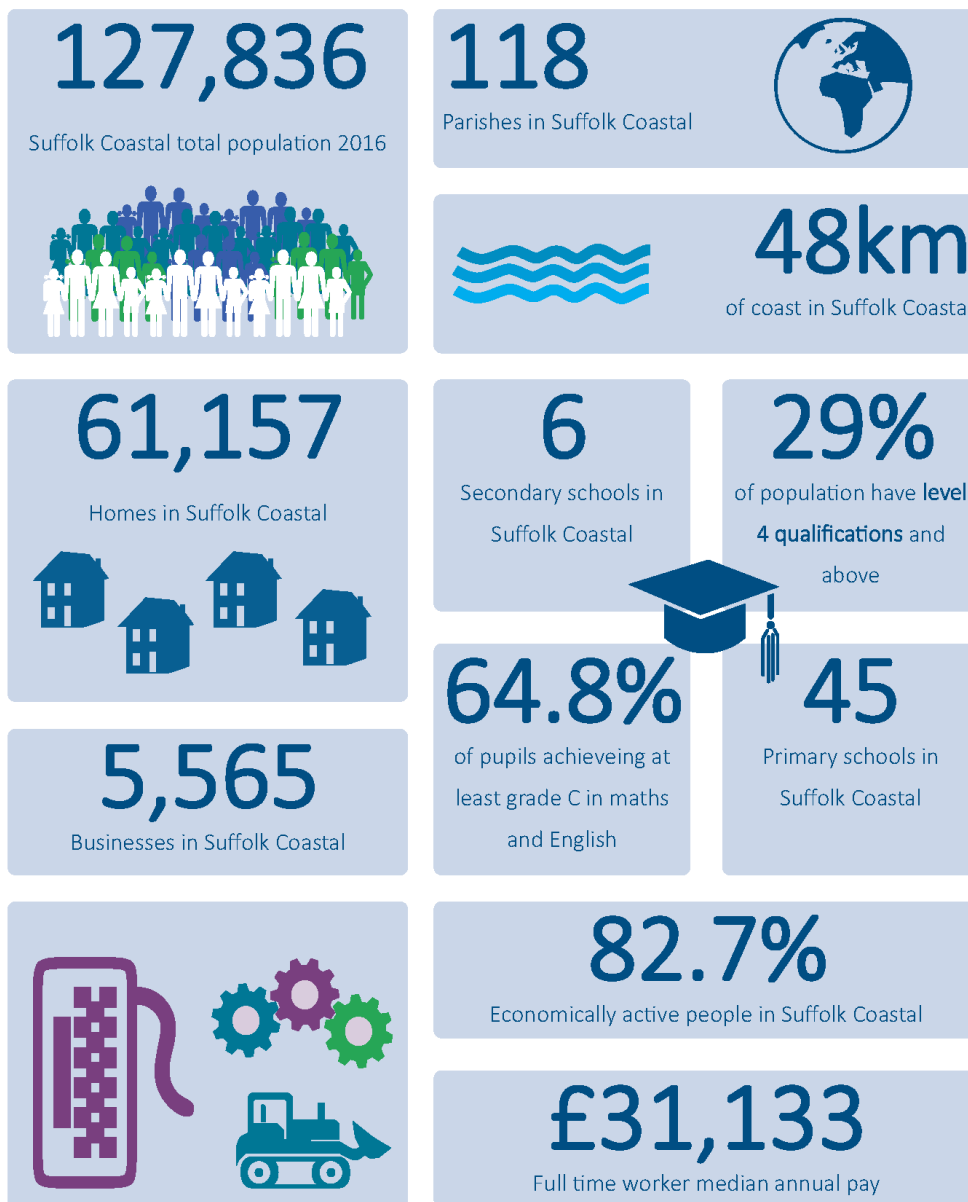
Environmental	
Water	<ul style="list-style-type: none"> ■ Number of Groundwater Source Protection Zones ■ High number of existing groundwater and surface water Nitrate Vulnerable Zones. ■ Timely provision of new water services and infrastructure.
Air	<ul style="list-style-type: none"> ■ Reliance on private motor cars and lack of public transport provision. ■ Two Air Quality Management Areas. ■ Requirement for clean vehicle infrastructure to encourage uptake of new technologies.
Material Assets (soil and water)	<ul style="list-style-type: none"> ■ Extensive areas of high quality agricultural land. ■ Need to manage waste in accordance with the waste hierarchy. ■ Limited availability of previously developed land. ■ Need to protect and enhance sites designated for their geological interest.
Climate change, flooding, coast and estuaries	<ul style="list-style-type: none"> ■ Need to increase renewable energy provision. ■ Need to ensure appropriate response to sea level rise and coastal erosion. ■ Need to ensure sustainable construction techniques and green infrastructure is employed to mitigate climate change. ■ Low lying areas at risk of flooding. ■ Large areas protected for species and habitat value which come under pressure from increased recreational and tourist activity.
Biodiversity	<ul style="list-style-type: none"> ■ Need to extend and enhance the green infrastructure across the Ipswich Housing Market Area. ■ Need to ensure that areas of biodiversity value are protected and enhanced.
Cultural	<ul style="list-style-type: none"> ■ High number of heritage assets.
Landscape	<ul style="list-style-type: none"> ■ Managing development while protecting significant areas of environmental protection. ■ Delivering high quality design that respects local character. ■ Significant areas of AONB across the District.
Economic	
Economy	<ul style="list-style-type: none"> ■ Limited employment land availability with limited large business unit provision outside Felixstowe. ■ Limited range of employment opportunities in rural areas. ■ Promoting growth in key employment sectors. ■ Competition for land for housing. ■ Changing nature of town and district centres.
Transport and connectivity	<ul style="list-style-type: none"> ■ Distances between key services and facilities in rural areas. ■ Reliance on private motor car and lack of public transport provision.

Digital Infrastructure

- Rural isolation and poor access to fast Broadband and reliable mobile coverage in rural areas.
- Access to fast broadband in rural areas.

District-wide Statistics

District-wide statistics



What is the Local Plan?

- 1.31 The Local Plan sets out the level of growth which needs to be planned for in Suffolk Coastal and identifies where this should be located and how it should be delivered. The Plan sets out the planning policies which the Council will use to determine planning applications across Suffolk Coastal. This Local Plan will cover the period 2018-2036.
- 1.32 This Local Plan will replace the Core Strategy and Development Management Policies (2013), the Site Allocations and Area Specific Policies DPD (2017), the Felixstowe Peninsula Area Action Plan (2017) and the remaining 'saved' policies in the 2001 Local Plan. It will not replace the policies in 'made' Neighbourhood Plans, but some Neighbourhood Plans or parts of them may need to be reviewed to be in general conformity with this Local Plan.
- 1.33 Suffolk Coastal District Council has been working in partnership with Waveney District Council since 2008 and most of the services are shared across the two Councils. To build on this decade of cooperation, give greater value for money and at the same time improve service delivery, including driving and investing in growth and infrastructure projects, the two Councils agreed to create one Council. In February 2018 the Secretary of State for Housing, Communities and Local Government agreed the shared proposals to create a new single East Suffolk Council. In May 2018, Parliament made the Orders required to create East Suffolk Council which will come into existence on 1st April 2019 and the two existing councils will be formally dissolved.
- 1.34 This Local Plan will continue to provide the vision, strategic priorities, policies and proposals against which planning applications will be determined, for the geographic area covered by Suffolk Coastal District until such time as the new East Suffolk Council decide to review the Local Plan.

Consultation

- 1.35 In August 2017, the Council published a Local Plan Issues and Options document for consultation. The Issues and Options consultation document (prepared and consulted upon in conjunction with Ipswich Borough Council) highlighted a variety of issues facing the communities of Suffolk Coastal. The responses received from the Issues and Options consultation informed the First Draft Plan.
- 1.36 The First Draft Plan was published for public consultation in July 2018. It took the form of what the final Local Plan will look like and was informed by comments received and the evidence base which has been prepared to justify the proposals and policies.
- 1.37 The Final Draft Plan has been informed by the responses to the earlier consultation periods and revised evidence base. The document is being published in January 2019 to invite representations in relation to soundness. Comments received on the Final Draft Plan will be considered by the Planning Inspectorate once the document is submitted for Examination by the Suffolk Coastal District Council in March 2019.

Duty to Co-operate

- 1.38 The Duty to Co-operate is a legal duty on all local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 1.39 Suffolk Coastal has engaged constructively with all partners during the preparation of this Local Plan and in the preparation of neighbouring authorities' Local Plans at the relevant times. The Council's main strategic relationships are with Babergh District Council, Ipswich Borough Council and Mid Suffolk District Council along with Suffolk County Council and Waveney District Council.
- 1.40 The Council has worked with the neighbouring authorities of Babergh, Ipswich and Mid Suffolk to identify the boundaries of the housing market area and the functional economic areas. Collectively it is considered that the housing and economic needs of the authorities can be met within the existing administrative boundaries.
- 1.41 In respect of infrastructure, the Council has worked positively with infrastructure providers such as the local Clinical Commissioning Group, the NHS, UK Power Networks, Essex & Suffolk Water, Anglian Water and Suffolk County Council. This engagement will be ongoing during the implementation of the Local Plan.

Neighbourhood Plans

- 1.42 Neighbourhood Plans are optional plans prepared by the local community which set out the detailed planning policies and proposals for their specific area. Once 'made,' they form part of the Development Plan against which planning applications are determined. Across Suffolk Coastal, a number of communities have committed to undertaking Neighbourhood Plans to guide the future of their communities. In January 2015, the Rendlesham Neighbourhood Plan was the first to be 'made' in Suffolk. Since then other communities have also 'made' their plan.
- Framlingham – made March 2017;
 - Great Bealings – made March 2017;
 - Leiston – made March 2017;
 - Martlesham – made July 2018;
 - Melton – made January 2018;
 - Wenhaston with Mells Hamlet – made July 2018.
- 1.43 Over the plan period, it is expected that further Neighbourhood Plans will be 'made' and these will need to be in conformity with the policies within the Local Plan.
- 1.44 All the policies in the Local Plan are 'strategic policies'. This means that policies and proposals within future Neighbourhood Plans should be in conformity with these policies. The policies do provide flexibility for Neighbourhood Plans to develop their own locally specific policies and in a number of policies there is specific reference to the types of policies that Neighbourhood Plans may choose to include.

Marine Plans

- 1.45 The marine environment (up to the high water mark) in Suffolk Coastal is covered by the East Inshore and East Offshore Marine Plans. These plans need to be considered alongside this Local Plan for developments which are within the marine plan areas and for developments which could impact upon the marine plan areas. The marine plans contain policies relating to a range of marine related issues including economy, tourism and recreation and culture. The marine plans have been taken into account in the preparation of this Local Plan, where relevant.
- 1.46 To ensure that marine plans and Local Plans are complementary, the Council will work in partnership with the Marine Management Organisation. Partnership working will enable the right activities to take place in the right place and in the right way, thus placing sustainable development at the centre of all decisions.

Sustainability Appraisal

- 1.47 Sustainability Appraisal is an iterative process which must be carried out during the preparation of a Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging Local Plan, when considered against alternatives, will help to achieve relevant environmental, economic and social objectives. A Sustainability Appraisal has been undertaken on all the different policy and site options considered during each stage of Local Plan preparation. The Sustainability Appraisal also considers the cumulative effect of the Local Plan on sustainability objectives.

Habitats Regulations Assessment

- 1.48 An assessment is required under the EU Habitats Directive³ to ensure that the plan will not result in harm the integrity of European protected sites. A Screening Assessment was undertaken to inform the First Draft Local Plan which identified those policies in the plan for which an Appropriate Assessment would be required as the plan moves forward. .
- 1.49 To inform the Final Draft Plan, the Council have undertaken a Habitats Regulation Assessment to inform the policies and site allocations within it. The assessment ensures that the legal and regulatory requirements outlined under the EU Habitats Directive are adhered to as part of the plan making process.

East Suffolk Business Plan


- 1.50 In partnership with Waveney District Council, Suffolk Coastal has adopted the East Suffolk Business Plan. The Business Plan adopted in 2015 sets out an up to date vision and priorities for the East Suffolk area. The vision for East Suffolk is to *'Maintain and sustainably improve the quality of life for everyone growing up in, living in, working in and visiting East Suffolk.'* The Business Plan priorities are set out under themes of enabling communities, economic growth and financial self-sufficiency alongside a number of specific planned actions.

³ Directive 92/43/EEC

- 1.51 The vision, objectives and strategic priorities of this Local Plan reflect the vision and priorities of the East Suffolk Business Plan.
- 1.52 On 1st April 2019, East Suffolk Council will be created and the existing Councils of Suffolk Coastal District and Waveney District will be dissolved. The East Suffolk Business Plan will provide the corporate vision for the new Council until it is updated.

Monitoring and Delivery

- 1.54 Central to the plan making system is the issue of deliverability. In order to be effective Local Plans must be deliverable. The success of the Local Plan will be dependent on the continual engagement and partnership working between the Council, developers, infrastructure providers and other interested stakeholders, including the public as well as Town and Parish Councils. Communities undertaking Neighbourhood Plans will also have a crucial role in expanding upon and adding to the Local Plan policies and proposals to address detailed local circumstances.
- 1.55 The policies and proposals of the Local Plan will be delivered primarily through the determination and implementation of planning applications for the development and use of land and buildings over the plan period. Neighbourhood Plans also have a key role to play in the delivery of the Local Plan policies.
- 1.56 Sustainability Appraisal, incorporating Strategic Environmental Assessment, has been carried out as part of the production of the Local Plan. A requirement of Sustainability Appraisal is to monitor the likely significant effects of the plan. A monitoring framework with indicators has been developed through the Sustainability Appraisal as a basis for monitoring the significant effects.
- 1.57 The Council reports on monitoring and delivery annually in its Authority Monitoring Report. In some instances it may be appropriate to alter the indicators being reported, either due to a change in information available or to reflect specific issues that emerge.
- 1.58 The Delivery and Monitoring Framework in Appendix A sets out the targets and indicators that are proposed to be used to track the progress of the plan and the policies within it.

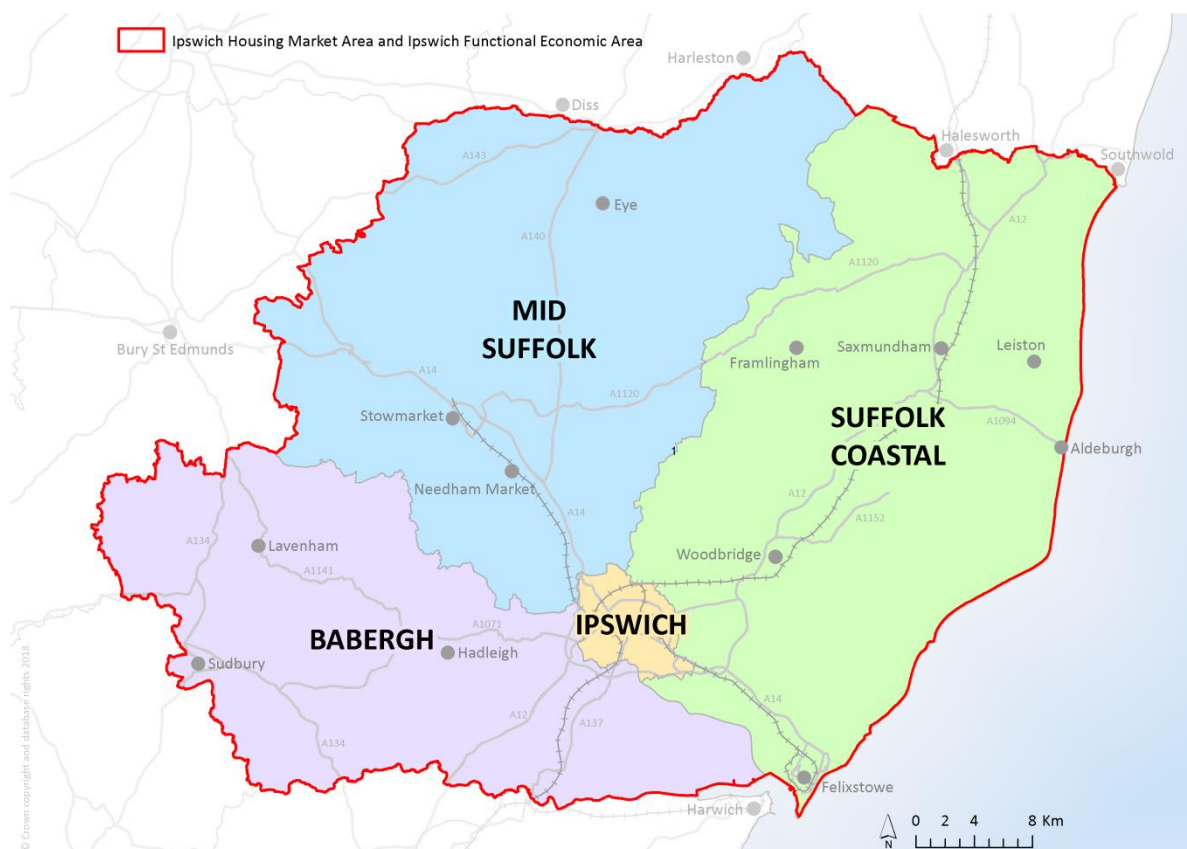


Section 2

Wider Strategic Planning Area

2 Wider Strategic Planning Area

- 2.1 Through this Local Plan, the ambition for Suffolk Coastal District is to significantly boost economic growth and housing delivery by providing significant areas of land to support the Port of Felixstowe and to attract investment through the creation of a new business park, whilst delivering at least 582 homes a year.
- 2.2 Suffolk Coastal District is part of a wider area within which there are strong functional economic and housing market relationships. This wider area includes Ipswich Borough and Mid Suffolk and Babergh Districts which also border Ipswich. Evidence produced as part of the production of the Local Plan demonstrates that the four authorities together form the Ipswich Housing Market Area and the Ipswich Functional Economic Area. The area has strong connections in terms of travel to work patterns and housing and commercial markets.
- 2.3 The four authorities, along with Suffolk County Council, have a history of working together on strategic planning issues through the former Ipswich Policy Area Board (now the Ipswich Strategic Planning Area Board). The Board provides a mechanism for the five authorities to develop, promote and deliver a vision for the Ipswich Strategic Planning Area (ISPA) and to co-operate on the preparation and monitoring of Local Plans and to share relevant evidence. This joint working is a fundamental part of planning in the area, and as such is reflected in the East Suffolk Business Plan which sets an action to develop even closer working relationships with other Suffolk Councils on strategic planning and reviewing Local Plans.
- 2.4 The Councils have worked together on evidence relating to housing and employment needs and all authorities. Suffolk Coastal District Council and Ipswich Borough Council also undertook combined evidence relating to Retail and Commercial Leisure needs and Landscape Sensitivity.
- 2.5 Under the 2011 Localism Act local planning authorities are required to co-operate on strategic planning matters. The strategic planning matters within the Ipswich Strategic Planning Area cover a range of issues including housing need and distribution, provision of land to support economic growth and delivering green infrastructure. In recognition of these interdependencies, the authorities have closely aligned their timetables for the production of Local Plans. The policies in this Section are based upon the recognised common strategic matters, and establish Suffolk Coastal's commitment to joint working. The five ISPA authorities, in reflection of the proposed changes to the National Planning Policy Framework, are working together on the production of a Statement of Common Ground to document the joint working and agreements in relation to strategic matters, which will evolve over the course of production of Local Plans



Ipswich Strategic Planning Area (ISPA)

Scale and location of growth

- 2.6 The authorities in the ISPA jointly commissioned the production of a Strategic Housing Market Assessment (SHMA) in 2016 to identify the objectively assessed housing need (OAN) for the area and to identify the mix and type of housing needed. The SHMA concluded that the area covered by Ipswich Borough and Suffolk Coastal, Babergh and Mid Suffolk Districts, represents one Housing Market Area (the Ipswich Housing Market Area) (IHMA) based upon the functional relationships between the areas such as being relatively self-contained in terms of travel to work areas.
- 2.7 The National Planning Policy Framework sets out the standard approach for determining local housing need, with the accompanying Planning Practice Guidance setting out the methodology for calculating this. This involves using the latest published household projections and applying an uplift based upon published ratios of median house prices to median workplace earnings. The latest (2016-based) household projections were published in September 2018 and the latest affordability ratios published in April 2018.
- 2.8 The housing need figures for the authorities in the ISPA are shown in Table 2.1. The starting point for each authority will be to meet their own housing needs within their own boundary.

Table 2.1 – Housing requirement across the IISPA

	Standard method annual housing need	Standard method total housing need (2018 – 2036)
Babergh	420	7560
Ipswich	479	8622
Mid Suffolk	590	10620
Suffolk Coastal	582	10476
Total	2071	37278

- 2.9 The authorities also jointly commissioned a Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment which identified needs for Gypsy and Traveller provision as follows:

Table 2.2 – Needs for Gypsy and Traveller accommodation in the IHMA

	Needs for permanent Gypsy and Traveller pitches ⁴ (2016 – 2036)
Babergh	1
Ipswich	27
Mid Suffolk	9 - 30
Suffolk Coastal	15
ISPA	52 - 73

- 2.10 The starting point for each authority will be to meet the needs in respect of Gypsy and Traveller accommodation within their own areas.
- 2.11 The authorities jointly commissioned the production of the Employment Land Needs Assessment, and the subsequent Economic Area Sector Needs Assessment, to identify the needs of the different employment sectors and the associated land requirements. This evidence demonstrates that the area functions as one Functional Economic Area and that there are distinct economic geographies within the area namely:
- Felixstowe / A14 corridor
 - Wider Ipswich Market Area
 - A140 corridor
 - Rural and agricultural
- 2.12 The baseline jobs growth and employment land requirements are as follows:

⁴ A pitch is an area on a site developed for a family unit to live.

Table 2.3 – Baseline jobs growth and employment land requirements in the Ipswich Strategic Planning Area (ISPA)

	Baseline jobs growth (2018-2036)	Minimum employment land requirements (B1, B2 and B8 uses) (2018 – 2036)
Babergh	2,970	2.3ha
Ipswich	15,580	23.2ha
Mid Suffolk	5,270	7.7ha
Suffolk Coastal	6,500	11.7ha
ISPA	30,320	44.9ha

- 2.13 Evidence of needs for retail and commercial leisure has been produced for Suffolk Coastal and Ipswich, and for Babergh and Mid Suffolk. This evidence supports the continuing role of Ipswich as the county town and provides quantitative requirements for convenience shopping and comparison shopping retail over the plan period.

Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area

Suffolk Coastal will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area, whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Suffolk Coastal Local Plan will contribute to:

- a) The creation of at least 30,320 jobs through the provision of at least 49.8ha of employment land across the Ipswich Functional Economic Area;
- b) The collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area; and
- c) Supporting the continued role of Ipswich as County Town.

The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.

Infrastructure

- 2.14 Within the Ipswich Strategic Planning Area there are aspirations towards the delivery of a number of key infrastructure projects, and in addition, there will be cross-boundary infrastructure that is required as a result of growth planned within Local Plans.

- 2.15 The provision of new and improved infrastructure is essential to ensure that the growth planned across the area is sustainable. Planning for infrastructure across the area will include schools, sustainable transport measures, improvements to the A12 and A14, improvements to other parts of the road networks and the railways. In addition to infrastructure requirements directly linked to planned growth, there are other cross-boundary projects that would help to grow and improve the economy and quality of life for the area.
- 2.16 In addition to enhancements to the existing highway network and integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in the longer term. The route would improve connectivity between the A14 and A12, reducing pressure on the A14 and improving network resilience, especially near the Orwell Bridge and Copdock interchange. Suffolk County Council published an Ipswich Northern Route Study in January 2017, which assessed three indicative broad routes. The Council fully supports the ongoing work of Suffolk County Council in considering potential options for routes, and it is expected that the next review of the Suffolk Coastal Local Plan (along with other Local Plans in the Ipswich Strategic Planning Area) will examine route options in more detail, including the extent to which the options might support potential future scenarios for housing and employment growth beyond that which is being planned for within this Local Plan.
- 2.17 Over the plan period, the Council will continue to work with neighbouring authorities, service providers and statutory bodies to ensure that strategic infrastructure as detailed in Policy SCLP2.2 is delivered in a timely and effective manner through appropriate funding and delivery mechanisms. Providing a range of infrastructure such as education, health and leisure provision will meet the needs of local communities and businesses and further promote sustainable communities across the District.

Policy SCLP2.2: Strategic Infrastructure Priorities

The Council will work with partners such as the other local planning authorities in the ISPA, Suffolk County Council, Clinical Commissioning Groups, Suffolk Constabulary, utilities companies, Highways England and Network Rail in supporting and enabling the delivery of key strategic infrastructure, and in particular the timely delivery of:

- a) Ipswich Northern Route;
- b) A12 improvements;
- c) A14 improvements;
- d) Sustainable transport measures in Ipswich;
- e) Improved walking and cycle routes;
- f) Increased capacity on railway lines for freight and passenger traffic;
- g) Appropriate education provision to meet needs resulting from growth;
- h) Appropriate health and leisure provision to meet needs resulting from growth;
- i) Appropriate community safety and cohesion provision to meet needs resulting from growth;
- j) Provision of green infrastructure and Suitable Alternatives Natural Greenspace;
- k) Improvements to water supply, foul sewerage and sewage treatment capacity; and
- l) Provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses.

Protection of the environment

- 2.18 Suffolk contains extensive areas of nationally and internationally protected landscapes and habitats. A particular issue is the need to ensure that new development does not result in harm to the integrity of internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites. Strategic projects may require joint working by public bodies to ensure the requirements of the Habitats Directive are met.
- 2.19 Local authorities in the ISPA have been working collectively on the Recreational Avoidance and Mitigation Strategy (RAMS) to mitigate the pressure caused by new developments on these designated sites. The partnership work, supported by Natural England has established a strategy to mitigate the impacts and is due to be supported by a Supplementary Planning Document that will provide further details in respect of cost implications and subsequent implementation.
- 2.20 Many of the European designated sites cross administrative boundaries and experience visitor pressure from residents and visitors. The collaborative approach is therefore required to ensure that green infrastructure requirements are considered across the wider area in a consistent manner.

Policy SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats

The Council will continue to work with other authorities to address the requirements of the Recreational Avoidance and Mitigation Strategy and implementation of mitigation measures for the benefit of the European protected sites across the Ipswich Strategic Planning Area.

The Council will continue to work with other authorities over the plan period to ensure that the strategy and mitigation measures are kept under review in partnership with Natural England and other stakeholders.

Section 3

Suffolk Coastal Spatial Strategy



3 Suffolk Coastal Spatial Strategy

Vision for Suffolk Coastal

- 3.1 The future growth of Suffolk Coastal will contribute to and enhance a range of sustainable settlements made up of appropriate economic opportunities, new homes, retail and leisure provision and supported by upgraded infrastructure. The Local Plan vision for the District in 2036 is based on the vision contained in the East Suffolk Business Plan which looks to *‘Maintain and sustainably improve the quality of life for everyone growing up in, living in, working in and visiting East Suffolk’*.
- 3.2 Suffolk Coastal is central to the future economic growth of the country – with major economic opportunities to be realised in relation to the Port of Felixstowe, BT and Sizewell. The District is also home to a variety of small and medium sized businesses in manufacturing, industrial, tourism, creative and other sectors that support a vibrant economy.

Vision for Suffolk Coastal 2018-2036

In 2036 a high quality of life for those growing up in, living in, working in and visiting Suffolk Coastal will have been nurtured through a healthy economy, healthy population and healthy environment supported by suitable infrastructure. Significant levels of growth which maintain the distinctive character and role of settlements, without breaching environmental limitations will have been planned for and delivered.

Suffolk Coastal will have a diverse, strong and prosperous economy which supports key sectors and embraced new opportunities that emerge over the plan period. The stronger and more diverse economy will provide more and better paid local earnings and job opportunities, ensuring that people can stay within their communities.

Supporting the job growth, there will be sufficient homes provided of the right types and tenures to meet the needs of the local population. The need for properties targeted at younger people and to meet the needs of older people will have been addressed, as well as the provision of homes to support people moving into the District.

Communities will be healthy and active with access to a diverse landscape of rural communities, suburban areas and market towns. The District continues to have an abundance of opportunities for physical activity on the doorstep of many residents' homes and businesses. Supporting healthy and active communities will have a positive impact on the health, wellbeing and happiness of all communities.

The high quality built, historic and natural environment will have been protected, maintained and enhanced through development which is sensitive to the designated and

protected areas across the District, including the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, Special Protection Areas, River Valleys and Coastline. The natural environment will be supplemented through provision of accessible green infrastructure and other public open spaces.

Climate change is a key factor for Suffolk Coastal, but the Local Plan will address issues relating to flood risk, coastal erosion and wider coastal management and adaptation, as well as ensuring that human impact is reduced and mitigated accordingly.

All communities will have fulfilled their potential by 2036 and significantly improved the economic, social and environmental wellbeing of the area, whilst safeguarding the prospects of current and future generations.

Strategic Priorities

- 3.3 Table 3.1 below identifies the strategic priorities and objectives for the Plan, to take forward the vision. These objectives are all implemented through a number of policies, as shown in the table.

Table 3.1: Strategic Priorities

Strategic Priority	Policies to deliver Objective / Strategic Priority
To support healthy, safe and active communities through improving health, wellbeing and education opportunities for all;	Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area Policy SCLP2.2: Strategic Infrastructure Priorities Policy SCLP3.1 Strategy for Growth in Suffolk Coastal District Policy SCLP3.3: Settlement Boundaries Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects Policy SCLP3.5: Infrastructure Provision Policy SCLP5.1: Housing Development in Large Villages Policy SCLP5.2: Housing Development in Small Villages Policy SCLP5.3: Housing Development in the Countryside Policy SCLP5.4: Housing in Clusters in the Countryside Policy SCLP5.5: Conversions of Buildings in the Countryside for Housing Policy SCLP5.6: Rural Workers Dwellings Policy SCLP5.8: Housing Mix Policy SCLP5.9: Self Build and Custom Build Housing Policy SCLP5.10: Affordable Housing on Residential Developments Policy SCLP5.11: Affordable Housing on Exception Sites Policy SCLP5.12: Houses in Multiple Occupation Policy SCLP7.1: Sustainable Transport Policy SCLP7.2: Parking Proposals and Standards Policy SCLP8.1: Community Facilities and Assets Policy SCLP8.2: Open Space Policy SCLP8.3: Allotments

Strategic Priority	Policies to deliver Objective / Strategic Priority
	Policy SCLP8.4: Digital Infrastructure Policy SCLP10.3: Environmental Quality Policy SCLP11.1: Design Quality Policy SCLP11.2: Residential Amenity Policy SCLP12.2: Strategy for Felixstowe Policy SCLP12.3: North Felixstowe Garden Neighbourhood Policy SCLP12.17: Strategy for Communities surrounding Ipswich Policy SCLP12.23: Strategy for Aldeburgh Policy SCLP12.25: Strategy for Saxmundham Policy SCLP12.29: South Saxmundham Garden Neighbourhood Policy SCLP12.31: Strategy for Woodbridge Policy SCLP12.34: Strategy for the Rural Areas
To achieve diverse and prosperous economic growth in towns and rural areas to provide at least 6,500 new jobs in the District;	Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District Policy SCLP3.2: Settlement Hierarchy Policy SCLP3.3: Settlement Boundaries Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects Policy SCLP4.1: Employment Areas Policy SCLP4.2: New Employment Areas Policy SCLP4.3: Expansion and Intensification of Employment Sites Policy SCLP4.4: Protection of Employment Sites Policy SCLP4.5: Economic Development in Rural Areas Policy SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use Policy SCLP4.7: Farm Diversification Policy SCLP5.6: Rural Workers Dwellings Policy SCLP12.2: Strategy for Felixstowe Policy SCLP12.3: North Felixstowe Garden Neighbourhood Policy SCLP12.18: Strategy for Communities surrounding Ipswich Policy SCLP12.26: Strategy for Aldeburgh Policy SCLP12.28: Strategy for Saxmundham Policy SCLP12.29: South Saxmundham Garden Neighbourhood Policy SCLP12.31: Strategy for Woodbridge Policy SCLP12.34: Strategy for the Rural Areas Policies SCLP12.7 – SCLP12.10, SCLP12.20, SCLP12.21, SCLP12.35 – SCLP12.42: allocations for employment uses
Enhance the vitality and viability of town centres and villages;	Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area Policy SCLP2.2: Strategic Infrastructure Priorities Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District Policy SCLP3.2: Settlement Hierarchy Policy SCLP3.3: Settlement Boundaries Policy SCLP3.5: Infrastructure Provision Policy SCLP4.8: New Retail Development Policy SCLP4.9: Development in Town Centres Policy SCLP4.10: Town Centre Environments Policy SCLP4.11: Retail in Martlesham and Kesgrave Policy SCLP4.12: District and Local Centres and Local Shops Policy SCLP8.1: Community Facilities and Assets Policy SCLP12.2: Strategy for Felixstowe Policy SCLP12.18: Strategy for Communities surrounding Ipswich

Strategic Priority	Policies to deliver Objective / Strategic Priority
	Policy SCLP12.26: Strategy for Aldeburgh Policy SCLP12.28: Strategy for Saxmundham Policy SCLP12.31: Strategy for Woodbridge Policy SCLP12.34: Strategy for the Rural Areas
Protect and enhance the tourism and cultural facilities across the District;	Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects Policy SCLP6.1: Tourism Policy SCLP6.2: Existing and New Tourism Attractions Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast Policy SCLP6.4: Tourism outside of the AONB Policy SCLP6.5: New Self Catering Tourist Accommodation Policy SCLP6.6: Existing Tourist Accommodation Policy SCLP12.26: Strategy for Aldeburgh Policy SCLP12.11: Felixstowe Ferry and Golf Course Policy SCLP12.12: Felixstowe Ferry Golf Club to Cobbolds Point Policy SCLP12.13: Cobbolds Point to Spa Pavilion Policy SCLP12.14: Spa Pavilion to Martello Park Policy SCLP12.15: Martello Park to Landguard Policy SCLP12.16: Felixstowe Leisure Centre Policy SCLP12.17: Tourism Accommodation in Felixstowe
To enhance and protect the natural, built and historic environment and provide accessible green infrastructure and public open spaces;	Policy SCLP2.2: Strategic Infrastructure Priorities Policy SCLP2.3: Cross-Boundary mitigation of effects on Protected Habitats Policy SCLP3.3: Settlement Boundaries Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects Policy SCLP3.5: Infrastructure Provision Policy SCLP5.14: Extensions to Residential Curtilages Policy SCLP5.15: Residential Moorings, Jetties and Slipways Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast Policy SCLP10.1: Biodiversity and Geodiversity Policy SCLP10.2: Visitor Management of European Sites Policy SCLP10.3: Environmental Quality Policy SCLP10.4: Landscape Character Policy SCLP10.5: Settlement Coalescence Policy SCLP11.1: Design Quality Policy SCLP11.3: Historic Environment Policy SCLP11.5: Non-Designated Heritage Assets Policy SCLP11.6: Conservation Areas Policy SCLP11.7: Archaeology Policy SCLP11.8: Parks and Gardens of Historic or Landscape Interest Policy SCLP11.9: Areas to be Protected from Development Policy SCLP11.10: Newbourne - Former Land Settlement Association Holdings Policy SCLP12.2: Strategy for Felixstowe Policy SCLP12.3: North Felixstowe Garden Neighbourhood Policy SCLP12.11: Felixstowe Ferry and Golf Course Policy SCLP12.12: Felixstowe Ferry Golf Club to Cobbolds Point Policy SCLP12.14: Spa Pavilion to Martello Park

Strategic Priority	Policies to deliver Objective / Strategic Priority
	Policy SCLP12.18: Strategy for Communities surrounding Ipswich Policy SCLP12.21: Recreation and Open Space in Rushmere Policy SCLP12.22: Land off Lower Road and Westerfield Road (Ipswich Garden Suburb Country Park) Policy SCLP12.23: Strategy for Aldeburgh Policy SCLP12.28: Strategy for Saxmundham Policy SCLP12.29: South Saxmundham Garden Neighbourhood Policy SCLP12.31: Strategy for Woodbridge Policy SCLP12.34: Strategy for the Rural Areas
Promote high quality design across the District;	Policy SCLP5.7: Infill and Garden Development Policy SCLP9.2: Sustainable Construction Policy SCLP10.4: Landscape Character Policy SCLP11.1: Design Quality Policy SCLP11.2: Residential Amenity Policy SCLP11.3: Historic Environment Policy SCLP11.5: Non-Designated Heritage Assets Policy SCLP11.5: Conservation Areas Policy SCLP12.3: North Felixstowe Garden Neighbourhood Policy SCLP12.29: South Saxmundham Garden Neighbourhood
Mitigate human impact on the environment and reduce contributions to climate change by conserving natural resources;	Policy SCLP3.5: Proposals for Major Energy Infrastructure Projects Policy SCLP7.1: Sustainable Transport Policy SCLP9.1: Low Carbon & Renewable Energy Policy SCLP9.2: Sustainable Construction Policy SCLP9.3: Coastal Change Management Area Policy SCLP9.4: Coastal Change Rollback or Relocation Policy SCLP9.5: Flood Risk Policy SCLP9.6: Sustainable Drainage Systems Policy SCLP 9.7: Holistic Water Management Policy SCLP12.26: Strategy for Aldeburgh
To deliver at least 10,476 new homes to meet the housing requirements of the whole community including those wishing to move into the area;	Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area Policy SCLP3.1 Strategy for Growth in Suffolk Coastal District Policy SCLP3.2: Settlement Hierarchy Policy SCLP3.3: Settlement Boundaries Policy SCLP5.1: Housing Development in Large Villages Policy SCLP5.2: Housing Development in Small Villages Policy SCLP5.3: Housing Development in the Countryside Policy SCLP5.4: Housing in Clusters in the Countryside Policy SCLP5.5: Conversions of Buildings in the Countryside for Housing Policy SCLP5.6: Rural Workers Dwellings Policy SCLP5.8: Housing Mix Policy SCLP5.9: Self Build and Custom Build Housing Policy SCLP5.10: Affordable Housing on Residential Developments Policy SCLP5.11: Affordable Housing on Exception Sites Policy SCLP5.12: Houses in Multiple Occupation Policy SCLP5.13: Residential Annexes Policy SCLP5.16: Residential Caravans and Mobile Homes Policy SCLP5.17: Gypsies, Travellers and Travelling Showpeople Policy SCLP12.2: Strategy for Felixstowe Policy SCLP12.3: North Felixstowe Garden Neighbourhood

Strategic Priority	Policies to deliver Objective / Strategic Priority
	<p>Policy SCLP12.18: Strategy for Communities surrounding Ipswich</p> <p>Policy SCLP12.26: Strategy for Aldeburgh</p> <p>Policy SCLP12.28: Strategy for Saxmundham</p> <p>Policy SCLP12.29: South Saxmundham Garden Neighbourhood</p> <p>Policy SCLP12.31: Strategy for Woodbridge</p> <p>Policy SCLP12.34: Strategy for the Rural Areas</p> <p>Policies SCLP12.4 – SCLP12.6, SCLP12.24, SCLP12.25, SCLP12.27, SCLP12.30, SCLP12.32, SCLP12.33, SCLP12.43 – SCLP12.72: housing site allocations.</p>
Improve the quality and provision of all types of infrastructure to support current and future requirements.	<p>Policy SCLP2.2: Strategic Infrastructure Priorities</p> <p>Policy SCLP3.1 Strategy for Growth in Suffolk Coastal District</p> <p>Policy SCLP3.5: Infrastructure Provision</p> <p>Policy SCLP8.2: Open Space</p> <p>Policy SCLP8.3: Allotments</p> <p>Policy SCLP8.4: Digital Infrastructure</p> <p>Policy SCLP9.1: Low Carbon & Renewable Energy</p> <p>Policy SCLP12.3: North Felixstowe Garden Neighbourhood</p> <p>Policy SCLP12.29: South Saxmundham Garden Neighbourhood</p>

Presumption in favour of sustainable development

- 3.4 Through this Local Plan the Council is positively supporting growth and the benefits that will bring to communities across the District. The purpose of planning is to help achieve sustainable development as outlined in the National Planning Policy Framework (NPPF) and the Local Plan plays an active role in guiding development towards sustainable solutions, but in doing so takes into account local circumstances and reflects the character, needs and opportunities across the District..
- 3.5 The NPPF , taken as a whole, constitutes the Government’s view of what sustainable development in England means in practice for the planning system and in paragraph 11 provides the presumption in favour of sustainable development.
- 3.6 This Local Plan provides a positive and ambitious vision for the future of the District and provides a framework for addressing the housing needs and other economic, social and environmental priorities on which to enable local communities to shape their surroundings. The Local Plan is in accordance with the Government’s presumption in favour of sustainable development and is the starting point for decision making. Where the Local Plan is absent, silent or relevant policies are out-of-date, permission should be granted unless the adverse impacts of doing so would outweigh the benefits when assessed against the policies in the NPPF or specific policies in the NPPF suggest that development should be restricted.
- 3.7 Footnote 6 of the NPPF provides examples of such policies as being those policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, Areas of Outstanding Natural Beauty, Heritage Coast, designated heritage assets and locations at risk of flooding or coastal erosion.

