

# Consultation Statement

Healthy Environments  
Supplementary Planning Document

April 2024



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# 1 Introduction

The Healthy Environments Supplementary Planning Document (SPD) provides policy implementation guidance for the delivery of key policies of the East Suffolk Council – Waveney Local Plan (2019) and East Suffolk Council – Suffolk Coastal Local Plan (2020) and design guidance for the topic area. The key topic areas of the guidance relate to the delivery of high quality green infrastructure, active travel infrastructure, buildings (with a focus on homes, schools and workplaces), centres, community facilities, and for ensuring larger developments support health holistically by combining these elements effectively. The SPD supports the delivery of developments that produce healthier built environments for people of all ages and abilities, increase inclusivity and reduce living environment deprivation so as to support the attainment of better health outcomes for East Suffolk’s communities.

Once adopted, the Healthy Environments SPD will replace the following documents:

- SPG15 Outdoor Playing Space (2001) – this relates to the former Suffolk Coastal area;
- Open Space Provision & Developer Contributions SPD (2012) – this relates to the former Waveney area; and
- the introduction section of the Waveney Green Infrastructure Strategy (2015) – this relates to the former Waveney area.

The SPD will also support the delivery of the recommendations of the East Suffolk Leisure Strategy (2021), East Suffolk Cycling and Walking Strategy (2022), East Suffolk Play Area Strategy (2023) and Our Direction 2028 (2023).

This Consultation Statement was first produced to accompany the initial consultation on the proposed scope and content of the Healthy Environments SPD that was held for six weeks between 26<sup>th</sup> September 2022 and 7<sup>th</sup> November 2022. The responses to the initial consultation were used to inform the production of the Draft Healthy Environments SPD. The Draft Healthy Environments SPD was consulted on for eight weeks between 15<sup>th</sup> November 2023 and 10<sup>th</sup> January 2024.

This Consultation Statement has since been updated following the draft consultation on the Draft Healthy Environments SPD to reflect the consultation responses received during that consultation. This Consultation Statement was produced in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

SPDs expand upon policy and provide further detail to support the implementation of policies in Local Plans. Whilst not a part of the development plan, they are a material consideration in the determination of planning applications. The Local Plan policies, which this SPD provides guidance on, can be viewed on the Council's website<sup>1</sup>. The Council's approach to engagement in the preparation of SPDs is set out in the Statement of Community Involvement<sup>2</sup>.

## 2. Who was consulted?

Consultation on the Healthy Environments Supplementary Planning Document (SPD) was split into two stages: an initial stage that informed the scope and content of the SPD, and a formal stage of consultation that sought views on the draft SPD once the draft version had been produced.

### 2.1 Initial consultation

The initial consultation was carried out between 26<sup>th</sup> September 2022 and 7<sup>th</sup> November 2022. The following organisations and groups were consulted during the preparation of the SPD:

- Developers, planning agents, architects, and land agents
- Town and Parish Councils
- Suffolk County Council – Highways, Public Health, Planning Strategy
- Infrastructure providers – e.g. Network Rail, Environment Agency etc.
- Housing Associations
- Relevant national, regional and county level organisations – Sport England, Historic England, Sustrans, Suffolk Mind, Home Builders Federation, etc.
- Neighbouring Local Authorities
- The NHS Suffolk and North East Essex Integrated Care Board
- The NHS Norfolk and Waveney Integrated Care Board

The consultation was also made available to the public on the Council's website.

### 2.2 Consultation on the Draft SPD

Consultation on the Draft SPD was held between 15<sup>th</sup> November 2023 and 10<sup>th</sup> January 2024. At the formal stage of consultation, all of those registered on the Council's Local Plan and other Policy Documents mailing list were directly consulted.

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<sup>1</sup> Available at: [www.eastsuffolk.gov.uk/localplan](http://www.eastsuffolk.gov.uk/localplan).

<sup>2</sup> Available at: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/statement-of-community-involvement-and-local-development-scheme/>.

A small number of consultees that were not on these mailing lists were contacted directly and invited to respond to the consultation due to their professional expertise in the topic area.

Steps were undertaken to advertise the consultation to others, as set out below.

### 3. How were they consulted?

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

#### **Initial consultation**

The initial consultation ran from 26<sup>th</sup> September to 7<sup>th</sup> November 2022. An Initial Consultation Document was prepared to provide background information and an overview of the proposed scope and content of the SPD, followed by an eight-question questionnaire for respondents to respond to. The consultation documents were made available on the East Suffolk Council website via this webpage:

<https://eastsuffolk.inconsult.uk/healthyenvironmentsspd2022/consultationHome>.

The consultation was advertised on the Council's website, as well as through social media posts on the Council's social media accounts. Specific consultees, both internal and external, that had professional expertise in areas relevant to the topic areas of the SPD were contacted at the initial consultation stage and invited to provide their feedback on the proposed scope and content of the SPD. Town and Parish Councils, elected members, and other organisations referred to above were notified directly by email, and a small number were contacted by post. All consultation respondents were also given the option to submit written responses to Planning Policy team via email or by post, or to contact the team with any questions. A press release was not made at initial consultation stage, as this is generally not considered to be appropriate at initial scope and content consultation stage. Similarly, hard copies of the Initial Consultation Document were not made available at local libraries or East Suffolk Service Centres as this is generally not considered to be appropriate at initial scope and content consultation stage.

In total 19 individuals and organisations responded to the consultation, which is a consistent number of respondents to previous SPD consultations the Council has conducted. Full copies of the responses have been published on the Council's website at:

<https://eastsuffolk.inconsult.uk/healthyenvironmentsspd2022/listRespondents>.

## Consultation on the Draft SPD

The consultation of the draft SPD ran for eight weeks between 15<sup>th</sup> November 2023 and 10<sup>th</sup> January 2024; an additional two weeks of consultation time was added to the standard six weeks due to the consultation period running over the festive period.

Both a downloadable PDF version of the document and a consultation portal version of the document was made available; the consultation portal document allowed respondents to comment directly on the section of the document that their comment related to. All consultation respondents were also given the option to submit written responses to Planning Policy team via email or by post, or to contact the team with any questions.

Town and Parish Councils, elected members, and other organisations referred to above were notified directly by email/letter as their preference. Specific external consultees that had professional expertise in areas relevant to the topic areas of the SPD were contacted at the draft consultation stage and invited to provide their feedback on the proposed detailed guidance included in the draft SPD.

Town and Parish Councils were sent a letter and two hard copies of a poster that advertised the consultation in the post, so that these could be displayed in their ward areas. Their email also included an electronic copy of the poster so that Town and Parish Councils could print additional copies of the poster if they wanted to.

The consultation was advertised on the Council's website, as well as through social media posts on the Council's social media accounts; social media posts were released in approximately two-week intervals over the duration of the consultation.

The consultation documents were made available on the East Suffolk Council website via the below page: <https://eastsuffolk.inconsult.uk/DraftHESPD2023/consultationHome>.