Spatial Strategy for Growth

- 3.8 National planning policy seeks to significantly boost the supply of homes through a sufficient amount and variety of land that will come forward where it is needed, to meet the needs of groups with specific housing requirements.⁵ The Council shares the government's ambition and is seeking to deliver sustainable communities across the District. Identifying a sufficient supply and mix of sites, which takes into account availability, suitability and viability, reflects the Council's ambition in regards to meeting the need for new homes.
- 3.9 New development across the District will promote and retain existing services and facilities. However, when considering how development is distributed, it is also necessary to consider the effects on existing infrastructure and the environment.
- 3.10 The distribution of growth across the District aims to deliver the vision for the Local Plan alongside the requirements of the National Planning Policy Framework. The Local Plan seeks to be ambitious in respect of housing delivery led by increased economic growth and infrastructure requirements across the District. Increased economic growth across the District will provide more jobs and opportunities for better paid jobs, which will enhance local prosperity and help to address housing affordability. The need for further infrastructure has been identified by service providers and community consultation responses and increased residential development will help facilitate infrastructure delivery across the District and the Housing Market Area.
- 3.11 Across the District many rural communities are thriving, but consultation responses have identified that in some locations, existing services and facilities are struggling to survive and remain viable. The Local Plan seeks to ensure that opportunities for development exist in these rural communities in order to sustain the variety of thriving rural communities over the plan period and for future generations.

Ambitions for Growth

Supporting business and employment

- Provision of land to deliver significantly more than the baseline requirement of 13ha
- Provision for employment and productivity growth equivalent to the creation of at least 6,500 jobs
- Provision of land to support the Port of Felixstowe



⁵ NPPF paragraph 59

- Development of a new business park
- Sustaining and growing the rural economy
- Supporting the vitality of town centres, district centres, local centres and local shops across the District.

- 3.12 Suffolk Coastal has a very diverse local economy, with both outstanding economic assets and potential. The District hosts assets and opportunities that are amongst the most significant anywhere in the UK. These matter for both current and future generations in East Suffolk and for the UK economy as a whole⁶. Across the District, the rural areas provide a variety of employment opportunities alongside the larger settlements and market towns.
- 3.13 The Port of Felixstowe, BT Campus at Adastral Park, offshore and renewable energy and Sizewell Nuclear Power Station perform key economic activities and provide significant opportunities that are also supported by a plethora of micro and small businesses and self employed persons. Numerous micro and small businesses, together with those people who are self employed, make a significant contribution to the local economy and the Local Plan seeks to reflect the growth ambition and potential of all businesses operating in the District.
- 3.14 To support the outstanding economic assets and variety of businesses operating in Suffolk Coastal, the Council and other organisations (such as New Anglia Local Enterprise Partnership) are seeking to raise the level of education, skills, and training opportunities and apprentice schemes that are available.
- 3.15 Alongside the need to increase skills and opportunities, the Local Plan seeks to provide the land to meet the needs of the main economic activities across the District. In order to maintain the significant contribution of operations like the Port of Felixstowe and Sizewell Nuclear Power Station, the Local Plan will take a positive approach to land allocations which are required to meet the demands of these sectors over the plan period which are well related to the A12 and the A14 corridors. Land requirements may be in excess of that outlined in the Employment Land Needs Assessment and will need to be justified by specific evidence relating to this demand.
- 3.16 The District's population is ageing and by 2036, the number of working age people will have declined significantly unless new initiatives are developed to retain the talented younger people and attract the required skills into the area. The retention of talent and skills as well as the opportunities to attract new talent into the area is a fundamental part of the Norfolk and Suffolk Economic Strategy.
- 3.17 The East of England Forecasting Model (August 2016) forecasts the growth in jobs by sector and reflects trends based upon projections at the regional level and how the individual sectors have fared relative to historic growth in the region. Over the plan period (2018 – 2036) the number of jobs in Suffolk Coastal is forecast to grow by 6,500, to 68,450, predominately in the service, tourism, business and professional

⁶ East Suffolk Economic Growth Plan

services sectors. It is acknowledged that there is insufficient existing provision for small businesses and limited growth on space with many land owners reluctant to build employment sites speculatively. This will in part limit potential economic opportunities.

- 3.18 The retail sector is characterised by rapid change and changing consumer demands related to new technologies. There are limited identified development opportunities in and around the town centres in Suffolk Coastal. The District's town centres and out of town retailing at Martlesham function within a wider retail network including the county town of Ipswich. Retail floorspace growth for goods purchased infrequently (comparison retail) is forecast to be most significant at Woodbridge and in areas East of Ipswich for regular food and other convenience shopping. Modest floorspace growth forecasts can be addressed across centres either in the area between Woodbridge, Felixstowe and Ipswich or between the other market towns. The Council's approach is to support and monitor retail and town centre development and present a clear and comprehensible range of policies to support a balance of retail and services including commercial leisure in distinctive town centres.

Boosting the Supply of Housing

- 582 new homes per year (10,476 over the lifetime of the plan - 2018-2036);
- Increasing choice in the housing available;
- Meeting the housing needs of all sectors of the population, including the growing elderly population;
- Delivering more affordable housing.

- 3.19 It is the role of the Local Plan to set the housing requirement for the District. The National Planning Policy Framework sets out the Government's objective to boost significantly the supply of housing. From the outset of the production of the Local Plan the Council has sought to set out an ambitious and positive strategy to promote the delivery of housing in the District, and increase the mix of housing available. The East Suffolk Business Plan sets out the Council's long term ambitions for East Suffolk by capitalising on the strengths of the area and enabling the Council to address more significant local challenges such as the need for new homes that are affordable and local to our communities.

- 3.20 The National Planning Policy Framework states that to determine the minimum number of homes needed strategic policies should be informed by a local housing need assessment conducted using the standard method set out in the national Planning Practice Guidance. The calculation of local housing need is based upon the 2016-based household projections⁷ and is also informed by an uplift based upon the ratio of

⁷ 2016-based household projections as published by the Office for National Statistics in September 2018

earnings to house prices⁸. Using the standard method, the local housing need for Suffolk Coastal District is 582 dwellings per year. In accordance with Planning Practice Guidance the baseline for housing need will be 2018, and it is applied to the period to 2036.

- 3.21 A housing requirement of 582 dwellings per annum is considered to represent an ambitious approach to housing delivery, which will assist in meeting the needs of local communities, as well as significantly boosting the supply of housing, consistent with the Council's corporate objectives.
- 3.22 The Council has a commitment to delivering new housing, including affordable housing, across the District to meet its own objectives, and to deliver the housing needed for the area. A large amount of this housing is already accounted for through dwellings that are being built, those already allocated through previous Local Plans and Neighbourhood Plans and those with planning permission. The role of this Plan is to review and roll forward existing allocations and to identify further opportunities for new housing development to come forward to meet the identified requirement.
- 3.23 In addition to the number of houses needed, there is also a need to address housing affordability and to increase the mix of housing, in particular addressing demographic changes which are seeing the population of the elderly in the District continue to rise.

Provision of Infrastructure

- 3.24 The term infrastructure covers a wide variety of facilities and services, including roads, railways, schools, health services, waste facilities, green infrastructure and digital and communications infrastructure. Across the District, it is acknowledged that there are existing issues in relation to infrastructure provision and capacity, such as schools that are at or reaching capacity, locations where roads and junctions are approaching capacity and broadband provision can be insufficient in some rural parts of the District.
- 3.25 Enhancements to existing infrastructure, and the provision of new infrastructure, is a central part of the strategy for growth over the Local Plan period. The Council has shared ambitions along with other Councils and organisations, including infrastructure providers, for the delivery of strategic infrastructure improvements as outlined in Section 2. These include improvements to the A12 and A14, improvements to rail capacity, sustainable transport and enhanced digital infrastructure. Such infrastructure improvements will help to support economic growth in the District and to improve the quality of life for residents.
- 3.26 In addition to strategic scale infrastructure, to support development in the District improvements to infrastructure will be delivered. The Local Plan has sought to identify growth in locations where there may be opportunities for infrastructure improvements alongside development such as increased provision for education and leisure facilities. Specific improvements for infrastructure alongside development, throughout the Plan. The Council has worked closely with a number of infrastructure providers throughout the production of the Plan.

⁸ Ratio of median workplace earnings to median house prices as published by the Office for National Statistics in April 2018

Distribution of Growth

Garden Neighbourhoods

- 3.27 The Local Plan proposes two garden neighbourhoods at Felixstowe⁹ and Saxmundham¹⁰. The principles of Garden Cities are well established on a larger scale and many examples of best practice are found around the country. Opportunity exists through land allocations to follow the principles of Garden Cities as Garden Neighbourhoods for Suffolk Coastal which provide generous provision of green spaces, range of local facilities including schools, shops, meeting places and other community spaces alongside opportunities for recreation, walking and cycling. The variety of green spaces and community facilities are to be supported by employment opportunities and a wide choice of new housing to meet a range of needs, designed in a way which acknowledges and protects the historic environment whilst providing environmental benefit and enhancements and are supported by the most up to date digital infrastructure.

Felixstowe

- 3.28 Large scale development through a Garden Neighbourhood is proposed for Felixstowe to enable the delivery of modern leisure facilities, education provision, residential units and other facilities to meet the needs of the town as well as the District and beyond. The current leisure provision at the Leisure Centre and Brackenbury Sports Centre, have reached the end of their useful life and need to be modernised. Felixstowe is the largest town in the District and has significant opportunities for future economic growth supported by the Port of Felixstowe, associated industries and tourism. Felixstowe is well served in respect of services and facilities but directing growth to this area will support the focus on the continued regeneration of the town as well as minimising the need to travel to access employment opportunities and essential services and facilities. The Local Plan seeks to address these issues through a comprehensive strategic garden neighbourhood master plan for land north of Felixstowe, well connected to the existing town, which will deliver leisure provision, residential units, employment opportunities, education provision, , community facilities, open spaces, green infrastructure and other supporting infrastructure.
- 3.29 Previous Local Plans, through the Felixstowe Peninsula Area Action Plan identified a variety of allocations and area specific policies for communities neighbouring Felixstowe. The villages of Trimley St Martin and Trimley St Mary were identified for growth which is being delivered. The Area Action Plan identified a need for additional Primary School provision, including an early years setting in this part of the District. This Local Plan seeks to identify a site to meet this identified requirement, through engagement with Suffolk County Council, to aid the overall provision in the communities neighbouring Felixstowe.

⁹ Part of the Felixstowe Garden Neighbourhood is also within the parish of Trimley St Mary.

¹⁰ Part of the Saxmundham Garden Neighbourhood is also within the parish of Benhall and Sternfield.

Saxmundham and the A12

- 3.30 The A12 is a well used road which provides connections to many communities with the East Suffolk branch line also serving these communities. Directing development to locations well related to the A12 will enable opportunities to make more use of the road and rail connections between Ipswich and Lowestoft. Increasing the level of development in these locations will help to sustain the existing communities and enhance the level of services and facilities found in this part of the District.
- 3.31 A large proportion of development is focused on the Saxmundham Garden Neighbourhood to enable the delivery of required education infrastructure, utilise the connections provided by the railway station and support the improvements to the A12 proposed as part of the Suffolk Energy Gateway Four Villages bypass. Saxmundham is geographically well placed in the District to provide employment opportunities for the communities in the north of the District and improve the connections between Ipswich and Lowestoft. The emergence of Sizewell C Nuclear Power Station will also further support the strategic growth of Saxmundham as a Market Town with a variety of services and facilities.
- 3.32 Consultation responses have highlighted the need for further education provision, improvements to the capacity of the medical practice and congestion issues in relation to the B1119 and B1121 crossroads and access to the supermarkets on Church Street. This Local Plan seeks to address these issues through a comprehensive garden neighbourhood master plan for Saxmundham which will provide employment opportunities, primary school, residential units and other supporting infrastructure.

Rural Areas

- 3.33 Suffolk Coastal has a large number of communities in the rural areas and public consultation responses highlighted there is a need for appropriate development to be encouraged in some of these settlements. The strategy reflects the need to support the numerous villages across Suffolk Coastal by recognising the possibility of higher levels of growth in some communities. Through allocation of appropriate sites some settlements will welcome higher levels of growth than has been experienced in previous Local Plans. Increasing the amount of development in rural areas reflects the need to provide more housing opportunities for people with a local connection to live in rural areas and to deliver more affordable housing to meet local needs. New housing should also help support existing services and facilities in the rural areas such as schools, employment opportunities, public houses, shops as well as supporting the extension of broadband and mobile provision into these areas, and also help to deliver infrastructure enhancements.

Communities Neighbouring Ipswich

- 3.34 The communities neighbouring Ipswich have in the past seen large proportions of growth directed towards them which has resulted in the established communities of Rushmere St Andrew, Kesgrave and Martlesham. These locations provide a comprehensive range of services and facilities which meet the needs of the local community and those of surrounding settlements. In April 2018, the Council granted

outline planning permission (DC/17/1435/OUT) for the delivery of 2,000 homes at Brightwell Lakes¹¹ as set out in the 2013 Core Strategy. The Brightwell Lakes site is significant in terms of infrastructure provision and housing delivery and therefore it is not currently considered appropriate to direct any further large scale development to this part of the District. However, in future Local Plan revisions, the Council will reconsider growth opportunities in the parts of the District neighbouring Ipswich, taking into account delivery rates at Brightwell Lakes and opportunity to bring forward development that supports the Business Case for strategic road routes to the north of Ipswich (as promoted by Suffolk County Council).

- 3.35 Over the plan period, there are opportunities for development associated with Neighbourhood Plans that will be reviewed to accommodate the limited level of development expected in these locations. Public consultation responses highlighted the rapid expansion of some locations (such as Framlingham and Leiston) as well as the planning permission associated with Brightwell Lakes. Taking these into account and the objectives for growth in other parts of the District, the Local Plan Review only seeks to direct a limited amount of growth to these towns.

¹¹ Previously known as Adastral Park. References in this document to Adastral Park relate to the adjoining area of employment uses occupied principally by BT.

Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District

The Council will deliver an ambitious plan for growth over the period 2018 – 2036 in Suffolk Coastal by:

- a) Supporting and facilitating economic growth through the supply of significantly more than the baseline requirement of 11.7ha of land for employment uses to deliver at least 6,500 jobs and to enable the key economic activities to maintain and enhance their role within the UK economy;
- b) Sustain and support growth in retail, commercial leisure and town centres including facilitating provision towards plan period forecasts of between 4,100 - 5,000 sqm of convenience retail floorspace and between 7,700 – 13,100 sqm of comparison retail floorspace;
- c) Significantly boosting the supply of housing, the mix of housing available and the provision of affordable housing, through the delivery of at least 582 new dwellings per annum (at least 10,476 over the period 2018 - 2036);
- d) Ensuring the provision of infrastructure needed to support growth;
- e) Protecting and enhancing the quality of the historic, built and natural environment across the District.

The strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:

- f) The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham;
- g) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors;
- h) New strategic employment allocations based around key transport corridors, including to support the Port of Felixstowe;
- i) Strategies for market towns which seek to reflect and strengthen their roles and economies;
- j) Appropriate growth in rural areas that will help to support and sustain existing communities.

Key Diagram

3.36 The Key Diagram below illustrates the spatial strategy that this Local Plan seeks to deliver.



Spatial distribution of residual housing requirement

- 3.37 Whilst the total requirement is 10,476 dwellings over the period 2018 - 2036, a large proportion of this is already accounted for in outstanding planning permissions, dwellings where there is a resolution to grant planning permission subject to completion of a Section 106 agreement and existing allocations review and carried forward from adopted Local Plans and those contained in 'made' Neighbourhood Plans'. The Local Plan also provides a contingency to allow for flexibility in the delivery of sites. Table 3.2 below explains the residual housing figure that this Local Plan will need to provide for.

Table 3.2 – Residual housing need calculation

	Number of dwellings
Outstanding planning permissions (31.3.18)	3,609
Dwellings with resolution to grant planning permission, subject to S106 (31.3.18)	2,413 ¹²
Allocations in current Local Plan or Neighbourhood Plans (<i>without</i> permission or resolution to grant subject to S106) (31.3.18)	976
Total commitments (31.3.18)	6,998
Housing requirement (2018 – 2036): (582 x 18)	10,476 (582 dwellings per annum)
Residual need (requirement minus commitments)	10,476 – 6,998 = 3,478 residual need. This is the minimum to be planned for in the Local Plan, however a contingency will also be incorporated.

- 3.38 Table 3.3 below details the distribution of the residual figure (including the contingency) for new housing across the District up to 2036, through proposed allocations and requirements for Neighbourhood Plans. This reflects the strategy of the Plan to direct more significant levels of the District's growth to Felixstowe and Saxmundham through the creation of two new Garden Neighbourhoods, to focus growth on the A12 and A14 corridors and to support rural communities. The strategy also reflects opportunities to set out a positive approach to future uses on brownfield sites and to enabling adjoining authorities to deliver their housing requirement. The figures include indicative minimum housing numbers provided for settlements with designated Neighbourhood Plan areas, as the expectation is that those Neighbourhood Plans will allocate sites to meet their requirement consistent with the Local Plan strategy and the Settlement Hierarchy. The figures do not include any assumptions around windfall development which it is expected

¹² 2,000 dwellings relate to the Brightwell Lakes development

will come forward at a rate of at least 50 dwellings per year from 2020/21 onwards, and would therefore provide at least an additional 800 dwellings over the plan period.

- 3.39 Allocations for housing in this Local Plan exceed the total dwelling requirement for the period 2018 – 2036 by approximately 8.5%, before an allowance for windfall is factored in. This over-allocation provides confidence that the overall housing requirement will be met even if some allocated sites fail to come forward. In addition there is likely to be further development which comes forward on sites not identified in the plan. These sites will either be within the Settlement Boundaries or through the exceptions and countryside policies or on additional sites identified in Neighbourhood Plans.

Table 3.3 – Spatial distribution of housing growth to be planned for

Location	Percentage of new growth identified in this Local Plan ¹³	Approximate Number of units (rounded) (minimum)
Communities related to the A12		
■ Saxmundham area ¹⁴	18%	800
■ Other A12 communities ¹⁵	15%	667
Felixstowe (including the Trimleys) ¹⁶	38%	1,670
Rural Settlements	12%	543
Communities surrounding Ipswich	11%	490
Framlingham	2%	100
Leiston	2%	100
Total		4,370

¹³ Note that figures may not sum 100% due to rounding

¹⁴ Including the part of Benhall Parish within the proposed South Saxmundham Garden Neighbourhood

¹⁵ Woodbridge northwards

¹⁶ Whilst Trimley St Martin and Trimley St Mary are identified as Large Villages in the settlement, in terms of District wide spatial distribution it is appropriate to identify these villages alongside Felixstowe owing to the strong functional relationship between them.

Settlement Hierarchy

- 3.40 This Local Plan provides the opportunity to redefine the Settlement Hierarchy across the District. Whatever the size and location of a community, too much development, too soon, or of the wrong type can damage the environment and local distinctiveness and thereby impact on the quality of life. The identification of a Settlement Hierarchy is a useful policy tool for identifying the spatial distribution of development across the District, taking into account the role of each settlement.
- 3.41 The National Planning Policy Framework encourages housing delivery where it will enhance or maintain the vitality of rural communities. The Local Plan seeks to encourage development in locations where people can access services and facilities and where there is a choice of transport modes including walking, cycling and public transport, recognising that in some of the more rural parts of the District opportunities for sustainable transport may be more limited but that some development may, nevertheless, help to sustain communities.
- 3.42 The overall objective of the Settlement Hierarchy is to deliver development that reflects the character of the area and contributes towards sustainable development, thereby supporting the needs of individual communities and enabling them to prosper in the long term. Generally the larger settlements have better provision of day to day facilities and are able to accommodate higher levels of growth without adversely impacting the character of the settlement.
- 3.43 Each category within the Settlement Hierarchy will contribute towards future growth in the District, with the largest levels of growth appropriate to the Major Centres and Market Towns and more limited development coming forward in the rural settlements. To facilitate this development and encourage communities to prosper, Settlement Boundaries are defined to guide the location of new development. New allocations for development are identified in some of the settlements in the hierarchy to provide certainty in respect of the location of future growth and to reflect the spatial strategy.
- 3.44 The Settlement Hierarchy has been defined through a scoring mechanism related to the presence of certain services and facilities. The list of services and facilities considered included:
- Convenience stores,
 - Primary schools,
 - Village halls / community centres,
 - Play areas,
 - Employment opportunities,
 - Medical facilities,
 - Public transport and,
 - For villages, proximity to a major centre or town.
- 3.45 In order to be identified as a Large Village, settlements need to have a primary school, village hall / community centre and a convenience store, as part of the mix of services and facilities present.

Policy SCLP3.3: Settlement Hierarchy

The Settlement Hierarchy enables the Council to achieve its vision for the District, meeting the scale of development required and enhancing the quality of the built, natural, historic, social and cultural environments whilst sustaining the vitality of communities.

The development requirements for Major Centres, Market Towns, Large Villages and Small Villages will be delivered through site allocations in the Local Plan or in Neighbourhood Plans, plus through windfall development in accordance with other policies in this Local Plan.

The development requirements in the Countryside will come forward through Neighbourhood Plans and windfall sites in accordance with other policies in this Local Plan.

Settlement Type	Communities	
Major Centre	Felixstowe East of Ipswich ¹⁷ - Kesgrave, Martlesham Heath, Brightwell Lakes ¹⁸ , Purdis Farm, Rushmere St Andrew (excluding village)	
Market Towns	Aldeburgh Framlingham Leiston Saxmundham Woodbridge ¹⁹	
Large Villages	Bramfield Earl Soham Grundisburgh Hollesley Knodishall Martlesham (village) Melton (village) Nacton	Orford Otley Rendlesham Snape Trimley St Martin Trimley St Mary Wickham Market Yoxford
Small Villages	Alderton Badingham Bawdsey Benhall Blythburgh Brandeston Bredfield Bucklesham	Levington Little Bealings Middleton Newbourne Peasenhall (with part of Sibton) Pettistree Rendham

¹⁷ East of Ipswich describes those settlements that are situated to the east of Ipswich and are separate from Ipswich but which are more suburban in nature than the villages to the east of Ipswich.

¹⁸ Area previously known as Adastral Park and defined by outline planning permission (reference DC/17/1435/OUT)

¹⁹ Including part of the built up area of the town extending into the neighbouring parishes of Martlesham and Melton

	Campsea Ashe Charsfield Clopton Darsham Dennington Easton Eyke Great Glemham Hacheston Hasketon Kelsale Kettleburgh Kirton (including part of Falkenham)	Rushmere St. Andrew (village) Sutton Heath Theberton Thorpeness Tuddenham Tunstall Ufford Walberswick Waldringfield Wenhaston Westerfield Westleton Winesham
Countryside	Aldringham Blaxhall Boulge Boyton Brightwell Bromeswell Bruisyard Burgh Butley Capel St Andrew Chediston Chillesford Cookley Cransford Cratfield Cretingham Culpho Dallinghoo Debach Dunwich Falkenham Farnham Foxhall Friston Gedgrave Great Bealings Hemley Heveningham	Hoo Huntingfield Iken Letheringham Linstead Magna Linstead Parva Little Glemham Marlesford Melton Park Monewden Parham Playford Ramsholt Saxtead Shottisham Sibton Sizewell Sternfield Stratford St Andrew Stratton Hall Sudbourne Sutton Sweffling Swilland Thorington Ubbeston Walpole Wantisden

3.46 Table 3.4 below summarises the type and scale of development that would be supported within the different categories of the hierarchy. This reflects policies which are set out in later Sections of this plan.

Table 3.4 – Summary of policy approach for Settlement Hierarchy

Category of settlement hierarchy	Summary of policy approach
Major Centres	<p><u>Employment</u> Development within existing employment areas (Policy SCLP4.1) Identification of new employment allocations linked to major centres and transport corridors (SCLP4.2) Development within Settlement Boundaries (SCLP4.2)</p> <p><u>Retail</u> Retail uses within defined Town Centres, District Centres and Local Centres (Policy SCLP4.9)</p> <p><u>Housing</u> New strategic mixed use allocation at North Felixstowe Garden Neighbourhood (SCLP12.3) Housing development at Brightwell Lakes (SCLP12.19) Housing development at the Police Headquarters, Martlesham Heath (SCLP12.25) Housing development within Settlement Boundaries (SCLP3.3)</p>
Market Towns	<p><u>Employment</u> Development within existing employment areas (Policy SCLP4.1) Development within Settlement Boundaries (SCLP4.2)</p> <p><u>Retail</u> Retail uses within defined Town Centres, District Centres and Local Centres (Policy SCLP4.9)</p> <p><u>Housing</u> New strategic mixed use allocation at South Saxmundham Garden Neighbourhood (SCLP12.29) Housing development at Woodbridge²⁰ (SCLP12.32 and SCLP12.33) Housing development within Settlement Boundaries (SCLP3.3)</p>
Large Villages	<p><u>Employment</u> Development within existing employment areas (Policy SCLP4.1) Development of employment uses appropriate to the scale of the settlement (Policy SCLP4.2 and Policy SCLP4.5)</p> <p><u>Retail</u> Retail uses within defined District Centres (Policy SCLP4.9) Protection of local shops (SCLP4.13)</p> <p><u>Housing</u></p>

²⁰ Partly within Martlesham and Melton parishes.

	New housing allocations (Section 12) New housing development and infill within Settlement Boundaries (SCLP5.1)
Small Villages	<u>Employment</u> Development within existing employment areas (Policy SCLP4.1) Development of employment uses appropriate to the scale of the settlement (Policy SCLP4.2 and Policy SCLP4.5) <u>Retail</u> Protection of local shops (SCLP4.13) <u>Housing</u> New housing allocations (Section 12) Small groups of new housing and infill within Settlement Boundaries (SCLP5.2)
Countryside	<u>Employment</u> Conversion and replacement of rural buildings for employment uses (Policy SCLP4.6) Farm diversification (Policy SCLP4.7) Development within existing employment areas (Policy SCLP4.1) New employment uses where need is demonstrated (Policy SCLP4.2) <u>Retail</u> Protection of local shops (SCLP4.13) <u>Housing</u> New housing within clusters of existing dwellings (SCLP5.4) Affordable housing on exception sites (SCLP5.11) Conversions of agricultural buildings / replacement dwellings (SCLP5.3) Rural workers' dwellings (SCLP5.6)

3.47 The Settlement Hierarchy has informed the identification of land for allocation for housing in the Local Plan. Strategies for Major Centres and Market Towns are based upon the circumstances and opportunities relevant to each, as detailed in Section 12 of this Plan. The starting point is that Large Villages and Small Villages are, in principle, suitable places to accommodate new housing. Consideration has been given to other factors in determining whether a settlement is a suitable location for additional housing growth, including infrastructure capacity, the existence of suitable sites and consultation responses.

3.48 Table 3.5 below shows the anticipated level of housing delivery in each Town and Parish (for settlements in the Settlement Hierarchy). Note these figures do not include an allowance for windfall which it is anticipated will come forward across the District at a rate of 50 dwellings per year, and will enable housing to come forward in those settlements where allocations are not proposed. It is anticipated that, with the greater development opportunities provided by the 'Housing in Clusters in the Countryside' policy (Policy SCLP5.4), windfall development in the countryside will increase above previous levels. Therefore the 1.5% indicative level of growth for countryside locations based on completions and commitments is presented as a minimum. A Housing Trajectory which indicates delivery on a timescale over the lifetime of the Local Plan is contained in Appendix C.

- 3.49 As Table 3.5 shows, a significant element of the supply of housing is contained within existing permissions and those permitted on sites of five or more dwellings are shown on the Policies Maps. Alternative uses that would prejudice the quantum of residential use permitted being developed on these sites will be resisted.

Table 3.5 Anticipated housing growth by Town / Parish 2018 - 2036

Area/Parish	Contribution (by parish)			(C) New housing allocations ²¹	(D) Indicative contribution 2018 – 2036 (A+B+C) ²²
	(A) Permissions & resolution to grant permission as at 31/3/2018	(B) Existing Allocations without permission or resolution to grant as at 31/3/2018	Total to date (A) + (B)		
Major Centres					
Felixstowe	1,523	209	1,732	1,520 ²³	3,252 (29%)
East Ipswich					
Kesgrave	19	0	19	20	39 (<0.5%)
Martlesham Heath ²⁴	0	0	0	300	300(2.5%)
Brightwell Lakes	2,000	0	2,000	-	2,000 (17.5%)
Purdis Farm	7	0	7	-	7 (<0.5%%)
Rushmere St Andrew (excluding village)	71	0	71	150	221 (2%)
Market Towns					
Aldeburgh	39	10	49	-	49 (<0.5%)
Framlingham	349	37	386	100	486 (4%)
Leiston	507	0	507	100	607 (5%)
Saxmundham	115	65	180	800	980 (8%)
Woodbridge (incl part of Melton and Martlesham)	336	0	103	220	323 (3%)

²¹ In italics are numbers provided to designated Neighbourhood Plan areas (Policy SCLP12.1)

²² Note that percentages have been rounded to the nearest 0.5%, and therefore may not sum

²³ Note that a small part of the North Felixstowe Garden Neighbourhood is within Trimley St Mary parish however is included with Felixstowe in the table

²⁴ Total of 20 for Neighbourhood Plan area, which covers Martlesham Heath and Martlesham village

Area/Parish	Contribution (by parish)			(C) New housing allocations ²¹	(D) Indicative contribution 2018 – 2036 (A+B+C) ²²
	(A) Permissions & resolution to grant permission as at 31/3/2018	(B) Existing Allocations without permission or resolution to grant as at 31/3/2018	Total to date (A) + (B)		
Large Villages					
Bramfield	3	0	3	-	3 (<0.5%)
Earl Soham	6	0	6	25	31 (<0.5%)
Grundisburgh	11	0	11	70	81 (1%)
Hollesley	38	0	38	-	38 (<0.5%)
Knodishall	16	0	16	16	32(<0.5%)
Martlesham (village)	56	0	56	20 ²⁵	76 (1%)
Melton (village)	20	55	75	-	75 (1%)
Nacton	5	0	5	-	5 (<0.5%)
Orford	1	10	11	-	11 (<0.5%)
Otley	38	0	38	60	98 (1%)
Rendlesham	10	100	110	-	110 (1%)
Snape	0	0	0	-	- (0%)
Trimley St Martin	161	360	521	150	671 (6%)
Trimley St Mary	105	0	105	-	105 (1%)
Wickham Market (with part of Pettistree)	10	0	10	220 ²⁶	230 (2%)
Yoxford	8	0	8	-	8 (<0.5%)
Small Villages					
Alderton	10	0	10	-	10 (<0.5%)
Badingham	16	0	16	-	16(<0.5%)
Bawdsey	14	0	14	-	14 (<0.5%)
Benhall	11	0	11	50	61 (0.5%)
Blythburgh	5	0	5	-	5 (<0.5%)
Brandeston	0	0	1	-	1 (<0.5%)
Bredfield	10	0	10	20	30 (<0%)
Bucklesham	13	0	13	30	43 (<0.5%)
Campsea Ashe	6	0	6	12	18 (<0.5%)
Charsfield	21	0	21	20	41 (<0.5%)
Clopton	2	0	2	-	2 (<0.5%)

²⁵ Figure of 20 identified for Martlesham Neighbourhood Plan

²⁶ 120 through allocation in Pettistree adjoining Wickham Market and 100 as figure for Wickham Market Neighbourhood Plan

Area/Parish	Contribution (by parish)			(C) New housing allocations ²¹	(D) Indicative contribution 2018 – 2036 (A+B+C) ²²
	(A) Permissions & resolution to grant permission as at 31/3/2018	(B) Existing Allocations without permission or resolution to grant as at 31/3/2018	Total to date (A) + (B)		
Darsham	22	0	22	145 ²⁷	167 (1.5%)
Dennington	1	10	11	40 ²⁸	51 (<0.5%)
Easton	24	0	24	20	44 (<0.5%)
Eyke	1	0	1	65	66 (0.5%)
Great Glemham	2	0	2	-	2 (<0.5%)
Hacheston	12	0	12	-	12 (<0.5%)
Hasketon	2	0	2	-	2 (<0.5%)
Kelsale	12	30	42	20	62 (0.5%)
Kettleburgh	4	0	4	16	20 (<0.5%)
Kirton (with part of Falkenham)	2	0	2	12	14 (<0.5%)
Levington	1	0	1	20	21 (<0.5%)
Little Bealings	2	0	2	-	2 (<0.5%)
Middleton	3	0	3	-	3 (<0.5%)
Newbourne	7	0	7	-	7 (<0.5%)
Peasenhall (with part of Sibton)	13	0	13	14	27 (<0.5%)
Pettistree ²⁹	1	0	1	-	1 (<0.5%)
Rendham	1	0	1	-	1 (<0.5%)
Rushmere St Andrew (village)	27	0	27	-	27 (<0.5%)
Sutton Heath	0	0	0	-	-
Theberton	0	0	0	-	0 (<0.5%)
Thorpeness	12	0	12	-	12 (<0.5%)
Tuddenham St Martin	1	0	1	25	26 (<0.5%)
Tunstall	77	0	77	-	77 (0.5%)
Ufford	44	0	44	-	44 (<0.5%)
Walberswick	2	0	2	-	2 (<0.5%)
Waldringfield	4	0	4	-	4 (<0.5%)

²⁷ Includes allocation for 120 dwellings at Darsham Station

²⁸ 40 additional dwellings proposed through extension of existing allocated site

²⁹ Excluding part adjoining Wickham Market – proposed allocation SCLP12.56

Area/Parish	Contribution (by parish)			(C) New housing allocations ²¹	(D) Indicative contribution 2018 – 2036 (A+B+C) ²²
	(A) Permissions & resolution to grant permission as at 31/3/2018	(B) Existing Allocations without permission or resolution to grant as at 31/3/2018	Total to date (A) + (B)		
Wenhaston	6	0	6	25	31 (<0.5%)
Westerfield	55	20	75	-	75 (1%)
Westleton	6	0	6	35	41 (<0.5%)
Witnesham	24	20	44	30	74 (0.5%)
Shottisham and Aldringham³⁰					
Aldringham	0	40	40	-	40 (<0.5%)
Shottisham	0	10	10	-	10 (<0.5%)
Countryside					
All countryside locations ³¹	92	0	82	-	82 (0.7%)
TOTAL	6,022	976	6,998	4,370	11,368³²

Settlement Boundaries

- 3.50 Settlement Boundaries are a policy line on a map which is used to define the built up area(s) of a settlement. The Settlement Boundaries, subject to other policies of this Local Plan, indicate where development for housing, employment and town centre development would be suitable. Inside the Settlement Boundaries, there is a policy presumption that development is acceptable in principle. Outside of these boundaries, opportunities for housing development are considerably more limited as countryside policies of restraint will apply. Settlement Boundaries are drawn to include any allocations for development that adjoin the previous boundary.
- 3.51 These boundaries allow for flexibility in the Local Plan by potentially allocating more development than is planned for by the allocation of specific sites, at the same time as avoiding the loss of further undeveloped land in the countryside and controlling the sprawl of existing settlements.

³⁰ Under the approach to defining the settlement hierarchy Aldringham and Shottisham fall within the countryside category, however it is shown in Table 3.5 as it has an existing allocation which is carried forward into this Local Plan.

³¹ Excluding Shottisham

³² Note that this excludes any contribution from anticipated windfall of 50 units per year from 2020/21 onwards

Policy SCLP3.3: Settlement Boundaries

Settlement Boundaries are defined on the Policies Map and apply to Major Centres, Market Towns, Large Villages and Small Villages. Land which is outside of Settlement Boundaries in the Local Plan and Neighbourhood Plans is defined as Countryside.

New development within defined settlement boundaries will be acceptable in principle, subject to consideration of other relevant policies of the development plan.

New residential, employment and town centre development will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise.

Proposals for new residential development outside of the Settlement Boundaries will be strictly controlled in accordance with national planning policy guidance and the strategy for the Countryside.

Neighbourhood Plans can make minor adjustments to Settlement Boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall strategy and distribution as set out in this Local Plan.

Major Energy Infrastructure

- 3.52 The Suffolk Coast is at the forefront of electricity energy generation across the country both in respect of onshore and offshore energy. It is essential that major energy infrastructure projects are delivered in a planned way which takes into account the potential impact of hosting large and nationally significant infrastructure in the District. The Council is committed to working in a collaborative partnership approach with the scheme promoters, local communities, Government, New Anglia Local Enterprise Partnership, service providers and public bodies to ensure the best outcomes of major energy infrastructure projects can be achieved.
- 3.53 The Government, through the Department for Business, Energy and Industrial Strategy is committed to the increased delivery of Nuclear Energy Provision across the country. A new nuclear power station at Sizewell is a nominated site in the National Policy Statement for Nuclear Power Generation EN6 as part of this national package. Nuclear Energy has been generated at Sizewell since the 1960's and will continue beyond the plan period as a result of the continued production at Sizewell B and at a new station.
- 3.54 The decisions in respect of the new power station will be taken at a national level as a Nationally Significant Infrastructure Project (NSIP) with various regulators assessing safety, security and other issues through the necessary design and construction. The Council would be a statutory consultee in this process. However it is considered that one of the biggest development and construction programmes faced by the Council and its communities in generations should be developed alongside the overall policy framework for the District to enable the impacts and benefits to be managed, including addressing the issues of cumulative impact and outcomes of other large scale projects.

- 3.55 The role of the Local Plan will be to consider the suitability of any specific proposal and the mitigation of local impacts (both positive and negative) on the communities across the District and to realise the economic benefits. The current Sizewell site is a remote rural location in close proximity to the town of Leiston and other nearby settlements such as Aldringham cum Thorpe and Eastbridge. In addition the wider highway and rail network to this location is challenging. As well as the social impacts affecting the communities nearby, the environmental impacts of a site on the coast, within the Area of Outstanding Natural Beauty and close to protected landscapes such as Sizewell Marshes and Minsmere Nature Reserve, and the impact on the Suffolk Seascape will need to be assessed both during construction and beyond. Focus should be on prevention of impact on the natural and historic environments as opposed to compensation for the effect. Where a project involves multiple consents, developers will be expected to work collaboratively with authorities to prepare a project wide Habitats Regulations Assessment.
- 3.56 Although the provision of nuclear energy is currently prominent, the Suffolk Coast is increasingly coming under pressure to support developments associated with the off shore energy sector and linking this into the national grid, as well as inter-continental connections to enable the exchange of electricity with other countries. Investment in a variety of major energy infrastructure projects needs to be supported by infrastructure and facilities on shore and these sectors are expected to require land to enable activities over the plan period. Where possible companies and developers will be encouraged to work collaboratively and share infrastructure and facilities that serve other requirements to reduce any potential impacts.
- 3.57 The cumulative impact of hosting a variety of major energy infrastructure facilities in the area is likely to have an impact on existing and future generations. To balance this impact a variety of local economic, environmental and community benefits will need to be delivered to ensure an overall positive balance of outcomes for the local communities and the District.
- 3.58 The timing of the Major Energy Infrastructure Projects across the District is not yet confirmed and the planning, construction, operation and decommissioning of projects are likely to be beyond the Local Plan period. Therefore it is not possible to fully identify all the issues that may arise as a result of individual or cumulative projects for local communities and operators. As such, this will need to be kept under consideration alongside future reviews of the Local Plan.
- 3.59 A variety of local issues have been identified by the Council, as local planning authority, which need to be addressed in relation to Major Energy Infrastructure Projects. The Council will work with the local community, other local authorities, government agencies, service providers and operators to ensure the most successful outcomes are achieved. Table 3.6 below is intended to inform pre-application and early engagement discussions and provides an early view on potential constraints and opportunities across the District.

Table 3.6 – Themes relevant to the consideration of energy infrastructure proposals

Theme	Issue – what do we need to consider as East Suffolk on these aspects?
Community	<ul style="list-style-type: none"> ■ Engagement with the local community on the provision of infrastructure ■ Housing ■ Community facilities ■ Health facilities ■ Police facilities ■ Legacy and local community benefits for hosting major significant energy developments
Economic Opportunities	<ul style="list-style-type: none"> ■ Economic strategies recognise importance of the Suffolk Energy Coast ■ Need to maximise the economic growth and balance these against economic and social impacts ■ Creation of jobs during the construction, operational and decommissioning stages of all projects ■ Realisation of local economic opportunities and benefits ■ Associated demands on local supply chain and sectors which support projects ■ Minimise adverse impacts and effects on the tourist economy in east Suffolk and maximise benefits where possible
Emergency Planning	<ul style="list-style-type: none"> ■ Requirement for a co-ordinated Emergency Plan to be established across all organisations
Environment	<ul style="list-style-type: none"> ■ Sites located within the Area of Outstanding Natural Beauty and Heritage Coast ■ Impact on designated and protected landscapes and habitats. Projects to be supported by Habitat Regulations Assessment ■ Physical form, scale and appearance of buildings within the landscape ■ Impact on built, historic and natural environment arising from development, operation and decommissioning of projects ■ Potential impact on designated and non-designated heritage assets and archaeological assets in the areas surrounding Major Energy Infrastructure Projects ■ Risk of significant dust deposition and damage to vulnerable landscapes including Minsmere Nature Reserve ■ Impact on Suffolk Seascape ■ Impact of light pollution to nocturnal species and on the AONB ■ Appropriate landscaping of sites after the decommissioning phases ■ Habitat loss and noise disturbance for species ■ Effect of light and dust on nature conservation sites

Flood Risk Management and Coastal Change	<ul style="list-style-type: none"> ■ Potential sites for Major Energy Infrastructure Projects located on an active coast line ■ Coastal management, erosion, adaptation ■ Flood risk related to estuaries ■ Effect of climate change on the coastline and hydrological processes ■ Detrimental impact on the sea bed and coastal foreshore environment
Health	<ul style="list-style-type: none"> ■ Construction and transportation noise impact on local communities ■ Long term loss of tranquil areas ■ Loss of large areas of countryside used for leisure and tourism ■ Negative impact on air quality
Housing and Accommodation	<ul style="list-style-type: none"> ■ Provision of campus style accommodation for construction workers ■ Influx of construction workers into the area and overwhelming the accommodation opportunities for local people and people visiting the area
Training and Education Opportunities	<ul style="list-style-type: none"> ■ Availability of skills in the local area ■ Upskilling of the local workforce through appropriate training programmes and education ■ Investment in training opportunities for the local workforce
Transport Network	<ul style="list-style-type: none"> ■ Local roads are not well suited to carrying the number or type of vehicle movements that will be necessary to enable construction and operation of Major Energy Infrastructure Projects ■ Agreement of dedicated routes with local community participation ■ Need for park and ride facilities to be created ■ Inadequate provision of laybys on the road network across Suffolk ■ Cumulative impact of other associated growth across and outside of Suffolk ■ Utilisation of existing rail networks

Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects

In its role either as determining authority for development under the Town and Country Planning Act, or as consultee on Nationally Significant Infrastructure Projects, the Council will take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning.

The Council will work in partnership with the scheme promoter, local communities, National Grid, Government, New Anglia Local Enterprise Partnership, service providers, public bodies and relevant local authorities to ensure significant local community benefits and an ongoing legacy of the development is achieved as part of any Major Infrastructure Projects as outlined in Table 3.6.

Proposals for Major Infrastructure Projects across the District and the need to mitigate the impacts arising from these will be considered against the following policy requirements:

- a) Relevant Neighbourhood Plan policies, strategies and visions;
- b) Appropriate packages of local community benefit to be provided by the developer to offset and compensate the burden and disturbance experienced by the local community for hosting major infrastructure projects;
- c) Community safety and cohesion impacts;
- d) Requirement for a robust Environmental Impact Assessment
- e) Requirement for a robust Habitats Regulations Assessment;
- f) Requirement for robust assessment of the potential impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty;
- g) Appropriate flood and erosion defences, including the effects of climate change are incorporated into the project to protect the site during the construction, operational and decommissioning stages;
- h) Appropriate road and highway measures are introduced (including diversion routes) for construction, operational and commercial traffic to reduce the pressure on the local communities;
- i) The development and associated infrastructure proposals are to deliver positive outcomes for the local community and surrounding environment;
- j) Economic and community benefits where feasible are maximised through agreement of strategies in relation to employment, education and training opportunities for the local community;
- k) Measures to ensure the successful decommissioning and restoration of the site through appropriate landscaping is delivered to minimise and mitigate the environmental and social harm caused during operational stages of projects;
- l) Cumulative impacts of projects are taken into account and do not cause significant adverse impacts; and
- m) Appropriate monitoring measures during construction, operating and decommissioning phases to ensure mitigation measures remain relevant and effective.

Infrastructure

- 3.60 The provision of new and improved infrastructure is essential to ensure the growth planned in the District is sustainable. Infrastructure includes a wide range of facilities and services including schools, medical facilities, police facilities, community facilities, open space, public rights of way, roads, railways, cycle paths and flood defences.
- 3.61 The Council has undertaken evidence to support the Local Plan, including:
- Economic Area Needs Assessment (2017) - identifies forecasted economic growth across the District and any ancillary infrastructure that may be required to facilitate such growth.
 - Economic Area Sector Needs Assessment (2017) – identifies the specific needs of economic sectors across the District.
 - Retail & Leisure Study (2017) - assesses the retail and leisure need across the District, identifying projected retail and leisure infrastructure requirements going forward.
 - Level 1 Strategic Flood Risk Assessment (2018) - indicates areas of the District where flood defence infrastructure may be required based on allocated development.
 - Leisure Strategy – the Council’s Leisure Strategy (2014) and supporting assessments identify the needs for open space and built leisure facilities across the District.
 - Transport modelling – analyses the effects of proposed growth on the transport network and identifies areas of the network where transport mitigation measures may be needed to accommodate growth.
 - Whole Plan Viability – assesses the policies and proposals within the Local Plan to ensure that the plan is deliverable over the plan period.
 - Water Cycle Study – considers the capacity of the water supply and treatment network in relation to potential growth..
 - Habitats Regulation Assessment – assesses the impacts of the plan in relation to potential harm to the integrity of European protected sites, under the European Habitats Directive, and identifies the needs for Suitable Alternative Natural Greenspace where necessary.
- 3.62 The Council has worked closely with Suffolk County Council and other infrastructure providers to ascertain infrastructure requirements related to growth planned in the Local Plan. This engagement will continue throughout the production of the Plan. Over the plan period, the Council will continue to update its evidence base and where necessary engage with service providers, funding partners and the Government to ensure that infrastructure projects are delivered in a timely manner to the benefit of the District, the county of Suffolk and the rest of the country.
- 3.63 Appendix B of this Plan provides a summary of the infrastructure needed in the District and how and when it is expected to be delivered to support growth.
- 3.64 All new development has a responsibility to contribute towards the cost of new infrastructure. Infrastructure is often funded by developers either through section 106 planning obligations or the Community Infrastructure Levy. Section 106 planning obligations are bespoke agreements made between the Council and the developer where the developer either delivers new infrastructure or contributes

money to fund infrastructure to meet the need that development generates. The Community Infrastructure Levy is a standard per sqm charge currently on housing and convenience retail development which the Council pools together to deliver necessary infrastructure.

- 3.65 Suffolk Coastal has had a Community Infrastructure Levy in place since July 2015, and this is currently the main way in which the Council collects funds from development. The rates of the Levy are set out in the Council's Charging Schedule. The Council intends to retain the Levy for most infrastructure funding. The Council will however, need to review the Levy, particularly with respect to the larger sites allocated in the Local Plan. This is because these sites will have on-site infrastructure which may be more effectively secured through section 106 planning obligations.
- 3.66 Policy SCLP3.5 sets out the strategic approach to infrastructure delivery across the District. The policy seeks to ensure that all new developments will be well supported by new and improved infrastructure.
- 3.67 Most needs generated by new development will necessitate improvements to existing infrastructure rather than completely new provision. Therefore, most infrastructure provision will take place outside of development sites. This infrastructure will be funded by the Community Infrastructure Levy and other sources of funding such as the Clinical Commissioning Group
- 3.68 Opportunities may arise for the provision of open space on site as part of new housing sites. This will be assessed on a case by case basis. The provision of new open space on site increases the opportunities and accessibility for play, physical activity and recreation which contributes significantly towards the health and well-being of the population. This will be secured through planning conditions and/or section 106 planning obligations. Provision of open space can also help to mitigate impacts of recreational pressure on protected environments. The necessary infrastructure requirements should form part of the Habitats Regulations Assessment where one is required, and information will be required to be submitted to demonstrate that the infrastructure provision will not impact upon European protected sites.
- 3.69 Other on-site infrastructure is only likely to be necessary as part of much larger developments where a new primary school or community centre for example may be needed. However, there are specific local needs where smaller developments can enable the delivery of infrastructure that satisfies local needs on site. On-site infrastructure will generally be secured through section 106 planning obligations. The development of a new leisure centre for Felixstowe is central to the Local Plan strategy for the town, and will be delivered as part of the North Felixstowe Garden Neighbourhood.
- 3.70 Effective telecommunications, including broadband and mobile phone signals are essential for economic development and to support communities. However, coverage remains poor in some areas, particularly outside of the towns. Policy SCLP8.4 is supportive of its facilitation where necessary and appropriately designed.

Policy SCLP3.5 Infrastructure Provision

The Council will work with partners including, Suffolk County Council, Parish and Town Councils, Suffolk Constabulary, Highways England, Environment Agency, Anglian Water, Essex and Suffolk Water, UK Power Networks and the Ipswich and East Suffolk Clinical Commissioning Group to ensure that the growth over the plan period is supported by necessary infrastructure in a timely manner.

Developers must consider the infrastructure requirements needed to support and service the proposed development. All development will be expected to contribute towards infrastructure provision to meet the needs generated.

Off-site infrastructure will generally be funded by the Community Infrastructure Levy. On-site infrastructure will generally be secured and funded through section 106 planning obligations.

Development will be expected to contribute to the delivery and enhancement of infrastructure which encourages active lifestyles and healthy communities, through on site provision where appropriate to the scale and nature of development and through CIL contributions. Open space should be provided on new residential development sites to contribute to the provision of open space and recreational facilities to meet identified needs, in accordance with Policy SCLP8.2.

In locations where there is inadequate capacity within local catchment schools development should contribute to the expansion or other measures to increase places available at the school. Where new primary schools are provided these should be in locations which are well located in relation to the catchments they will serve, and which maximise opportunities for walking and cycling to school. Development adjacent to existing schools should not compromise the ability of schools to expand to an appropriate size in the future.

Development will not be permitted where it would have a significant effect on the capacity of existing water infrastructure and follow the principles of Holistic Water Management. Specifically, developers should provide evidence to ensure there is capacity in the water recycling centre and the wastewater network in time to serve the development. Where there is no capacity in the water recycling centre, development may need to be phased in order to allow improvement works to take place. The agreed improvements should be in place before occupation of proposed dwellings in order to avoid a breach of environmental legislations.

Development should not be permitted where the electricity supply network cannot accommodate it. Particular regard should be had to large scale employment sites, which are regarded as particularly energy intensive development. The Council will work with UK Power Networks to ensure that development proposed in this Local Plan does not conflict with the electricity supply network.

The Council will work with the digital infrastructure industry to maximise access to super-fast broadband, wireless hotspots and improved mobile signals for all residents and businesses. All new developments must provide the most viable high-speed broadband connection. Infrastructure relating to new

developments should be designed so as not to impede or obstruct connection to antennae or masts in the local vicinity. Early engagement with the relevant digital infrastructure provider should be undertaken to avoid such a scenario.

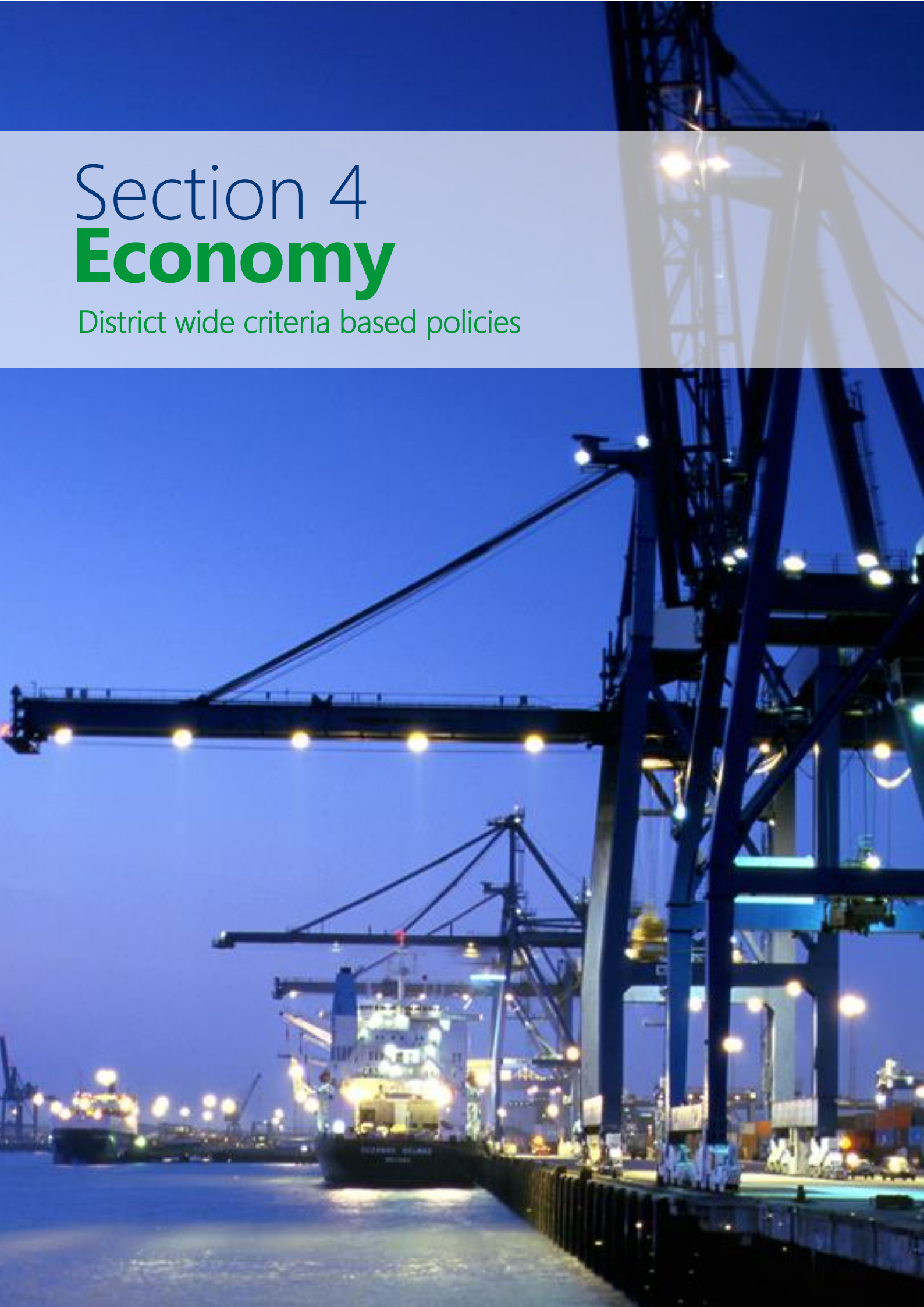
To support the provision of waste management infrastructure, where the size of the development allows for it bring sites should be included in the design and layout of developments to encourage recycling measures and to reduce the demand on Household Waste Recycling Centres.

Enabling Development

- 3.71 The concept of enabling development, whereby an exception to planning policy is permitted in order to allow for development that will provide sufficient public benefit, is one supported by the Council where appropriate. Across the District, a number of successful examples have been delivered through partnerships between landowners, service providers, local communities and the Council.
- 3.72 The District Council consider that enabling development could be required in a number of circumstances such in the conservation of a heritage asset, enhancement of sports facilities, coastal defence and flood adaptation measures where necessary. The exceptional individual circumstances where enabling development may be supported by the Council in exceptional circumstances needs to be justified, transparent and deliverable as a comprehensive package, with clear community benefits.
- 3.73 Over the plan period the public benefits associated with enabling development are expected to change and the Council will keep this under review through regular monitoring. If considered necessary, the Council may introduce a Supplementary Planning Document to provide further detail and justification in respect of enabling development.

Section 4 **Economy**

District wide criteria based policies



4 Economy

- 4.1 Suffolk Coastal is a unique District which makes a significant contribution to regional, national and international economies. This includes the presence of the Port of Felixstowe, Sizewell Nuclear Power Station and BT Adastral Park. The Local Plan supports these major economic drivers. It also supports complementary and broader business growth and enterprise across the district including the changing rural, agricultural and logistics economies.
- 4.2 The Government's 2017 Industrial Strategy places emphasis on supporting businesses to create better, higher paid employment and self-employment throughout the United Kingdom with investment in the skills, industries and infrastructure of the future. The Industrial Strategy seeks to ensure that every part of the country realises its full potential. The New Anglia Local Enterprise Partnership has an ambitious desire to drive business growth and productivity and build the skills to enable the economies of Norfolk and Suffolk to prosper, with a high performing, productive economy. The Local Plan has a key role in the implementation of the economic visions to enable Suffolk Coastal to realise its potential.
- 4.3 The East Suffolk Economic Growth Plan 2018-23 sets out a vision to *'focus on building business confidence and with it, both the capacity and ambition of our businesses to invest and grow.'* The Local Plan is a key contributor to this vision through the identification of appropriate land, premises and opportunities for economic growth.
- 4.4 Evidence prepared identifies that between 2001 and 2016, employment grew by 13.4% in Suffolk Coastal and the District is expected to see an increase in the number of jobs over the Local Plan period to 2036³³. Suffolk Coastal has economic ambitions and the Local Plan sets out how the main economic drivers in the District can be supported, as well as providing the opportunities and conditions for small enterprises to start and flourish in the District and create better, higher paid employment
- 4.5 Creating opportunities for businesses to invest and grow over the plan period can facilitate and develop training opportunities such as apprenticeship schemes and enhance skills prospects for the local community. Through the creation of further training and development opportunities, the District can experience economic growth by increasing skills, productivity and better paid employment prospects as well as jobs growth.
- 4.6 Suffolk Coastal District is well placed to embrace economic changes and opportunities over the plan period by providing a range of employment areas in suitably accessible locations.
- 4.7 The District is home to a number of large scale strategic businesses such as the Port of Felixstowe, Sizewell Nuclear Power Station and BT Campus at Adastral Park and it is important that the Local Plan responds to their needs. Not only are these businesses large employers but they also have a positive impact on the

³³ Ipswich Economic Area Sector Needs Assessment, September 2017 (Lichfields)

supply chains and related commercial activities in both Suffolk Coastal and the neighbouring authorities of Babergh, Ipswich, Mid Suffolk and Waveney as well the national and international economies.

- 4.8 The local economy is also diverse, made up of many small and medium enterprises that collectively provide a variety of economic opportunities, jobs and services. Planning policies reflect that over the Local Plan period new businesses and business sectors will emerge, as experienced in recent years, with the emergence of creative businesses and film technologies at locations like Rendlesham which has boosted the number of enterprises in Suffolk Coastal.
- 4.9 The mixture of large scale strategic businesses alongside small and medium enterprises reflects the economic potential across the District. The Local Plan needs to ensure that the economy is able to prosper and grow with a combination of suitable sites for serviced employment land and supporting infrastructure.

Existing Employment Areas

- 4.10 To support the District's economy and realise the economic ambitions for the area as outlined in the Economic Strategy for Norfolk and Suffolk and the East Suffolk Economic Growth Plan, the Local Plan needs to identify and preserve a range of employment sites to achieve these ambitions. Previous Local Plans made a distinction between strategic and general employment areas. In reality this has made little difference to the development taking place so this Local Plan based on consultation responses simplifies the approach and uses the term Employment Areas for all sites. This approach should continue to create the conditions to facilitate business opportunities for investment, expansion and adaptation on a variety of sites across the District to deliver the economic vision for the District.
- 4.11 To ensure this happens over the plan period, it is therefore essential that the Local Plan ensures a flexible supply of land for a variety of employment sectors, targeted at the needs of businesses operating across the District including the delivery of start up units. For example, Port related operations in locations well related to the Port of Felixstowe or film and creative industries emerging at Rendlesham.
- 4.12 Area specific policies for Existing Employment Areas are outlined in Neighbourhood Plans and Chapter 12 of the Local Plan and these secure employment development on a range of established sites and premises. Employment Area policies are found at:
- Policy SCLP12.7: Port of Felixstowe
 - Policy SCLP12.8: Land at Bridge Road, Felixstowe
 - Policy SCLP12.9: Land at Carr Road/Langer Road, Felixstowe
 - Policy SCLP12.10: Land at Haven Exchange, Felixstowe
 - Policy SCLP12.36: Former airfield Debach
 - Policy SCLP12.37: Carlton Park, Main Road, Kelsale cum Carlton
 - Policy SCLP12.38: Levington Park, Levington
 - Policy SCLP12.39: Land at Silverlace Green (former airfield) Parham
 - Policy SCLP12.40: Former airfield Parham

- Policy SCLP12.41: Bentwaters Park, Rendlesham
- Policy SCLP12.42: Riverside Industrial Estate, Border Cot Lane, Wickham Market

- 4.13 A variety of employment areas are identified in the Local Plan and Neighbourhood Plans to cater for the needs of all sectors in the District. Some of these are established sites with buildings and infrastructure already in place and covered by existing planning permissions or established lawful uses. The Local Plan allocates new employment areas close to the A14 at Felixstowe and at the Seven Hills junctions of the A12 and A14, as well as expecting some employment development to come forward alongside the development of the garden neighbourhoods at Saxmundham and Felixstowe. In other locations, the policies support new employment development within Settlement Boundaries, along with appropriate development in the countryside, such as through conversions and farm diversification schemes.
- 4.14 Economic growth related to the logistics sector and the Port of Felixstowe can provide opportunities for strategic scale development. It is vitally important that the Local Plan can appropriately meet the current needs of the logistics sector and have the flexibility to meet future needs. In recent years the changing nature of customer demands such as online shopping and next day delivery expectations requires new technologies and patterns of distribution to meet the needs of these sectors operating across the District.
- 4.15 Policy SCLP4.1 also allows for quasi-retail uses such as car showrooms, tyre and exhaust centres and builders merchants on the main road frontages of Employment Areas. These uses are often not suitable in town centre locations due to their size and characteristics. If located within existing Employment Areas, conflicts between industrial traffic and general traffic can occur. Therefore a more appropriate location is on the main road frontages of these areas. These uses can sometimes improve the appearance of industrial areas, and by allowing them on existing employment areas, it provides a suitable developed location for these uses which are difficult to accommodate in town centres.

Policy SCLP4.1: Existing Employment Areas

Existing Employment Areas are identified in Area Specific Strategy Policies in Chapter 12 of the Local Plan and on the Policies Map.

New development for employment uses which takes place during the plan period (including sites currently with consent for employment use) will be treated as Existing Employment Areas for the purposes of this Policy and Policies SCLP4.2, SCLP4.3 and SCLP4.4.

Within Existing Employment Areas, premises currently in B1, B2 and B8 use will be protected from change of use and redevelopment to other uses. Exceptionally, quasi-retail uses (not falling within use class A1) may be permitted on the main road frontages of Employment Areas which have good access to a range of transport options. Such development should not be detrimental to the efficient and effective use of the remainder of the Employment Area.

Outside of the Existing Employment Areas, the redevelopment or change of use of existing employment premises will be considered under Policy SCLP4.4

Neighbourhood Plans may identify additional premises or clusters of premises outside of Existing Employment Areas within use classes B1, B2 and B8 for protection from redevelopment or change of use if local evidence supports it.

New Employment Development

- 4.16 Across the District a number of established Employment Areas provide land and buildings for a variety of economic opportunities as detailed in Policy SCLP4.1.
- 4.17 Through the allocation of new land for employment development, the Local Plan can provide opportunities for new local and inward investment to come forward over the plan period which will improve the economic vibrancy and enterprise across the District. The creation of well situated sites for new employment development will broaden the range of sites available and offer flexibility to potential occupiers and users which is welcomed by the Council. In appropriate locations opportunities to utilise the main road frontage of sites ensures that a high quality design is brought forward which is in keeping with the surrounding area and raises the economic potential across the area.
- 4.18 Ensuring a range of appropriate sites to facilitate business start ups and incubator units as well as sites for established businesses to grow into, enables commercial activity across the District to be free from barriers to business and supports productivity and prosperity across the District. Making provision for new employment development can encourage new technologies to be introduced and for industries to cluster by sectors which emerge over the plan period.
- 4.19 New employment development will also provide opportunities to be realised for all sectors as and when the economic conditions are right. Another key benefit to the provision of new employment areas is that it will provide opportunities to renew the existing stock of business premises which in some parts of the District are not fit for purpose or are coming to the end of their useable life.

Without the allocation of new land, there is very limited flexibility to renew and regenerate the existing sites.

- 4.20 Where businesses within Existing Employment Areas wish to expand onto adjacent land outside of the Existing Employment Area or adjacent to these, Policy SCLP4.2 allows for this. For new employment development the policy requires it to be demonstrated that there is an additional need for the employment development over and above the needs identified in the Local Plan, or alternatively there is no suitable land within Existing Employment Areas, existing employment allocations or within settlement boundaries.
- 4.21 In demonstrating an additional need, evidence submitted with the planning application should provide information on latest economic forecasts or bespoke forecasts for the relevant sector. The evidence of need should also justify the locational requirements for the development and also review of land and premises available together with the specific locational requirements of the proposed development. The review of land and premises availability should assess whether the alternative land or premises are suitable (with regard to specific locational requirements), available (the landowner is willing to sell at market value) and achievable (whether the alternative land is viable to develop).
- 4.22 Chapter 12 of the Local Plan identifies a number of sites for New Employment Development. Each of these have site specific policies and are outlined in:
- Policy SCLP12.3 North Felixstowe Garden Neighbourhood (as part of the masterplanned approach),
 - SCLP12.19 Land at Felixstowe Road,
 - SCLP12.26 South Saxmundham Garden Neighbourhood (as part of the masterplanned approach),
 - SCLP12.30 Land at Innocence Farm.

Policy SCLP4.2: New Employment Development

The Council will support the delivery of new employment development to provide greater choice and economic opportunities in suitably located areas across the District. Other uses which are functionally related to the economic activity on the site and the local area will also be supported.

Proposals for new employment development falling within use classes B1, B2 and B8 outside of Existing Employment Areas but within Settlement Boundaries will be supported where these do not have an adverse impact on the surrounding land use and local highway network.

Proposals for new employment development falling within use classes B1, B2 and B8 on land outside of Settlement Boundaries will be permitted where a need for additional employment development has been demonstrated or it can be demonstrated that there is no sequentially preferable land available adjacent to Existing Employment Areas, within Existing Employment Areas or within Settlement Boundaries and:

- It would not have an adverse impact on surrounding land use;
- It would not have a significant adverse impact on the Suffolk Coast and Heaths AONB or its setting, Heritage Assets or internationally designated biodiversity sites;

Expansion and Intensification of Employment Sites

- 4.23 The Council acknowledges that over the plan period, it may be necessary for some existing employment premises to require expansion and or intensification of their operations. Across the District it may not be suitable and practical to support the economic growth aspirations and this policy provides the criteria against which proposals to expand, alter or make productivity enhancements to existing employment premises will be supported.
- 4.24 The East Suffolk Economic Growth Strategy seeks to support all businesses across the District to ensure a successful and prosperous economy. The successful delivery of this strategy will be assisted by a positive policy which encourages sustainable economic growth and allows for the expansion, intensification or adaptation of existing premises. Opportunities for sustainable growth and productivity may also be realised by the co-location of business activities to realise synergies that may further boost local prosperity. In Suffolk Coastal this could include opportunities that may come forward in relation to high technology business and storage and distribution operations which operate at a variety of scales and in suitable accessible locations.
- 4.25 In some instances enterprises will have outgrown their established premises and future options may include expansion of the current site or relocation to another. These enterprises may be either on allocated Employment Areas or on individual sites within an existing and lawful employment use.
- 4.26 Some employment sites by their nature have a greater impact on their local environment and the economic operations anticipated to take place on a site is an important consideration in respect of expansion and intensification of premises. Applicants will be required to demonstrate that their proposals for expansion or intensification of employment premises do not have a material harm on the environment and that any adverse impacts can be successfully mitigated.

- 4.27 Where employment premises are located close to residential areas and proposals would have a detrimental impact on residential amenity by virtue of noise, odour or dust for example, the Council will seek to assist in identifying alternative suitable location(s) within Suffolk Coastal for continued economic activity.

Policy SCLP4.3: Expansion and Intensification of Employment Sites

Proposals to expand, alter or make productivity enhancements to existing employment premises will be permitted unless:

- a) The scale of development would cause a severe impact on the highway network; or
- b) There will be a material harm to the environmental sustainability in the area; or
- c) The proposed use is not compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity concerns; or
- d) There is harm to the amenity and living conditions of local residents and businesses relating to matters of noise, vibration, dust and light; and
- e) Potential adverse impacts can not be successfully mitigated.

Where expansion or intensification of existing premises falling within use classes B1, B2 and B8 cannot reasonably take place within Existing Employment Areas, development will be permitted on adjacent land outside of Settlement Boundaries providing it does not have an impact on surrounding land uses.

Protection of Employment Premises

- 4.28 Over the plan period, it is anticipated that in exceptional circumstances employment premises will be lost, despite the strong and prosperous local economy. However, it is important to retain these premises to support the economic prosperity of the District. Employment premises provide a contribution to the local economy and the majority of existing operations remain suitable and should be protected for economic development and regeneration.
- 4.29 When employment uses cease to operate from a site, the land and buildings often come under pressure for redevelopment. The Local Plan acknowledges the importance of a vibrant and successful local economy and therefore takes a positive approach to the protection of employment premises.
- 4.30 In April 2016 the Council published the Commercial Property Marketing Best Practice Guide. The document focuses on the information that the Council would expect in support of planning applications for the change of use of commercial premises and sites. The principles of this guide have been included within Appendix D.

Policy SCLP4.4: Protection of Employment Premises

Employment premises across the District will be protected for their established B class uses unless:

- a) Marketing evidence is provided which demonstrates that the premises have been marketed for a sustained period of 12 months in accordance with the requirements set out in Appendix D;
- b) There would be substantial planning benefit in permitting alternative uses; and
- c) The proposed use is compatible with the surrounding uses in terms of car parking, access, noise, odour and other amenity concerns.

Proposals for loss of employment premises to be used for residential use will only be permitted in exceptional circumstances where there is no current or long term need for the premises and is within the defined Settlement Boundary.

Economic Development in Rural Areas

- 4.31 Economic activity also takes place outside of the towns and the identified Employment Areas in rural locations. It is important that the Local Plan continues to maximise the potential of these activities to support the rural economy and provide a valuable source of jobs locally.
- 4.32 National Planning Policy seeks to support a prosperous rural economy through the sustainable growth and expansion of businesses in the rural areas. Across the District there are a large number of farms and rural diversification schemes on isolated sites which provide employment opportunities or which through investment, could provide new economic opportunities in the form of traditional B class industries, cultural or tourism activities. Rural Estates in the District present particular opportunities related to their long term management and diverse economic functions.
- 4.33 Public consultation responses have highlighted the need to improve digital services such as mobile and broadband signal to support business activity in the rural areas. The Local Plan supports this need and encourages the increased provision of infrastructure to ensure greater coverage and reliability of this type of utility as outlined in Policy SCLP8.4.
- 4.34 It is acknowledged that employment opportunities in the rural areas are generally only accessible via motor vehicle and public transport opportunities are limited. In such locations any development needs to be sensitive to the surrounding landscape and not have an unacceptable impact (such as high volumes of HGV traffic) on the local road network including routes to the main road network. However the benefit of retaining these types of sites for economic activity and the local employment opportunities they provide in the majority of cases is considered to outweigh the negatives that arise from location and access arrangements.

- 4.35 Within the Suffolk Coast and Heaths AONB, the Council will still support economic development in rural areas, but will strive to ensure that higher levels of design and appropriate screening are delivered to reflect their location within the protected landscape.

Policy SCLP4.5: Economic Development in Rural Areas

Proposals that grow and diversify the rural economy, particularly where this will secure employment locally, enable agricultural diversification and other land based rural businesses, will be supported.

Proposals will be supported where:

- a) They accord with the vision of any relevant Neighbourhood Plan in the area;
- b) The scale of the enterprises accord with the Settlement Hierarchy;
- c) The design and construction do not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment;
- d) Small scale agricultural diversification schemes make good use of previously developed land;
- e) The proposed use is compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity concerns; and
- f) The proposal delivers additional community, cultural or tourism benefits.

Conversion and Replacement of Rural Buildings for Employment Use

- 4.36 National Planning Policy supports a prosperous rural economy, sustainable rural tourism and retention and development of accessible local services. This includes the sustainable growth and expansion of all types of business through conversion of existing buildings and well-designed new buildings; development and diversification of agricultural and other land-based rural businesses. The Local Plan seeks to support and enhance the rural areas through enabling farm, forestry and other land-based businesses to build the new and replacement buildings and infrastructure they need to function efficiently. The identification of a variety of employment sites throughout the District ensures that the needs of local communities and their ability to realise economic potential comes forward over the plan period.
- 4.37 When buildings in the countryside are no longer required for their original purpose or become under-used, their re-use and conversion to appropriate uses for employment can represent a sustainable form of development. Buildings in the rural areas can provide opportunities to enhance local prosperity and support the move from lower paid to better paid employment.
- 4.38 Suffolk Coastal has a number of large traditional rural estates which, through co-ordinated land management, can have an impact on the landscape of the District. Over time, these estates have had a major impact on the variety of economic opportunities across the District and tend to have numerous rural buildings on their land. The management of these rural estates has an influence on the nature of the economic opportunities within the rural areas and, the conversion and replacement of the estate buildings

needs to be carefully considered, to ensure appropriate uses are retained and facilitated over the plan period.

- 4.39 Rural buildings in the countryside are often also heritage assets which are important to retain and bring back into use. Relevant proposals will also need to be considered carefully against the historic environment policies of the Local Plan as well as national planning policy on the conservation of heritage assets.

Policy SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use

The conversion of rural buildings to employment use will be permitted where:

- a) The business use is of a scale and character that is appropriate to its location in accordance with the Settlement Hierarchy;
- b) The proposal does not have an unacceptable impact on local roads, exploits opportunities to make the location more sustainable by walking, cycling or public transport and would not have an adverse effect on highway safety and the amenity of local residents;
- c) The proposal would not conflict with neighbouring uses; and
- d) The proposal is complementary to the setting of any historic or architecturally important buildings and reflects the form and character of the existing buildings.
- e) The design and construction do not have an adverse impact on the character of the surrounding landscape, the AONB and its setting, or harm the natural or historic environment.

The replacement of rural buildings with employment uses will be permitted where:

- f) The proposal is of a similar size and scale to the building that is being replaced;
- g) The proposal does not have an unacceptable impact on local roads and exploits opportunities to make the location more sustainable by walking, cycling or public transport and would not have an adverse effect on highway safety and the amenity of local residents;
- h) The proposal would not conflict with neighbouring uses;
- i) The proposal is complementary to the setting of any historic or architecturally important buildings and reflects the form and character of the existing buildings; and
- j) Proposals would not result in a significant adverse environmental impact.
- k) The proposal enables farm, forestry and other land-based businesses to build the buildings and infrastructure they need to function efficiently.

Farm Diversification

- 4.40 Agriculture and farming are an important part of the District's economy. Traditionally farming provided significant employment opportunities but over recent years the numbers employed has reduced due to increased costs and technological advances as well as the agglomeration of farmsteads. However, farming

remains a key economic sector in the District and the Local Plan seeks to ensure that appropriate farm diversification schemes can help sustain agricultural operations for the wider benefit.