Hard copies of the draft SPD were also made available at the following libraries and East Suffolk Customer Service Centre locations for the duration of the draft SPD consultation:

- Aldeburgh Library, Victoria Road, Aldeburgh, IP15 5EG
- Beccles Library, Blyburgate, Beccles, NR34 9TB
- Bungay Community Library, Wharton Street, Bungay, NR35 1EL
- Felixstowe Library, Crescent Road, Felixstowe, IP11 7BY
- Framlingham Library, The Old Court House, Bridge Street, Framlingham, IP13 9AJ
- Halesworth Library, Bridge Street, Halesworth, IP19 8AD
- Kesgrave Library, Kinsey House, Kays Close, Kesgrave, IP5 2HL
- Kessingland, Marram Green, Hall Road, Kessingland, NR33 7AH
- Leiston Library, Old Post Office Square, Main Street, Leiston, IP16 4ER

- Lowestoft Library, Clapham Road South, Lowestoft, NR32 1DR
- Marina Centre, Lowestoft, NR32 1HH
- Oulton Broad Library, 92 Bridge Road, Oulton Broad, NR32 3LR
- Rushmere Library, Rushmere Sports Pavilion, Sidegate Avenue, Ipswich, IP4 JJ
- Saxmundham Library, County Offices, Street Farm Road, Saxmundham, IP17 1AL
- Southwold Library, Old Hospital Hub, Field Stile Road, IP18 6LD
- Wickham Market Library Resource Centre, Chapel Lane, Wickham Market, IP13 OSD
- Woodbridge Library, New Street, Woodbridge, IP12 1DT

In total 21 individuals and organisations responded to the consultation. Between them they made 116 comments.

Full copies of the responses have been published on the Council's website at:

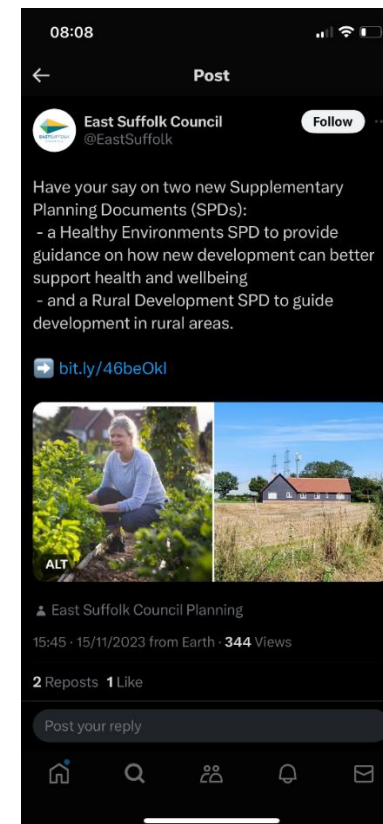
<https://eastsuffolk.inconsult.uk/DraftHESPD2023/listResponses>

## Appendix 1: Initial Consultation – Social Media

The table below lists the social media posts made on the Council’s social media accounts during the initial consultation.

### Draft consultation – Nov 2023 – Jan 2024

X (formerly Twitter)	Facebook
15/11/2023	15/11/2023





## Appendix 2: Initial Consultation Summary

The table below lists the main issues raised in the consultation responses, the Council’s response and how they informed the preparation of the document.

### 1. Do you consider the proposed scope (range of Local Plan policies and topic areas that have been included or excluded) of the SPD to be appropriate?

Respondent Name	Comment Summary	Council Response	Action
Badger Building (East Anglia) Ltd (Edward Gilder)	Yes.	Comment noted.	None.
Bloor Homes (Savills, Lydia Voyias)	Yes, we consider the proposed scope of the SPD to be appropriate for the emerging SPD.	Comment noted.	None.
Kesgrave Town Council (Joanna Abbott)	Yes.	Comment noted.	None.
Martlesham Parish Council (Diane Linsley)	No. SPD should be in conformity with, and refer to, policy direction from other bodies that influence development design, e.g. Suffolk County Council/Highways, the Environment Agency.	Agreed. Supplementary Planning Documents expand upon policy and provide further detail to support the implementation of policies in Local Plans. Whilst not a part of the development plan, they are a material consideration in the determination of planning applications. Where relevant, the SPD’s guidance is responsive to and makes reference to national and county policies, strategies and guidance documents. Suffolk County Council’s respective Highways and Public Health teams and the two Integrated Care Boards that cover the East Suffolk district have directly contributed to decisions on the content of the SPD chapters.	Guidance will be responsive to the wider policy and guidance context in which the SPD sits. References to adopted policy, strategies and guidance created by relevant organisations will be added throughout the document.
Paul Smith	No. Respondent was not able to access or did not understand the initial consultation document	When a planning document is consulted on, the relevant consultation documents are made available to be viewed on the East Suffolk Council website.	None.

Respondent Name	Comment Summary	Council Response	Action
Reydon Parish Council (Fiona Taylor)	Yes.	Comment noted.	None.
Sport England (Philip Raiswell)	Yes.	Comment noted.	None.
NHS Suffolk and North East Essex Integrated Care Board (Chris Crisell)	Yes. The scope is large and does encompass many different policies but this is a broad subject and the more policies this SPD can touch upon the better.	Comment noted.	None.
Suffolk County Council – Planning Strategy (Natalie Winspear)	<p>Yes. The proposed scope of the SPD is considered appropriate, but suggest the following policies are also considered:</p> <p>Healthy homes and workplaces to protect health and amenity: -</p> <ul style="list-style-type: none"> <li>• SCLP 4.5 (Economic development in rural areas) – amenity.</li> <li>• SCLP 4.6 (Conversion and replacement of rural buildings for employment use) – amenity.</li> <li>• WLP 8.2 (Affordable Housing) – to be indistinguishable from market housing and meeting all design requirements.</li> <li>• WLP 8.14 (Conversion and replacement of rural buildings for employment use) – amenity.</li> </ul> <p>Social, accessible, inclusive and attractive design of the public realm: -</p> <ul style="list-style-type: none"> <li>• SCLP 11.3 (Historic Environment) – for incorporation of heritage assets in public realm.</li> <li>• SCLP 11.5 (Conservation Areas) – as above.</li> </ul>	<p>Policies SCLP4.2, SCLP4.5, SCLP4.6, and WLP8.14 are not high level enough to be scoped in for specific coverage of them in this SPD, which generally has a broad and high level scope. Active travel and environmental quality (including residential amenity) matters are covered within the Active Travel and Healthy Homes, School &amp; Workplaces chapters, respectively. It should be noted however that policies SCLP4.5, SCLP4.6, and WLP8.14 are proposed to be covered within the guidance of the Draft Rural Development SPD which is also currently being prepared.</p> <p>Agreed, guidance on tenure-blind design (via Policy WLP8.2 and Policy SCLP11.1 Design Quality and the Building for a Healthy Life guide) will be included within the Healthy Homes, Schools and Workplaces chapter. This is also covered in depth in the Design chapter of the already adopted Affordable Housing SPD (2022).</p> <p>It is agreed and acknowledged that the retention of historic assets and features are of value to the health and wellbeing of communities. The already adopted Historic Environment SPD (2021) provides in depth</p>	<p>Add guidance on policy WLP8.14 within the Healthy Homes, Schools and Workplaces chapter of the SPD.</p> <p>Add guidance on the health and wellbeing value of retaining heritage assets, including historic shop fronts, to the Healthy Centres &amp; Community Facilities chapter of the SPD.</p> <p>Add planning and design guidance on community facilities to Healthy Centres &amp; Community Facilities chapter.</p> <p>Add active travel guidance with a focus on accessibility to Active Travel chapter of the SPD.</p>