- 4.41 Examples of farm diversification across the District include the introduction of farm shops, post offices, tourism activities and education centres which all provide a valuable contribution to the original farm as well as the wider economy and community. In exceptional circumstances farm diversification can include conversion of buildings to permanent residential use. However the Local Plan has a role to ensure that farm diversification does not have an adverse impact on nearby villages or the local road network through traffic generation and parking arrangements in rural area.
- 4.42 As a popular tourist area, many farms have converted buildings to provide tourist accommodation. This is an issue which the Local Plan needs to address to continue to ensure that only appropriate farm diversification schemes involve conversion to tourism accommodation.
- 4.43 It is anticipated that more diversification proposals will come forward over the plan period and it is essential that these are carefully considered to sustain the existing farm activities and do not have a detrimental impact on the wider community. Applicants will be expected to provide information to demonstrate how the diversification will support the vitality of the existing farm. Information required will need to clearly justify the additional benefits that will be brought about through the diversification proposals.

Policy SCLP4.7: Farm Diversification

Proposals for farm diversification schemes to support the continued viability of the farm will be supported where:

- a) Farming activities remain the predominate use on the site;
- b) The proposal is of a use and scale that relates well to the setting of the existing farm;
- c) The proposal does not compromise highway safety to the local road network or free flow of traffic and there is adequate off road parking;
- d) The proposals do not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment;
- e) The diversification is supported by detailed information and justification that demonstrates that the proposals will contribute to the viability of the farm as a whole and its continued operation;
- f) The diversification retains or provides additional employment for the local community;
- g) The proposal supports the retention or creation of jobs associated with the farm;
- h) The conversion of existing farm buildings is undertaken sympathetically to the traditional character of the farm; and
- i) The proposal does not involve permanent residential uses.

Support will be given to farm shops which provide continued employment opportunities and sell a range of produce associated with the farm and the local area. Proposals should be of a scale which is not detrimental to the existing shopping facilities provided in nearby towns and villages.

Town Centres and Retail

- 4.44 The distinctiveness, historic character and accessibility of resort and market towns in Suffolk Coastal presents an attractive setting for town centres as concentrations for shopping, leisure, employment, business, social and cultural activities. This also makes them popular with tourists and visitors from nearby areas within and beyond Suffolk Coastal. The towns have varying tourism functions that contribute to the scale of the retail offer and the presence of many specialist and artisan shops. The blend of different types of shops and leisure facilities in town centres is important to the experience of visitors and local quality of life.
- 4.45 Tourism and cultural aspects of town centres in Suffolk Coastal and growing leisure activities present opportunities for more inclusive day time and evening time economies, social interaction and the appeal of town centres as places to live. Town centres in the District provide residential development opportunities on appropriate sites that play an important role in ensuring their vitality. Opportunities to encourage residential developments targeted at the provision of smaller homes and specialist housing will be supported in appropriate locations (such as on upper floors) where they do not undermine the main town centre use.

- 4.46 Town centres are the most accessible places in Suffolk Coastal for shopping and commercial leisure. Commercial leisure is the business of entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
- 4.47 In common with national trends, food shopping growth has moved towards discounters and smaller store formats of large supermarket chains catering for more frequent, smaller shopping trips. High levels of car ownership and use in the District and consumer choice mean people are increasingly prepared to travel further, in order to access a greater choice of shops and leisure facilities available in larger centres.
- 4.48 Government policy and up-to-date evidence highlight that it is important that town centres offer a shopping and social experience that is different to out of town or online shopping. This reflects a broader change in the economy, population, e-commerce and how town centres are used and the way people spend their money and leisure time. More locally, this is in addition to the effects of a significant presence of out of town retail at Martlesham in the District and nearby Ipswich.
- 4.49 A balanced mix of town centre shops and services is important to ensure a strong offer to meet the needs of residents of the towns and their surrounding rural areas. This includes well situated units suitable for modern operator requirements on main routes around and through town centres.
- 4.50 Local and regional projects and strategies (e.g. East Suffolk Business Plan) are consistent in supporting local prosperity, community and cultural life and access to facilities and opportunities.

New Retail and Commercial Leisure Development

- 4.51 Opportunities for new retail development can enhance customer choice, convenience and shopping experience but can inevitably compete with existing shops and impact on town centres. Evidence forecasts based on population change and household spending patterns (taking into account online shopping and new forms of retailing) show capacity to grow the amount of shopping floorspace in Suffolk Coastal to be very modest. In line with national trends, capacity for retail growth is concentrated on the large urban centres outside the District. Retail capacity for the towns in the District and for the area between Ipswich, Woodbridge and Felixstowe is identified in the Ipswich and Suffolk Coastal Retail and Commercial Leisure Town Centre Study (2017).
- 4.52 In the context of rapid change in the retail sector, the National Planning Policy Framework requires Local Plans to meet future shopping floorspace forecasts for 10 years rather than full plan period capacity figures. Changing consumer demands related to new technologies are driving comprehensive change from traditional retail supply chain processes. In land use terms this is seen in storage and distribution development (planning use class B8) rather than significant retail floorspace growth. However, retail floorspace may incorporate changing showroom, customer experience, and collection and return facilities and functions. There may be further implications for retail floorspace and development through the integration of the storage and distribution and goods inventories with the visibility of goods for sale by the different methods of shopping available to consumers.

- 4.53 Estimated retail floorspace growth in Suffolk Coastal is mostly for goods which are purchased less often (comparison goods). Comparison goods retail growth for the plan period up to 2036 is up to 5,800m² in Woodbridge, up to 3,400m² in Felixstowe and up to 3,500m² shared between Saxmundham, Aldeburgh, Framlingham and Leiston. In terms of retail for groceries and other goods purchased regularly like toiletries (convenience goods) very modest estimates of floorspace growth for the District are 400m² in Woodbridge, 0m² in Felixstowe and up to 1,600m² between Saxmundham, Aldeburgh, Framlingham and Leiston. Garden neighbourhoods at Saxmundham and Felixstowe present opportunities for some new small scale convenience retail provision.
- 4.54 Available evidence indicates that there are opportunities for growth of commercial leisure uses including eating and drinking venues. There are also commercial leisure growth opportunities in relation to hotel accommodation and health and fitness provision equivalent to 268 hotel rooms and between 5 and 7 additional gyms in the District over the plan period. Integrated use of premises may represent use of floorspace in multiple planning use classes. For example health and beauty facilities together with a hotel. Integrated use of town centre ground floor space may also combine some commercial leisure or community uses with retail to enhance the retail experience and help sustain the retail use. Suffolk Coastal's town centres function within a wider network of retail centres that includes the established retail destination of the retail park and superstore in Martlesham, the neighbouring county town of Ipswich as well as historic cities, towns and shopping centres outside the District.
- 4.55 The Council recognises that each of the town centres within the District is different, not least in terms of its particular shopping character, tourism offer and relationships with nearby places. This reflects links and relationships between shopping destinations offering choice and differentiation for shoppers' requirements, mobility and lifestyles. For example, Woodbridge is close to Ipswich and Martlesham and has a larger existing retail offer than the other market towns.
- 4.56 Evidence reveals significant shopping relationships between Woodbridge, Felixstowe, Martlesham and Ipswich. It is therefore important to consider provision for accessible retail and commercial leisure in the south of Suffolk Coastal in the context of the neighbouring county town of Ipswich.
- 4.57 National planning policy sets out the principles of the sequential test. Proposals for main town centre uses, which includes retail and commercial leisure uses, should be located in town centres. If no suitable sites are available then edge of centre locations should be considered, and if no suitable town centre or edge of centre locations are available then out of centre may be considered. A retail impact assessment will need to be submitted alongside any applications outside of town centres which exceed the thresholds set out in Policy SCLP4.9, in accordance with the National Planning Policy Framework and the guidance set out in the Planning Practice Guidance.
- 4.58 A retail hierarchy for the District sets out the provision of facilities and scales of shopping development that can be expected of a centre. This recognises retail relationships between centres in the hierarchy, especially in the south of the District between Woodbridge, Felixstowe, the out-of-centre retail destination at Martlesham and the neighbouring county town of Ipswich.

- 4.59 An out of centre location is one that is neither in, nor on the edge of a centre, but is within the urban area. As an out-of-centre location, Martlesham Retail Park is not sequentially preferable for new retail and commercial leisure so it is therefore not included in the retail hierarchy.
- 4.60 Small parades of shops serving only the immediate neighbourhood are not classed as centres in national policy, and therefore are not designated. These include corner shops and other very small parades serving the immediate area.

Policy SCLP4.8: New Retail and Commercial Leisure Development

Priority will be given to concentrating retail and commercial leisure development within Town Centres in the Suffolk Coastal Retail Hierarchy and the neighbouring regional town centre of Ipswich. The retail hierarchy in Suffolk Coastal is:

- Level 1 – Town Centre – Felixstowe (resort town),
- Level 2 – Town Centres – Aldeburgh, Framlingham, Leiston, Saxmundham, Woodbridge (market towns),
- Level 3 – District Centres,
- Level 4 – Local Centres.

Retail and commercial leisure (falling within Use Classes A1, A2, A3, A4, A5, C1 and D2) will be permitted within Town Centre boundaries as defined on the Policies Maps. This will reinforce and reflect compact town centres in Suffolk Coastal.

Retail and commercial leisure development will be permitted on edge of centre sites, only where there are no suitable or available sites within a Town Centre. For retail developments, edge of centre is defined as within 300 metres of the Primary Shopping Area, as defined on the Policies Maps. For commercial leisure, edge of centre sites should be within 300 metres of the Town Centre.

Retail and commercial leisure development will only be permitted on out of centre sites where there are no suitable or available sites within a Town Centre or edge of centre location. Retail and commercial leisure development will only be permitted on out of centre sites where:

- a) The location is accessible by public transport and is accessible to pedestrian and cyclists;
- b) The site is well connected to a Town Centre, or links can be improved; and
- c) The site will not impact upon other neighbouring uses, in terms of traffic, parking and amenity issues.

Proposals for retail or commercial leisure uses outside of Town Centres will only be permitted where it can be demonstrated that there will be no significant adverse impact on centres in the retail hierarchy and the neighbouring regional town centre of Ipswich. This will be determined through an impact assessment which will be required for proposals greater in size than the thresholds set out below:

Settlement Centre	Floor Space Impact Threshold (gross)
Level 1 (Felixstowe)	750sqm
Level 2 (Woodbridge)	750sqm
Level 2 (Aldeburgh, Framlingham, Leiston, Saxmundham)	350sqm

The impact assessment will need to consider potential impact on all relevant centres (including those outside of the District) depending on the location, scale and nature of the proposal. The minimum gross floor space impact threshold to demonstrate impact on Ipswich Town Centre is 750sqm. The scope and

nature of an impact assessment will be determined at the time of a planning application. Proposals that would have a significant adverse impact on the vitality and viability of town centres will be refused.

Development in Town Centres

- 4.61 Development will improve and develop the town centres incrementally and organically to reflect their distinct historic character and functions having regard to their position in the retail hierarchy and relationships with other shopping and leisure destinations. The policy approach is to support centres in the hierarchy to consolidate and enhance their offer to local residents, surrounding rural areas and visitors.
- 4.62 The Local Plan designates Primary Shopping Areas, Primary Shopping Frontages, Secondary Shopping Frontages and Town Centre Boundaries. Primary frontages are where most shops are concentrated. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, professional services and businesses. The Council undertakes monitoring of town centres annually and the 2018 monitoring provides a baseline position for each town centre. Maintaining the high proportion of ground floor primary frontage units in retail use promotes customer choice and a healthy and appealing balance between retail and services in town centres across the District. Setting out this direct and comprehensible approach provides businesses and decision makers with clarity in the context of changing economic and social conditions faced by town centres.

Town Centre	Total Ground Floor Units in Primary Frontage (excluding residential)	No. of units in retail (A1) use	Percentage of retail (A1) units	No. of vacant units
Felixstowe	123	82	67%	9
Aldeburgh	58	37	64%	1
Framlingham	31	20	65%	1
Leiston	49	30	61%	3
Saxmundham	48	29	60%	5
Woodbridge	75	60	80%	1

- 4.63 The District is fortunate to have many historic shopfronts in the town centres, which are often within designated Conservation Areas. The Local Plan will seek to ensure these are protected to maintain distinct and individual town centres. In partnership with Historic England the Council will encourage the retention

and/or restoration of historic shop fronts through planning applications or specific interventions and projects in accordance with policies SCLP11.3, SCLP11.4 and SCLP11.5.

Policy SCLP4.9: Development in Town Centres

Town centres will improve and develop incrementally and organically to reflect their distinct historic character and functions having regard to their position in the retail hierarchy and relationships with other shopping and leisure destinations.

Town centres will develop in ways that support healthy lifestyles, social interaction, overnight stays, culture and the arts. Residential development targeted at the provision of smaller homes and specialist housing on appropriate sites within town centres will be supported where it does not undermine the main town centre use.

Within the Primary Shopping Areas as identified on the Policies Maps, the primarily retail function of these areas will be safeguarded. Non-A1 uses on the ground floor will be supported where they will help to sustain A1 uses and enhance the retail offer.

New retail uses (A1) will be directed to the Primary Shopping Frontage in the first instance. The majority of primary frontages will be in retail use at ground floor level. Proposals that reduce the high proportion of A1 uses and/or result in concentrations of non A1 use will be resisted.

The Secondary Shopping frontage, as defined on the Policies Map, will provide a mixture of town centre uses whilst retaining a proportion of A1 uses at ground floor level to ensure a balance and blend of shops and services is maintained.

Outside of the Primary and Secondary frontages the Council will take a flexible approach to future uses and redevelopment opportunities within the town centre which sustain and enhance the vitality and viability of the town.

Proposals for the redevelopment/change of use of existing units should give particular consideration to retaining and/or restoring historic shopfronts.

Town Centre Environments

- 4.65 All of the town centres are at least partly within designated Conservation Areas. Development should enhance and invest in historic environments and infrastructure including public seating, arts and cultural facilities. Development in the town centre should also provide enhancements for urban biodiversity where possible. This will help promote community interaction and healthy lifestyles. It is recognised that there may be opportunities or advantages for temporary use of historic buildings for buildings for a short and prescribed period of time especially whilst buildings are otherwise vacant.

4.66 There are particular opportunities to enhance pedestrian connectivity and legibility related to development and change within the town centres. This includes but is not limited to the following examples:

- Felixstowe – between town centre and seafront;
- Woodbridge - between town centre and riverside;
- Aldeburgh - between car parks and town centre;
- Framlingham - highways junctions (identified in the Neighbourhood Plan);
- Leiston - mixed use town centre opportunity site (identified in the Neighbourhood Plan);
- Saxmundham – between railway station and town centre;
- Martlesham – between retail units and employment areas.

Policy SCLP4.10: Town Centre Environments

Development will encourage people to spend more time, enjoy and participate in town centres. It will do this by:

- a) Supporting opportunities for social interaction;
- b) Ensuring safe pedestrian access to link up with and enhancing existing pavements, pedestrian spaces, routes and focal points;
- c) Improving access for cyclists, people with limited mobility and people with other disabilities;
- d) Enabling physical linkages so that pedestrians can move easily and safely between parts of the town centre; and
- e) Providing environmental improvements that make the most of historic environments and heritage features.;

The expansion of Shared Space and Dementia Friendly areas will be supported where proposals maintain active town centre frontages without compromising highway access, vehicular and pedestrian movements.

Retail and Commercial Leisure in Martlesham

4.67 Martlesham is a popular place to live offering a high quality of life³⁴ including good employment prospects with a significant presence of diverse business areas. Connected by an extensive network of public open spaces and cycle routes the area is a convenient location from which to access other parts of the District and surrounding area through a variety of transport opportunities. Martlesham and surrounding parishes have experienced economic and housing growth which places particular pressures on highways and local infrastructure.

³⁴ Royal Mail 2017 update of its 2015 study to find the most desirable places to live and work in England based on postcode.

- 4.68 The retail park at Martlesham has evolved sporadically into a number of large modern premises comprising retail floorspace selling mostly non-bulky goods. This includes clothing and footwear as well as groceries and toiletries. The Retail Park is not characterised by the wider role or function of a town centre. Capacity for its further expansion is dependent upon adjacent employment areas and impact on centres in the retail hierarchy as well as the vision outlined in the Martlesham Neighbourhood Plan.

Policy SCLP4.11: Retail and Commercial Leisure in Martlesham

Retail and leisure development will enable Martlesham to thrive and support community interaction and inclusivity.

Out of centre retail and commercial leisure uses at Martlesham will only be permitted where:

- a) There are no sites that are suitable or available to accommodate the nature and scale of the proposal in or on the edge of a centre in the Retail Hierarchy; and
- b) The principal type of retail provision would not have a significant adverse impact on centres in the retail hierarchy including, but not limited to, the Square in Martlesham Heath, Woodbridge, Felixstowe and the regional town centre of Ipswich. Where development is considered acceptable in terms of the town centre sequential and impact tests proposals, it should make a positive contribution towards improving:
 - i. Safe non-car circulation and pedestrian / highway conflicts;
 - ii. The physical and visual integration of out of centre retail and commercial leisure;
 - iii. Green infrastructure supporting healthy lifestyles and social interaction;
 - iv. Accessibility for persons with physical or mental disabilities including dementia friendly environments; and
 - v. Accessible local services.

The change of use of existing office, industrial and storage floorspace (use classes B1, B2 and B8) to retail or commercial leisure uses will be resisted. Such changes of use will only be permitted if the site is surplus to requirements for B1, B2 and B8 uses, as satisfactorily demonstrated by marketing in accordance with Appendix D.

District and Local Centres

- 4.69 A District Centre is a large group of shops anchored by a small supermarket, together with facilities, which collectively form a coherent area. They provide opportunity for local people to meet everyday needs without having to travel. Garden neighbourhoods identified at Felixstowe and Saxmundham present opportunities for new District Centres. Existing District Centres are defined on the Policies Map at:

- Cavendish Park, Felixstowe,
- High Road East, Felixstowe,
- Undercliff Road West, Felixstowe,
- Walton High Street, Felixstowe,
- Ropes Drive West, Kesgrave
- The Square, Martlesham Heath,
- Sycamore Drive, Rendlesham
- The Hill, Wickham Market

4.70 A Local Centre is the next level down in the retail hierarchy, offering a smaller range of facilities than those present in a District Centre. Nonetheless, they play an equally important role in meeting the day-to-day shopping needs for a community, particularly the less mobile and elderly. Local Centres typically feature a newsagent and/or small convenience store, along with various other small shops serving a small catchment. Existing Local Centres are defined on the Policies Map at:

- Bixley Farm, Rushmere St Andrew, and
- Saxmundham Road, Aldeburgh

4.71 Outside of District and Local Centres, small shops within communities play a vital role in serving the day to day needs for convenience goods for residents, and often also provide a focal point for the community.

Policy SCLP4.12: District and Local Centres and Local Shops

District Centres are defined on the Local Plan Policies Map. District Centres provide shops and some other local services to meet the needs of residents in the local area.

Local shopping opportunities and facilities within District Centres will be supported and safeguarded where possible. Proposals which seek to increase the shopping opportunities and facilities within District Centres will be supported where they complement the existing role of these areas and do not have a detrimental impact on the town centres across the District or on neighbouring residential amenity. Proposals for the redevelopment/change of use of existing retail units should give particular consideration to retaining and/or restoring historic shopfronts in accordance with other policies in the Local Plan.

Local Centres will provide a small range of shops and other local services which help meet the needs of residents. Local shopping opportunities and facilities within Local Centres will be supported and safeguarded where possible. Where appropriate, proposals for the redevelopment/change of use of existing retail units should give particular consideration to retaining and/or restoring historic shopfronts in accordance with other policies in the Local Plan.

Individual and groups of local shops, services and community facilities located outside of the designated centres will be protected where they are important to meet day-to-day needs of local communities.

Section 5 **Housing**

District wide criteria based policies



5 Housing

- 5.1 This Local Plan sets a housing requirement of 545 dwellings per annum over the period 2018 – 2036 (10,476 in total). As at 31st March 2018, around 6,998 dwellings are already under construction, permitted or allocated, and, with a contingency applied to allow flexibility, the policies and allocations in this plan seek to ensure that this requirement is met.
- 5.2 The strategy for Suffolk Coastal set out in this Local Plan focuses on supporting economic growth and the provision of infrastructure, and alongside this, sets out ambitious plans for increasing the supply of housing. Integral to this is ensuring that the Plan supports existing infrastructure and services particularly in the more rural parts of the District. Addressing the need for more affordable housing and housing to meet the needs of an increasingly elderly population is another key objective. Accordingly, in addition to delivering an ambitious housing requirement, the Local Plan seeks to diversify the supply of housing through delivering a range of different sizes of sites in a variety of locations, and ensuring that the mix of housing types and tenures reflects the needs of the District's population. The East Suffolk Housing Strategy also sets out the ways in which the Council will continue to pursue a range of models for housing delivery, including through working with Housing Associations and providing support to community led housing initiatives.
- 5.3 The amount of housing needed is covered in Section 3 of this Local Plan. Allocations for housing development and the approach to housing provision in the Major Centres and Market Towns are contained in the settlement and area specific Sections of this Local Plan in Section 12.

Major centres

- 5.4 Detailed policies for Major Centres are contained in Section 12.
- 5.5 As part of the development of the North Felixstowe Garden Neighbourhood, up to 2,000³⁵ new homes are planned along with 80 new homes on the existing Brackenbury Sports Centre site once new leisure uses are provided at the Garden Neighbourhood. Elsewhere in the town, it is likely that other sites will come forward within the Settlement Boundary in accordance with Policy SCLP3.4.
- 5.6 For the East of Ipswich, as the Brightwell Lakes development is proposed to come forward during the plan period, no further major growth is planned. Outline planning permission is granted under permission DC/17/1435/OUT. This local plan also identifies the site of the current Suffolk Police Headquarters as an opportunity to deliver 300 homes on a brownfield site, due to its likely availability within the plan period. It is expected that some small scale housing development will come forward within the Settlement Boundaries in accordance with Policy SCLP3.4.

³⁵ Including 560 already with planning permission at Candlet Road

Market Towns

- 5.7 Detailed policies for the Market Towns are contained in Section 12. Policy SCLP4.9 identifies town centres as presenting opportunities for residential development including affordable homes, older persons accommodation and specialist housing for particular groups.
- 5.8 A new Garden Neighbourhood is planned for the south of Saxmundham, which will deliver 800 dwellings.
- 5.9 Whilst no other new allocations are proposed in the Market Towns, it is envisaged that some small scale development will come forward within the Settlement Boundaries in accordance with Policy SCLP3.4.

Large Villages

- 5.10 Whilst the Major Centres and Market Towns in the District provide the main focus for a wide range of services and facilities, a number of other settlements across the District nevertheless provide for a range of services meeting the daily needs of their residents and surrounding hinterland.
- 5.11 Development of new housing in such settlements can help to support existing local services as well as contributing towards the mix of housing available in such locations. The National Planning Policy Framework states that housing should be located where it will enhance or maintain the vitality of rural communities and that plans should identify opportunities for villages to grow and thrive, especially where this will support local services. This Local Plan therefore allocates some sites for housing in these settlements. Alongside these, it is also necessary to consider the contribution that will come forward from 'windfall' (i.e. not allocated) sites in Large Villages.
- 5.12 Settlement Boundaries, formerly known as 'physical limits boundaries' are defined around Large Villages. The Settlement Boundaries define the area within which the principle of development is supported and where policies would support residential development outside of allocations, of a scale appropriate to that settlement.

Policy SCLP5.1: Housing Development in Large Villages

Residential development will be permitted within defined Settlement Boundaries where this is:

- a) Development of a scale appropriate to the size, location and character of the village; or
- b) Infill development (in accordance with Policy SCLP5.7).

Residential development will be permitted on Exception Sites adjacent or well related to defined Settlement Boundaries in accordance with Policy SCLP5.11.

Small Villages

- 5.13 Small Villages are identified due to their modest range of service provision, which will serve the needs of residents within the village and can also serve the needs of those living in other settlements or the countryside nearby although will generally cater for a smaller catchment than the Large Villages. As with the Large Villages, development of new housing in such settlements can help to support existing local services as well as contributing towards the mix of housing available in these villages. The form and character of Small Villages varies across the District and the impact upon these will be a key consideration in determining planning applications.
- 5.14 Settlement Boundaries have been defined for Small Villages which identify the area within which the principle of development will be supported in accordance with Policy SCLP5.2 below.

Policy SCLP5.2: Housing Development in Small Villages

Residential development will be permitted within defined Settlement Boundaries where it is:

- a) A small group of dwellings of a scale appropriate to the size, location and character of the village; or
- b) Infill development (in accordance with Policy SCLP5.7).

Residential development will be permitted on Exception Sites adjacent or well related to defined Settlement Boundaries in accordance with policy SCLP5.11.

Countryside

- 5.15 Areas outside of the defined Settlement Boundaries of the Major Centres, Market Towns, Large Villages and Small Villages are defined as Countryside. The countryside includes a number of small settlements, which have no or very few, services and facilities and are therefore not considered to be suitable locations as a focus for new development.
- 5.16 However, consistent with policy in the National Planning Policy Framework the Council recognises that there is a need for housing in the countryside in certain circumstances and where this can help to sustain thriving rural communities. The East Suffolk Housing Strategy (2017 – 2023) contains five ‘areas of focus’, including ‘Increasing the Supply of New Housing to meet a Range of Needs – a more proactive role for East Suffolk supporting the development of affordable homes’, within which there is a specific action around delivering housing tailored to meet the needs of rural communities. The Housing Strategy identifies that housing in rural areas can support the sustainability of those places, by enabling younger working families to remain and older residents to move to more suitable housing while continuing to live within their community.

- 5.17 Whilst providing social benefits, housing in the countryside can have impacts upon the landscape and natural environment, and does not present the same opportunities in relation to encouraging sustainable transport as less remote locations would. It is therefore important that the Local Plan achieves the correct balance between supporting some development that can help to sustain rural communities whilst not resulting in harm to the environment and undermining the reasons for which people choose to live in and visit the District.
- 5.18 Isolated dwellings in the countryside in particular have the potential for harming the landscape and environment. Reflecting this, the National Planning Policy Framework states that isolated new homes in the countryside should be avoided other than in a limited number of specific circumstances.
- 5.19 Policy SCLP5.3 below sets out the circumstances where new housing in the countryside would be supported. Exception sites for affordable housing may include entry-level accommodation for first time buyers or those looking to rent their first home, in accordance with paragraph 71 of the National Planning Policy Framework, where this forms part of a scheme which aims to meet locally identified needs for affordable housing.
- 5.20 In relation to replacement dwellings, the impact of the new dwelling on the landscape when compared to the existing dwelling will be a key consideration. In this respect, particular consideration will be given to height, screening, footprint, design and materials. Opportunities to enhance the appearance of the dwelling in the landscape should be taken where feasible.

Policy SCLP5.3: Housing Development in the Countryside

Outside of the defined Settlement Boundaries, new residential development will be limited to:

- a) Affordable housing to meet identified local needs on exception sites adjacent to, or well related to, Settlement Boundaries or clusters of housing in the countryside (in accordance with Policy SCLP5.11 and Policy SCLP5.4);
- b) Limited development within existing clusters (in accordance with Policy SCLP5.4);
- c) Replacement dwellings on a one to one basis where these are no more visually intrusive in the countryside than the building to be replaced;
- d) Subdivision of an existing larger dwelling;
- e) Conversion of an existing building (in accordance with Policy SCLP5.5);
- f) Rural workers dwellings, where there is an essential need for a rural worker to live permanently at or near their place of work (in accordance with Policy SCLP5.6);
- g) Other residential development consistent with policy on residential development in the countryside contained in the National Planning Policy Framework.

Housing in Clusters in the Countryside

- 5.21 Clusters can vary in size, and can include those settlements in the countryside which do not have the range or amount of facilities to be classed as a Small Village. The geography of Suffolk Coastal District is such that there are many small, dispersed communities and clusters of houses outside of the Towns, Large Villages and Small Villages. Whilst they do not have the level of services and facilities to support larger scale new housing development, some locations where there are existing clusters of five or more dwellings may be suitable for a small amount of development. Such an approach will help to meet local housing needs by enabling people to stay within their communities, reflecting the aims of the Council's Housing Strategy as well as helping to sustain rural communities and the services within them. The policy therefore would support up to three new dwellings in clusters of at least five existing dwellings, or up to five new dwellings in clusters of at least ten existing dwellings which are well related to services and facilities.
- 5.22 The policy does not intend to support development which would have an adverse impact upon the natural or historic environment or the landscape, but that can integrate with an existing cluster of houses, and the scale and design of schemes will be expected to not cause harm to the character of the cluster or the surrounding landscape.
- 5.23 Alongside seeking to maintain and enhance the vitality of rural areas there is a need to protect sensitive environments and landscapes and to seek to minimise the need to travel and reliance on the private car as far as is possible. The National Planning Policy Framework states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, whilst also seeking to avoid isolated dwellings in the countryside except in special circumstances. The National Planning Policy Framework also states that in preparing Local Plans, local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
- 5.24 Whilst it is acknowledged that within these more rural locations, there is likely to be dependency on the private car for transport, it is considered appropriate to recognise that this may be reduced in some locations which are closer to settlements with services and facilities. Therefore, in locations which are more accessible to services and facilities up to five dwellings would be supported. Consideration will be given to proximity to a Major Centre, Town, Large Village or Small Village and the accessibility to that location, for example through the existence of a continuous footpath.
- 5.25 Criterion (c) in Policy SCLP5.4 sets out policy regarding the characteristics of the location of sites in relation to surrounding development. In considering whether a proposal would be acceptable under criterion (c), adjacent development on two sides can include circumstances where the site is separated from existing development by the highway. The adjacent development on two sides must extend along the entirety of the proposed site.
- 5.26 For development of four or five dwellings the Council would require applicants to demonstrate that meaningful and effective engagement has taken place with the community, including with the Parish Council, and that the submitted scheme addresses any planning issues raised and reflects needs identified

by the community. Applicants should submit a statement describing the consultation and engagement undertaken, the outcomes of the consultation and engagement and how this is reflected in the proposal.

- 5.27 In contributing to the provision of a mix of dwelling types across the District, proposals that are suitable under this policy may provide opportunities for custom and self build dwellings.
- 5.28 As the policy is intended to support limited new development in clusters, it is important that consideration is given to cumulative impacts. In this respect, consideration will be given to whether there is an extant permission or completed development permitted under this policy, and the cumulative impact on the character.

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
- b) 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
- c) 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;
- d) 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
- e) 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 the scheme has the support of the local community 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, the Area of Outstanding Natural Beauty and the special qualities and features of Landscape Character Areas in accordance with Policy SCLP10.3.

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.

Conversion of Rural Buildings in the Countryside for Housing

- 5.29 Rural buildings outside of settlements should ideally be used for the purposes for which they were constructed; however there are instances where commercial uses are no longer viable and a residential use may be appropriate. The National Planning Policy Framework supports the re-use of redundant or disused buildings in the countryside for residential purposes where this would enhance the immediate setting. Permitted Development rights now also allow for some conversions of agricultural buildings to residential use.
- 5.30 A key consideration in relation to proposals for conversions is the extent to which the immediate setting is enhanced through conversion. In this respect, the conversion should not result in the creation of residential curtilages or other features that would detract from the rural nature of the area and the building, such as porches and openings. Only extensions and alterations that are essential to enable the building to be converted for residential use should be made. It is also recognised that in some cases conversion of buildings in the countryside can help to safeguard heritage assets.

Policy SCLP5.5: Conversions of Buildings in the Countryside for Housing

The conversion of buildings in the countryside for residential use will be permitted where:

- a) The building is redundant;
- b) The building provides a positive contribution to the landscape;
- c) The conversion does not require significant alteration;
- d) The design maintains or enhances the structure, form and character of the rural building;
- e) The design of the conversion, including any necessary works to the curtilage, does not have a harmful effect on the character of the landscape;
- f) Any impacts on the natural environment are adequately mitigated for;
- g) The conversion enhances the immediate setting of the area; and
- h) The site is served by an appropriate existing access.

Rural Workers Dwellings

- 5.31 Policy on rural workers dwellings is well established in the planning system. There are a number of rural activities which require full time workers to be accommodated on site or nearby. In particular there are agricultural, horticultural and forestry practices which may require a worker to attend at short notice or to be available during night and day. The affordability and relatively short supply of accommodation in the countryside can mean that there is no suitable housing for such rural workers. Whilst it is important to provide accommodation to meet these needs, it is also important to ensure that this does not result in a proliferation of new dwellings in the countryside. The provision of a rural workers dwelling should therefore only be supported where it is essential to meet the needs of the business.

- 5.32 Applications will be assessed taking account of the history of the enterprise. Evidence will need to demonstrate whether there are existing dwellings within the site/holding or nearby which could fulfil the need. If any dwellings or buildings on the holding suitable for conversion have been sold on the open housing market this is likely to constitute lack of evidence of essential need. To assess whether the existing business is viable, financial information from the last three years prior to the planning application will be required which show that the business was profitable for at least one of those years.
- 5.33 Where planning permission is granted for a rural workers dwelling, occupancy restriction conditions will be imposed to ensure the dwelling is used for that purpose and remains available for that purpose in the future. To avoid new isolated market housing in the countryside proposals to remove occupancy restriction conditions will rarely be approved. Where applications are made for the removal of an occupancy condition, evidence will be required to demonstrate that there is no longer a need for the accommodation for either the business or for the wider local area, or to meet needs for affordable housing. Evidence of marketing should be provided.

Policy SCLP5.6: Rural Workers Dwellings

Proposals for permanent dwellings in the countryside for rural workers will only be permitted where:

- a) There is a clearly established existing functional need for a worker to be accommodated;
- b) The need could not be fulfilled by another existing dwelling or accommodation in the area which is suitable and available for the occupied workers or, could be converted to do so;
- c) The need relates to a full time worker, or one who is primarily employed in the rural sector, and does not relate to a part time requirement;
- d) The unit and the rural activity concerned has been established for at least three years, has been profitable for at least one of them, is financially sound and has a clear prospect of remaining so; and
- e) The proposed dwelling is sensitively designed, landscaped and located to fit in with its surroundings and of a scale that reflects its functional role to support the agricultural activity.

Where a rural dwelling is permitted, the occupancy will be restricted by condition to ensure that it is occupied by a person, or persons, currently or last employed in local rural employment. Applications for the removal of an occupancy condition related to rural workers will only be permitted where it can be demonstrated that:

- f) There is no longer a need for accommodation on the holding/business and in the local area;
- g) The property has been marketed to ensure proper coverage within the relevant sector for at least one year at a price which reflects the existence of the occupancy condition; and
- h) The dwelling has been made available to a minimum of three Registered Providers operating locally on terms that would prioritise its occupation by a rural worker as an affordable dwelling, and that option has been refused.

Infill and Garden Development

- 5.34 Infill development is that which takes place in a gap between existing buildings. Garden development is that which takes place in the garden of an existing dwelling, often to the rear. The housing policies provide for infill development in certain circumstances, and these infill developments provide a valuable contribution to housing supply and the mix and type of housing delivered. This policy relates to the details of the design and siting of infill development, rather than to the principle.
- 5.35 Infill development can have the potential to harm the character of a streetscape if not carefully designed or if it takes place on unsuitable sites such as those which are too small. In addition, development of backland or garden plots can impact on the landscape if they encroach into the countryside, or can raise amenity issues within built up areas. This issue is recognised in the National Planning Policy Framework which states that Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. Policy SCLP11.9 identifies Areas to be Protected from Development and within these infill policies would not apply.

Policy SCLP5.7: Infill and Garden Development

Proposals for infill development or residential development within existing gardens will be supported where:

- a) The scale, design and materials would not result in harm to the street scene or character of the area;
- b) The proposal is well related in scale and design to adjacent properties, including the design of curtilage areas, parking and access, and incorporates landscaping where appropriate to mitigate any potential impacts or to enhance the appearance of the site;
- c) There would not be significant harm to residential amenity of occupants of either the existing or proposed dwellings;
- d) Existing and proposed dwellings have sufficient curtilage space; and
- e) The proposals are otherwise in accordance with the housing policies of the Local Plan.

Neighbourhood Plans are able to set their own policies on this type of development in response to local circumstances.

Housing Mix

- 5.36 In addition to ensuring a supply of housing land, it is also necessary to ensure that the right size, type and tenure mix of housing built is delivered. The National Planning Policy Framework requires planning authorities to identify the size, type and range of housing required and, furthermore, the National Planning Practice Guidance states that once identified, the housing need should be broken down by household size and type. Specifically, the National Planning Policy Framework requires planning authorities to plan for a

mix of housing including the needs of families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to build their own homes.

- 5.37 The Strategic Housing Market Assessment for Ipswich and Waveney Housing Market Areas (2017) (SHMA) is a key piece of evidence which identifies the needs for mix and type of housing across the District to 2036.
- 5.38 The SHMA provides conclusions on the size of property needed in each tenure for the District as a whole. Evidence shows that this varies between tenure, but that overall there is a need for all sizes of property and that across all tenures there is a need for at least 40% to be 1 or 2 bedroom properties. Consultation feedback suggests a relatively high level of demand for smaller properties, particularly those to meet the needs of first time buyers or those looking to downsize. At present, around 30% of all properties in the District are 1 or 2 bedrooms. To ensure that a mix of sizes is delivered, and in particular recognising the issues around affordability and the potential demand for properties for downsizing due to the ageing population, Policy SCLP5.8 includes a requirement for new development to provide for a mix which reflects the conclusions of the SHMA. It should be noted that these requirements relate to District level need. It is acknowledged that, depending on the character of the surrounding area, some sites may present a greater opportunity to secure smaller properties and consideration will therefore be given to surrounding densities and character in this respect.

Table 5.1 Housing need by size, source: Strategic Housing Market Assessment Part 2 (May 2017)

Number of bedrooms	Percentage of District wide need
1	13%
2	29%
3	30%
4+	28%

- 5.39 In Suffolk Coastal District the number of households in private rented accommodation has increased by 35% between 2001 and 2011. Whilst this increase is lower than that of surrounding authorities, it nevertheless highlights a growing need for rental properties. The SHMA concludes that 16% of housing need to 2036 is for private rented properties.
- 5.40 Other evidence of local housing needs may include the Housing Register or a housing needs survey carried out by a Town or Parish Council, Neighbourhood Plan group or other organisation, however this would be considered alongside the conclusions of the SHMA which sets out the need at the District level. Any alternative assessment of local need would need to be viewed in the context that new housing development is contributing to the District wide need and not just to the needs of the Town or Parish where the development is proposed.
- 5.41 The SHMA highlights that within the Ipswich Strategic Planning Area the population of those aged over 65 is projected to increase by 57.8% between 2014 and 2036. The East Suffolk Housing Strategy recognises that there are an increasing number of older people living in housing that is too large or is not suited to

their mobility needs. It states that there is a need for more housing to be adapted to make it accessible and for more specialist housing for older people, including higher level support for people with severe mobility problems, chronic physical health conditions and dementia. The development of new housing provides an opportunity to design-in such considerations. Provision of smaller, more suitable, accommodation may result in more of the existing larger properties becoming available.