Respondent Name	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> <li>WLP 8.22 (Built community services and facilities) – as shared recreational facilities.</li> </ul> <p>Active travel infrastructure: -</p> <ul style="list-style-type: none"> <li>SCLP 4.2 (New employment development) – employment developments are key destinations for travel and active travel routes.</li> <li>SCLP 11.1 (Design quality) – active travel is a component of accessible environments.</li> <li>WLP 8.13 (New employment development) – employment developments are key destinations for travel and active travel routes.</li> </ul> <p>WLP 8.29 (Design) – active travel is a consideration in designing integrated highway layouts and developments which avoid the perception of a car dominated environment.</p>	<p>guidance (and links to further information) on the incorporation of heritage assets in the public realm, and therefore this guidance is not duplicated in this SPD. Coverage of the value of the retention of heritage assets, including historic shopfronts, is included in the Healthy Centres &amp; Community Facilities chapter.</p> <p>Guidance on the planning and design of new community facilities are covered in the Healthy Centres &amp; Community Facilities chapter.</p> <p>The key design policies, Policy SCLP11.1 Design Quality and Policy WLP8.29 Design, are the main ‘policy windows’ for the guidance content of this SPD. Active travel matters are covered (including the provision of links to external sources of information and guidance) in the Active Travel chapter of SPD and covers increasing accessibility and inclusivity.</p>	
Suffolk Mind (Jon Neal)	<p>No. Support the intention of the document.</p> <p>Guidance should be structured to ensure that the built environment meets both physical needs (food, drink, sleep, movement, etc.) and emotional needs (emotional connection, privacy, safety, etc.). The built environment can be a barrier and enabler to these needs through:</p> <ul style="list-style-type: none"> <li>Clear signage, with directions and estimated journey time on foot to support feeling more in control.</li> <li>Poor streetlighting undermines feelings of safety when walking.</li> </ul>	<p>Agreed. These principles have been incorporated within the document.</p> <p>Wayfinding signage, lighting, community engagement, conversation benches (curved), and gamification will be referred to and supported in the relevant chapters of the SPD.</p> <p>Designing safe and pro-social developments is covered in the main chapters of the SPD.</p>	<p>Incorporated guidance on how the built environment can meet both emotional and physical health and wellbeing needs into the Introduction/Background chapter.</p> <p>Reference wayfinding signage, lighting, community engagement, conversation benches and gamification in the Active Travel and Green Infrastructure (play sections) chapters of the document.</p>

Respondent Name	Comment Summary	Council Response	Action
	<ul style="list-style-type: none"> <li>• Community engagement directly supports positive health and wellbeing outcomes.</li> <li>• Support conversation style benches (curved). Supports gamification (urbanism principle).</li> </ul>		Safe and pro-social development to be covered in relevant locations with the SPD.
Westerfield Parish Council (David Gooch)	Yes.	Comment noted.	None.
Woodbridge Town Council (Greg Diaper)	Yes.	Comment noted.	None.
Yoxford Parish Council (Sharon Smith)	Yes.	Comment noted.	None.

## 2. Do you consider the proposed content (the intended approach of the guidance to be included under each topic area) of the SPD to be appropriate?

Respondent Name	Comment	Council Response	Action
Badger Building (East Anglia) Ltd (Edward Gilder)	Yes.	Comment noted.	None.
Bloor Homes (Savills, Lydia Voyias)	<p>Support the proposed content for each topic area of the SPD to be appropriate.</p> <ul style="list-style-type: none"> <li>• Don't duplicate existing active travel design guidance.</li> <li>• Support 20 minute neighbourhood concept in dense urban areas; content will need to be adapted for the range of contexts in East Suffolk to ensure concept is successfully delivered.</li> <li>• Supports 'Wellness Hubs' in the respect of co-locating health infrastructure.</li> <li>• Cross-reference rather than duplicate existing guidance.</li> </ul>	<p>Comment noted. The active travel section will predominantly be led by the 'Suffolk Design: Streets Guide' (SDSG, 2022) and 'Cycle Infrastructure Design (LTN1/20, 2020)'; the SPD adds further guidance on increasing accessibility, inclusivity and designing an effective movement network. The SPD also adds guidance specifically on off-carriageway/Public Rights of Way routes. The SPD's guidance does not overly duplicate or conflict with the SDSG or LTN1/20.</p> <p>Support noted. The SPD makes reference to the three golden threads of the core 20 minute neighbourhoods model: compact, connected and complete neighbourhoods and adapts it for use in the creation of new centres/development in existing centres.</p> <p>Support for Wellness Hubs noted.</p>	None.
Kesgrave Town Council (Joanna Abbott)	Yes.	Comment noted.	None.
Martlesham Parish Council (Diane Linsley)	Yes, subject to any changes required from inclusion of the above.	Comment noted.	None.
Paul Smith	No. As above. I would like to know what this is, hence taking the time to do the questionnaire. Unfortunately, I have no idea what this is.	When a planning document is consulted on, relevant consultation documents are made available to be reviewed on the East Suffolk Council website.	None.

Respondent Name	Comment	Council Response	Action
Reydon Parish Council (Fiona Taylor)	Yes.	Comment noted.	None.
Sport England (Philip Raiswell)	Yes.	Comment noted.	None.
NHS SNEE ICB (Chris Crisell)	In the majority we find that the content is correct and as we have picked out earlier in this response, there are small amendments we have suggested.	Comment noted. The ICB was engaged with directly throughout the drafting process to ensure the proposed content was appropriate.	None.
Suffolk County Council – Planning Strategy (Natie Winspear)	<p>Yes. Some sections overlap. Suggests sections are made more distinct by organising into:</p> <ul style="list-style-type: none"> <li>• The physical design of individual homes and workplaces.</li> <li>• The layout of residential development to appropriately accommodate affordable housing.</li> <li>• The layout and design of public realm (residential streets and centres).</li> </ul> <p>Outdoor spaces content should include more guidance on increasing accessibility from new developments to existing destination landscapes (AONB, the Broads, coastline, PROW, etc.).</p>	<p>Comment noted. Overlapping is likely unavoidable, however, to support useability for the reader the draft document has been restructured and organised into four main topic-area chapters: Green Infrastructure, Active Travel; Healthy Homes, Schools &amp; Workplaces, and Healthy Centres &amp; Community Facilities. These chapters are proposed to then be followed by a chapter that focuses on bringing all four of these high level ‘essential elements’ together into a well-functioning neighbourhood (‘lifetime neighbourhood’) with enabling healthy lifestyles, accessibility and widening inclusivity its overarching priorities.</p> <p>The SPD’s Green Infrastructure chapter focuses on green open space, play provision, nature-led sustainable drainage systems, landscaping, trees, green routes and Suitable Alternative Natural Greenspace (provision) and playing fields as these can be provided through new development.</p>	SPD is to be restructured to be more useable.

Respondent Name	Comment	Council Response	Action
		The Active Travel chapter guidance on planning and creating or improving (for convenience, comfort, accessibility, directness, legibility and inclusivity) existing active travel routes, such as those created as Public Rights of Way to destination landscapes/'countryside' locations, as well as neighbouring communities and amenities.	
Yoxford Parish Council (Sharon Smith)	Yes.	Comment noted.	None.
Westerfield Parish Council (David Gooch)	Yes.	Comment noted.	None.
Woodbridge Town Council (Greg Diaper)	Yes.	Comment noted.	None.

### 3. How valuable do you think an East Suffolk Health Impact Assessment template (or series of templates for different types of development proposals) to assess development proposals would be?

Respondent Name	Summary of Comments	Council Response	Action
Badger Building (East Anglia) Ltd (Edward Gilder)	Very helpful.	Comment noted.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.
Bloor Homes (Savills, Lydia Voyias)	Support an East Suffolk HIA template; assume the template will allow for a rapid and full assessment.  Support HIA speeding up planning process.	Comment noted.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.
Martlesham Parish Council (Diane Linsley)	Very valuable.	Comment noted.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.
Paul Smith	It sounds a good idea, but there is no way for a new reader to know.	When a planning document is consulted on, relevant consultation documents are made available to be reviewed on the East Suffolk Council website.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.
Reydon Parish Council (Fiona Taylor)	The Parish Council thinks that a template would be useful to provide guidance on the required content of an HIA and to give a structure against which the impact of the proposed development can be assessed.	Comment noted.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.
NHS Suffolk and North East Essex Integrated Care Board (Chris Crisell)	Support a Suffolk-wide HIA template; different LPAs having different HIA templates will cause confusion.	Agreed.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.



Respondent Name	Summary of Comments	Council Response	Action
Suffolk Mind (Jon Neal)	We would be happy to expand upon the above comments in person.	Comment noted.	None.
Westerfield Parish Council (David Gooch)	Support a standardised form of assessment.	Comment noted.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.
Suffolk County Council – Planning Strategy (Natalie Winspear)	Suffolk wide HIA supported by SCC’s Policy team. SCC will collaborate and support.	Agreed.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.
Woodbridge Town Council (Greg Diaper)	Support conditional to draft.	Comment noted.	Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD.

#### 4. How valuable do you think a Healthy Environments Master Checklist of design considerations for use as a tool during the design process of a development proposal would be?

Respondent Name	Summary of Comments	Council Response	Action
Badger Building (East Anglia) Ltd (Edward Gilder)	Very helpful.	Comment noted.	None.
Bloor Homes (Savills, Lydia Voyias)	Useful for informing HIA process; will also help to inform content of Design and Access Statements.	Comment noted.	None.
Martlesham Parish Council (Diane Linsley)	Very valuable.	Comment noted.	None.
Paul Smith	As above.	When a planning document is consulted on, relevant consultation documents are made available to be reviewed on the East Suffolk Council website.	None.
Reydon Parish Council (Fiona Taylor)	Extremely valuable to provide the minimum requirements of what is to be expected in a new development; stronger emphasis on climate change needed.	Agreed. Guidance on matters related to climate change adaptation and mitigation are proposed to be covered in various sections of the SPD. However, care has been taken to not duplicate the guidance provided in the adopted Sustainable Construction SPD (2022).	Ensure guidance on matters related to climate change are covered appropriately within this SPD.
NHS Suffolk and North East Essex Integrated Care Board (Chris Crisell)	Consistency in approach is important, we would be happy to work with you on creating this.	Comment noted. The NHS SNEE ICB (and also the Norfolk and Waveney ICB) was included in discussions on the creation of the Healthy Environments Master Checklist during the draft SPDs preparation.	None.
Suffolk County Council – Planning Strategy (Natalie Winspear)	A master checklist would be valuable as both a design and evaluation tool. Consistency is important, so we support this.	Comment noted.	None.
Westerfield Parish Council (David Gooch)	This would ensure the required evidence is provided.	Comment noted.	None.

## 5. Are there any elements of national policy or guidance related to the creations of healthy environments that you consider would benefit from additional guidance in the SPD?

Respondent Name	Summary of Comments	Council Response	Action
Badger Building (East Anglia) Ltd (Edward Gilder)	No.	Comment noted.	None.
Bloor Homes (Savills, Lydia Voyias)	<p>Yes. Support further detailed guidance on delivering against the National Planning Policy Framework (NPPF) para 92 health and wellbeing directions through developments, and bringing the approach to development more into alignment with the World Health Organisation (WHO)'s holistic definition of health (inclusive of physical, mental and social health and wellbeing) and provide clarity on expectations of development proposal designs.</p> <p>SPD should include means of assessing the quality of elements to gauge success.</p> <p>SPD should make links between the NPPF, National Design Guide and policies of the East Suffolk Local Plans.</p> <p>Support location specific, detailed guidance.</p>	<p>The SPD's Background chapter is proposed to open with the WHO's holistic definition of health. The NPPF's chapter 8 (promoting healthy and safe communities, which includes para 92) has been used to set the scope of this document's topic area.</p> <p>Cross-referencing is intended to occur throughout the document in order to create links to key external policy and guidance. References to specific paragraphs/sections of these documents have generally been avoided unless the specifics are relevant, but instead set the wider policy context for the content of the chapters and SPD as a whole.</p> <p>The SPD does not include guidance on the policy requirements for specific allocated sites.</p>	References to NPPF and the National Design Guide included in the SPD.
Kesgrave Town Council (Joanna Abbott)	No.	Comment noted.	None.
Martlesham Parish Council (Diane Linsley)	Yes. More detailed advice on the protection of AONBs and nature reserves and details about how major planned infrastructure /development can contribute to/enhance the intrinsic character and beauty of the countryside and bring economic and biodiversity benefits to an area.	<p>Comments noted. The protection and enhancement of natural landscapes, including the AONB, is beyond the scope of the SPD. However, the document will provide guidance on the health benefits of wildlife and increased biodiversity.</p> <p>The SPD does not include guidance on appropriate densities as this will vary from site to site depending on context. It is possible to provide healthy environments</p>	None.

Respondent Name	Summary of Comments	Council Response	Action
	<p>Do not think higher density development supports health as well as low density development.</p> <p>Is of the view that the Suffolk Police HQ, Portal Avenue, Martlesham site (site allocation Policy SCLP12.25) would provide better health benefits for future occupants if developed at a lower density of dwellings per hectare.</p>	<p>at higher densities with the appropriate design and mitigation measures in place.</p> <p>The SPD does not include guidance on the policy requirements for specific allocated sites.</p>	
Paul Smith	As above.	When a planning document is consulted on, relevant consultation documents are made available to be reviewed on the East Suffolk Council website.	None.
Reydon Parish Council (Fiona Taylor)	Yes. Support; support tenure blind design and sign-posting to relevant external guidance.	Agreed. Tenure blind design is proposed to be integrated throughout the chapters of the SPD, reflecting that its scope should not be limited to only the external appearance of dwellings but also matters such as relative location to amenities and inappropriate clustering of tenure types on mixed tenure sites. Tenure blind-design is also covered in detail in the Affordable Housing SPD's (2022) Design chapter.	Add reference to tenure blind design within the topic chapters of the SPD.
Sport England (Philip Raiswell)	Yes. Link to Active Design guide.	The Active Design Guide has helped to shape the scope and inform the content of the guidance throughout the SPD chapters. The Active Design Guide is proposed to be directly referenced in Chapter 6: Lifetime Neighbourhoods as a key external guidance document for considering and refining the design of the development as a whole for functionality, accessibility and inclusiveness, thereby supporting both incidental and session-based activity.	Use Active Design Guide to inform the content of the chapters of the SPD and directly recommend the guidance for use in the design and appraisal of development sites as a whole.
NHS Suffolk and North East Essex Integrated Care Board (Chris Crisell)	No.	Comment noted.	None.
Suffolk County Council – Planning Strategy (Natalie Winspear)	<p>Yes.</p> <ul style="list-style-type: none"> <li>How development can promote access to healthier food including provision of</li> </ul>	Agreed. The improvement of access to healthy food is proposed to be covered throughout the chapters of the SPD.	Cover healthy food environments, appropriate design of