- 5.42 The SHMA includes an assessment of the needs for specialist accommodation (sheltered housing, enhanced sheltered housing and extra care housing) and identifies a need for a total of 1,287 units by 2036. The SHMA also identifies a need for a further 1,118 spaces in Registered Care (nursing and residential care homes) over the plan period. However traditional forms of provision may not always match modern demands and although the specialist housing market sector addresses a wide variety of needs it is considered that some of this need will be met through the provision of non-specialist housing, and therefore it is important that the mix of housing helps to address these needs. Provision for sheltered and extra care housing and registered care will be secured through larger residential allocations where feasible, as part of a mix of housing types.
- 5.43 In 2015, the Government introduced two new 'optional' Building Regulations standards relating to accessible dwellings, which set standards in relation to accessible and adaptable dwellings (Part M4(2)) and wheelchair accessible dwellings (Part M4(3)) which are over and above the minimum requirements³⁶. Local authorities can apply these optional standards by incorporating a requirement within their planning policies. The SHMA identifies that there will be an increase of 3,120 people over 65 in Suffolk Coastal with a limiting long term illness by 2030. Considered alongside the number of adaptations made annually to the existing stock³⁷ and the scale of projected growth in population aged over 65, it is considered that there is a clear need for a significant proportion of new dwelling stock to be built to higher accessible and adaptable standards. Such dwellings are not only beneficial to older people but may also help to meet the needs of other groups for example families with young children. The policy therefore requires 50% of dwellings in developments of 10 dwellings or more to meet the requirements of Part M4(2). Whilst the Council will support the development of dwellings built to the wheelchair accessible standard, a requirement for these will not be set as the needs for them will be specific to individual circumstances. This approach also supports the Joint Health and Wellbeing Strategy for Suffolk which identifies the provision of greater choice and innovation in housing for those with disabilities as one of its priorities, and the East Suffolk Housing Strategy which identifies a need for more accessible accommodation.
- 5.44 There is a range of types of housing that may be particularly well suited to the older population, but may also help to improve choice in the housing stock across the District more generally. The Council will support innovative schemes which seek to create integrated communities and will expect developers to consider whether such types of housing would be feasible depending on the site size and location.

³⁶ Part M4(2) and Part M4(3) are references to the relevant Building Regulations Approved Documents.

³⁷ Part 2 of the Strategic Housing Market Assessment shows this to be around 100 per year on average over the past five year, and is consistently higher than the other authorities.

Examples of housing types and design which may contribute to providing a mix of housing choices for older people could include those set out below, however it is not the intention that these would routinely be limited to occupation by older people and they may also suit the needs of others. Types of housing which could be suitable for older people include:

- Almshouses – housing provided by charities at a low rent, usually for older people;
- Cohousing – community led schemes whereby residents share some spaces / facilities;
- Bungalows, including dormer bungalows provided there is adequate living accommodation (i.e. bedroom(s) and bathroom(s)) on the ground floor;
- Smaller properties, but which have larger than standard living and storage space;
- Provision of shared or smaller garden/outdoor spaces.

- 5.45 Opportunities should be taken to integrate older persons housing into the community, in order to address potential issues of isolation and to promote inclusivity. For example older persons housing on sites that are well related to schools, community centres or other focal points can help to create integrated communities. The Suffolk Healthy Ageing Needs Assessment (2018) identifies tackling social isolation and loneliness as one of its recommendations. There is a particular need for older and vulnerable people to have opportunities to access sustainable transport and modes of travel other than the car.
- 5.46 To achieve a greater mix of housing types, the starting point will be that all developments of 5 or more residential units will be expected to provide a mix of house types and sizes. The Council will expect applicants to relate needs to the SHMA and/or to an assessment of local need where the methodology and scope for this is agreed with the Council.
- 5.47 To ensure that the size of dwellings appropriately reflects the needs identified, the Council will consider the number of rooms and layout of dwellings proposed in determining the number of rooms that could be used as bedrooms.
- 5.48 Neighbourhood Plans may wish to identify specific localised needs for certain types of dwellings where supported by evidence gathered through a local housing needs assessment which is supported by the Council. There are also other or complementary mechanisms in which communities can deliver the homes needed in the local community, for example through the establishment of a Community Land Trust.

Policy SCLP5.8: Housing Mix

Proposals for new housing development will be expected to reflect the mix and type of housing needs identified in the Strategic Housing Market Assessment or other evidence of local needs as supported by the Council.

Proposals for 5 or more units should provide for a mix of sizes and types based upon table 5.1, and should provide for at least 40% of 1 or 2 bed properties.

On proposals of 10 units or more at least 50% of the dwellings will need to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations, and will be required to demonstrate how the proposal contributes to increasing the choice and mix of housing available for the older population.

Sheltered and extra-care housing will be supported where the scheme incorporates a mix of tenures and sizes to meet an identified need.

Neighbourhood Plans may set out an approach to housing type and mix specific to the local area where this is supported by evidence.

Self Build and Custom Build Housing

- 5.49 From 1 April 2016, the Self Build and Custom Housebuilding Act 2015 requires Local Planning Authorities to keep a register of people who are interested in building their own homes. As part of meeting the needs for a mix of housing types, the National Planning Policy Framework states that planning authorities should plan for the needs of those wishing to build their own homes.
- 5.50 Self build projects are defined as those where someone directly organises the design and construction of their own home. This covers a wide range of projects including a traditional DIY self build home, to projects where the self builder employs someone to build their home for them. Community-led projects can also be defined as self build. Custom build homes are where a person works with a developer as an individual or a group to help provide their own home. The developer may help to find a plot, manage the construction and arrange the finance for the new home. This is more of a hands-off approach but the home is tailored to match the individual's requirements. Modular construction may be an appropriate form of self-build or custom-build, where this is acceptable in design terms.
- 5.51 There are presently (2018) over 250 people on the Suffolk Coastal Self-build and Custom Build Register, and analysis of the Register indicates that a large proportion of the demand is for village and countryside locations, and geographically, where a location is identified, the area around the east of Ipswich, Woodbridge and the Deben peninsula are popular locations. The SHMA identified that across the Ipswich Housing Market Area, 94.7% of those on the Register are interested in a single plot of land to build a home for themselves to live in (or employ someone else to build this home), 28.1% are interested in a group self-

build project (where a group of people come together to design and develop a custom build housing development which they then live in) and 19.3% in a developer led custom build (where a developer divides a larger site into individual plots and provides a design and build service to purchasers enabling people to customise existing house designs). Those on the Self-build Register were also asked about the minimum number of bedrooms they would require in their new home. Some 46.9% of respondents indicated they require three bedrooms, 35.9% require four bedrooms, 15.9% two bedrooms and 1.3% five or more bedrooms.

- 5.52 Policy SCLP5.9 below sets out the Council's approach to delivering serviced plots across the District. As well as requiring all developments of 100 or more dwellings to provide a proportion of serviced plots for self and custom build units, the policy also supports the delivery of solely self build and custom build developments where they are in conformity with the other relevant policies of this plan.

- 5.53 A key element of self and custom build schemes is the flexibility to design and build homes to individual requirements however it is important that an element of coherence in the design and appearance of the overall site is maintained. As such, where groups of plots are concerned, a design code should be agreed as part of an outline planning permission which establishes design principles to which each plot should adhere. This will also provide greater certainty for self and custom builders that their individual designs will be granted permission. Design codes can address matters such as building heights; massing; position on plot; plot coverage; materials palette; landscaping; parking; and waste management amongst others.

- 5.54 Where serviced self build or custom build plots are made available (i.e. the required highways and services are in place) but are not taken up after 12 months, permission may be granted for the plots to be developed by a developer. In such instances, the Council will require evidence to demonstrate that the plots have been actively promoted as self build and custom build plots, in accordance with the marketing guidance contained in Appendix D. The Self Build Register will provide a source of information in relation to potential interest.

Policy SCLP5.9: Self Build and Custom Build Housing

Proposals for self build or custom build plots, or proposals that make a proportion of serviced dwelling plots available for sale to self builders or custom builders, will be supported where in compliance with all other relevant policies of this Local Plan.

Developments of 100 or more dwellings will be expected to provide a minimum of 5% self or custom build properties on site through the provision of serviced plots. Once completed and available for development, the serviced plots should be marketed for a period of not less than 12 months, in accordance with the principles set out in Appendix D. If, following this period, any of the serviced plots remain unsold; they may be built out by the developer.

Proposals for 5 or more self build or custom build dwellings in a single site location should be developed in accordance with a set of design principles to be submitted with planning applications and agreed by the Local Planning Authority.

Affordable Housing on Residential Sites

- 5.55 High house prices across Suffolk Coastal District mean that many people cannot afford to purchase or rent a house on the open market. The Strategic Housing Market Assessment identifies that within Suffolk Coastal median property prices are higher than in the other parts of the Ipswich Housing Market Area.
- 5.56 The East Suffolk Housing Strategy (2017 – 2023) identifies the affordability of housing as a key challenge and includes an area of focus around having a more proactive role towards supporting the delivery of affordable housing in East Suffolk. The provision of affordable housing through the development of market housing is an integral part of the delivery of the East Suffolk Housing Strategy, including through investing commuted sums into additional affordable homes and achieving on-site affordable homes which provide the right mix of sizes and tenures to meet local need.
- 5.57 Affordable housing is defined in the National Planning Policy Framework as affordable housing for rent, starter homes, discounted market sales housing and other routes to home ownership which includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy. .
- 5.58 The National Planning Policy Framework expects the need for affordable housing to be met on-site unless off-site provision or a financial contribution can be justified and where the agreed approach contributes to creating mixed and balanced communities. The NPPF states that affordable housing contributions should only be sought for major housing development (defined as sites of ten dwellings or more in the draft revised National Planning Policy Framework).
- 5.59 The National Planning Policy Framework includes a requirement for major development (defined as that of ten or more dwellings) whereby at least 10% of the homes should be available for affordable home ownership unless this would exceed the level of affordable housing required in the area or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. The National

Planning Policy Framework states that exemptions should be made where the development is for solely Build to Rent homes, is specialist accommodation for a group of people with specific needs, is self build or custom build, is exclusively for affordable housing or is a rural exception site.

- 5.60 The Strategic Housing Market Assessment identifies that of the total housing need across the District 12.3% should be for social rent / affordable rent, 6.3% should be for shared ownership and 6.9% should be for Starter Homes / discounted home ownership. In recognition that market schemes below 10 dwellings will not need to provide affordable housing, it is appropriate that the proportion required on sites of ten or more dwellings makes a greater contribution to the overall District wide need. The National Planning Policy Framework requirement for 10% of homes on major development to be for affordable home ownership will be considered alongside the conclusions of the Strategic Housing Market Assessment and other evidence of local need on a case by case basis.
- 5.61 The Strategic Housing Market Assessment, included some analysis of Starter Homes and discounted market housing to identify their potential role in meeting housing needs. The Strategic Housing Market Assessment concluded that these tenures would most likely be suitable for those who currently reside in the private rental sector and concluded that there would be an indicative demand for 642 dwellings in these tenures. The provision of Starter Homes and discounted home ownership should not therefore be made at the expense of shared ownership and social / affordable rent. Further, as Starter Homes are not required to remain as such in perpetuity, policy needs to consider the longer term appropriateness of market housing in locations where Starter Homes are supported.
- 5.62 In exceptional circumstances where proposals are not able to meet the requirements for affordable housing for viability reasons, and to ensure that development can still come forward and overall housing delivery is not compromised, the Council may agree to alter the requirements subject to this being demonstrated through a comprehensive viability assessment, to the Council's satisfaction. Before reducing the overall provision of affordable housing, the tenure and type of affordable housing should be first adjusted to secure viability. In line with the draft revised National Planning Policy Framework, viability assessments will be made publicly available. Guidance on viability assessments is contained in Appendix F. In determining whether a site has capacity for more than ten units, consideration will be given to the potential developable area of a site and an appropriate density for development that accords with Policy SCLP11.1 Design. The National Planning Policy Framework states that where vacant buildings are being re-used or redeveloped an affordable housing contribution should be reduced by a proportionate amount.
- 5.63 Local need for affordable housing may be identified through a local housing needs assessment. Developers are encouraged to work closely with the Council's Housing team to ensure appropriate evidence is provided with any planning application.
- 5.64 Where a contribution towards affordable housing provision is secured, the Council operates a system whereby these are delivered within the relevant defined 'housing market area' (of which there are five covering the District).

Policy SCLP5.10: Affordable Housing on Residential Developments

Proposals for residential development with capacity for ten units or more or sites of 0.5ha or more will be expected to make provision for 1 in 3 units to be affordable dwellings, and to be made available to meet an identified local need.

Proposals which provide a higher amount of affordable housing than that set out above will also be permitted.

Of these affordable dwellings, 50% should be for affordable rent / social rent, 25% should be for shared ownership and 25% should be for discounted home ownership.

Provision is expected to be made on-site, unless it can be demonstrated in exceptional circumstances that it is not feasible or practical to provide the units on site in which case it may be agreed that a commuted sum could be paid towards provision of affordable housing outside of the site.

In exceptional circumstances, where the Council is satisfied that the provision of affordable housing is not viable, as demonstrated through a viability assessment the Council may agree to vary the requirement for affordable housing.

Neighbourhood Plans may set requirements for a greater proportion of affordable housing where this is supported by evidence of need and viability assessment.

Affordable housing in the countryside

- 5.65 Limiting development beyond Settlement Boundaries lowers land values in these locations by removing the 'hope value' for high value developments such as market housing. This allows the Council to develop 'exception site' policies which allow for certain types of development such as 100% affordable housing schemes or schemes for the relocation of homes at risk from coastal erosion which wouldn't otherwise be viable if they were competing for land with market housing. This approach is supported by national planning policy.
- 5.66 Consideration should first be given to whether the need can be met within the Settlement Boundary or on allocated sites. To be supported, the housing proposed on exception sites should relate to an identified local need. The need may be identified through, for example, a community planning exercise or a local housing needs assessment. Developers are encouraged to work closely with the Council's Housing team to ensure appropriate evidence is provided with any planning application. Affordable housing provision on exception sites should have a tenure mix which is reflective of local housing needs identified in the local housing needs assessment.
- 5.67 In recognition of the fact that Starter Homes are not required to remain as such in perpetuity, they are not considered appropriate on their own on exception sites but may form part of a mix of affordable housing where they would meet an identified local need. A Starter Home is as defined in the Housing and Planning Act 2016.
- 5.68 Paragraph 71 of the National Planning Policy Framework supports the development of entry level exception sites suitable for first time buyers or those looking to rent their first home, unless the need for such homes is already being met within the authority's area. In accordance with criterion a) under paragraph 71, such schemes would need to form part of a mix of affordable housing provision as identified within a local housing needs survey.

Policy SCLP5.11: Affordable Housing on Exception Sites

Proposals for the development of affordable housing in the countryside will be permitted where:

- a) It is demonstrated there is an identified local need for affordable housing and this cannot be met through existing housing allocations in the Local Plan or relevant Neighbourhood Plan, or through development within the Settlement Boundary;
- b) The scheme is adjacent or well related to an identified Settlement Boundary or a cluster of houses in the countryside (as defined in Policy SCLP5.4);
- c) The scheme incorporates a range of dwelling sizes, types and tenures appropriate to the identified local need; and
- d) The location, scale and design standard of a scheme will retain or enhance the character and setting of the settlement or cluster and not lead to settlement coalescence.

A limited amount of market housing will be permitted as part of affordable housing development in the countryside where it is required to cross-subsidise the affordable housing. Where market housing is to be provided on site this will be subsidiary to the affordable housing element of the proposal and the amount of market housing required will need to be demonstrated through a viability assessment. The amount of market housing on the site should be no more than one third of the dwellings on the site.

Where Starter Homes are proposed, these should form part of a mix of tenures on the site.

Where sites for affordable housing in the countryside are brought forward with an element of market housing, both housing tenures should be built to the same design standards and contribute towards the character of the area.

Houses in Multiple Occupation

- 5.69 Houses in Multiple Occupation (HMOs) fall within Use Class C4 and are defined as ‘small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.’ Change of use between Use Class C3 and C4 is ‘permitted development’, although permission may be required for related works so the advice of the Council should be sought. Larger HMOs are classed as ‘sui generis’ and will require planning permission for change of use. Licenses are also required for all HMOs of 5 or more individuals comprising 2 or more households.
- 5.70 Proposals for conversion to HMOs usually occur within residential areas in the more urban parts of the District. HMOs present issues that distinguish them from residential dwellings (Use Class C3) through the need for additional features including parking areas, bin storage, accesses and windows. Due to the nature of use of such properties, they are usually most suited to locations where there are a good range of services and access to public transport. This is particularly important in relation to parking provision and opportunities to access jobs and services by public transport or by walking or cycling. These will be key considerations where there is insufficient scope for appropriate on-site parking.

Policy SCLP5.12: Houses in Multiple Occupation

Proposals for Houses in Multiple Occupation will be supported within Settlement Boundaries where:

- a) There is no adverse impact on the character of the dwelling or the surrounding area;
- b) Provision can be made for sufficient parking , or the dwelling is served by good public transport or walking/cycling links which connect the dwelling to main employment and service centres; and
- c) Any extensions necessary are in accordance with the Council's design policies.

Residential Annexes

- 5.71 Residential annexes can be important in enabling families to live close to one another but maintain a degree of independent living. In view of the ageing population in Suffolk Coastal, it is expected that the demand for annexes is likely to grow.
- 5.72 However, in situations where policy would prevent the development of an independent dwelling, it is important that annexes are designed and used in a way which ensures that they are ancillary to the host dwelling and are not able to be used as an independent dwelling. In this respect, annexes should be smaller in scale than the host dwelling and should not have their own separate curtilage or access. Proposals will be expected to demonstrate the way in which the annex has been designed to prevent it being used as an independent dwelling in the future.
- 5.73 In order to ensure that annexes remain as such and are not sold, let or used as independent dwellings, occupation will be limited by way of a condition or planning obligation. Particular care will be taken in respect of residential annexes to ensure that, through design and/or planning conditions, annexes are not able to be separated from the main building in order to create a separate dwelling.

Policy SCLP5.13: Residential Annexes

An annex to an existing dwelling will be supported where:

- a) The annex is smaller in scale and clearly ancillary to the host dwelling;
- b) The proposal does not involve the physical separation of the residential curtilage;
- c) No separate access is required;
- d) The annex is either an extension or is well related to the host dwelling;
- e) In the case of a new build annex, it is not feasible to create the annex through an extension or the conversion of an outbuilding;
- f) There is sufficient off-road parking; and
- g) There is no significant adverse effect on the landscape or visual amenity.

Conditions will be applied to limit occupation to prevent future use as a separate dwelling and where an annex is proposed as an extension, it should be designed in a way which will enable it to be incorporated into the host dwelling when no longer required.

Extensions to Residential Curtilages

- 5.74 In some cases, areas of land which it is intended to incorporate into the gardens of dwellings do not raise any concerns. In other cases, particularly where the proposed extension is into areas of open landscape or agricultural land, this can lead to considerable harm to the landscape and visual amenity, particularly within the Area of Outstanding Natural Beauty. The loss of hedgerows in particular can have a harmful impact.
- 5.75 The size and scale of the proposed extension should reflect the character of the property and the local area. Retention of boundary features or the use of appropriate landscaping and native species can help to address any potential visual impacts. Permitted Development rights may be withdrawn for the extended area where it is considered that the addition of swimming pools, greenhouses and garden sheds for example could potentially detract from the openness of the landscape or character of the area, Consideration will also be given to the landscape character of the area in terms of Policy SCLP10.3.

Policy SCLP5.14: Extensions to Residential Curtilages

Extensions to residential curtilages will be permitted where:

- a) The resulting size of the curtilage reflects the scale and location of the dwelling;
- b) They do not result in the removal of an existing hedgerow of native species unless replaced by a similar hedgerow;
- c) They do not have a harmful impact on the historic environment, landscape or character of the area, including as a result of developments ancillary to the residential use; and
- d) The proposed boundary feature of the extended curtilage is of a form which reflects its location and the character of the area.

In granting planning consent for the extension of residential curtilages, the Council will consider the removal of Permitted Development rights.

Houseboats

- 5.76 Houseboats contribute to the overall housing stock of Suffolk Coastal District and have grown in numbers over the course of time. There currently exists no standard definition for houseboats and no specific overarching planning guidance for houseboats, although they are considered as a housing group by national planning policy. A houseboat is, forthwith, locally defined as a floating decked structure without a permanent foundation which is designed or adapted for use as a residence and not primarily used for navigation.
- 5.77 In 2017 a Boat Dwellers Accommodation Needs Assessment was undertaken on behalf of the Council, as part of the Strategic Housing Market Assessment, to estimate the need for additional houseboat moorings in the District for the period 2016-2036. The assessment indicated that there are a total of 16 permanent houseboats located in Suffolk Coastal, but it was recognised that this may be an underestimation. The assessment concluded that there is a need for 17 additional moorings in the District for the period 2016-2036.
- 5.78 However, the estuaries where houseboats are located are sensitive environments and are nationally and internationally protected. Saltmarsh intrusion and poor pump-out facilities are issues that have been highlighted in recent times which could potentially adversely affect the protected European sites in the Deben Estuary. Increased recreational activity can also have an impact upon European sites through disturbance, and the Council is producing a Recreation Avoidance and Mitigation Strategy to set out measures for securing appropriate mitigation. Slipways, jetties and river access points can also create similar issues to that of the actual houseboat, for example by covering of saltmarshes.
- 5.79 Planning consent must be obtained for:
- A residential boat moored to a new site connected to land that has not previously been used as a berth or to facilitate a berth for a residential boat;

- Alterations to a residential boat that may materially change its external appearance;
- A replacement residential boat on an existing mooring which is substantially different in size and form from the original;
- Construction of, jetties, platforms and sheds (including alterations materially changing the size of such structures).

- 5.80 Due to the prevalence of houseboats on the Deben Estuary, the Deben Estuary Plan (produced by the Deben Estuary Partnership) provides guidelines for residential boats including in relation to their design and siting and ancillary features. The Plan was endorsed by the District Council in 2015 and proposals on the Deben Estuary will therefore be expected to demonstrate that they are consistent with the Deben Estuary Plan.
- 5.81 In addition to planning permission, some works may also require consent from the Marine Management Organisation and/or the Crown Estate. The advice of the Environment Agency in relation to potential risk from flooding will be considered. Works in, under, over or within 8 metres from a fluvial main river and from any flood defence structure or culvert may also require an environmental “Flood Risk Activity” permit from the Environment Agency.
- 5.82 Some ‘made’ Neighbourhood Plans on the Deben Estuary specify policy for houseboats within their Neighbourhood Plan areas, namely Martlesham and Melton. The Council will assist Neighbourhood Plan groups in developing policy for houseboats specific to their area.
- 5.83 The Council, in consultation with the Deben Estuary Partnership, identified a number of areas of existing houseboats along the Deben Estuary. Maps of the areas of existing houseboats are shown on the Policies Maps. Areas of existing houseboats are identified at Felixstowe Ferry, Martlesham Creek, Woodbridge and Melton.
- 5.84 Sewage disposal has been consistently identified as a problem in the Deben Estuary. In this respect, any proposal involving a new or replacement houseboat or alterations to an existing houseboat that requires planning consent must fully address the matter of sewage disposal.

Policy SCLP5.15: Residential Moorings, Jetties and Slipways

Proposals for new residential moorings, jetties and slipways, and proposals for alterations to and/or replacement of existing residential moorings, jetties and slipways, will only be supported where:

- a) They are within an area of existing houseboats identified in the Local Plan, as shown on the Policies Map, and do not result in an expansion of the overall area within which houseboats are located;
- b) They will not cause harm to the integrity of European sites or Ramsar sites either on their own or in combination with other uses;
- c) They will not result in harm to the visual amenity and/or tranquillity of the estuary; and
- d) An adequate means of sewage disposal is provided to the satisfaction of the relevant wastewater provider

Neighbourhood Plans may include local policies relating to residential moorings.

Residential Caravans and Mobile Homes

- 5.85 Residential caravans and mobile homes for permanent residential use are acknowledged as a form of housing which contributes to the overall mix of housing, and does make up part of the housing stock within Suffolk Coastal District. However, due to their construction and materials they have the potential to have a more harmful impact on the landscape and character of the surrounding area than traditional homes. Careful siting and screening may help to reduce such an impact.
- 5.86 It is acknowledged that temporary caravans are often required in the countryside for seasonal agricultural workers.
- 5.87 In addition to planning permission, a licence is also required in relation to residential caravan or mobile homes sites.

Policy SCLP5.16: Residential Caravans and Mobile Homes

As a residential use, the principal of development of permanent residential caravans and mobile homes will be considered under the relevant policies for housing.

Proposals for residential caravan and mobile home sites will be supported where:

- a) They are designed and sited in a way which does not result in a harmful impact on the landscape or on the character of a settlement;
- b) Amenity space is provided on site;
- c) They are located outside of flood zones 3 and 2; and
- d) Safe access and space for vehicle manoeuvring can be achieved within the site.

Gypsies and Travellers

- 5.88 National planning policy for Gypsies and Travellers is set out in Planning Policy for Traveller Sites (2015) and requires planning authorities to use their evidence to plan positively to meet the needs of Gypsies and Travellers and Travelling Showpeople. Gypsies and Travellers are defined for planning purposes within the Planning Policy for Travellers Sites (2015) as:

‘Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are ‘gypsies and travellers’ for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.’*

- 5.89 Travelling Showpeople are defined within the Planning Policy for Travellers Sites (2015) as:

‘Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.’

- 5.90 The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (2017) identifies Suffolk Coastal as ‘unique’ in the eastern region in that it has a relatively stable population of New Age Travellers and concludes that there is a need for 15 permanent Gypsy and Traveller pitches³⁸ over the period 2016 – 2036. The Accommodation Needs Assessment also concludes that there is a need for 2 to 3 short stay stopping sites across the study area.
- 5.91 The District also has one, long-established Travelling Showpersons site. The Accommodation Needs Assessment identifies a need for 4 plots for Travelling Showpeople in Suffolk Coastal over the period 2016 - 2036.
- 5.92 Proposals for accommodation for those who do not meet the current definition of Gypsies and Travellers or Travelling Showpeople would be considered under the other relevant housing policies, including Policy SCLP5.16 Residential Caravans and Mobile Homes.

³⁸ Area on a site developed for a family unit to live

Policy SCLP5.17: Gypsies, Travellers and Travelling Showpeople

Sites for Gypsies and Travellers and Travelling Showpeople will be permitted where:

- a) The proposed occupants meet the definition of 'Gypsies and Travellers' or 'Travelling showpeople' as set out in 'Planning Policy for Traveller Sites' (2015) (or subsequent revisions);
- b) The site is within, adjacent to or well related to a Major Centre, Town, Large Village or Small Village. Where the requirement for a site is linked to the education or health needs of the occupants the site must be well related to locations where these services are provided;
- c) The site is capable of being provided with mains water and adequate sewage/waste disposal provision (including the storage of waste prior to disposal);
- d) The site is acceptable in terms of highway safety;
- e) The site is designed so as to minimise visual impact on the surrounding area and landscape character, and does not dominate the nearest settled community;
- f) The site is not located in flood zone 2 or flood zone 3;
- g) Any industrial, retail, commercial, or commercial storage activities to take place on the site must be ancillary to the primary use of the site for residential purposes and must not harm the amenity of occupants of the site or surrounding areas;
- h) The scale and range of uses proposed within the site are acceptable in terms of their impact on any existing neighbouring uses; and
- i) Where it is intended that a site should be self managed by the occupants, the capacity of the site should not normally exceed 8 pitches.

Where the proposal is for a Travelling Showpersons site (or extension to an existing site) sufficient space for storage of vehicles and equipment will be provided.

Neighbourhood Plans may allocate sites for Gypsy and Traveller use.

Section 6

Tourism

District wide criteria based policies



6 Tourism

- 6.1 The tourism sector is a substantial and important part of Suffolk Coastal's overall economy, which brings benefit to the quality of life and the wellbeing of communities. The District succeeds in attracting visitors for a variety of reasons, but the character and appeal of its landscapes, villages and market towns is of fundamental importance.
- 6.2 Tourism supports businesses, facilities, town centres and community life across the District. Destinations throughout the District are popular for holidays, overnight stays and with residents of the district, nearby areas and further afield. Sustainable growth in tourism can promote a better understanding and appreciation of the natural and built environment, which in turn will help to maintain these finite resources for future generations.
- 6.3 Visitors to Suffolk Coastal are attracted by the character, culture, history, festivals, music, art, film, food and drink, clean beaches and spectacular coastline, river valleys, and the outstanding countryside and wildlife found across the District. Capitalising on these strengths will enable the District to continue to attract year round tourism trade.
- 6.4 Tourism is an important part of the economy of Suffolk Coastal, contributing 12% to total employment across the District in 2017. The Suffolk Coastal Economic Impact of Tourism Report 2017 identifies that over 6.3 million tourist trips were recorded generating a total of £325 million total tourism value across the District. The Ipswich Economic Area Sector Needs Assessment (2017) identifies that growth is expected to be seen within the 'Hospitality and Leisure' sector of the District's economy. Tourism is an important part of this reflecting both the cultural and natural environment across the District.
- 6.5 Suffolk Coastal offers a diverse range of tourism experiences to satisfy all tastes, with strengths including beaches, family attractions, landscapes, culture and heritage. Weaknesses include low pay and productivity in the sector along with gaps and inconsistencies in the overall offer made to visitors alongside strong competition from other local, national and international locations. The strength of the tourism offering in the peak summer months have created a seasonal tourism environment and it is important to exploit opportunities which support the tourism offer all year round.
- 6.6 The East Suffolk Business Plan, the East Suffolk Tourism Strategy and the East Suffolk Economic Growth Plan 2018 strive to build on the strength of the tourism economy and set out aims for increasing visitor numbers outside of the main tourist season including delivering and supporting cultural and sporting events. Supporting the industry is of great importance but it must not be at the expense of the sensitive natural and historic assets and attractions that draw people in to the area.
- 6.7 Popular tourism destinations include locations within the Area of Outstanding Natural Beauty (AONB), Heritage Coast, forests, estuaries, seaside towns and historic villages. This could result in some places and communities experiencing potential significant adverse impacts such as loss of natural habitats or overcrowding. The Local Plan seeks to reduce these impacts whilst increasing the volume and value of

tourism trade and extending the tourist season to support compelling destinations and visitor experiences. Tourism destinations across the district present a range of complementary attractions and experiences.

- 6.8 The Local Plan recognises the AONB as vitally important to the tourism industry across Suffolk Coastal. The 2018 AONB Management Plan identifies the natural beauty, tranquillity and historic assets within the AONB as supporting social wellbeing and the local economy.
- 6.9 The National Planning Policy Framework encourages development of tourism initiatives in urban and rural locations, provided the character of the countryside is respected, and pollution and other adverse effects on the local and natural environments are minimised. The NPPF encourages the retention and development of accessible local services and facilities. In Suffolk Coastal tourism uses can support local facilities but it is important to maintain a balance between facilities meeting the needs of visitors and communities. Sustainable tourism, as advocated in the adopted and draft AONB Management Plans, is strongly supported in the implementation of tourism development throughout Suffolk Coastal, but with particular regard to the AONB and Heritage Coast. Along the Heritage Coast it is important that sustainable tourism is integrated with local economic and community benefits and conservation and enhancement of its unique environment and valuable natural resources.
- 6.10 The Suffolk Coast Tourism Strategy 2013-2023 further advocates support for sustainable tourism, with a strong reputation for its positive environmental values which attract visitors throughout the year, and encourage effective partnership working to balance the environmental, heritage, economic, and community priorities. The Suffolk Coast Destination Management Organisation (DMO) is the organisation established to manage the improved delivery, co-ordination, facilitation, and monitoring of the key elements of the tourism strategy across the Suffolk Coast, through the development and marketing of the Suffolk Coast area as a visitor destination.

Policy SCLP6.1: Tourism

The Council will seek to manage tourism across the District in a way that protects the features that make the District attractive to visitors, and supports local facilities where the local road network has the capacity to accommodate the traffic generated from proposals.

Proposals which improve the visitor experience and support opportunities for year round tourism will be supported where increased tourism uses can be accommodated.

Proposals for tourist related development will be determined by the area's capacity for further growth in the following locations:

- a) The resorts of Felixstowe and Aldeburgh;
- b) Market towns of Woodbridge, Framlingham, Saxmundham and Leiston;
- c) The Heritage Coast environment which is of national significance;
- d) The Suffolk Coast and Heaths Area of Outstanding Natural Beauty; and
- e) Rural areas across the rest of the District.

Applicants will be expected to undertake biodiversity and habitat assessments to ensure that any development of tourism related facilities does not conflict with environmental policies. Where appropriate the Council will support the introduction of local management solutions to address any issues caused by tourism.

Tourism Destinations

- 6.9 As well as the natural environment, seaside towns and villages in Suffolk Coastal, there are a number of tourist attractions which are popular places for visitors and local residents, including beaches, family attractions, special landscapes, and cultural and heritage assets. Suffolk Coastal is characterised by diverse tourism destinations across the district which integrate experiences around culture, food and drink, artisan and creative products, aviation, military, historical interpretation and education, active recreation and wellbeing.
- 6.10 Tourism destinations support businesses and jobs in other sectors of the local economy and the Local Plan recognises and supports tourism relationships and opportunities with neighbouring local authorities including Ipswich, Tendring and Waveney, for example boat trips, pedestrian and cycle ferries and links between museums, businesses and communities.
- 6.11 Within established tourism destinations, there are likely to be opportunities for further development or intensification of use over the plan period and it is important that these are realised in a sympathetic way which works for the site as a whole and surrounding area. In this regard, the addition of new buildings, car parking areas, bus routes, cycle facilities, rail infrastructure and pedestrian links will be supported when related to the continued operation of the attraction. In

sensitive locations across the District, proposals will need to be subject to consideration under the Habitats Regulations to ensure that development does not cause any significant adverse impacts.

- 6.12 Across the District there is a comprehensive range of tourism activities provided by organisations, stakeholders and businesses. Some have the benefit of tourist road signage which are coordinated by Suffolk County Council as local Highways Authority, however many more do not benefit from such dedicated signage. Many of these take place within Suffolk Coastal but the area also benefits from attractions outside of the District such as Latitude Festival and the County Town of Ipswich, which result in additional visitors to the area and demand on accommodation in the District.
- 6.13 Attractions or facilities which broaden the tourist opportunities across the District and extend the tourist season will be welcomed where they accord with other policies in the Local Plan. The Suffolk Coast Tourism Strategy 2013-2023 emphasises the need to maximise the appeal, quality and popularity of the countryside, and the market and coastal towns to encourage more off and shoulder season visits for a range of activities.

Policy SCLP6.2: Tourism Destinations

The Council will support proposals for tourism development that contribute to the broad appeal, accessibility and year round nature of destinations across the district.

Tourism proposals should be of the highest standard of design and seek to protect and enhance the special character and interest of the attractions and the distinctiveness of the area with particular regard to sensitive landscapes and heritage assets.

Where necessary, applications for new attractions or the redevelopment or extension/intensification of attractions will need to be subject to screening under the Habitats Regulations Assessment. Any attractions which would result in significant adverse effects which could not be appropriately mitigated will not be permitted. A Landscape and Visual Impact Assessment will also be required where the attraction is in an area of landscape sensitivity in accordance with the Landscape policies.

Tourism in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Heritage Coast

- 6.14 The scenic beauty and special landscape qualities that justify the 155 square miles of designated Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) make a significant contribution to the attractiveness of the area to visitors. In this regard it is vitally important that the sensitive landscapes of the AONB are conserved for the future success and public enjoyment of the area, as supported by national planning policy.

- 6.15 The importance of conserving the Heritage Coast is also outlined in national planning policy. The Council recognises the wider economic benefits that can be brought about through the conservation of the historic environment, bringing significant benefit to local economies and communities.
- 6.16 National planning policy is clear that major development in designated areas (such as the Suffolk Coast and Heaths AONB and Heritage Coast) should be restricted except in exceptional circumstances and where it can be demonstrated that proposals are in the public interest.
- 6.17 It is acknowledged in the Suffolk Coast and Heaths AONB Management Plan of 2018 that development of sustainable tourism and Heritage Coast conservation is vitally important to the success of the tourism industry across the AONB. The value of the tourism economy to the AONB was nearly £200m in 2016 and supported over 4,000 jobs. The Management Plans encourage new tourism development in the AONB, provided it is inclusive, sustainable and supports the conservation of the area.
- 6.18 Tourism can take many forms but within the AONB, the Local Plan will seek small scale developments which are of a higher standard of design, and proposals that reduce impact on the environment, by making reuse of existing buildings to ensure that special qualities of the area are retained. Opportunities for innovative contemporary design are welcomed in appropriate locations within the AONB. The success of the tourism industry and the conservation of the AONB are not mutually exclusive. In this regard a supportive tourism strategy must acknowledge the importance of the scenic beauty and special landscape qualities of the AONB and the synergistic benefits associated with open collaboration and communication between tourism businesses, visitors, local communities, and the AONB Partnership.
- 6.19 The Suffolk Coast Tourism Strategy 2013 emphasises the need for continued uptake of the Community and Conservation Fund, operated by the Suffolk Coast and Heaths AONB Partnership, in aiding the conservation of the sensitive landscapes of the AONB through monetary contributions. In this regard, the Local Plan encourages businesses that benefit from the special character of the AONB for attracting visitors, to contribute financially to the Community and Conservation Fund.
- 6.20 Sustainable tourism is strongly encouraged throughout Suffolk Coastal, and to a greater extent within the AONB and Heritage Coast. Sustainable tourism is defined as tourism development that actively enables the wider environmental objectives of the AONB Partnership. These objectives, as stated in the Suffolk Coast and Heaths AONB Management Plan, are as follows:
- Special wildlife, landscape, seascape and heritage qualities are conserved and meet the needs of people who live, work and visit the AONB;
 - Local communities are fully engaged in the care of the area;
 - A high-quality landscape and infrastructure exist to support sustainable access of the AONB as a whole.

- 6.21 Extending opportunities for tourist activities that draw on and are consistent with, the conservation of their heritage features is encouraged.

Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast

Applicants are encouraged to engage with local communities and the Suffolk Coast and Heaths AONB Management Unit in evolving development proposals, with the aim of delivering development that takes an active role in the management of the local area.

Tourism development in the AONB, or its setting and Heritage Coast will be supported where it:

- a) Enhances the long term sustainability of the area;
- b) Is of an appropriate scale for its surroundings (10 pitches/units or fewer in relation to proposals for tourist accommodation);
- c) Is well related to existing settlements and / or supporting facilities;
- d) Avoids, prevents or mitigates for adverse impacts on the natural environment;
- e) Supports the conservation and enhancement of the natural beauty and special qualities of the AONB and its setting;
- f) Is of the highest design standards and where appropriate reuses existing buildings;
- g) Promotes innovative, contemporary design in appropriate locations;
- h) Minimises light pollution from artificial light sources and ensures the retention of dark skies;
- i) Avoids locations sensitive to the exposed nature of the AONB and Heritage Coast; and
- j) Demonstrates sustainable aspects of the development during construction and throughout the life of the development. Renewable energy provision is strongly encouraged.

Tourism outside the AONB

- 6.22 Outside of the AONB, the Council is welcoming of tourist enterprises and activities which can complement the tourism industry established in the ‘hotspots’ across the District. The areas outside of the AONB can play a key role in supporting and facilitating the increase of attractions and accommodation across the District.
- 6.23 The East Suffolk Business Plan and the East Suffolk Tourism Strategy both support the focus of tourism across the entire District and to establish strong links with neighbouring areas. Encouraging increased tourism opportunities in the less sensitive parts of the District will ensure that the overall tourism capacity is increased and tourism spend increases across the District and throughout the year.

- 6.24 Tourism development outside of the AONB should be directed to locations which are well related to the existing settlements and will need to demonstrate good connectivity with existing amenities, services and facilities, and promote walking and cycling opportunities where appropriate.

Policy SCLP6.4: Tourism Development outside of the AONB

Tourism development outside of the AONB will be supported where it:

- a) Enhances the long term sustainability of the area;
- b) Is well related to existing settlements;
- c) Avoids, prevents or minimises adverse impacts on the natural environment;
- d) Is of a scale that reflects the surrounding area;
- e) Is of the highest design standards;
- f) Minimises light pollution from artificial light sources and ensures the retention of dark skies; and
- g) Demonstrates sustainable aspects of the development during construction and throughout the life of the development. Renewable energy provision is strongly encouraged.

New Tourist Accommodation

- 6.25 Across Suffolk Coastal, tourist accommodation is provided in a variety of forms from large hotels, to small scale bed and breakfast establishments, to caravan and camping parks.
- 6.26 The Local Plan supports tourism accommodation initiatives that enhance and broaden the choice of accommodation and visitor destination facilities, which promote year round tourism and longer stays. The town centres, seafront resorts and market towns are priority locations for new hotel development followed by other accessible locations within settlement boundaries.
- 6.27 There is a broad range of self catering tourist accommodation available including camp sites, chalets, log cabins, caravan sites and glamping sites for all year round and seasonal uses. These sites provide a range of permanent and temporary buildings as well as differing in size and location and collectively create a rich and diverse choice of places for tourists to stay. It is important that landscape character assessment and design ensures that such developments do not conflict with the character of the landscape.
- 6.28 Providing a diverse range of tourist accommodation across the District is desirable and the Council is generally supportive of opportunities that come forward subject to compliance with other policies in the Local Plan. Tourists visiting the area for short or longer periods of time have a positive impact on the viability of local shops and services and support the vitality of local and rural economies. The Local Plan recognises the importance of maintaining vibrant and active local communities particularly during off peak tourism months, as emphasised in the Local Plan consultation responses.

- 6.29 National Planning Policy supports tourism opportunities in the rural areas which respect the character of the area. The rural parts of the District provide a valuable economic and social contribution through increased spend in the local area and the provision of jobs and associated employment as demonstrated in the Suffolk Coastal Economic Impact of Tourism Report 2017. In order to promote the reuse/redevelopment of existing buildings, the Council will be supportive of proposals which bring these back into use.
- 6.30 In the interests of sustainable travel, proposals for new tourist accommodation will need to demonstrate good connectivity with tourist destinations, local amenities and promote walking and cycling opportunities.
- 6.31 The Local Plan seeks to provide a diverse range of accommodation across the District to cater for the tourist demand. Tourist accommodation particularly that which is in permanent buildings can sometimes come under pressure to be occupied for full time residential use. New tourism accommodation should therefore be restricted by planning conditions and/or legal agreements so that it is retained for the benefit of the tourism economy and not lost to residential use. Planning conditions will limit the occupation of new self-catering tourist accommodation units to a continuous period of 56 days by one person or persons within one calendar year. The owners/operators of the accommodation will be required to maintain an up-to-date Register of all lettings, which shall include the names and addresses of all those persons occupying the units during each individual letting. The Register will be required to be made available at all reasonable times to the Local Planning Authority.

Policy SCLP6.5: New Tourist Accommodation

Proposals for new tourist accommodation will be acceptable where:

- a) The demand or need for tourist accommodation is clearly demonstrated;
- b) They are of a high standard of design;
- c) They are of a scale appropriate to the nature of the site and its setting;
- d) They do not have a material adverse impact on the AONB or its setting, Heritage Coast or estuaries;
- e) Covered cycle storage, proportionate to the size of the site is provided on site;
- f) The road network is able to accommodate the volume of traffic generated without having a significant adverse impact on the free flow of traffic and highway safety;
- g) Ancillary facilities to support the tourist uses are provided on the site where required; and
- h) Flood adaptation and mitigation measures are included where required.

Tourist accommodation comprising permanent buildings will only be permitted within the Settlement Boundaries through the conversion of buildings of permanent structure; on medium and large scale sites where commercial, recreational or entertainment facilities are provided on site, or where such development forms part of a comprehensive landscape creation master plan which supports wider landscape and ecological gain

New tourist accommodation will be restricted by means of planning conditions which permits holiday use only, restricts the period the accommodation can be occupied plus requires a register of all lettings, to be made available at all times.

Protection of Existing Tourist Accommodation

- 6.32 The existing stock of hotels, guest houses, bed and breakfast businesses and self catering accommodation provide an important role in support of the District's economy. Council monitoring in 2018 shows that Suffolk Coastal has over 4000 rooms providing over 7500 bedspaces for tourist accommodation.
- 6.33 However, this diverse range of accommodation can sometimes come under pressure for conversion into residential properties, particularly in countryside settlements where new residential development is more strictly controlled. In recent times the rise of more flexible tourist accommodation provided through websites such as Airbnb has seen a more diverse range of accommodation being available which supplements the more established provision.
- 6.34 The Local Plan recognises the importance of maintaining vibrant and active local communities particularly during off peak tourism months, as emphasised in the Local Plan consultation responses. A balance must be made between the need to provide permanent housing for local people and provide tourist accommodation to support the local economy. As such, regard will be given, where

the lack of demand for tourist accommodation can be demonstrated, to the vitality of local communities throughout the year.

- 6.35 The Local Plan therefore needs to set out an approach to protect existing tourist accommodation from conversion to residential use where tourist use may continue to be viable. The policy resists the change of use apart from exceptional cases where an identified lack of demand for tourist accommodation is clearly and satisfactorily demonstrated. As a minimum, planning applications for a change of use will need to provide marketing evidence demonstrating the accommodation has been marketed for a sustained period in accordance with the requirements set out in the Commercial Property Marketing Guidance seen in Appendix D.

Policy SCLP6.6: Existing Tourist Accommodation

Existing tourist accommodation will be protected. Change of use will only be considered in exceptional circumstances where it can be fully and satisfactorily demonstrated that there is no current or future demand for the tourist accommodation.

Marketing evidence must be provided which demonstrates the premises has been marketed for a sustained period of a minimum of 12 months in accordance with the requirements set out in the Commercial Property Marketing information as seen in Appendix D.



Section 7

Transport

District wide criteria based policies

7 Transport

- 7.1 Suffolk Coastal has a mixture of urban and rural settlements with limited public transport opportunities in certain parts of the District which places a heavy reliance on the private motor car as a form of transport to conduct day-to-day business. Many local roads are single track and unsuitable for conventional public transport and the lack of alternatives increases the use of the private motor car across the District. For those residents and visitors close to a range of facilities a bicycle may offer an alternative or additional transport option but this is limited.
- 7.2 As a result of this, the Local Plan seeks to acknowledge that sustainable transport opportunities are limited and appropriate provision for vehicle parking is required alongside developments and to maintain the viability and vibrancy of the District's town centres, visitor locations and wider communities. The Local Plan outlines strategic ambitions in respect of transport and highways infrastructure in chapter 2 and 3. Policies in this chapter relate to local and site specific transport issues.
- 7.3 The Council has prepared a parking strategy and policies as part of Civil Parking Enforcement to be introduced across the District in April 2019. The Parking Plan details the Council's approach to parking management and enforcement, and the Local Plan helps to deliver the objectives through appropriate parking provision and sustainable transport as part of new developments.

Sustainable Transport

- 7.4 . Many areas do not have access to convenient public transport and many local roads are single track and unsuitable for conventional public transport such as buses. This is reflected by the level of household vehicle ownership in Suffolk Coastal which amounts to 86% compared to a national average of 74% (Census, 2011). Furthermore, approximately 44% of people in the District use a car as their primary mode of travel to work compared to a national average of 37% (Census, 2011).
- 7.5 The Suffolk Local Transport Plan 2011-2031 sets out a priority to support the growth of businesses, reducing the demand for car travel, making efficient use of transport networks and improving infrastructure. The County Council's Rights of Way Improvement Plan complements the Local Transport Plan by identifying changes that will secure an improved network, contributing to its four shared priorities of reducing congestion, accessibility, air quality and safety. In consideration of this, Policy SCLP7.1 below encourages and facilitates the use of sustainable transport options where possible, and supports the efficient use of existing transport networks.
- 7.6 In designing and assessing development proposals, the Public Rights of Way Network should be considered as a means of encouraging physical activity, providing access to the natural environment, supporting

tourism, reducing travel by vehicular modes, reducing carbon emissions and (where relevant) aiding recreational avoidance of sensitive sites.

- 7.7 Travel Plans are required by the National Planning Policy Framework for all new developments that create significant amounts of movement. The purpose of a Travel Plan is to set out measures to facilitate sustainable forms of travel and reduce the use of the private car. This will help to leave a lighter footprint on the environment by enhancing sustainability and will ultimately create better places to live; an action of the Government's 25 year Environment Plan. It is not necessarily the size of the development that triggers the need for such a plan but more the nature of the use.
- 7.8 The Council will work in partnership with Suffolk County Council as they draft new guidance for Travel Plans. When published the new guidance will be considered by the Council and adopted for use as a material planning consideration if appropriate.

Policy SCLP7.1: Sustainable Transport

Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.

Development will be supported where:

- a) It is proportionate in scale to the existing transport network;
- b) It is located close to, and provides safe pedestrian and cycle access to services and facilities;
- c) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;
- d) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
- e) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety;
- f) It will improve public transport in the rural areas of the District; and
- g) The cumulative impact of new development will not create severe impacts on the existing transport network.

Proposals for new development that would have significant transport implications should be accompanied by a Travel Plan. A Travel Plan will be required for proposals for:

- h) New large scale employment sites;
- i) Residential development of 80 or more dwellings; and
- j) A development that when considered cumulatively with other developments, is likely to have a severe impact on the local community or local road network.

In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds a Transport Statement will be required for development of 50 -80 dwellings and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. Non residential development will be considered on a case by case basis dependent on the volume of movements anticipated with the use proposed..

Vehicle Parking

- 7.9 The reliance on the car as a primary form of transport in this District necessitates the need for provision of adequate, reasonably priced car parking to maintain the viability and vibrancy of our town and district centres, as well as resorts and other areas popular with tourists across the District.
- 7.10 Transport and logistics form a very significant part of the local economy. To support the specific needs of this sector, the Council will work with relevant organisations such as Highways England and Suffolk County Council to ensure that needs such as stopping places are provided. Vehicle parking is an important tool for

visitor management particularly in relation to tourism across the District. The provision of off-street visitor parking, (including multi storey) particularly where it applies to tourism and town centres, will be supported in appropriate locations.

- 7.11 Some people, either self employed, or as a condition of their employment, are required to take their work vehicle (such as a van or recovery vehicle) home with them. Modern vehicles tend to be bigger than the size of residential garages and parking spaces which means that these are not always suitable or available for parking. Where possible, the Council will encourage larger residential garages and parking spaces in new and renovated residential development to help facilitate this.
- 7.12 Many modern vehicles are being manufactured with the aim of decreasing carbon emissions. This has led to the increase of low-emission vehicles as a usable and reliable form of transport. Although the concept of low-emission vehicles has been promoted and embraced in urban areas (such as town centre locations, supermarkets or places of work), rural areas have not seen a similar level of uptake. Notwithstanding this, the National Planning Policy Framework promotes the facilitation of low-emission vehicles. Over the plan period, it is anticipated that technological advances could lead to a wider uptake of such vehicles and the Council will support and encourage the facilitation of low-emission vehicles and their ancillary infrastructure needs, such as:
- Passive electric charging (capacity in the connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces).
 - Active electric charging (fully installed and ready-to-use charging points):
 - Rapid charging hubs (22-50kw charging power)
 - On-street electric charging (7kw charging power)
 - Off-street electric charging (3kw charging power).
- 7.13 The level of charging supplied should be commensurate with the number of vehicle parking spaces included in the development. However, higher levels of charging power will be supported, if considered appropriate and desirable. Technological advances throughout the lifetime of the plan may require a flexible approach to be taken when considering low-emission vehicles and charging points in developments.

Parking Proposals and Standards

- 7.14 The level of parking provision required can be influenced by the location of new development, accessibility to public transport, provision for cyclists and the availability of public and on-street parking. The Local Plan recognises that improvements to public transport can reduce the requirement for parking provision, and have a beneficial impact on 'anti-social' parking, particularly with respect to commuters' vehicles. The Local Plan will therefore support all improvements in public transport and sustainable travel options that have a positive impact on existing problems of parking provision and congestion at key 'pinch points'.

- 7.15 When considering proposals for parking, in order to reduce potential for surface water flooding and for the protection of water quality, sustainable drainage systems should be implemented (SUDS) with permeable surface materials³⁹.
- 7.16 As local highways authority, Suffolk County Council published 'Suffolk Guidance for parking' in 2015. The document provides details in respect of vehicle parking standards to be implemented across the county subject to local considerations. Residential standards in the County Council's document are presented as minimums and the Local Plan will seek to ensure appropriate parking does not proliferate the parking issues faced by many communities. The visual impact of parking will be considered against relevant policies of this Local Plan including SCLP11.1 and SCLP10.3.

³⁹ Examples of such can be found in the CIRIA SUDS Manual which details examples of best practice in this regard.

Policy SCLP7.2: Parking Proposals and Standards

The Council will work with partners to ensure that vehicle parking provision is protected and managed to support the economy and sustainable communities. The level of parking provision required will depend on the location, type and intensity of use. Proposals that minimise congestion, encourage sustainable transport modes and reduce conflict between road users across the District will be supported.

Proposals involving vehicle parking will be supported where they take opportunities to make efficient use of land and they include:

- a) The provision of safe, secure, and convenient off-street parking of an appropriate size and quantity including addressing the need for parking or secure storage for cars, cycles and motorcycles, and where relevant, coaches and lorries;
- b) Opportunities to reduce the recognised problem of anti-social parking or potential problems that may arise which impacts the quality of life or vitality of an area for residents and visitors;
- c) Appropriate provision for vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles; and
- d) The incorporation of sustainable drainage systems (SuDS), permeable surfacing materials and means of protecting water quality in drainage schemes should be ensured.

Where proposals involve public transport improvements or re-developments, the Council will encourage the provision of Park & Ride facilities, if appropriate.

Proposals will be expected to meet the parking standards contained in the 2015 Suffolk Guidance for Parking (or subsequent revisions) where they do not relate to 'Residential Parking Design' unless other local planning considerations indicate otherwise. Proposals should also accord with both the East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy, or Neighbourhood Plans for the area where applicable.

Section 8 Community Facilities and Assets

District wide criteria based policies



8 Community Facilities and Assets

- 8.1 Community facilities and assets are an important part of the social fabric of neighbourhoods and communities. Facilities can include shops, post offices, public houses, medical facilities, police facilities, sports venues, cultural buildings, places of worship and places which promote social interaction and provide opportunities for meetings between people who might not otherwise come into contact with each other. Individually and collectively these provide places for people to meet and socialise as well as valuable services which encourages active communities and fosters a sense of identity and well-being for those who live in and visit the area.
- 8.2 The National Planning Policy Framework reflects the need to plan positively for and promote the retention and development of local services and facilities which is supported by the Council. Protecting community facilities and assets reduces social exclusion which can be disproportionately influenced by limited access to facilities. The loss of facilities across the District could lead to a significant number of residents being socially excluded and have a detrimental impact on community cohesion and the creation of successful communities across Suffolk Coastal.
- 8.3 Large scale developments provide the opportunity to create places where communities can thrive through the provision of social, recreational, cultural and community facilities to meet the needs of residents and visitors. Ensuring that community facilities and assets enable and support healthy lifestyles across the district is essential and will broaden the variety of provision for all.

Protection of Community Facilities

- 8.4 The Council considers it is important to retain community facilities across the District to both serve the local community and support tourism activities in the area.
- 8.5 The Localism Act 2011 introduced 'assets of community value', providing community groups with the ability to nominate non-residential buildings or land which is important to their community. Once an asset is listed, if the owner decides to sell, within five years of listing, they must inform the local authority of their intention to do so. The community has up to six weeks to express an interest in becoming potential bidders to buy the asset. Once an expression of interest has been received, a further four and a half month pause in the sale process is triggered. This gives potential bidders a total of six months to raise the funds required to purchase the asset. At the end of the period, the owner may sell the asset to whomever and at whatever price they choose. However, the listing of an asset does not provide protection against a change of use or redevelopment. This can mean the value of the asset is greater due to its potential to be converted to non-community uses. This can frustrate the ability of the community to raise sufficient funds to purchase the asset.

- 8.6 The Local Plan also has a role to provide protection to community facilities which have not been identified as assets of community value. These facilities are still important to the local community and help enhance the level of services across the District. Consultation responses have highlighted that there is strong support for investigating all potential options before the redevelopment for a non-community use is allowed. The consultation responses also highlighted that the rural areas of the District lack adequate facilities which places a greater emphasis on the facilities in the market towns and larger villages in the area.
- 8.7 However, there is a need for flexibility to allow the change of use or redevelopment in certain circumstances such as lack of community need, lack of viability or re-provision of the building in an equally or more accessible location. In demonstrating that there is no community need for the facility or an alternative community use, evidence should be submitted with a planning application which provides details of consultation with the local community and an analysis of service provision in the locality which demonstrates that accessibility to similar services and facilities will not be adversely affected. Evidence will need to demonstrate that the premises have been marketed in a manner agreed with the Council for at least 12 months for the current use or alternative community facility in line with the requirements of the Commercial Property and Marketing Guidance as detailed in Appendix D.
- 8.8 The government periodically amend the General Permitted Development Order which in some circumstances allows some changes of use to take place without the need for planning permission.

Policy SCLP8.1: Community Facilities and Assets

Proposals for new community facilities and assets will be supported if the proposal meets the needs of the local community, is of a proportionate scale, well related to the settlement which it serves and would not adversely affect existing facilities that are easily accessible and available to the local community.

Proposals to change the use, or redevelop for a non-community use, a facility registered as an asset of community value, will not be permitted.

Proposals to change the use, or redevelop for a different use, a community facility which is not registered as an asset of community value, will only be permitted if:

- a) It can be demonstrated that there is no community need for the facility and the building or the site is not needed for an alternative community use;
 - b) It can be demonstrated that the current, or alternative community uses are not viable and marketing evidence is provided which demonstrates the premises have been marketed for a sustained period of 12 months in accordance with the Commercial Property Marketing Guidance;
- Or
- c) Development would involve the provision of an equivalent or better replacement community facility either on site or in an alternative location in the vicinity that is well integrated into the community and has equal or better accessibility than the existing facility which meets the needs of the local population.

Open Space and Recreational Facilities

- 8.9 The open space and recreational facilities and the continued management of these areas across the District are vital for the promotion of healthy communities and active lifestyles for all as well as mitigating the impact of development, and has been emphasised by consultation responses. Open space which is accessible can be provided through formal facilities such as playing pitches and courts, but also through informal spaces such as village greens, woodlands, beaches, and public rights of way which collectively contribute to healthy communities and active lifestyles. Open space such as countryside which provides a visual sense of openness is not included within this policy as normally those areas are not publically accessible, other than on public rights of way.
- 8.10 Ensuring the appropriate provision and retention of a wide variety of accessible open spaces and recreational facilities is an important role for the Local Plan, and providing access to these areas is important for people's mental and physical well-being. Open spaces also have a role in helping to support habitat creation, enhancement of biodiversity networks, the aesthetic quality of the public realm and built environment and to manage surface water; improving water quality; enabling conservation/reuse and supporting the mitigation of flood risk.

- 8.11 Suffolk Coastal is committed to improving the health and well-being of people in the District and published a Leisure Strategy in 2014. The Leisure Strategy and the supporting assessments⁴⁰ identify existing provision of open space and recreational facilities across the District and identify areas of deficiencies.
- 8.12 The Council supports the provision of open space and recreational facilities (or expansion of existing facilities) across the District to encourage active lifestyles and community well-being and this should be delivered alongside new development. The National Planning Policy Framework acknowledges the need for open space and recreational facilities and how these contribute to social interaction and the creation of healthy, inclusive communities. National standards recommended by Fields in Trust promotes a requirement for 2.4 hectares of open space (play areas and playing fields) per 1,000 people which enables residents of all ages to participate in sport and play. Suffolk Coastal uses this calculation as a standard and this is to be continued over this plan period when considering applications for new open space and recreational facilities apart from when local evidence and provision demonstrates the need for an alternative approach.
- 8.13 Given the age structure of the District, proposals which support more specific provision for recreational facilities which are designed to meet the needs of the ageing population will be encouraged alongside those targeted at the wider community.
- 8.14 As well as the provision of open space and recreational facilities over the plan period, the Local Plan also seeks to protect these spaces from redevelopment unless exceptional circumstances can be demonstrated. This has been strongly encouraged throughout consultation responses regarding the provision and protection of new and existing community facilities.
- 8.15 To demonstrate whether an open space proposed for development is surplus to requirements, applicants are expected to undertake an open space needs assessment. This should follow the approach taken in the Suffolk Coastal Open Space Needs Assessment and consider the provision of open space with the same use within the site catchment area, alternative open space uses and how the site relates to existing provision for each respective type of open space use in the locality. The contribution an open space makes towards local amenity, public realm, biodiversity and the wider green infrastructure network should be considered as part of an open space needs assessment.
- 8.16 The National Planning Policy Framework allows local communities through Local Plans and Neighbourhood Plans to identify green areas of particular importance to them for special protection. By designating land as Local Green Space local communities are able to rule out new development other than in very special circumstances which is a stronger test than the Local Plan policy. The Council does not have enough evidence to designate Local Green Spaces across the District in the Local Plan but local communities can consider designating areas important to them in Neighbourhood Plans.

⁴⁰ Suffolk Coastal District Council Playing pitch/non pitch assessment (2014), Open space assessment (2014), Built facilities assessment (2014)

Policy SCLP8.2: Open Space

The Council supports the provision of open space and recreational facilities and their continued management across the District. Primarily to encourage active lifestyles and to increase participation in formal and informal recreation for all sectors of the community, and also to support the biodiversity, promote effective water management and to enhance the public realm. New residential development will be required to contribute to the provision of open space and recreational facilities in order to benefit community health, well-being and green infrastructure..

There will be a presumption against any development that involves the loss of open space or community sport and recreation facilities.

Proposals for development that results in the loss of open spaces will only be permitted in exceptional circumstances where:

- a) The proposal is ancillary to the open nature of the area and will enhance local character, increase local amenity and be of greater community or wildlife benefit,
- b) An open space assessment demonstrates the site is surplus to requirements including its ability to be used for alternative open space uses;

Or

- c) The loss resulting from the proposed development will be replaced by equivalent or improved provision in terms of quantity, quality and in a location that is equally or more accessible to the community in a timely manner..

Neighbourhood Plans may identify areas of Local Green Space and include policies relating to their protection.

Allotments

- 8.17 Allotments are valuable community spaces that provide people with the opportunity to enjoy an active and healthy lifestyle and benefit the quality of life of residents across the District. They provide opportunities for food production, exercise and community interaction as well as being valuable green spaces which provide habitats for many forms of wildlife alongside the built environment.
- 8.18 The Council have transferred ownership of land used as allotments to Town or Parish Councils with a legal requirement that these are retained for use as allotments as statutory allotment land. The statutory designation requires these to be retained for use as allotments. Allotments are also provided by community groups and private landowners but in respect of the Local Plan the land use and community

benefit are treated equally. Across the District, many settlements benefit from the provision of allotments, although some settlements do not have the same provision.

- 8.19 Proposals for new allotments will be preferred alongside residential allocations, master plans for the Garden Neighbourhoods or through Neighbourhood Plans which emerge over the plan period. Alongside the provision of the land for allotments, it is also necessary to ensure that infrastructure associated with this community facility is provided, such as vehicle parking and water supply.

Policy SCLP8.3: Allotments

The Council will encourage the provision of new allotments in order to meet a locally identified demand. Allotments and associated infrastructure should be located in locations well related to the existing community.

The loss of existing allotments to alternative uses will be resisted unless:

- a) Evidence shows that there is unlikely to be any future demand for the allotments;
- b) Other allotments exist and have the necessary capacity to meet demand;
- c) Alternative provision is made on an alternative site within the settlement which ensures an increase in the overall level and standard of allotments across the District;

Or

- d) There is evidence to show that there is unlikely to be any future demand for allotments.

Digital Infrastructure

- 8.20 Advanced, high quality and reliable digital infrastructure is essential for modern life in respect of improved economic development and well-being across the District. With more facilities being accessed on-line (such as personal banking and shopping as well as to access educational and health services) the need for modern digital infrastructure including mobile and broadband services which are reliable and meet the demands of both residents and businesses is fundamental to sustaining local communities.
- 8.21 Across the District there is a deficit in reliable and high quality digital infrastructure. Currently demands for mobile phone services and broadband are increasing, and across Suffolk Coastal there is a variety of provision with some rural areas experiencing poor service and signal. National programmes supported by the government are continually being expanded and updated across the District. These are expected to continue and increase provision over the plan period as digital technology evolves.
- 8.22 The East Suffolk Business Plan demonstrates that the Council is committed to supporting the improved delivery of telecommunications across the District. The Council's Enabling Broadband Programme complements the improvements undertaken by service providers across the district. Improving the

telecommunications across the District has the potential to boost the local economy as well boosting community well being and transforming the lives of local residents through improving access to services.

- 8.23 Service providers are currently rolling out the 4G network supported by the government across the country. In Suffolk, service providers are working with government agencies, New Anglia Local Enterprise Partnership and Suffolk County Council to improve provision across the District. Technology and infrastructure to support network expansion for the next generation of communications is being trialled in pilot areas nationwide and will provide better coverage in a more concentrated area. Although widespread rollout of the next generation network is not expected in the immediate future, developments that come about in the future should be cognisant of this.
- 8.24 The Council as local planning authority has a role to play in supporting the provision of digital infrastructure through the consideration of equipment such as masts to improve the overall network. The location and setting of equipment associated with digital infrastructure will need to balance the technical requirements of providing the services against the design and location of such facilities.
- 8.25 Across the District a number of sensitive locations and landscapes are identified and designated. Within these areas the Local Plan requires sympathetic design standards to be achieved and this principal will also apply to the provision of digital infrastructure. For the purposes of this policy, sensitive locations include the Area of Outstanding Natural Beauty, Heritage Coast, Conservation Areas, Listed Buildings, Scheduled Ancient Monuments, Historic Parklands or features identified in the Landscape Character and Sensitivity Study.

Policy SCLP8.4: Digital Infrastructure

Proposals to improve the provision of digital infrastructure across the District will be supported, provided:

- a) The siting and external appearance of all equipment does not have a significant detrimental impact on the surrounding area and is sympathetically located while respecting the operational needs of the digital infrastructure network;
- b) Equipment installed on buildings is sited and designed to minimise the impact on the external appearance of the building; and
- c) Applications are supported by evidence which demonstrates early engagement with relevant digital infrastructure providers and the need for the equipment to be located within that area.



Section 9

Climate Change

District wide criteria based policies

9 Climate Change

- 9.1 The National Planning Policy Framework sets out strong measures to address climate change as well as encouraging local planning authorities to set target contributions and promote the uptake of decentralised renewable or low-carbon energy in developments. Transitioning to a low carbon future, encouraging the reuse of existing resources (including conversion of existing buildings), and encouraging the use of renewable resources are measures which are promoted by the National Planning Policy Framework. The Government's recently published 25 year Environment Plan outlines a broader commitment to reduce emissions from 1990 levels by 80% by 2050. The Council will aim to contribute to this wider national commitment to address climate change.

Renewable Energy

- 9.2 Suffolk Coastal is part of the Norfolk & Suffolk Energy Coast which is part of the wider East of England Energy Zone. The New Anglia Local Enterprise Partnership intends to maximise the energy opportunities in this area. This is an intention that the Council will endeavour to support, where possible. The Suffolk Coastal area can contribute towards the generation of renewable energy, most notably through biomass and anaerobic digestion schemes, solar panel schemes and wind power, including turbines and landing points to serve off-shore provision. Proposals relating to offshore wind should also take account of relevant policies and guidance in the East Marine Plan.
- 9.3 The National Planning Policy Framework promotes and encourages schemes that utilise renewable energy resources. This should be in tandem with energy efficiency measures, particularly in any new development, and should be consistent with the need to safeguard residential amenity, the environment and the landscape.
- 9.4 National planning policy states that Local Plans should consider identifying suitable areas for renewable and low carbon energy development. Local planning authorities should also support community-led initiatives for renewable and low carbon energy taken forward through Neighbourhood Planning. The Government have stated that wind farm developments should only be granted planning permission if the site is identified as a 'suitable area' and the proposal has the backing of the local community. The level of local community support for low carbon and renewable energy proposals will be evaluated in terms of engagement related to planning applications and through the neighbourhood planning processes where applicable.
- 9.5 Proposals for wind energy and energy from biomass or waste of more than 50MW installed capacity are defined as nationally significant infrastructure projects and are determined by the Secretary of State. Policy relating to such proposals is contained in the National Policy Statement for Renewable Energy Infrastructure. Proposals for energy from waste schemes of less than 50MW will be determined by Suffolk County Council as Waste Planning Authority and policy for such schemes is currently contained in the Suffolk County Council Waste Core Strategy (2011).

- 9.6 Biomass and anaerobic digestion schemes can provide an important contribution to energy generation, in particular in areas not served by the national gas grid. However, there also exists the potential for such schemes to effect air quality. In this respect, proposals for energy generation from biomass will be supported in principle but particular consideration will be given to air quality impacts, transport impacts, proposals for associated buildings and, where relevant, grid connections.
- 9.7 Solar panel developments can range in scale from installations on individual buildings to solar farms, and can range in type, from in-built solar panels to mounted solar panels. Notwithstanding this, solar panel schemes will generally be supported, particularly for new development, however careful consideration will be given to the visual impact in sensitive locations including through design, siting and, where possible, natural screening.
- 9.8 In respect of wind power, much of the District's environment is a sensitive one and needs protection. Given the national and local recognition of the need to transition to a low carbon future, the option of resisting wind power generation entirely is not appropriate. The Local Plan will encourage onshore wind within the mix of the generation of renewable energy, most notably to serve local communities. Although generally encouraged, proposals will need to ensure they do not adversely affect the high quality landscape, wildlife populations or habitats and avoid noise pollution across the District.
- 9.9 Reflecting the policy in the National Planning Policy Framework, applicants for wind energy development of one or more turbines will be expected to demonstrate how the local community has been involved in developing proposals and that the submitted scheme has the support of the local community. Where Neighbourhood Plans are produced, the opportunity exists to obtain local community support in the identification of suitable areas for renewable energy as part of the Neighbourhood Plan process. The Council aims to undertake a Supplementary Planning Document related to low carbon and renewable energy development, following completion of this Local Plan, to support this process.
- 9.10 Due to the potential for impacts on the landscape, the Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018), and any subsequent iterations, should be consulted when evaluating the landscape and visual impact of low carbon and renewable energy development. The cumulative impact of energy proposals could have potentially significant impacts on the Suffolk Coastal countryside and the Council will be working closely with government and other agencies to ensure issues related to the National Grid are considered comprehensively and not incrementally.
- 9.11 As not all renewable and low carbon energy installations require planning permission it is not always possible to monitor renewable energy capacity accurately. Therefore, actual installed capacity is likely to be higher than reported in the Authority Monitoring Reports.

Policy SCLP9.1: Low Carbon & Renewable Energy

The Council will support low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the following criteria:

- a) They can evidence a sustainable and, ideally, local source of fuel;
- b) They can facilitate the necessary infrastructure and power connections required for functional purposes;
- c) Provide benefits to the surrounding community; and
- d) Are complementary of the existing environment without causing any significant adverse impacts, particularly relating to the residential amenity, landscape and visual impact, transport, flora and fauna, noise and air quality, unless those impacts can be appropriately mitigated.

Wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan. The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed above.

When the technology is no longer operational there is a requirement to decommission, remove the facility and complete a restoration of the site to its original condition.

Sustainable Construction

- 9.12 Buildings are no longer viewed as products of construction and engineering, but as products of place-making and design that reflect the environment in which they're situated. This is proven by the fact that sustainable construction does not solely relate to the physical structure of a building, it also relates to other aspects such as transport, waste and water management and in some cases, ecological value. Therefore, comprehensive sustainable construction that appropriately encapsulates the values of sustainability will be strongly supported by the Council. This will help to achieve the concept of 'environmental net gain' promoted in the Government's 25 year Environment Plan. Sustainable construction methods can also help to reduce the running costs of housing, helping to contribute towards objectives of improving the affordability of housing.
- 9.13 Sustainable construction methods, water efficiency standards and the energy consumption of buildings are largely controlled by Building Regulations. However, the Council is still able to require lower energy and water usage in new developments.
- 9.14 From October 2015, local planning authorities can require higher 'optional' Building Regulations standards to be met. For water efficiency the Government has introduced an optional technical standard that requires new housing to go further than Building Regulations and be designed to consume 110 litres/person/day, as opposed to 125 litres/person/day. The Environment Agency have identified East

Anglia as an area of 'serious water stress' and the Anglian Water Resources Management Plan (2015) identifies lowering demand as one way in which this can be addressed. Requiring the optional standard to be met will contribute towards lowering demand for water use.

- 9.15 In the interests of mitigating against climate change and to help achieve the objectives of the Suffolk Climate Action Plan, the Council will also implement higher energy efficiency standards and will expect all new developments of more than 10 dwellings to achieve a 20% improvement in CO2 emissions performance above the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations. Coastal development proposals should also take account of Policy CC2 of the East Marine Plan when minimising emissions. Higher energy efficiency standards need not be met if they amount to maladaptation, for example, designing buildings to maximise solar gain in winter without thinking through the implications for overheating in summer.
- 9.16 For all non-residential development, the Council will expect compliance with BREEAM standards. BREEAM is a tool that allows the owners, users and designers of buildings to review and improve environmental performance throughout the life of a building. The Council expects all non-residential development to comply with these standards, as detailed in Policy SCLP9.2, to mitigate further against climate change.
- 9.17 Improved energy efficiency and a reduction in CO2 emissions in buildings can be achieved through various means including orientation, siting, photovoltaics, heat pumps etc. The Council supports any viable and permissible methods of improving energy efficiency and reducing CO2 emissions in buildings.
- 9.18 The Council is mindful that local sustainable construction requirements lead to increased costs and may impact upon development viability (viability is defined in this context as what is practical and affordable). On this basis and in exceptional circumstances where the additional costs attributed to achieving sustainable construction standards represent the overriding factor in preventing the site from going to market, the Council will be prepared to consider detailed information on the viability of a particular scheme, where justified, to alter the sustainable construction requirements. The viability information must be compiled in line with viability guidance contained in Appendix F.
- 9.19 In order to allow for higher energy efficiency standards to be achieved, a meaningful proportion of the energy consumed by new builds or conversions should be provided from an on-site renewable source. The meaningful proportion should be considered on a case-by-case basis. Locally sourced, reused and recycled materials should also be used in the construction of new builds or conversions, where practicable. Where possible, circularity should be considered – that is the materials used in construction and the ability to deconstruct and reuse post use. Waste arising from construction itself should be minimised, where possible.
- 9.20 Major developments in particular, will have greater opportunities to incorporate high build standards due to economies of scale. Provision should also be made for 'environmental net gain' from new or conversion development, including infrastructure developments. Considering the fact that the principle of 'environmental net gain' is strongly promoted in the Government's 25 year Environmental Plan, this should be considered an imperative provision in new or conversion development, including infrastructure developments.

- 9.21 In recognition of the potential for conflicts between achieving sustainable methods of construction and conserving and enhancing the historic environment, Historic England's guidance relating to the application of the Building Regulations should be consulted when evaluating the energy efficiency of historic and traditionally constructed buildings.
- 9.22 As evidence of sustainable construction compliance for all new dwellings, the Council will require the submission of an interim compliance report prior to development commencement. A final compliance report will be required to be submitted upon development completion. This should be compiled in line with advice provided in the Building Regulations.
- 9.23 In order to demonstrate compliance with BREEAM standards, developers will be required to submit Design Stage Assessments and Post Construction Reviews, carried out by a qualified BREEAM assessor (as appropriate), for all planning applications for qualifying development.

Policy SCLP9.2: Sustainable Construction

All new developments of more than 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO2 emissions below the Target CO2 Emission Rate (TER) set out in the Building Regulations. Exceptions should only apply where they are expressed in the Building Regulations or where applicants can demonstrate, to the satisfaction of the Council, that it is not viable or feasible to meet the standards.

All new residential development in the District should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day. The use of locally sourced, reused and recycled materials, along with on-site renewable energy generation are encouraged in order to achieve environmental net gain in new build or conversion developments. Development proposals are also encouraged to set out measures for minimising waste arising from the construction process.

All new non-residential developments of equal or greater than 1,000sqm gross floorspace are required to achieve the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so.

Proposals should improve the efficiency of heating, cooling and lighting of buildings by maximising daylight and passive solar gain through the orientation of buildings.

Coastal Management policies

- 9.24 The coastal zone is a distinct part of the Suffolk Coastal District containing a diverse range of interests such as Areas of Outstanding Natural Beauty, internationally and nationally important environmental areas, tourism destinations, Sizewell nuclear power plants, offshore wind infrastructure, Felixstowe Port, the largest container port in the UK, and some of the most productive arable land in the UK; playing a vital role

in creating economic growth and tourism opportunities across the District. However, this diverse and dynamic coast has the ever present threat of both coastal erosion and coastal flooding.

- 9.25 The Suffolk coast is known to be one of the fastest eroding areas in Europe and is vulnerable to major storm surges. These factors make it necessary to actively manage the coastal zone to ensure it is resilient⁴¹ in the face of coastal change, by incorporating the holistic principles of Integrated Coastal Zone Management into coastal policies. In this respect, the Council will work closely with coastal communities and other Risk Management Authorities such as the Environment Agency, the Marine Management Organisation, and Natural England etc. The Council also recognises the importance of partnership working and will continue to work with coastal and estuary partnerships in the District going forward.