Respondent Name	Summary of Comments	Council Response	Action
	<p>allotments/ areas for community growing of fresh fruit and vegetables (para.92 NPPF).</p> <ul style="list-style-type: none"> <li>• How development can support cultural well being through provision of community spaces for cultural events and social interaction (Para.93 NPPF).</li> <li>• How development should incorporate open space, which is important for mental and physical health and wellbeing (para. 98 NPPF).</li> <li>• How development should promote active and sustainable travel, in order to improve physical health by reducing obesity and air pollution (para. 105 NPPF).</li> </ul>	<p>The appropriate design of community facilities for useability and social benefits is proposed to be covered in the Healthy Centres &amp; Community Facilities chapter.</p> <p>The appropriate design of green infrastructure is proposed to be covered in the Green Infrastructure chapter of the SPD.</p> <p>The appropriate design of active travel infrastructure is proposed to be covered in the Active Travel and Green Infrastructure (green routes) chapters of the SPD.</p>	<p>community facilities, green infrastructure and active travel infrastructure in the SPD.</p>
<p>Westerfield Parish Council (David Gooch)</p>	<p>Yes. Protecting health and well-being is noted as being important for dense urban areas and it is also important to establish guidelines for Rural Local Centres.</p>	<p>Comment noted. The SPD is proposed to include guidance on the planning and design of new centres and new development within existing centres.</p>	<p>Add content on development of new centres and development within existing centres.</p>
<p>Woodbridge Town Council (Greg Diaper)</p>	<p>Yes.</p>	<p>Comment noted.</p>	<p>None.</p>

**6. Are there any developments or places that you think are good practice examples of overall health-supporting environments, or that have excelled in a particular aspect of creating health-supporting (for example, healthy homes and workplaces, inclusive design, active travel, natural infrastructure, encouraging community cohesion, etc.) that you would like to suggest for use as case studies in the SPD?**

Respondent Name	Summary of Comments	Council Response	Action
Bloor Homes (Savills, Lydia Voyias)	Suggests Northstowe, Cambridgeshire (a 10,000 homes NHS Healthy New Towns site) as a case study, and consideration of the Healthy Living, Youth and Play Strategy produced to support this development.	Comment noted. This potential case study was reviewed. It was decided during the drafting process that focused sections on case study sites/elements would be cut from the SPD, in favour of captioned images to illustrate specific examples that support the text.	None.
Martlesham Parish Council (Diane Linsley)	Woodland restoration case study provided. Advises of name change to nature reserve in Martlesham to 'Martlesham Wilds'. Of the view that woodland restoration benefits residents in nearby areas.	Comment noted. This potential case study was reviewed. It was decided during the drafting process that focused sections on case study sites/elements would be cut from the SPD, in favour of captioned images to illustrate specific examples that support the text.	None.
Paul Smith	As above.	When a planning document is consulted on, relevant consultation documents are made available to be reviewed on the East Suffolk Council website.	None.
NHS Suffolk and North East Essex Integrated Care Board (Chris Crisell)	No.	Comment noted.	None.
Suffolk County Council – Planning Strategy (Natalie Winspear)	No.	Comment noted.	None.

Respondent Name	Summary of Comments	Council Response	Action
Westerfield Parish Council (David Gooch)	No obvious examples suggested.	Comment noted.	None.
Woodbridge Town Council (Greg Diaper)	<p>We consider that the Deben Wharf development in Woodbridge provides an example of good practice for the provision of accommodation fit for purpose for those living with accessibility requirements.</p> <p><a href="https://www.fw-properties.com/completed-projects/deben-wharf-woodbridge/">https://www.fw-properties.com/completed-projects/deben-wharf-woodbridge/</a>.</p>	<p>Comment noted. This potential case study was reviewed. It was decided during the drafting process that focused sections on case study sites/elements would be cut from the SPD, in favour of captioned images to illustrate specific examples that support the text.</p>	None.

**7. Are there any examples of good practice guidance (for example, included in other SPDs or guidance documents) you think would be helpful to consider in the preparation of the SPD?**

Respondent Name	Summary of Comments	Council Response	Action
Bloor Homes (Savills, Lydia Voyias)	<p>Refer to and use TCPA (2015) 'Public Health in Planning Good Practice Guide'. Use/adapt its 'Strategic Screening for Health' template to help developers/DM officers to identify which level of HIA assessment they should undertake as per the development type being proposed. SPD must specify requirements for completion of HIA.</p> <p>Recommends review of Milton Keynes' Health Impact Assessment SPD (March 2021).</p>	<p>The recommended TCPA guide and Milton Keynes SPD were reviewed. The Local Plans do not include policies that specify the requirement for HIAs to be submitted to support planning applications, though the Local Validation List (October 2020) identifies them as a requirement for developments of the stated thresholds. There is therefore no policy basis to specify development scale/type thresholds for specific types of HIA process (rapid, desktop or full), and instead this currently must be determined on a case by case basis.</p> <p>Due to limited timescales and capacity, it is now intended that a Suffolk wide HIA template will be produced in collaboration with the Public Health team at Suffolk County Council as a separate and subsequent project to the SPD. In the meantime, the Introduction/Background chapter is proposed to cover some high level guidance on the HIA process.</p>	None.
Martlesham Parish Council (Diane Linsley)	Refer to Environmental Guidance note in SPD.	Agreed. Various topics addressed within the Environmental Guidance Note (2020) correlate with issues intended to be addressed within the SPD. The guide is proposed to be acknowledged in the policy context for the SPD in the Introduction/Background chapter of the SPD.	Make reference to the Environmental Guidance Note in SPD.
Paul Smith	As above.	When a planning document is consulted on, relevant consultation documents are made available to be reviewed on the East Suffolk Council website.	None.
NHS Suffolk and North East Essex Integrated Care	No.	Comment noted.	None.