Coastal Change Management

- 9.26 Land affected by physical change to the shoreline through coastal erosion, coastal landslip or permanent inundation is defined in the National Planning Policy Framework as a Coastal Change Management Area. The boundaries are based on coastal erosion estimates and assumptions, with information taken from the current Shoreline Management Plans. The Shoreline Management Plans are integral to the formulation of planning policy and act as the primary evidence base for the policy in this area. Shoreline Management Plans reflect the long term intent of management towards coastal change in the form of epochs or time periods up to 2025, 2055 and 2105.
- 9.27 The current Shoreline Management Plan for the Suffolk coast was prepared between 2007 and 2010. However, it is recognised by all Risk Management Authorities that there is a need to regularly review and update key information within the Shoreline Management Plan on erosion and flood risk. The approach to defence management may change, which may change the delineation of the Coastal Change Management Areas. Planning policy in this area will be afforded a level of flexibility to allow for consideration of changes in the evidence base over the plan period. To help inform responses to coastal management proposals on the Areas of Outstanding Natural Beauty, specialist advice is available and should be consulted.
- 9.28 Infrastructure such as access roads and pipelines need to be fully considered when delineating Coastal Change Management Areas. This can lead to properties that are not within a Coastal Change Management Area becoming inaccessible when an access road, for example, is lost to coastal erosion. It is the aim of the Council, going forward, to fully consider the existing infrastructure and topography of an area when delineating a Coastal Change Management Area and evaluating sites for rollback.
- 9.29 National planning guidance suggests that new permanent residential structures are not permitted in a Coastal Change Management Area. Therefore, the Council will continue to implement this policy.
- 9.30 Although Coastal Change Management Areas exist to highlight where rates of shoreline change are significant over the next 100 years and new residential development is generally avoided in these areas, there are some cases where development exceptions are permitted. Temporary or seasonal developments

⁴¹ Resilience accepts, and as a result works with, rather than against, natural processes.

or extensions to properties are often considered as exceptions, subject to certain assessments. The Council will aim to facilitate appropriate development in the Coastal Change Management Area and to divert inappropriate development away from the Coastal Change Management Area. Policy SCLP9.3 details development considered appropriate in the Coastal Change Management Area.

- 9.31 Coastal Erosion Vulnerability Assessments are the primary means of assessing the coastal erosion impacts of proposed developments in and within a specified distance landward of the Coastal Change Management Area. The Coastal Erosion Vulnerability Assessment should consider the management proposals for the coastline and the likelihood of investments being made and the risk of erosion impacting upon the development in light of these factors. The assessment should be undertaken by the developer to demonstrate that the development will not be at risk from coastal change for the lifetime of the development. In this regard, the assessment should comply with policy CC1 of the East Inshore and Offshore Marine Plans. The assessment will also need to demonstrate that the proposed development will not increase the risk of erosion (e.g. from surface water run-off). It is considered essential to liaise with the Council's Coastal Management team in carrying out this assessment.
- 9.32 There currently exists a 30 metre risk zone landward of areas identified as Coastal Change Management Areas in order to ensure that developments take account of the coastal erosion risk in the general vicinity. Added to this, the Council will implement a 30 metre risk zone landward of areas where the intent of management is to Hold the Line (HTL) and where, consequently, no Coastal Change Management Area has been identified. This is to ensure that access to coastal defences is not inhibited by new and/or replacement development. However, this measure should not be used in such a manner that precludes development from coming forward.
- 9.33 Where known geological information demonstrates that soft cliffs⁴² located behind coastal defences are likely to adversely affect the capacity of said defences, a Coastal Erosion Vulnerability Assessment should be considered. As a starting point, development up to 60 metres landward of coastal defences should consult the Council's Coastal Management team as to whether or not a Coastal Erosion Vulnerability Assessment is required. This will allow for greater consideration of both coastal erosion and the threat of soil degradation when considering proposed developments in defended areas.
- 9.34 The National Planning Policy Framework requires the delineation of the Coastal Change Management Area to be informed by, amongst many other things, Estuary Plans. It is the intention of the Council to expand the boundary and principles of Coastal Change Management Areas to the estuaries of the District in order to fully address coastal change along the Suffolk Coastal coastline which, by law, extends to the mean low water mark in the estuaries. This will involve consideration of both the Deben and Alde & Ore Estuary

⁴² Soft cliffs are formed in less resistant rocks such as shales or in unconsolidated materials such as boulder clay; being unstable they often form less steep slopes and are therefore more easily colonised by vegetation. Soft cliffs are subject to frequent slumping and landslips, particularly where water percolates into the rock and reduces its effective shear strength (JNCC, UK Biodiversity Action Plan Priority Habitat Descriptions, 2016).

Plans and will be undertaken as part of any review to the Shoreline Management Plan which ultimately identifies the Coastal Change Management Areas.

- 9.35 Coastal Squeeze is the term used to describe habitats on the coast that are 'squeezed' between man-made barriers, such as river walls, sea walls and farmland, and an eroding coast. In a natural system, areas of saltmarsh or shingle 'move' inland as sea levels rise, and the animals and plants that depend on them migrate with the habitat.
- 9.36 Realignment is one answer to the problems caused by coastal squeeze because it gives the coast room to evolve. This can be done in both a managed and unmanaged way. An example of this being the construction of walls inland of historic defences to protect land and property behind them, while in front, natural processes take over and saltmarsh, for example, is allowed to develop. Innovative approaches such as this that are in keeping with the natural processes of the coastline will be supported, where appropriate, by the Council.

Policy SCLP9.3: Coastal Change Management Area

The Coastal Change Management Area is identified on the Policies Map. Reputable and scientifically robust evidence that emerges over the lifetime of this plan which effects the delineation of the Coastal Change Management Area should be considered when applying this policy.

Planning applications for all development within and 30 metres landward of the Coastal Change Management Area and within and 30 metres landward of areas where the intent of management is to Hold the Line, identified on the Policies Map must be accompanied by a Coastal Erosion Vulnerability Assessment.

In areas of soft cliff located up to 60 metres landward of coastal defences where known geological information indicates that the capacity of coastal defences are likely to be adversely affected by development, a Coastal Erosion Vulnerability Assessment should be considered.

In parts of the Coastal Change Management Area expected to be at risk from change within a 20 year time horizon, only temporary development directly related to the coast, for example beach huts, cafes, car parks and sites used for touring caravan and camping will be permitted.

In parts of the Coastal Change Management Area expected to be at risk from change beyond a 20 year time horizon, other commercial and community uses will be permitted providing they require a coastal location and provide economic and social benefits to the local community.

Proposals for new or replacement coastal defence schemes will only be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the relevant Shoreline Management Plan and/or endorsed Coastal Strategy, and there will be no material adverse impact on the environment, including exacerbation of coastal squeeze.

Proposals for new or replacement estuary defence schemes will only be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the endorsed estuary plans/strategies, and there will be no material adverse impact on the environment, including exacerbation of coastal squeeze.

Essential infrastructure, including transport infrastructure, utility infrastructure and wind turbines will only be permitted in the Coastal Change Management Area where no other sites outside of the Area are feasible and there is a management plan in place to manage the impact of coastal change including their future removal and replacement.

Planning permission for all development within the Coastal Change Management Area will be time-limited according to the risk identified in the Coastal Erosion Vulnerability Assessment.

Adapting to a Changing Coast

- 9.37 The Council recognises that the coast will change and there are both properties and infrastructure at risk. Coastal adaptation is generally considered as a response to coastal change, and can be defined as *‘making changes to prepare for and negate the effects of climate change, thereby reducing the vulnerability of communities and ecosystems. By adapting to cope with the effects of climate change, communities, enterprises and institutions can build up their climate change resilience’ (Action on Climate Today).*
- 9.38 This approach is being pursued in coastal locations worldwide, and it is through the initiative of both coastal stakeholders and communities that the Council aims to achieve effective coastal adaptation in Suffolk Coastal.
- 9.39 Facilitating coastal relocation⁴³ or rollback⁴⁴ has been one of the main approaches undertaken to implement coastal adaptation in the East Suffolk area in recent years. The Council will continue with the exception policy of facilitating rollback or relocation for sites under threat from coastal erosion which demonstrates that Suffolk Coastal is able and willing to adapt to coastal change. In doing so, the Council will aspire to long term thinking in affecting this approach in order to properly and effectively prepare for coastal adaptation, and to allow communities to thrive in their coastal locations.

What is Currently Anticipated to be at Risk?

- 9.40 Suffolk Coastal has some of the fastest eroding coastline in Europe. Over the next 20 to 100 years there is the potential for properties, agricultural land and conservation land in some of our more vulnerable areas to be considered ‘at risk’ or lost to increased coastal erosion.

Taking a Proactive Approach

- 9.41 The Council aims to take a proactive approach in dealing with loss of land and/or property to coastal erosion by encouraging rollback or relocation before the land or property is lost.
- 9.42 The National Planning Policy Framework states that Local Plans should make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas. The National Planning Practice Guidance advises that either formally allocating land in a Local Plan or allowing for relocation where planning permission would normally be refused are two ways in which this can be achieved. The Council considers it feasible, in this respect, to relocate and replace agricultural buildings that are required to meet the essential needs of an agricultural development.
- 9.43 In order to benefit from the exception rollback or relocation policy, properties must be at risk from erosion within a 20 year period. This enables property owners to take a pro-active approach to relocate to an alternative location well before erosion becomes an imminent threat. In order to maintain the

⁴³ An approach of allowing relocation to areas where development would normally be refused planning permission (NPPF).

⁴⁴ Rollback of assets inland away from the risks posed by coastal change (Coastal Change Pathfinder).

sustainability of coastal settlements, relocation should take place close to the existing community, where possible. Relocation of residential properties should also be to land which is outside of the Coastal Change Management Area. Alternative land uses within Coastal Change Management Areas that contribute to the sustainability of coastal communities and also reduce the risk of the development being adversely impacted by coastal erosion are encouraged. Such uses will be evaluated on a case by case basis.

- 9.44 It is important to ensure decisions with long-lasting consequences do not create obstacles for future adaptation, known as avoiding 'lock-in'. As an example, siting new buildings and infrastructure in low flood risk areas where possible, will have a long term benefit. Therefore, it is important to consider both flood risk and coastal adaptation policies concurrently when evaluating development on the coast.

Policy SCLP9.4: Coastal Change Rollback or Relocation

Proposals for the relocation and replacement of community facilities, commercial, agricultural and business uses affected by coastal erosion will be permitted in the Countryside, provided that:

- a) The proposed development replaces that which is within the Coastal Change Management Area as identified on the Policies Map and is forecast to be affected by erosion within 20 years of the date of the proposal;
- b) The new development is located at an appropriate distance inland with regard to Policy SCLP9.3 on the Coastal Change Management Area;
- c) The new development is in a location that is accessible to the coastal community from which it was displaced; and
- d) The existing site is either cleared and made safe or put to a temporary use beneficial to the local community.

Proposals for the relocation and replacement of dwellings affected by coastal erosion will be permitted in the Countryside where:

- e) The development replaces a permanent building which is within the Coastal Change Management Area as identified on the Policies Map and is forecasted to be affected by erosion within 20 years of the date of the proposal;
- f) The relocated dwelling should be in an location which exhibits a similar or improved level of sustainability with respect to access to services and facilities as the original dwelling;
- g) The relocated dwelling is outside of the Coastal Change Management Area as identified on the Policies Map; and
- h) The existing site is either cleared and made safe or put to a temporary use beneficial to the local community.

Flood Risk & Holistic Water Management

- 9.45 The District Council, in its capacity as a Flood Risk Management Authority, ensures that flood risk related to development is effectively managed through the planning system, and have the power to carry out flood risk management works on ordinary watercourses and works on coastal defences. Other Flood Risk Management Authorities include Suffolk County Council, the Environment Agency, Internal Drainage Boards and Water and Sewerage Companies. The responsibilities of each Flood Risk Management Authority can be seen here: <https://www.gov.uk/guidance/flood-risk-management-information-for-flood-risk-management-authorities-asset-owners-and-local-authorities#managing-flood-risks-who-is-responsible>
- 9.46 The low-lying nature of the coastline means that Suffolk Coastal is no stranger to flooding – flood events over the last few generations have resulted in infrastructural damage and, in some cases, loss of life. Flash flooding, estuarine and coastal flooding, partly induced by climate change, have been the main cause of this. The Council will work with flood risk stakeholders to lessen the impacts of flooding going forward by recognising and assessing the flood risk, mitigating against it and providing resilience measures to alleviate it. Working together with communities and stakeholders, the Council will look to help combat flood risk, particularly in coastal areas where national funding for flood protection is limited.
- 9.47 Government guidance advocates various flood risk assessments and approaches to guide new development to areas with the lowest probability of flooding. Notwithstanding this, it is appreciated that development in areas at some risk of flooding is sometimes unavoidable, as many of the towns in the District such as Aldeburgh, Woodbridge and Felixstowe are located in high risk areas. To address this, mitigation will be required to ensure no net increase in the risk of flooding.

Addressing Flood Risk across the District

- 9.48 The National Planning Policy Framework requires Local Planning Authorities to prepare a Strategic Flood Risk Assessment to inform the Local Plan. A Strategic Flood Risk Assessment has recently been completed for East Suffolk and has identified areas at risk from flooding both now and in the future after taking climate change into account. This includes flooding models prepared by the Environment Agency as well as modelling from other Risk Management Authorities, which helps to attain the most up to date understanding of risk.
- 9.49 The Strategic Flood Risk Assessment should be used in assessing the flood risk of new development proposals. All sources of flooding should be considered including surface water flooding and flooding from sewers.
- 9.50 National planning policy seeks to mitigate the risk of flooding by restricting vulnerable new development within areas at risk from flooding. It does this by requiring development proposals in areas at risk from flooding to be subject to a sequential test where it has to be proven there are no suitable areas of land with a lesser risk of flooding and an exception test which identifies sustainability benefits of development and ensures the development is safe for its lifetime.

- 9.51 A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving:
- Sites of 1 hectare or more;
 - Land which has been identified by the Environment Agency as having critical drainage problems;
 - Land identified in a Strategic Flood Risk Assessment as being at increased flood risk in future;
- Or
- Land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.
- 9.52 If development is to be constructed with less vulnerable uses on the ground level, covenants need to be put in place to prevent future alteration of these areas to 'more vulnerable' uses without further consideration of the associated flood risk.
- 9.53 The Shoreline Management Plan proposes various management approaches such as 'managed realignment' and adaptation measures. This method of actively managing the shoreline allows for, or creates, conditions for the coast to move. An example of this would be to relocate a linear flood defence back from the active coastal zone to a more secure long term position and, therefore, allow the shoreline to re-adjust naturally. It can bring benefits including the creation or recreation of valuable and threatened inter-tidal habitats as well as more robust flood defence for the community, but may result in the loss of some agricultural land and, in a number of limited cases, property. If it is not carefully managed it could have a major impact on the economic and social infrastructure, as well as the everyday operation of communities.
- 9.54 The Local Plan will need to take account of any review of the Shoreline Management Plan. It may be necessary to ensure that development to be permitted in areas at risk from coastal erosion or flooding by the sea is proportionate to the level of risk.
- 9.55 Developments should be designed to incorporate natural flood management measures that sustainably utilise natural capital, in line with the Natural Capital Committee's advice. By working with natural processes, we can better protect ourselves from hazards such as flooding. Natural flood management involves the use of a variety of measures including tree planting, river bank restoration, building small-scale woody dams, reconnecting rivers with their flood plains and storing water temporarily on open land. Of course, such measures should be complementary of traditional flood defences in the interests of integrated flood management. However, where flood risk measures result in significant depreciation of natural capital, the creation of compensatory natural capital will be required.

Policy SCLP9.5: Flood Risk

The Strategic Flood Risk Assessment should be the starting point in assessing whether a proposal is at risk from flooding.

Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (and any successor). These include the 'sequential test'; where needed the 'exception test' and also a site specific flood risk assessment that addresses the characteristics of flooding and has tested an appropriate range of flood event scenarios (taking climate change into consideration). This should address as a minimum: finished floor levels; safe access and egress; an emergency flood plan; identification and provision of surface water exceedance routes; flood resilience/resistance measures; any increase in built or surfaced area; and any impact on flooding elsewhere.

Developments should exhibit the three main principles of flood risk, in that, they should be safe, resilient and should not increase flood risk elsewhere. In this respect, single storey residential developments will not be permitted in areas of high risk of flooding within or outside Settlement Boundaries.

Developments are encouraged to include natural flood management measures that complement existing flood defences if pre-existing flood defences are in place, in the interests of integrated flood management.

Any new flood risk measures that result in significant depreciation of natural capital will be required to create compensatory natural capital.

Neighbourhood Plans can allocate land for development, including residential development, in areas at risk of flooding providing it can be demonstrated:

- a) There are no alternative available sites appropriate for the proposed use within the Neighbourhood Area;
- b) The development provides sustainability benefits which outweigh flood risk; and
- c) Evidence is provided that it is possible for flood risk to be mitigated to ensure development is safe for its lifetime.

Sustainable Drainage Systems

- 9.56 It is important to ensure that new development does not impede flood flows, reduce flood storage capacity, or exacerbate problems of flooding in areas downstream through an increase in run-off from impermeable surfaces such as roofs and paved areas. A common way of achieving this is through use of sustainable drainage systems (SuDS). Sustainable drainage systems can take up large areas of land on development sites and therefore significantly influence the layout through good design which responds to its built and natural surroundings.

- 9.57 Sustainable drainage systems should be integrated into the green infrastructure provision on the site and complement the overall landscaping scheme of the site. They should not be surrounded by palisade fencing and where restrictions to access are required due to safety considerations, these should be innovatively designed by low impact barriers such as landscaping or planting. Sustainable drainage systems should also incorporate 'Blue Corridors', where possible, to create a network of corridors designed to facilitate natural hydrological processes that help to minimise flooding.
- 9.58 Well designed drainage systems can deliver environmental improvements including water quality, biodiversity and reduced flood risk. Discharges of surface water should be designed to deliver water quality improvements to help meet the objectives of the Water Framework Directive relating to deterioration and improvement in water body status. Surface water should be discharged as high up the drainage hierarchy as possible in line with the concept of the SuDS management train. Presently, there is a tendency for required attenuation volumes to be accommodated below ground. In order to discourage this, preference should be given to the installation of blue-green surface infrastructure, as opposed to hardscape or underground solutions, due to the wider benefits attained through ecosystem services provided by natural capital. This includes habitat provision, recreational benefits and mitigation against the urban heat island effect, where relevant.
- 9.59 The latest advice from the Lead Local Flood Authority at Suffolk County Council, the CIRIA SuDS Manual and the latest Suffolk Flood Risk Management Strategy should be consulted when considering SuDS planning, design and maintenance.

Policy SCLP9.6: Sustainable Drainage Systems

Developments should use sustainable drainage systems to drain surface water. Developments of 10 dwellings or more, or non-residential development with upwards of 1,000 sq. m of floorspace or that equates to 1 hectare or more, will be required to utilise sustainable drainage systems, unless demonstrated to be inappropriate. Sustainable drainage systems should:

- a) Be integrated into the landscaping scheme and green infrastructure provision of the development;
- b) Contribute to the design quality of the scheme; and
- c) Deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible. This should be complementary of any local designations such as Source Protection Zones.

Runoff rates from new development must be restricted to greenfield runoff rates wherever possible. Where a site is previously developed, the proposed runoff rates should be restricted as close to the greenfield rates, or at the very minimum a betterment of at least 30% should be considered over the brownfield runoff rates.

No surface water connections should be made to the foul system and connections to the combined or surface water system should only be made in exceptional circumstances where there are no feasible alternatives. Foul and surface water flows should also be separated.

Holistic Water Management

- 9.60 In recognition that water does not respect physical boundaries, the Council will work with neighbouring authorities and other relevant stakeholders to devise a catchment-based approach to holistic water management. In respect of implementing holistic water management, new developments will be required to be phased to allow water and wastewater infrastructure to be in place when needed.
- 9.61 The Deben Holistic Water Management Pilot Project provides a best practice example of holistic water management, in that, it involves the re-use of water that would normally be pumped into the river system which adds to flow velocity and ultimately the rate of erosion. Through holistic water management methods such as attenuation ponds and managed aquifer recharge, the pilot project will filter excess water from flooding into the groundwater tables which will help to improve river flows and water quality. The Council supports this approach to holistic water management and will aim to complement such an approach, where possible.

Policy SCLP 9.7: Holistic Water Management

All development will be expected to demonstrate that water can be made available to support the development and that adequate foul water treatment and disposal already exists or can be provided in time to serve the development. Development will be phased to allow water and water recycling infrastructure to be in place where needed.

All new developments will be expected to incorporate water efficiency and re-use measures to maximise the opportunities to reduce water use. This includes:

- a) Grey water recycling;
- b) Rainwater harvesting; or
- c) Water use minimisation technologies;

Infrastructure that leads to a reduction in the amount of water released to the sewer system and allows for natural infiltration into groundwater tables will be favoured in this instance.



Section 10

Natural Environment

District wide criteria based policies

10 Natural Environment

- 10.1 Suffolk Coastal is a District with a high quality natural environment which is enjoyed by residents, visitors, businesses and, most importantly, wildlife. The natural environment is primarily rural with coastline, river valleys, undulating countryside interspersed with market towns and villages. There is a range of locally, nationally and internationally designated sites of natural importance in Suffolk Coastal spanning the length and breadth of the District. Sites of note include the Suffolk Coast & Heaths AONB, RSPB Minsmere, Orford Ness National Nature Reserve and Sutton Heath.
- 10.2 The Local Plan seeks to protect, retain and enhance the high quality natural environment and designated landscapes and sites found across the District which contribute to the overall success of the District and provides economic and social benefits for all. Of further importance, however, are the wider environmental and ecological benefits provided by the natural environment including, for example, carbon sequestration, natural flood protection and habitat creation. It is wider benefits such as this that the Local Plan will seek to foster in new developments and to protect, retain and enhance in existing developments. Locally adopted plans such as the Deben Estuary Plan and Alde & Ore Estuary Plan will need to be considered in respect of locally important natural environment issues.

Biodiversity & Geodiversity

- 10.3 Biodiversity⁴⁵ and geodiversity⁴⁶ are of great significance across Suffolk Coastal due to the extent and range of sites and habitats identified. Many of these areas are spread across the District but the coastal areas are of particular importance due to international, national and local designations. Across the District there are a variety of land based and marine based designations as seen in Table 10.1 below.
- 10.4 Both biodiversity and geodiversity represent elements of natural capital. A natural capital approach is an integral aspect of the Government's recently published 25 year Environment Plan. The Council aims to incorporate this approach into this Local Plan.

⁴⁵ Biodiversity means the variety of life forms, the ecological roles they play, and the genetic diversity they contain.

⁴⁶ Geodiversity may be defined as the natural range of geological features (rocks, minerals, fossils, and structures), geomorphologic features (landforms and processes) and soil features that make up the landscape. It includes their assemblages, relationships, properties, interpretations and systems.

Table 10.1 Nature Conservation Sites – change in area

Designation	2016/17	2015/16	2014/15
Ramsar	9,221 ha (4 sites)	9,221 ha (4 sites)	8,861 ha (4 sites)
Special Protection Areas	12,477 ha (5 sites)	12,477 ha (5 sites)	12,483 ha (5 sites)
Special Areas of Conservation	3,868 ha (5 sites)	3,868 ha (5 sites)	3,816 ha (5 sites)
Sites of Special Scientific Interest	11,207 ha (46 sites)	11,132 ha (45 sites)	11,201 ha (45 sites)
County Wildlife Sites	5,709 ha (221 sites)	5,668 ha (216 sites)	5,644 ha (218 sites)
Local Nature Reserves	85 ha (6 sites)	85 ha (6 sites)	85 ha (6 sites)

- 10.5 By their nature, areas of biodiversity and geodiversity importance are particularly sensitive to development and, therefore, careful consideration should be given when assessing new proposals. Consideration should be given to the European Birds or Habitats Directives as to whether ‘screening’ of impacts and/or an Appropriate Assessment is required. In accordance with national policy guidance, the strongest level of protection is given to these areas and the presumption in favour of sustainable development therefore does not apply to development proposals requiring Appropriate Assessment under European Birds or Habitats Directives.
- 10.6 Sites of European importance, which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are statutorily protected under the Conservation of Habitats and Species Regulations 2017 (based on EU directives), and wetlands of global importance (Ramsar sites) are protected by Government policy to apply the same level of protection as to European sites. Sites of Special Scientific Interest (SSSIs), of national importance, are protected under the Wildlife and Countryside Act 1981 (as amended). The District also contains sites of local importance including County Wildlife Sites (CWSs) designated by the Suffolk County Wildlife Sites panel, Local Nature Reserves (LNRs) designated by Local Authorities, and County Geodiversity Sites (CGSs) (formerly Regionally Important Geological Sites) designated by GeoSuffolk. Considerable weight is given to protecting these designated sites. However, the level of

protection should be commensurate with the level at which the site is designated (i.e. international, national and local). The NPPF defines irreplaceable habitats as those which would be very difficult or would take a long time to restore, and in Suffolk Coastal would include habitats such as ancient woodland, veteran trees and sand dunes. Development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons as defined by the NPPF.

- 10.7 Whilst these designated areas are provided with protection, the potential exists nonetheless for all new developments to look at ways of increasing or improving areas of biodiversity and/or geodiversity importance, providing a net gain of biodiversity and/or geodiversity and enhancing the green infrastructure network. Areas of value, or potential value, for biodiversity include freshwater and marine environments as well as terrestrial habitats. Any increase or improvement to areas of biodiversity and/or geodiversity importance and to the green infrastructure network should be accurately evidenced at an early stage in the planning process. Creation of ecological corridors, connections to existing habitats and habitat ‘stepping stones’ represent examples of how this can be achieved. This will simultaneously help contribute to the establishment of a wider Nature Recovery Network; an action outlined in the Government’s 25 year Environment Plan.
- 10.8 When considering the creation of ecological corridors that could affect neighbouring authorities, any relevant plans or policies relating to ecological corridors in that authority should be consulted. Semi-natural areas, circular dog walking routes, dedicated dogs off leads areas and dog waste bins should be incorporated into ecological corridors or networks within new developments in order to encourage routine recreational activities within the vicinity of the development.
- 10.9 Strategic, flexible and locally tailored approaches that recognise the relationship between the quality of the environment and development should be pursued. Brownfield sites and/or previously developed sites will be considered favourably when evaluating development proposals in order to increase the likelihood of achieving biodiversity and/or geodiversity net gain, unless the site has been proven to be of high biodiversity value. The Brownfield Register should be consulted in this respect.
- 10.10 The opportunity exists for development proposals involving SuDS schemes to facilitate enhancement of the green infrastructure network and to provide a net gain for biodiversity and/or geodiversity by incorporating such principles into the proposal. It is therefore expected that all development proposals involving SuDS schemes will complement the green infrastructure network in the interests of achieving wider sustainability benefits and a net gain for biodiversity and/or geodiversity.
- 10.11 Development proposals located in coastal, riverine and estuarine areas should have regard for the cumulative impact of development on biodiversity and the ecosystem services it provides, particularly in relation to coastal and marine protected areas. This will help to contribute to an ecosystem based approach; a common approach taken in the marine planning sphere. The Marine Management Organisation, Natural England and any adopted Estuary Plans must be consulted in this respect.
- 10.12 Development proposals should be accompanied by sufficient information to assess the effects of development on priority habitats and species, protected sites, protected species, biodiversity or geology, together with any proposed prevention, mitigation or compensation measures. The Suffolk Biodiversity

Information Service can provide general species distribution data for development sites and further information is also available from the Suffolk Wildlife Trust. Natural England and GeoSuffolk can provide detailed information regarding sites of geological importance.

- 10.13 Plans or projects which may have a likely significant effect on a European site will require Appropriate Assessment under Reg. 63 of the Conservation of Habitats and Species Regulations 2017. Accordingly, local authorities can only consent plans or projects where it can be ascertained that they will have no adverse effect on the integrity of a European site. In exceptional circumstances, where there are no alternative solutions, a plan or project may meet the tests of Imperative Reasons of Overriding Public Interest (IROPI), which then requires demonstration that appropriate compensation will be provided to ensure that the integrity of the Natura 2000 network is not compromised. Given the rigour of these tests, the presumption is that plans or projects that could adversely affect Natura 2000 sites will not be approved. In practice, schemes which qualify for IROPI are extremely rare and are very unlikely to fall under the Council's remit for decision making.
- 10.14 The NPPF states that if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. This sequential approach is referred to as the 'mitigation hierarchy' and the policy has been created to cover these scenarios.

Conserving and Enhancing our Natural Areas

- 10.15 In order to protect nature conservation, it will also be important to protect habitats outside designated sites and to protect particular species, such as those which are rare or protected. Suffolk Biodiversity Action Plan priority species and habitats and other species protected by law will be protected from harmful development. Where there is reason to suspect the presence of nature conservation interests, applications for development should be accompanied by a survey and assessment of their value, in accordance with local biodiversity validation requirements. If present, the proposal must be sensitive to, and make provision for, their needs. For example, through the provision of nest sites for swifts in developments and renovations or including features to create permeability for hedgehogs.
- 10.16 The high quality natural environment is important to many local communities as it adds to the overall quality of life and quality of place, particularly regarding mental health. The Council recognises that issues relating to biodiversity and geodiversity need to be considered collaboratively with businesses and other stakeholders to ensure that the natural assets are protected. To address the impact of development on the European Sites across the District, Suffolk Coastal has been working in partnership with Waveney District Council, Ipswich Borough Council, Babergh and Mid Suffolk District Councils, Suffolk County Council and Natural England to develop a Recreational Avoidance and Mitigation Strategy (RAMS). The strategy provides the practical basis and evidence to identify projects to mitigate the impact of new development on the protected sites.
- 10.17 With respect to the effect of increased recreational use of Special Protection Areas (SPAs) in large scale developments throughout the District, the approach adopted has been to provide Suitable Alternative

Natural Greenspaces (SANGs) as part of development proposals. Such an approach has been successfully implemented in developments such as the 'Brightwell Lakes' development of approximately 2,000 dwellings in the south of the District. Likewise, compensatory areas have been provided at Sizewell Nuclear Power plants to mitigate the effects of development on SSSIs. In the interests of ensuring the continued conservation of mitigation measures such as SANGs and compensatory areas, considerable weight should be afforded to the conservation of such measures where they are included as part of large scale development proposals.

Policy SCLP10.1: Biodiversity and Geodiversity

Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat 'stepping stones'.

Proposals that will have a direct or indirect adverse impact (alone or in-combination with other plans or projects) on locally designated sites of biodiversity or geodiversity importance, including County Wildlife Sites, priority habitats and species, will not be supported unless it can be demonstrated that new opportunities to enhance the green infrastructure network will be provided as part of the development that will mitigate or compensate for this loss and provide a biodiversity net gain.

Any proposal that adversely affects a European site, or causes significant harm to a Site of Special Scientific Interest, will not normally be granted permission.

Where compensatory habitat is created, it should be of equal or greater size and ecological value than the area lost as a result of the development, be well located to positively contribute towards the green infrastructure network, and biodiversity and/or geodiversity and be supported with a management plan.

Where there is reason to suspect the presence of protected, UK or Suffolk Priority species or habitat, applications should be supported by an ecological survey and assessment of appropriate scope undertaken by a suitably qualified person. If present, the proposal must follow the mitigation hierarchy in order to be considered favourably. New development must also secure significant ecological enhancements as part of its design and implementation.

Any development with the potential to impact on a Special Protection Area or Special Area for Conservation within or outside of the District will need to be supported by information to inform a Habitat Regulations Assessment. A Supplementary Planning Document will be prepared to implement a strategic Recreational Avoidance and Mitigation Strategy in order to mitigate any potential significant adverse effects arising from new growth on Special Protection Areas, Ramsar Sites and Special Areas of Conservation. The Council will work with neighbouring authorities and Natural England to develop and implement this strategy. The strategy will include a requirement for developers to make financial contributions towards the provision of strategic mitigation within defined zones.

Visitor Access to the Special Protection Areas

- 10.18 The Council in partnership with Natural England and neighbouring authorities is committed to the need to mitigate the recreational impact on sites designated as being of international importance for their nature conservation interest (European Sites) from increased housing provision.
- 10.19 Across Suffolk Coastal the following sites are designated as being of international importance for their nature conservation interest:

- Alde-Ore Estuary SPA/Ramsar;
- Alde-Ore and Butley Estuaries SAC;
- Deben Estuary SPA / Ramsar;
- Minsmere – Walberswick SPA/Ramsar;
- Minsmere to Walberswick Heaths and Marshes SAC;
- Orford Ness – Shingle Street SAC;
- Sandlings SPA;
- Staverton Park and Thicks SAC;
- Stour and Orwell Estuaries SPA / Ramsar.

- 10.20 The Council is aware that the distribution of growth proposed by the Local Plan along with developments that come forward over the plan period can have an impact on European Sites. The impact is primarily in relation to an increase in disturbance to wildlife linked to people walking dogs along with increased recreational use of estuaries from water based activities.
- 10.21 The previous Local Plan supported by an Appropriate Assessment required specific mitigation measures in respect of strategic housing growth in the southern part of the District. The Appropriate Assessment identified a 1km buffer from the boundary of a designated area as an appropriate distance to apply when determining impact. This is because studies have shown that people are reluctant to walk 1km to get to the start of their main walk. Beyond this distance they tend to drive.
- 10.22 The Council is preparing a 'Recreational Avoidance and Mitigation Strategy' (RAMS) with Babergh and Mid Suffolk District Councils, Ipswich Borough Council and Waveney District Council. The strategy will review and monitor effectiveness and amend the approach as deemed necessary.
- 10.23 Estuary management plans that have been endorsed / adopted by the Council as well as the AONB management plan are material planning considerations along with the RAMS in the determination of planning applications which are considered to have an impact on designated sites. These include the Deben Estuary Plan and the Alde and Ore Estuary Plan.

Policy SCLP10.2: Visitor Management of European Sites

The Council has a duty to ensure that development proposals will not result in an increase in activity likely to have a significant effect upon sites designated as being of international importance for their nature conservation interest.

Applications for new car parking provision (public or privately owned which are available for wider public use) located within 1km boundary of a designated site or new access points direct into the estuary such as slipways or jetties will need to demonstrate that they will not result in an increase in activity likely to have a significant effect upon a European site whether on their own, or in combination with other uses. Such proposals need to be subject to a project level Habitats Regulation Assessment.

Environmental Quality

- 10.24 The quality of environment in which people reside is inextricably linked to their quality of life and invariably affects their standard of living. Pollution is often thought of as a negative influence on environmental quality due to carbon emissions, particulate matter emissions and soil contamination, for example. Regulation of air and soil quality, in this respect, is important in order to mitigate such pollution.
- 10.25 The National Institute for Health and Care Excellence (NICE) encourages Local Authorities to address the issue of air pollution in their Local Plan to help improve air quality. This Local Plan will seek to improve air quality not just in the two Air Quality Management Areas (AQMAs) across the District, but in every part of the District. Development proposals will be expected to minimise and mitigate air pollution and to contribute towards the achievement of air quality objectives.

Policy SCLP10.3: Environmental Quality

Development proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination.

Development proposals will be considered in relation to impacts on;

- a) Air quality, and the impact on receptors in Air Quality Management Areas;
- b) Soils and the loss of agricultural land;
- c) Land contamination and its effects on sensitive land uses;
- d) Water quality and the achievement of Water Framework Directive objectives;
- e) Light pollution; and
- f) Noise pollution.

Proposals should seek to secure improvements in relation to the above where possible.

The cumulative effect of development, in this regard, will be considered.

Landscape

- 10.26 The quality of landscapes— visible features of land or scenery — is a defining feature of the District and the identity of local communities. The diverse landscapes of Suffolk Coastal have been influenced and defined by natural and human activity, including a long tradition of farming. The District includes large areas of farmland, much of which is the most productive in the country i.e. grades 1, 2, and 3a under the Agricultural Land Classification.

- 10.27 Since human and natural activity evolves over time, landscape character also changes over time. Positive and beneficial management of that change, including restoration and protection where necessary, is essential to maintaining the quality, distinctiveness and vitality of the local environment.
- 10.28 The landscape of the District is varied but characterised by areas which have important landscape designations such as the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, Heritage Coast, Historic Parks and Gardens, River Valleys and Estuaries. Previous Local Plan documents included a county wide approach in the form of Special Landscape Areas (SLA) which originated from the Suffolk Structure Plan. The SLA designations primarily identified the river valleys and tributaries as areas with special landscape attributes that are particularly vulnerable to change.
- 10.29 Government guidance and best practice advise that a landscape character assessment approach should be taken to inform policy making and planning decisions, rather than locally defined area specific landscape designations. To accord with government guidance, the Council has commissioned a Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018) of the District and the fringes of Ipswich⁴⁷. The evidence provides a tool to help understand the character and local distinctiveness of the landscape and identifies the special qualities and features that give it a sense of place, as well as providing guidance on how to manage change. Landscape character is the distinct, recognisable and consistent pattern of elements that make one landscape different from another. The assessment recognises all landscapes, not just those that are designated, and considers sensitivity to change including in relation to recognised features.
- 10.30 The Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018) analyse the sensitivity of settlement fringes, their capacity to accommodate future development and priorities for the enhancement, protection, management and conservation of these landscape areas.

Suffolk Coast & Heaths Area of Outstanding Natural Beauty

- 10.31 Areas of Outstanding Natural Beauty (AONB) are national landscape designations afforded the highest protection for their landscape and scenic quality. Protection of the Suffolk Coast and Heaths relates not only to the land within this AONB, but also to its setting. In line with national policy (NPPF paragraph 172) great weight is attributed to conserving and enhancing the landscape and scenic beauty in the AONB and the conservation and enhancement of wildlife and cultural heritage are important considerations.
- 10.32 The protection of the landscape and setting of the Suffolk Coast and Heaths AONB is also an important influence within the plan area. Incorporating extensive landscapes in the District from the River Blyth Estuary in the north to landscapes around the River Orwell and River Deben Estuaries in the south, the AONB also extends beyond the District to the north and south.

⁴⁷ The Settlement Sensitivity Assessment (2018) covers Suffolk Coastal District and the area around Ipswich within Ipswich Borough and Babergh and Mid Suffolk Districts.

- 10.33 The Suffolk Coast and Heaths Management Plan 2018 is a material consideration and sets out the management objectives for the AONB. The Management Plan has a key role in supporting and co-ordinating the role of management of the AONB as required by the Countryside and Rights of Way Act 2000. A key objective of the Management Plan is to conserve and enhance the AONB's natural beauty and improve its special qualities. Working with local communities, farmers, businesses, non-government organisations, local authorities, statutory agencies and individuals the AONB Management Plan reflects the co-ordinated activity of the partnership. .