Respondent Name	Summary of Comments	Council Response	Action
Board (Chris Crisell)			
Suffolk County Council – Planning Strategy (Natalie Winspear)	No.	Comment noted.	None.
Westerfield Parish Council (David Gooch)	No obvious examples suggested.	Comment noted.	None.
Woodbridge Town Council (Greg Diaper)	<a href="https://www.udg.org.uk/publications/othermanuals/building-healthy-life">https://www.udg.org.uk/publications/othermanuals/building-healthy-life</a>  <a href="https://www.ciht.org.uk/import/pdf/a%20transport%20journey%20to%20a%20healthier%20life.pdf">https://www.ciht.org.uk/import/pdf/a%20transport%20journey%20to%20a%20healthier%20life.pdf</a>	<p>Agreed. The Building for a Healthy Life guide (via its predecessor Building for Life 12) is directly referred to in Policy SCLP11.1 Design Quality and Policy WLP8.29 Design of the Local Plans for all residential development, requiring them to perform positively against the guide when used as assessment criteria for design quality.</p> <p>It is considered that the benefits identified within the Chartered Institution of Highways and Transportation topic paper are sufficiently covered within the Department for Transport Gear Change LTN1/20 documents.</p>	Ensure appropriate reference to the Building for a Healthy Life guide (2020)

## 8. Do you have any other comments or information that you would like us to consider in drafting the Healthy Environments SPD?

Respondent Name	Summary of Comments	Council Response	Action
Badger Building (East Anglia) Ltd (Edward Gilder)	Respondent of the view that the planning system is limited in its ability to influence behaviours/lifestyles in the interests of health and wellbeing.	Comment noted.	None.
Bill Hough	Respondent hopes the SPD will influence the proposed HGV route for Sizewell C NSIP project.	Guidance related specifically to the Sizewell C NSIP project is not within the scope of this SPD.	None.
Felixstowe Town Council (Ash Tadjrishi)	Councillors will respond individually. Felixstowe Town Council will respond to full draft consultation.	Comment noted.	None.
Historic England (Andrew Marsh)	Consider impacts of the guidance on the historic environment; want to be consulted at final draft stage.	Agreed. Health and wellbeing benefits of conserving and integrating heritage features and assets will be touched on in the SPD guidance. The already adopted Historic Environment SPD (2021) provides in depth guidance historic environment matters and therefore content does not need to be excessively duplicated in this SPD.	Incorporate guidance on health and wellbeing benefits of preserving and integrating historic features and assets into built environments within the SPD.
Ipswich Borough Council (Sarah Barker)	Ipswich Borough Council do not wish to comment at this stage.	Comment noted.	None.
Martlesham Parish Council (Diane Linsley)	Respondent submitted a list of aspirations for the Martlesham area, including matters such as improved cycling routes, improvements to pedestrian routes through the Martlesham Retail Park, improving the water quality of the river Deben, and aspirations specifically for the allocated Police HQ site at Martlesham (Policy SCLP12.25).	Not relevant for this SPD. The SPD is not proposed to include area specific recommendations. Specific recommendations for new and improvements to existing cycling and walking infrastructure in the Martlesham area are included within East Suffolk's Cycling and Walking Strategy (2022).	None.
Mutford Parish Council (Angela Colbridge)	20 minute neighbourhoods concept not relevant to villages. Support use of historic design guidance.	The SPD is proposed to adapt the concept of 20 minute neighbourhoods so that it can be applied appropriately according to the local context. In short the SPD supports walkability to surrounding amenities (which may or may not include a centre or	None.

Respondent Name	Summary of Comments	Council Response	Action
		<p>Local Shops), and supports application of the three main 20 minute neighbourhoods principles to new centres and development within existing centres – compactness, connectedness and completeness.</p> <p>The SPD is proposed to include a glossary to help readers with the interpretation of terms.</p>	
Paul Smith	<ol style="list-style-type: none"> <li>1. Explain terminology and process.</li> <li>2. Allow reader to review what has so far been completed from within questionnaire.</li> <li>3. Do not assume past exposure to objectives or progress.</li> </ol> <p>There is no point in asking questions to complete a consultation process if the reader cannot understand what they are being asked. I am new to this site and feel that this is probably an important issue. However, I have been unable to express my opinions. Perhaps the questionnaire needs redesigning?</p>	When a planning document is consulted on, relevant consultation documents are made available to be reviewed on the East Suffolk Council website.	None.
Reydon Parish Council (Fiona Taylor)	<p>Support; Council considers that active travel infrastructure, housing that meets accessibility needs, community facilities, climate resilient building and tenure-blind development and design that encourages social interaction, as essential components of (healthy) built environments.</p> <p>Council supports more community facilities and play provision.</p>	Comment noted.	None.
Sport England (Philip Raiswell)	Want to see Active Design embedded in SPD.	Active Design guide has helped to inform the proposed scope and content of all of the chapters of the SPD. It is also directly referenced in Chapter 6 Lifetime neighbourhoods.	None.

Respondent Name	Summary of Comments	Council Response	Action
<p>NHS Suffolk and North East Essex Integrated Care Board (Chris Crisell)</p>	<p>Provided an overview of changes to how the NHS SNEE ICB will seek mitigation towards the provision of healthcare infrastructure in the future.</p> <p>Mental health and wellbeing should be better recognised as benefits of active travel in the SPD. The Department for Transport’s ‘Gear Change: A bold vision for cycling and walking’ (2020) document should be referenced in the SPD.</p> <p>Reference the NHS SNEE ICS’ Green Pan.</p> <p>Support the weaving together of green infrastructure, health, climate and economy.</p> <p>Request that ‘green infrastructure’ be considered an integral part of the built environment (rather than treated separately in the SPD). Every roof and wall is an opportunity for providing green infrastructure, therefore providing biodiversity, health, climate mitigation and air quality benefits. Biophilic design principles should be added to the SPD. Thinks the SPD overly separates buildings and greening opportunities/green infrastructure.</p> <p>Guidance should be included on increasing digital connectedness for accessing online NHS services such as GP appointments via video conferencing technology.</p> <p>It should be made clear that adequate ventilation increases adequate indoor air quality. Support for use if indoor planting in domestic and commercial spaces to act as air filters/oxygenators, with added visual health and wellbeing benefits.</p>	<p>Agreed. Cross referencing is intended to occur throughout the document in order to create linkages and aid the reader in accessing all of the key information on the policy area being covered. Reference to Department for Transport’s policy document ‘Gear Change’ is proposed to be added to the ‘Active Travel’ chapter. Mental health and wellbeing will also be added to the list of benefits of active travel.</p> <p>References to the NHS SNEE ICS Green Plan are proposed to be included.</p> <p>Agreed. Green infrastructure is proposed to be recommended to be the first layer that is planned into developments, in accordance with the ‘landscape first’ principle. Biophilic design proposed to be directly referenced in the green roofs and green walls subsection of this chapter.</p> <p>Agreed. The Healthy Homes, Schools &amp; Workplaces chapter is proposed to support the inclusion of enclosable home office spaces – this includes coverage of the value to children undertaking homework, working age adults undertaking paid work from home and the benefits of inclusion for older people, such as having an appropriate space to access online NHS appointments.</p> <p>Comprehensive coverage of indoor air quality matters are proposed to be included in the ‘Healthy Homes, Schools, and Workplaces’ chapter.</p>	<p>Mental health and wellbeing benefits of engaging in active travel and reference Department for Transport’s policy document ‘Gear Change’ to be added to Active Travel chapter.</p> <p>Add reference to the NHS SNEE ICS ‘Green Plan’.</p> <p>Change to SPD’s language to include green infrastructure within and integral to the conceptualisation of the ‘built environment’ rather than separate to it.</p> <p>Add specific guidance on green roofs and green walls to the Green Infrastructure chapter.</p> <p>Guidance relating to biophilic design principles to be added to Green Infrastructure chapter.</p> <p>Guidance on the value of enclosable home office spaces for all ages (to support digital connectedness) to be added to Healthy Homes, Schools &amp; Workplaces chapter.</p>