Landscape Character and Assessment

- 10.34 Landscape character is the distinct, recognisable and consistent pattern of elements that makes one landscape different from another. Landscape assessment helps to describe the important features and characteristics of different areas of landscape. This helps to make recommendations for future protection, management and planning. An up to date Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018) are important tools in proposing, shaping and determining proposals for new development, analysing and identifying landscape features and characteristics in particular parts of the District. This kind of information and guidance is helpful in the conservation of features that give places their unique character, in identifying opportunities for enhancement and positive change, and in providing evidence to support local action. The Landscape Character Area Maps are contained in Appendix G.
- 10.35 Landscape assessment is not limited to designated landscapes. It recognises particular qualities and features of landscapes to provide an understanding of distinct sense of place and sensitivities to development and change. Types of landscapes with broadly similar combinations of geology, landform, vegetation, land use, field and settlement patterns repeat around the District. Landscapes belonging to a particular type, such as Valley Meadowlands, may be found in different places. Particularly valued landscape types within Suffolk Coastal of the greatest sensitivity to change are rural river valleys, historic park and garden, coastal, estuary and heathland areas. The AONB is characterised by the combination and proximity of such very sensitive and valued landscapes.
- 10.36 The Settlement Sensitivity Assessment analyses the sensitivity of settlement fringes, their capacity to accommodate future development and priorities for the enhancement, protection, management and conservation of landscape areas.
- 10.37 Proposals for development should be informed by, and be sympathetic to, the special qualities and features, strategy objectives and considerations identified in the Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018). This evidence may be updated during the plan period in which case successor documents will be used in decision making.
- 10.38 The Council acknowledges that the landscape of the District is important to healthy and active communities across the District. The Public Rights of Way network and areas of green infrastructure associated with developments support social interaction, well being and ease disturbance on protected wildlife sites, for example, by providing alternative outdoor recreation places. Proposed development

should take into account Public Rights of Way and provide enhancements to the network where possible. The provision of new footpaths should ensure that these are accessible for all users.

- 10.39 The Deben Estuary Plan as well as the Suffolk Coast and Heaths AONB Unit both acknowledge the defining feature of tranquillity in parts of the District. Tranquillity is categorised by areas of semi-natural habitat, a general absence of developments and apparent lack of human activity. Tranquillity is further enhanced by natural sounds and the areas of darkest skies. Evidence indicates that the areas of the District with greatest tranquillity are the estuaries, river valleys and heaths. Extensive areas of estuary, river valley and heaths are characterised by relatively little artificial light helping to keep the sky dark at night and supporting quality of light and space, wild bird migration and feeding behaviour and sounds like bird calls, the wind through reeds in estuaries and waves on shingle.
- 10.40 Neighbourhood Plan groups may choose to produce local landscape character assessments to supplement the District-wide assessments at the Town or Parish level.

Policy SCLP10.4: Landscape Character

Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence.

Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance:

- a) The special qualities and features of the area;
- b) The visual relationship and environment around settlements and their landscape settings;
- c) Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;
- d) Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and
- e) The growing network of green infrastructure supporting health, wellbeing and social interaction.

Development will not be permitted where it will have a significant adverse impact on rural river valleys, historic park and gardens, coastal, estuary, heathland and other very sensitive landscapes. Conserving and enhancing the landscape and scenic beauty of the AONB is of particular importance. Proposals for development will be required to secure the preservation and appropriate restoration or enhancement of natural, historic or man made features across the District as identified in the Landscape Character Assessment, Settlement Sensitivity Assessment and successor landscape evidence.

Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network.

Development proposals which have the potential to impact upon the AONB or other sensitive landscapes should be informed by landscape appraisal, landscape and visual impact assessment and landscape mitigation.

Proposals for development should protect and enhance the tranquillity and dark skies across the District. Exterior lighting in development should be appropriate and sensitive to protecting the intrinsic darkness of rural and tranquil estuary, heathland and river valley landscape character.

Neighbourhood Plans may include local policies related to protecting and enhancing landscape character and protecting and enhancing tranquillity and dark skies.

Settlement Coalescence

- 10.41 Landscapes are a unique combination of features that make a place distinctive. There are a number of locations throughout the District where important undeveloped areas of land exist between settlements. These gaps help protect the identity and character of separate settlements.
- 10.42 Gaps between settlements help give the sense of leaving one place and arriving at another. Feedback from community engagement and public consultation used to help shape this Local Plan document stresses the importance of communities retaining their individual identity. Many distinct villages in Suffolk Coastal are near to other villages and towns. In places such as Rushmere St Andrew and Martlesham landscapes characterise village character as distinct from nearby suburban areas. The presence of buildings, signs and other development along roads prevents the sense of leaving a settlement and passing through the countryside. At night, various forms of artificial lighting can also lead to a sense of continuous urbanisation.

Policy SCLP10.5: Settlement Coalescence

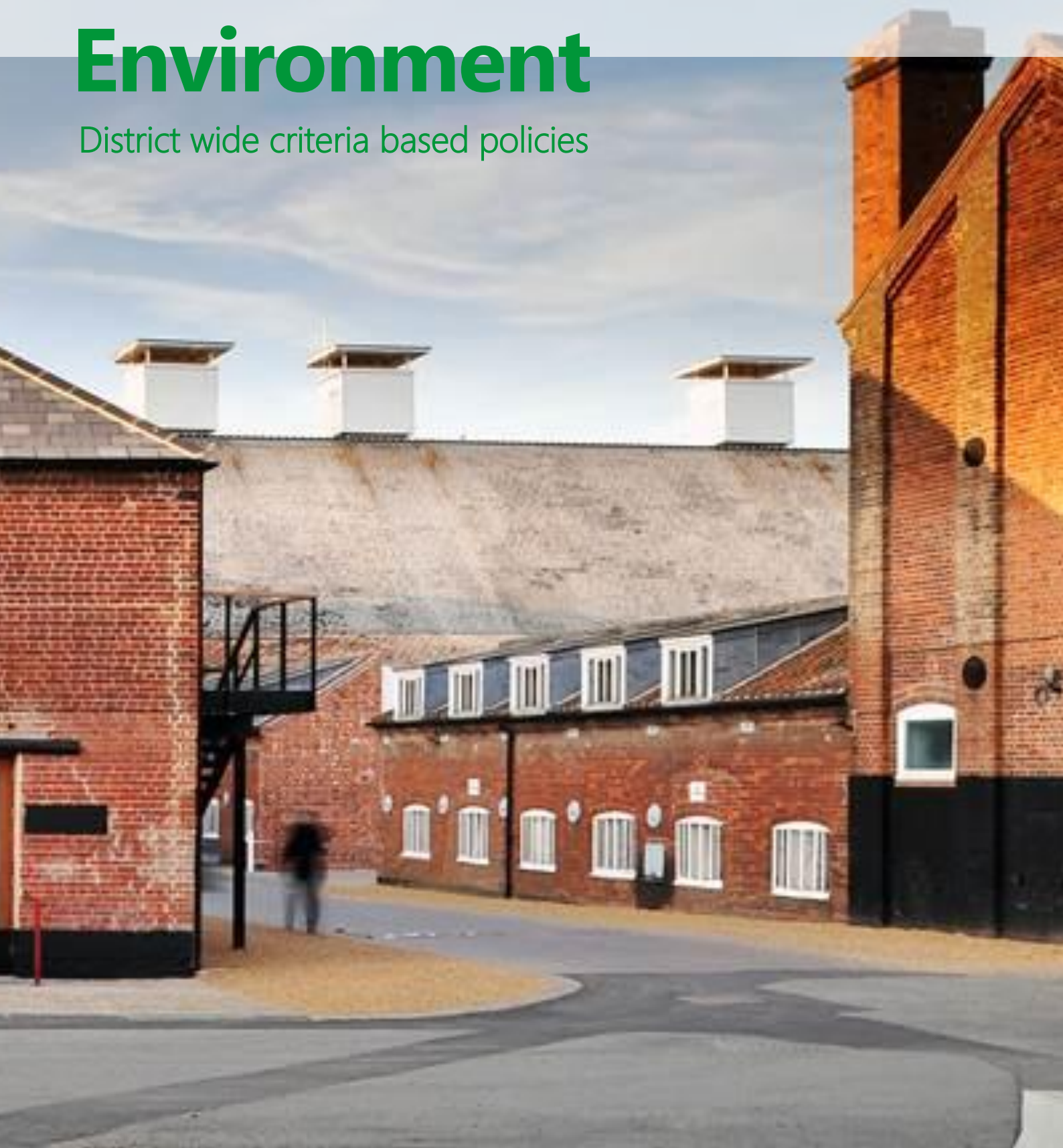
Development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements.

Neighbourhood plans may include policies addressing local issues related to settlement coalescence.

Section 11

Built and Historic Environment

District wide criteria based policies



11 Built and Historic Environment

- 11.1 Suffolk Coastal is fortunate to have a rich and varied built and historic environment with significant heritage assets alongside contemporary developments which provide a significant boost to the local economy. The District contains over 2,500 Listed Buildings and 36 Conservation Areas, as well as numerous archaeological assets and historic parkland.

Design Quality

- 11.2 Design is a key principle in the creation of sustainable development and should contribute positively to making communities better for everyone. Good design is concerned not only with how development looks but how it feels and functions. Incorporating both the enhancement of local character and distinctiveness that encourages innovative and creative solutions is encouraged. The Local Plan seeks to plan positively for high quality and inclusive design by creating places that function well, and establish a strong sense of place with comfortable places to live, work and visit. As stated in paragraph 124 of the National Planning Policy Framework 'the creation of high quality buildings and places is fundamental to what the planning and development process should achieve'.
- 11.3 The National Planning Policy Framework also emphasises high quality design and good amenity standards as a core planning principle. It is therefore, of great importance that design principles are understood and appropriately considered by the Local Plan and planning applications. Creating well designed places that incorporate all aspects of design in an inclusive manner can help to deliver a high quality of life. The Council is committed to providing a framework for good design that contributes to improvements in crime prevention, access and inclusion, safe and connected streets, cohesive neighbourhoods, well connected green spaces, and provision of services. The Local Plan seeks to ensure these principles are brought forward over the plan period. The National Planning Policy Framework also promotes the effective use of land and it is important that this is achieved alongside delivering high quality and inclusive design.
- 11.4 Local distinctiveness plays an important role in enhancing local character and site specific qualities, the importance of which was highlighted through consultation feedback. The Local Plan encourages design that creates a sense of place and acknowledges local form and character. The aim of development should be to create new and exciting places where people want to live, work and visit. In this regard, design should be of its time and site specific. The National Planning Policy Framework establishes the importance of supporting innovative and outstanding design. The Council encourages this across the District where it is respectful of its surroundings. In areas of more limited design quality the Council encourages development to significantly enhance design quality through innovative and creative means.
- 11.5 To help facilitate the understanding of local character and to support development that acknowledges and enhances the essence of local character it is important that the most appropriate information sources are referenced in relevant planning applications. Sources which may assist with identifying and assessing local

character include Conservation Area Appraisals, Neighbourhood Plans, village / parish plans and the Suffolk Design Guide.

- 11.6 The introduction of Neighbourhood Plans in the Localism Act 2011 has encouraged local communities to take an active role in the plan-making process and prepare plans and policies that, in gaining statutory weight, have a real impact on the development of localities. In this regard, Neighbourhood Plans can, and are encouraged to, set out design policies which respond to their own local circumstances.
- 11.7 The Suffolk Design Guide was adopted as Supplementary Planning Guidance by the Council in 1993, and revised in 2000 to acknowledge changes in national planning policy guidance. Although an ageing document, it is comprised of fundamental design principles that will continue to be important considerations. The Suffolk Local Authorities are in the early stages of reviewing the Suffolk Design Guide which will supersede the current guide, and which will be an important reference in relation to design considerations.
- 11.8 Local Plan consultation representations support the use of Building for Life 12 (BFL 12). Building for Life 12⁴⁸ is advocated in paragraph 129 of the National Planning Policy Framework as a tool to deliver well designed development proposals and to assess development proposals. In this regard, the Local Plan encourages all development proposals to use BFL 12 in demonstrating how the scheme meets the criteria for delivering high quality design. BFL 12 will be used as a tool to assist with design discussions during the pre-application and planning application stages, not as a prescriptive set of inflexible rules.
- 11.9 The Built for Life accreditation reflects high quality design and provides confidence that appropriate consideration has been given to all aspects of design. BFL 12 operates a traffic light scoring system when assessing developments against the 12 criteria. Developments that achieve at least 9 'green' scores are eligible for the Built for Life quality mark, which indicates a high quality of design has been achieved. Developments that achieve a 'green' score for all 12 criteria can be awarded the Built for Life 'Outstanding' accreditation through an independent assessment process, with the best developments recognised at BFL 12 organised events. Residential development proposals will be supported where they perform positively when assessed, by planning officers and/or agreed upon through a dialogue between planning officers and applicant, against the Building for Life 12 guidelines.
- 11.10 The Suffolk Design Review Panel was established by the Royal Institute of British Architects Suffolk in 2012, to help consider the design quality of planning applications. Comprised of local design experts, the aim of the Panel is to promote and encourage high standards in design of the built environment across Suffolk. In determining planning applications, regard is given to any recommendations detailed in the reports generated by the Design review Panel.
- 11.11 The Suffolk Coastal Quality of Place awards, reviewed by judges which are comprised of local design experts and chaired by a District Councillor, are a celebration of the effort being made by people across

⁴⁸ [Building for Life 12 - Third edition | Design Council](#)

Suffolk Coastal to add to the quality of our environment, by creating high quality designs in both the built and natural environment and helping to conserve our historic buildings. The best designed developments across the District are recorded on the Council's website.

- 11.12 Suffolk Coastal has a large percentage of older peoples and as such the need for housing to meet the needs of an ageing population is increasing. The Office for National Statistics predicts the population for the over 65 age group is set to increase by 59.7% between 2014 and 2039 across Suffolk. The RTPI's recent Dementia and Town Planning Document⁴⁹ and the Alzheimer's Society state that nationally there are currently 850,000 people living with dementia in the UK. This is set to increase to 1 million by 2021 and to 2million by 2051. It is therefore important that the design of the built environment caters for people throughout their lifetime and is suitable and accessible for people regardless of age, mobility or disability. This policy establishes the considerations against which residential developments will be considered, to provide for the needs of the most vulnerable in our society.
- 11.13 Creating a high quality environment for the elderly and those with disabilities will also result in a high quality environment for young people, for families with young children, and ultimately for everyone. Felixstowe has established a reputation as a Dementia Friendly Town, which can be attributed to Felixstowe Town Council actively engaging with communities as a Dementia Friendly Organisation and a Dementia Action Alliance Member.

Dementia Friendly Design Principles

- Familiar environments – functions of places and buildings are obvious, any changes are small scale and incremental;
 - Legible environment – a hierarchy of street types, which are short and fairly narrow. Clear signs at decision points;
 - Distinctive environment – A variety of landmarks, with architectural features in a variety of styles and materials. There is a variety of practical features (e.g. trees and street furniture);
 - Accessible environment – Land uses are mixed with shops and services within a 5-10 minute walk from housing. Entrances to places are obvious and easy to use and conform to disabled access regulations.
- 11.14 Inclusive design is concerned with understanding how we use places differently and how this can inform design decisions for the benefit of all users. Inclusive design is defined as the design of mainstream products and/or services that are accessible to and useable by, as many people as reasonably possible without the need for special adaptation or specialised design. However, it is also important that inclusive design recognises the need for specialised adaptation where necessary. The principles of inclusive design detailed in above should be considered as standard practice and at the earliest possible opportunity in the evolution of development proposals with the aim of creating balanced and mixed communities.

⁴⁹ [Dementia and Town Planning 2017 | RTPI](#)

- 11.15 Developers are advised to undertake pre application consultation with local communities when proposing development. They are encouraged to seek views regarding the local community's needs and expectations from a broad spectrum of the community, in relation to the design of a proposal. Applicants are encouraged to engage with communities through the use of Building for Life 12.
- 11.16 Policy SCLP5.8 Housing Mix details the policy requirements in relation to accessible and adaptable dwellings, under Building Regulations standard M4(2). The requirements will be met where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users. This policy will help to ensure the principles of inclusive design are met.

Policy SCLP11.1: Design Quality

The Council will support locally distinctive and inclusive design that clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means.

In so doing, permission will be granted where proposals:

- a) Support inclusive design environments which are legible, distinctive, accessible, comfortable, and safe, and adopt the principles of dementia friendly design;
- b) Demonstrate a clear understanding of the form and character of the built and natural environment and use this understanding to complement local character and distinctiveness through both robust evidence informed information sources and site specific context and analysis;
- c) Respond to local context and the form of surrounding buildings in relation to the following criteria:
 - i. the overall scale and character should clearly demonstrate consideration of the component parts of the buildings and the development as a whole in relation to its surroundings;
 - ii. the layout should fit in well with the existing neighbourhood layout and respond to the ways people and vehicles move around both internal and external to existing and proposed buildings;
 - iii. the height and massing of developments should be well related to that of their surroundings;
 - iv. the relationship between buildings and spaces and the wider street scene or townscape; and
 - v. by making use of high quality materials appropriate to the local context;
- d) Take account of any important landscape or topographical features and retain and/or enhance existing landscaping and natural and semi-natural features on site;
- e) Protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development;
- f) Take into account the need to promote public safety and deter crime and disorder through well lit neighbourhoods and development of public spaces that are overlooked;
- g) Create permeable and legible developments which are easily accessed, throughout the site and connections outside the site, and used by all, regardless of age, mobility and disability;
- h) Provide highway layouts with well integrated car parking and landscaping which create a high quality public realm, avoiding the perception of a car dominated environment, and that encourage and the use of pedestrian, cycle and other sustainable modes as the most attractive modes of sustainable travel;
- i) Include hard and soft landscaping schemes to aid the integration of the development into its surroundings;
- j) Ensure that the layout and design incorporates adequate provision for the storage and collection

of waste and recycling bins in a way which does not detract from the appearance of the development; and

Utilise measures that support resource efficiency. All major residential development proposals will be required to perform positively when assessed against Building for Life 12 guidelines. Developments should avoid red outcomes unless there are exceptional circumstances. All Building for Life 12 assessed schemes will be reviewed once built out and compared to initial BfL12 assessments.

Neighbourhood Plans can, and are encouraged to, set out design policies which respond to their own local circumstances.

Residential Amenity

- 11.17 The planning system plays an important role in safeguarding the quality of life of residents of the District. New development of any type is required to be located and designed with regard to the amenity of both existing and future residents to avoid generating significant harmful effects. Harmful effects can include those arising from overlooking, loss of privacy, noise, odour and light pollution and overbearing development. Residential amenity can be affected by individual developments or, as a result of cumulative impacts. In relation to air quality, there is a need to consider the impact on the development as well as from the development.

Policy SCLP11.2: Residential Amenity

When considering the impact of development on residential amenity, the Council will have regard to the following:

- a) Privacy/overlooking;
- b) Outlook;
- c) Access to daylight and sunlight;
- d) Noise and disturbance;
- e) The resulting physical relationship with other properties;
- f) Light spillage, air quality and other forms of pollution; and
- g) Safety and security.

Development will not cause an unacceptable loss of amenity to neighbouring or future occupiers of development in the vicinity.

Historic Environment

- 11.18 Heritage gives places their character and individuality. It creates a focus for community pride, a sense of shared history, and a sense of belonging. Historic buildings and the historic parts of our towns and villages provide a focus for social and economic activity. Historic places that are well-maintained and well-

managed add greatly to cultural life, community resilience and our individual and collective wellbeing. The conservation and enhancement of this heritage contributes directly to a healthier environment, benefiting people and offering support to thriving rural economies which are home to a large amount of the historic fabric in Suffolk Coastal.

- 11.19 The acknowledged quality of the built, natural and historic environments within the District is one of its key assets, making it an attractive area to live, work and visit. The District is home to over 2,500 Listed Buildings, 36 Conservation Areas, over 100 Scheduled Monuments, more than 7,300 sites of archaeological interest and 6 Parks and Gardens of Special Historic Interest as well as a number of locally identified historic parklands. Within the District the heritage assets characteristic of the area reflect the important coastal, cultural, farming and military history and relate to a diverse range of building typologies including resort tourism, aviation, landed estates and park and garden structures amongst many others.
- 11.20 These heritage assets need to be protected and enhanced for the benefit of current and future generations. National policies require Local Plans to set out a positive strategy for the protection and enhancement of these valuable assets. It is recognised that heritage assets are significant and are a resource that cannot be replaced. Therefore, the Council intends to pursue a policy approach that incorporates a positive strategy for the protection and enhancement of the District's heritage assets.
- 11.21 National planning policy states that a heritage asset can be a building, monument, site, place, area or landscape, identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Designated heritage assets are defined in the National Planning Policy Framework as World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas. It is acknowledged that large developments and small developments can have a similar impact on designated heritage assets, whether that be singularly or cumulatively.
- 11.22 Policy for determining proposals that would affect a heritage asset is set out in the National Planning Policy Framework. The Council will therefore rely on national policy and guidance in this regard.
- 11.23 Heritage protection is most effective, and the benefits of the historic environment are most likely to be seen, when local communities are engaged and encouraged to discover, understand and appreciate their history. The Neighbourhood Plan process, in this respect, plays an important role in identifying and protecting locally important/significant heritage assets. Therefore, the Council will encourage any future Neighbourhood Plans to consider identifying and protecting non designated heritage assets.
- 11.24 It is generally recognised that encouraging active use of a heritage asset is the best way to prevent deterioration and a proactive approach such as this is supported by the Council, where possible. In all cases there will be an expectation that any new development will enhance the historic environment or better reveal the significance of the heritage asset, in the first instance, unless there are no identifiable opportunities available. In instances where existing features are found to have a negative impact on the historic environment, the Council will encourage the removal of those features that undermine the historic environment as part of any proposed development. The Council will encourage the provision of creative

and accessible interpretations of heritage assets impacted by development, where this is appropriate to the asset and the development. Such interpretations should look to promote and display the features of the asset that make it a heritage asset.

- 11.25 Conservation and enhancement of the historic environment should be achieved in line with Policy SCLP9.2, where possible.
- 11.26 Conversely, heritage assets should not be allowed to fall into a state of disrepair as a means of gaining planning permission or increasing the likelihood of such. The Council will ensure that any identified or evidential deterioration or damage to a heritage asset, as a result of deliberate or intentional neglect, will not be taken into account to secure development that would otherwise be unacceptable, in line with national planning policy.
- 11.27 In accordance with good practice the Council will strive to maintain a register of Listed Buildings at risk. The Council will work with owners in this respect, but also has access to a range of statutory powers, where needed. Evaluation of proposals that have an impact on buildings at risk should apportion weight to any impacts that positively enhance a building at risk.
- 11.28 The Retail & Commercial Leisure Town Centre Study 2017 indicates that historic and small sites contribute to a balanced mix of retail in the town centres of the District. Proposals for new shopfronts or retail uses should carefully consider the contribution to the street scene, balanced against the need for shops and services to be accessible.
- 11.29 Heritage Impact Assessments and/or Archaeological Assessments will be required for proposals related to, or impacting on, heritage assets and their setting and/or known or possible archaeological sites, and where there is potential for encountering archaeological sites. This is to ensure that sufficient information is provided to assess the significance of the heritage assets and to assess the impacts of development on historic assets alongside any public benefits..
- 11.30 Pre-application consultation with the Council is encouraged to ensure the scope and detail of a Heritage Impact Assessment and/or Archaeological Assessment is sufficient. The level of detail of a Heritage Impact Assessment and/or Archaeological Assessment should be proportionate to the scheme proposed and the number and significance of heritage assets and/or known or possible archaeological sites affected.

Policy SCLP11.3: Historic Environment

The Council will work with partners, developers and the community to conserve and enhance the historic environment and to ensure that where possible development makes a positive contribution to the historic environment.

The policies of the National Planning Policy Framework will be applied in respect of designated and non-designated heritage assets.

All development proposals which have the potential to impact on historic assets or their settings should be supported by a Heritage Impact Assessment and/or an Archaeological Assessment prepared by an individual with relevant expertise. Pre-application consultation with the Council is encouraged to ensure the scope and detail of a Heritage Impact Assessment or Archaeological Assessment is sufficient. The level of detail of a Heritage Impact Assessment should be proportionate to the scheme proposed and the number and significance of heritage assets affected.

Listed Buildings

- 11.31 Listed Buildings are designated heritage assets and, as such, are afforded a high level of protection. There are over 2,500 Listed Buildings in the District. Listed Building consent will be required for many works relating to Listed Buildings, and is a separate consent to planning permission. National planning policy relating to Listed Buildings, as designated assets, is contained in the National Planning Policy Framework and will be applied alongside policy SCLP11.4 below.

Policy SCLP11.4: Listed Buildings

Proposals to alter, extend or change the use of a listed building (including curtilage listed structures) or development affecting its setting will be supported where they:

- a) Demonstrate a clear understanding of the significance of the building and/or its setting alongside an assessment of the potential impact of the proposal on that significance;
- b) Do not harm the building's character or any architectural, artistic, historic, or archaeological features that contribute towards its special interest;
- c) Are of an appropriate design, scale, form, height, massing and position which complement the existing building;
- d) Use high quality materials and methods of construction which complement the character of the building;
- e) Retain the historic internal layout of the building; and
- f) Remove existing features that detract from the building to enhance or better reveal its significance.

Conservation Areas

- 11.32 Conservation Areas are designated heritage assets and are afforded a high level of protection in national planning policy. At present, there are 36 designated Conservation Areas across the District, ranging from the centre of older villages and towns to hamlets and include open spaces and the landscape setting of a village. Conservation Areas are an important part of the evidence base which underpins this Local Plan and to which, the Council will have regard, when determining planning applications for schemes affecting Conservation Areas and Listed Buildings. Amendments may be made to individual Conservation Area boundaries as they are re-appraised and consulted upon as part of a separate on-going programme being undertaken by the Council.
- 11.33 There are no Article 4 Directions in Suffolk Coastal District. Development within Conservation Areas will be required to be consistent with measures set out in the relevant Conservation Area Appraisal or Management Plan, and any related policies in the wider Local Plan. The South Felixstowe Conservation Area is identified as being 'at risk' and within this area proposals will be expected to enhance the Conservation Area. Development within Conservation Areas should take account of the relevant District Council supplementary planning guidance. For demolition of listed buildings in a Conservation Area the Listed Buildings Policy (SCLP11.4) will also apply. National planning policy relating to Conservation Areas, as designated assets, is contained in the National Planning Policy Framework and will be applied alongside Policy SCLP11.5.

Policy SCLP11.5: Conservation Areas

Development within, and which has potential to affect the setting of, Conservation Areas will be assessed against the relevant Conservation Area Appraisals and Management Plans and any subsequent additions or alterations. Developments should be of a particularly high standard of design and high quality of materials in order to preserve or enhance the character or appearance of the area.

Proposals for development within a Conservation Area should:

- a) Demonstrate a clear understanding of the significance of the conservation area alongside an assessment of the potential impact of the proposal on that significance;
- b) Preserve or enhance the character or appearance of the conservation area;
- c) Be of an appropriate design, scale, form, height, massing and position;
- d) Retain features important to settlement form and pattern such as open spaces, plot divisions, position of dwellings, hierarchy of routes, hierarchy of buildings, and their uses, boundary treatments and gardens; and
- e) Use high quality materials and methods of construction which complement the character of the area.

Proposals which involve the demolition of buildings in a Conservation Area will only be permitted where:

- f) The building has no architectural, historic or visual significance; or
- g) The building is structurally unsound and beyond technically feasible and economically viable repair (for reasons other than deliberate damage or neglect); or
- h) All measures to sustain the existing use or find an alternative use/user have been exhausted.

In all cases, proposals for demolition should include comprehensive and detailed plans for redevelopment of the site.

Non-Designated Heritage Assets

- 11.34 Non-designated heritage assets can vary in type and form, and should possess a degree of heritage significance that merits consideration in planning decisions. Non-designated heritage assets can be either buildings or structures, or non-built assets such as archaeological assets and parks and gardens. The Council encourages Neighbourhood Plans to identify non-designated heritage assets, examples of such can be seen in Great Bealings and Martlesham Neighbourhood Plans. Non-designated heritage assets are not protected in the same way as Designated Heritage Assets but the identification of them as a non-designated heritage asset is a planning consideration when determining applications. The National

Planning Practice Guidance states that Local Planning Authorities may identify non-designated heritage assets that are buildings and that it is helpful to have criteria in place to allow the identification of such assets.

- 11.35 In relation to archaeological assets, any non-designated heritage assets that are deemed to be of equal importance to a Scheduled Monument by way of a heritage assessment and/or government guidance should be considered under the same policy as a Scheduled Monument, in accordance with paragraph 194 and footnote 63 of the NPPF. In this case, Policy SCLP11.3 along with the National Planning Policy Framework will apply.
- 11.36 The following criteria will be used to establish if any potential non-designated heritage asset that is a building or structure meets the definition in the National Planning Policy Framework at an early stage in the process, as advised by the national Planning Practice Guidance. A building or structure must meet two or more of these significance-measuring criteria to be identified by the Council as a non-designated heritage asset. Greater weight should be attributed to the conservation of any building or structure that meets more than two of the significance-measuring criteria. The weight attributed should be reflective of the number of criteria met.

Archaeological Interest	Architectural Interest	Artistic Interest	Historic Interest
<ul style="list-style-type: none"> Recorded in the Suffolk County Historic Environment Record 	<ul style="list-style-type: none"> Aesthetic value Known architect Integrity Landmark status Group value 	<ul style="list-style-type: none"> Artistic value Known designer 	<ul style="list-style-type: none"> Association Rarity Representativeness Social and communal value

- 11.37 The above criteria can be located on the Council's website and may be subject to change over time, therefore, it is advised to consult the website when utilising the criteria. The criteria are also contained in Appendix E, whilst the criteria apply to buildings and structures, policy SCLP11.6 applies to all Non Designated Heritage Assets. The National Planning Policy Framework contains policy in relation to assessing the impact of proposals on a Non-Designated Heritage Asset.

Policy SCLP11.6: Non-Designated Heritage Assets

Proposals for the re-use of Non-Designated Heritage Assets will be supported if compatible with the elements of the fabric and setting of the building which contribute to its significance. New uses which result in harm to a Non-Designated Heritage Asset or its setting will be considered based on the wider balance of the scale of any harm or loss.

In considering proposals which involve the loss of a non-designated heritage asset, consideration will be given to:

- a) Whether the asset is structurally unsound and beyond technically feasible and economically viable repair (for reasons other than deliberate damage or neglect); or
- b) Which measures to sustain the existing use, or find an alternative use/user, have been fully investigated.

Neighbourhood Plans can identify Non-Designated Heritage Assets. However, the protection afforded to these should be no more than that provided to Non-Designated Heritage Assets protected by this policy. Heritage assets identified should at least meet the Council's criteria for identifying Non-Designated Heritage Assets.

Archaeology

- 11.38 Suffolk Coastal has a rich, diverse and dense archaeological landscape with the river valleys, in particular, topographically favourable for early occupation of all periods. The distinctive character of the historic environment in the District includes outstanding coastal archaeology of all dates, prehistoric burial tumuli on the open heathlands around the eastern margins of Ipswich and on the Felixstowe peninsula, the remains of Roman small towns at Felixstowe and Wenhaston, the internationally important Anglo-Saxon burial ground at Sutton Hoo, numerous medieval historic towns and villages with both above and below ground heritage assets, for example Woodbridge and Aldeburgh, and the strategically placed, Napoleonic Martello towers.
- 11.39 Some archaeological sites are designated as Scheduled Monuments, although most assets are non-designated and sometimes not known of until development proposals come forward. Scheduled Monuments are nationally significant assets and afforded great protection in the National Planning Policy Framework. The Council recognises that archaeological remains are non-renewable resources which are valuable for their own sake and for their role in education, leisure and tourism.
- 11.40 The Suffolk Historic Environment Record provides information about archaeological sites throughout the District and is used to identify sites that may be at risk from development. Policy SCLP11.6 requires a full archaeological assessment of sites within potential areas of archaeological importance to describe the significance of any heritage assets affected and to ensure that provision is made for the preservation of important remains, particularly those that may be demonstrably of national significance. Archaeological

Assessment prior to determination may comprise a combination of desk-based assessment, geophysical survey and/or field evaluation.

- 11.41 The Council will work with Historic England, Suffolk County Council and the local community in identifying and protecting or relocating archaeology that comes to light as a result of erosion. The level of protection afforded should be relative to the significance and importance of the archaeological remains. The known rate of erosion should be considered when determining the significance and importance of archaeological remains and when determining whether or not relocation of the archaeological remains is required.
- 11.42 Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis, reporting, dissemination and deposition of archive for access and curation, will constitute appropriate mitigation for the impacts of development. Archaeological conditions or planning obligations will be imposed on consents as appropriate. Appropriate programmes of work post-consent could include some or all of:
- further evaluation;
 - upfront excavation;
 - paleo-environmental work;
 - building survey and or monitoring;
- Or
- control of contractor's groundworks.
- 11.43 The provision of interpretation about archaeological work will be encouraged, as appropriate to the scale of development and the nature of the archaeological remains.

Policy SCLP11.7: Archaeology

An archaeological assessment proportionate to the potential and significance of remains must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains.

Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and/or deposition of archive is more appropriate.

Archaeological conditions or planning obligations will be imposed on consents as appropriate. Measures to disseminate and promote information about archaeological assets to the public will be supported.

Parks and Gardens

- 11.44 Registered Parks and Gardens are identified as Designated Heritage Assets within the National Planning Policy Framework. In addition to these, Supplementary Planning Guidance (SPG) 6 identifies 21 parks and

gardens of historic interest of 50 hectares or more, which are important within Suffolk Coastal District. The site size threshold is considered to be an appropriate measure for identifying parklands of District-wide significance. They are identified primarily for their historic landscape significance, and also contribute towards other objectives such as the protection and enhancement of habitats. Policy relating to historic parks and gardens identified as Non Designated Heritage Assets is contained within policy SCLP11.6. The Council will keep the list of locally identified Historic Parks and Gardens under review and will designate further Historic Parks and Gardens where this is considered appropriate.

Policy SCLP11.8: Parks and Gardens of Historic or Landscape Interest

Within the plan area 7 parks are included in the National Register of Parks and Gardens of Special Historic Interest compiled by Historic England and have the status of Designated Heritage Assets:

- Campsea Ashe Park
- Henham (part in Suffolk Coastal)
- Heveningham Hall
- Glemham Hall
- Bawdsey Manor
- Woodbridge Cemetery
- Cliff Gardens and Town Hall Garden (Felixstowe)

Development proposals affecting these assets will be considered in relation to the policy on Designated Heritage Assets contained in the National Planning Policy Framework and guidance contained in Supplementary Planning Guidance SPG6 (or any subsequent Supplementary Planning Document).

The following historic parklands have been identified as being of District wide significance, and have the status of Non-Designated Heritage Assets. A major attribute of a parkland 'of note' is its extensive coverage within the landscape:

- Benhall Park, Benhall
- Boulge Park, Boulge
- Broke Hall Park, Nacton
- Carlton Park, Kelsale
- Cockfield Hall Park, Yoxford
- Easton Park, Easton
- Glemham House Park, Great Glemham
- Glevering Hall Park, Hacheston
- Grove Park, Yoxford
- Grundisburgh Hall Park, Grundisburgh
- Marlesford Hall Park, Marlesford
- Orwell Park, Nacton
- Rookery Park, Yoxford
- Sibton Park, Sibton
- Spa Gardens and Town Hall Gardens, Felixstowe
- Staverton Park, Wantisden
- Sudbourne Park, Sudbourne

The delineated boundary of each of these locally listed historic parklands includes the area currently forming the visual extent of the parkland as well as any additional areas that historically formed part of the extent of the parkland and which continue to display the remnants of the former parkland.

The District Council will encourage the preservation and enhancement of these parks and gardens of historic interest and their surroundings. Applications for planning permission will be permitted where the development proposal will not have a materially adverse impact on the character, features or immediate setting of the delineated park or garden and which have due regard to the additional advice and guidance in Supplementary Planning Guidance SPG6 (or any subsequent Supplementary Planning Document).

Proposals affecting or within the designated and non-designated parks and gardens will be required to be accompanied by landscape design and management proposals, to ensure a high level of design, mitigation and enhancement is achieved.

Areas to be Protected from Development

- 11.45 Areas to be protected from development are a long established policy across the District. These areas make an important contribution to the setting or character of a Town, Village or surrounding countryside. The identification of these areas is necessary to resist infilling development that could be detrimental to the character, spacing or density of a particular area.
- 11.46 In some locations such as Trimley St Martin and Trimley St Mary, areas to be protected from development have been identified to maintain the separation between settlements. The identification of these adjacent to residential allocations established in the Felixstowe Peninsula Area Action Plan reinforces the separation between settlements and protects the individual character of settlements.

Policy SCLP11.9: Areas to be Protected from Development

Areas to be protected from development as identified on the Policies Map comprise local scale sites, gaps, gardens and spaces that make an important contribution to the character and setting of a settlement in their undeveloped form. In some locations these areas maintain settlement separation.

Accordingly, development within these areas will be severely restricted to maintain the character of the area and ensure settlement coalescence is not compromised.

Newbourne: Former Land Settlement Association Holdings

- 11.47 Newbourne is defined as a Small Village in the Settlement Hierarchy. The part of Newbourne which comprises the Former Land Settlement Association Holdings is a unique area within the District. The Land Settlement Association was set up in 1934 as an experimental scheme to provide unemployed workers from depressed industrial areas with employment on the land. The scheme and its legacy can still be seen in the number of large regular shaped plots, some of which still contain commercial scale greenhouses.
- 11.48 Due to its unique nature, Newbourne does not have a defined Settlement Boundary in the same way as other settlements in the District. It is considered that backland development, particularly for residential use, has the potential to harm the character of the village. Whilst it is preferable to maintain the plots and their associated horticultural and agricultural buildings in those uses, it is recognised that a number are not being used for their original purpose or have become derelict. There may be instances therefore where low key employment uses would be appropriate on the site of former horticultural and agricultural buildings, where this does not result in the functional or physical separation of the dwelling and the wider plot.
- 11.49 To retain the character, it is also important to continue to control changes which may occur through new dwellings or the replacement or enlargement of dwellings and consideration will be given to the impact on the character of the Former Land Settlement Association Holdings area of Newbourne in this respect.

Policy SCLP11.10: Newbourne - Former Land Settlement Association Holdings

The Council will encourage the retention of suitable buildings in horticultural or agricultural use of those parts of the former Land Settlement Association Holdings shown on the Policies Map, not currently used or required in connection with the residential curtilages, taking account of any physical features which currently mark garden limits.

New employment uses on backland plots will be supported where:

- a) It is demonstrated that the land and/or buildings are surplus to agricultural and horticultural requirements;
- b) Any new or replacement buildings are of a scale and nature appropriate to the character of the Former Land Settlement Association Holdings area;
- c) They do not result in physical separation of individual plots; and
- d) They are of a suitable design and construction for the proposed use.

The erection of new or replacement dwellings, or extensions to existing dwellings or ancillary residential development will be supported where:

- e) Their scale and design would not harm the character of the former Land Settlement Association Holdings area; and
- f) In the case of new dwellings, it would represent infill development within the existing frontage and not result in backland development.