Respondent Name	Summary of Comments	Council Response	Action
	<p>Supports a ‘Health in All Policies’ approach. Education in a broader sense is missing. Spaces that have an education benefit should be included.</p> <p>Supports coverage of guidance on the provision of appropriate spaces to grow healthy food in the SPD; this mirrors the NHS SNEE ICS Green Plan and references to it should be included in the SPD. Healthy food and ecosystem services should be linked.</p> <p>Reports that green infrastructure provision/access is lower in communities with higher levels of deprivation at higher densities.</p> <p>Supports inclusion of sustainable materials within the conceptualisation of sustainable construction.</p> <p>Supports inclusion of climate anxiety and the need for climate mitigation and adaptation to be reflected in the design of developments.</p>		<p>Guidance on indoor air quality to be added to Healthy Homes, Schools &amp; Workplaces chapter.</p> <p>Guidance to cover the impacts of climate anxiety and the need for developments to include climate change adaptation and mitigation measures and use of sustainable materials and construction methods.</p>
Westerfield Parish Council (David Gooch)	Social isolation and lack of walkability in rural areas a key health and wellbeing issue.	Comment noted.	None.
Woodbridge Town Council (Greg Diaper)	None.	Comment noted.	None.
Yoxford Parish Council (Sharon Smith)	<p>Yoxford Parish Council believes the Healthy Environment SPD should include:</p> <ul style="list-style-type: none"> <li>• The importance of access to the countryside and open space in the development of healthy lifestyles.</li> <li>• The importance of nature in regard to health and wellbeing.</li> </ul>	Agreed. The SPD is intended to provide guidance on the provision and design of green infrastructure; active travel; healthy homes, schools, and workplaces; healthy centres and community facilities; and bringing these elements together as lifetime neighbourhoods.	SPD to provide guidance on green infrastructure and active travel infrastructure, including appropriate design of new/improvements to existing Public Rights of Way routes.

Respondent Name	Summary of Comments	Council Response	Action
	<ul style="list-style-type: none"> <li>The significance of large developments in their impacts on health and wellbeing; for Theberton and Eastbridge this would mean the impact of the energy developments on the Suffolk coast, in particular SZC.</li> <li>The importance of the public rights of way (walking, cycling and horse riding) network to provide access to the countryside and open spaces.</li> <li>The need to secure funding from developers for initiatives related to healthy lifestyles.</li> <li>Support NHS to enable access to open space to be prescribed as an option for healthy lifestyles, e.g. healthy walks initiatives.</li> <li>Development of planning policies that minimise the environmental impact of new developments, including residential developments.</li> <li>Support for public sector services that are tasked with delivering healthy lifestyles.</li> </ul>	<p>The Active Travel chapter includes guidance on the provision of/improvements to existing Public Rights of Way, which will often be routed through countryside (e.g. over agricultural fields).</p> <p>The Sizewell C development is not relevant to this SPD.</p> <p>The Green Infrastructure chapter is proposed to include background on the benefits of green infrastructure, including access to nature (particularly in relation to ‘nature immersion’ experiences), for health and wellbeing.</p> <p>The Green Infrastructure chapter is also proposed to mention the potential for green open spaces to be used as the setting for green social prescribing and group exercise activities (e.g. parkruns®).</p> <p>Guidance on developer contributions to open space provision is proposed to be included in the Green Infrastructure chapter.</p> <p>SPDs do not create new policy but provide guidance on the implementation of adopted development plan policies. Public sector services are beyond the scope of SPDs.</p>	<p>SPD to include guidance on the benefits of green infrastructure.</p> <p>SPD to include guidance on developer contributions to green infrastructure.</p>
<p>Suffolk County Council – Planning Strategy (Natalie Winspear)</p>	<p>Links provided to the following sources:</p> <ul style="list-style-type: none"> <li>Suffolk County Council’s planning advice pages</li> <li>The Chief Medical Officer’s annual report for 2021, with a focus on health in coastal communities.</li> </ul>		

Respondent Name	Summary of Comments	Council Response	Action
	<ul style="list-style-type: none"> <li>• Public Health England’s Healthy Weight Environments guide – ‘Using the planning system to promote healthy weight environments: Guidance and supplementary planning document template for local authority public health and planning teams (2020).</li> <li>• NICE – The Marmot Review – implications for Spatial Planning - The review includes area and development assessment tools and post-development indicators. These may be useful when developing the “master checklist” and HIA tool – It also recognises the protective factors of people’s environment.</li> <li>• The State of the Union: Reuniting health with planning in promoting healthy communities</li> <li>• Local Government Association (2016) Health in All Policies: a manual for local government</li> <li>• Public Health England (2021) Place-based approaches for reducing health inequalities: main report</li> <li>• Public Health England (2017) Spatial Planning for Health: An evidence resource for planning and designing healthier places</li> <li>• King’s Fund pages on health and spatial planning</li> <li>• UK Health Security Agency (2020) Giving everyone the opportunity to lead a healthy life.</li> </ul> <p>Also, the Ipswich Strategic Planning Area (ISPA) project.</p> <p>Good planning can and must do more than “provide opportunities to access... health-creating experiences, behaviours and relationships”. Good spatial planning can reduce health inequalities and prevent ill health. A</p>		

Respondent Name	Summary of Comments	Council Response	Action
	good quality, healthy, home, a job and friends are more important to good health than the NHS.		



## Appendix 3: Initial Consultation Bodies

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

- Elected members
- Developers / Agents / Architects
- Town and Parish Councils
- Suffolk County Council
- Broads Authority
- Historic England
- Natural England
- Environment Agency
- Members of the public

### **Specific consultation bodies**

- Town and Parish Councils within and adjoining the East Suffolk area
- Local planning authorities adjoining the East Suffolk area – The Broads Authority, Mid Suffolk District Council, Babergh District Council, South Norfolk District Council, Great Yarmouth Borough Council, Ipswich Borough Council
- Canal and River Trust
- Centre for Ageing Better
- Forestry Commission
- Fields in Trust
- Homes England
- Network Rail
- Norfolk County Council
- Sport England
- Suffolk Constabulary
- Suffolk Mind
- Sustrans
- Theatres Trust
- The British Horse Society
- The Design Council
- Suffolk and North East Essex Integrated Care Board
- Norfolk & Waveney Integrated Care Board

### **Other individuals and organisations**

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

## Appendix 4: Draft Consultation Bodies

The following organisations and groups were consulted during the consultation on the Draft Supplementary Planning Document:

- Elected members
- Developers / Agents / Architects
- Town and Parish Councils
- Suffolk County Council
- Broads Authority
- Historic England
- Natural England
- Environment Agency
- Members of the public

### **Specific consultation bodies**

- Town and Parish Councils adjoining the East Suffolk area
- Local planning authorities adjoining the East Suffolk area – The Broads Authority, Mid Suffolk District Council, Babergh District Council, South Norfolk District Council, Great Yarmouth Borough Council, Ipswich Borough Council
- Canal and River Trust
- Centre for Ageing Better
- Forestry Commission
- Fields in Trust
- Homes England
- Network Rail
- Norfolk County Council
- Sport England
- Suffolk Constabulary
- Suffolk Mind
- Sustrans
- Theatres Trust
- The British Horse Society
- The Design Council
- Suffolk and North East Essex Integrated Care Board
- Norfolk & Waveney Integrated Care Board

### **General consultation bodies**

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

- Bodies which represent the interests of persons carrying on business in the District
- Bodies which represent the interests of environmental groups in the District

**Other individuals and organisations**

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

## Appendix 5: Draft Consultation Promotion Material

Social media platform	Date	Image
X (formerly Twitter)	15 <sup>th</sup> November 2023	 <p>East Suffolk Council @EastSuffolk</p> <p>Have your say on two new Supplementary Planning Documents (SPDs):</p> <ul style="list-style-type: none"> <li>- a Healthy Environments SPD to provide guidance on how new development can better support health and wellbeing</li> <li>- and a Rural Development SPD to guide development in rural areas.</li> </ul> <p><a href="https://bit.ly/46beOkI">bit.ly/46beOkI</a></p> <p>ALT</p> <p>East Suffolk Council Planning</p> <p>3:45 PM · Nov 15, 2023 · 660 Views</p>
	30 <sup>th</sup> November 2023	 <p>East Suffolk Council @EastSuffolk · Nov 30</p> <p>Have your say on 2 new Supplementary Planning Documents (SPDs):</p> <ul style="list-style-type: none"> <li>- a Healthy Environments SPD to provide guidance on how new development can better support health and wellbeing</li> <li>- and a Rural Development SPD to guide development in rural areas:</li> </ul> <p><a href="https://bit.ly/48beOkI">bit.ly/48beOkI</a></p> <p>ALT</p> <p>East Suffolk Council Planning</p> <p>249</p>

<p>Facebook</p>	<p>15<sup>th</sup> November 2023</p>	<p>East Suffolk Council 15 November at 15:44 · 🌐</p> <p>We are preparing two new Supplementary Planning Documents (SPDs) and welcome your comments:</p> <ul style="list-style-type: none"> <li>- a Healthy Environments SPD to provide guidance on how new development can better support health and wellbeing</li> <li>- and a Rural Development SPD to guide development in rural areas.</li> </ul> <p>View and comment: <a href="https://bit.ly/46beOkl">https://bit.ly/46beOkl</a></p> <p>2 👍 12 🗨️</p> <p>Like Comment</p>	
	<p>30<sup>th</sup> November 2023</p>	<p>East Suffolk Council 30 November at 09:51 · 🌐</p> <p>We are preparing two new Supplementary Planning Documents (SPDs) and welcome your comments:</p> <ul style="list-style-type: none"> <li>■ a Healthy Environments SPD to provide guidance on how new development can better support health and wellbeing</li> <li>■ and a Rural Development SPD to guide development in rural areas.</li> </ul> <p>... See more</p> <p>2 👍 1 16 🗨️</p> <p>Like Comment</p>	
<p>LinkedIn</p>	<p>15<sup>th</sup> November 2023</p>	<p>East Suffolk Council · Following Government Administration</p> <p>We are preparing two new Supplementary Planning Documents (SPDs) and welcome your comments: ...see more</p> <p>12 · 1 repost 3w</p> <p>Like Comment Repost Send</p>	

Press Release – 15<sup>th</sup> November 2023

## Have your say on two planning documents

*Posted by on 15 November 2023 | Comments*

East Suffolk residents are invited to have their say on two new planning documents that provide guidance on rural developments and environments that promote health and well-being.

East Suffolk Council is seeking views through a public consultation on two supplementary planning documents - the draft Rural Development Supplementary Planning Document (SPD) and the draft Healthy Environments Supplementary Planning Document (SPD). The consultation will run for 8 weeks from Wednesday 15 November to Wednesday 10 January 2024, closing at 5pm.

The draft [Rural Development SPD provides guidance on matters related to development in rural areas](#), including rural worker dwellings, annexes, residential curtilage expansion, building and barn conversions, economic development, equestrian development, tourism accommodation, small scale renewable energy generation and wastewater management.

The [draft Healthy Environments SPD](#) provides guidance on matters related to the planning and design of active travel infrastructure (cycling and walking routes and cycle parking), green infrastructure (green open spaces, play provision, biodiversity, trees and landscaping), homes, schools, workplaces, community facilities and retail centres. The aim of the guidance is to support healthier, active lifestyles and improve the quality of environments for health and wellbeing and greater inclusivity.

Cllr Stephen Molyneux, East Suffolk's deputy cabinet member for Planning and Coastal Management said: "These Supplementary Planning Documents provide key guidance for developments in rural areas and outline how we can support health and wellbeing by promoting active lifestyles within rich green spaces. We welcome all feedback and comments received will be carefully considered when finalising the document."



Consultation period  
15<sup>th</sup> November 2023 – 10<sup>th</sup> January 2024

# Public Consultation on two Supplementary Planning Documents

## Rural Development and Healthy Environments

### What are we doing?

East Suffolk Council is preparing two documents to support planning policy - one which will provide guidance on the types of development found in rural areas and provide additional detail on a broad range of rural issues, and another to provide guidance related to the design of built environments that support the health and wellbeing of the district's communities.

Find out more and give your views:  
[www.eastsuffolk.gov.uk/  
planningpolicy](http://www.eastsuffolk.gov.uk/planningpolicy)

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

### How can you get involved?



#### HIGHLIGHT ISSUES

Matters to highlight could include rural employment, tourism and rural character, residential amenity, accessibility, inclusivity, access to open space and active travel infrastructure.



#### SUGGEST SOLUTIONS

Are there ways the Council could support rural development and the creation of healthier environments?

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

## Appendix 6: Draft Consultation Responses

Please note that in the Comment Summary column any page and paragraph numbers relate to the Draft Healthy Environments Supplementary Planning Document (November 2023).

### Chapter 1 - Introduction - The purpose of the SPD

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Langdon-Morris, Vincent (Councillor for Framlingham ward)	3	Respondent is unclear about the content of the SPD, asking whether there is guidance about ensuring sufficient water and sewage treatment capacity, and whether the SPD addresses the issue of sewage discharge into rivers by water utilities companies. The respondent also asked whether sustainable drainage systems (SuDS) can contribute to surface water run off to other areas, causing flood damage.	The SPD does not include guidance on consulting water companies regarding the demands on local water capacity arising from developments, as this is beyond the scope of the SPD. The SPD, and Local Plan policies, cannot address the practise of private water companies illegally discharging sewage into rivers. Correctly designed and well-functioning sustainable drainage systems will be effective in attenuating anticipated levels of surface water from rainfall and will therefore prevent run off to other sites.	None.
Langdon-Morris, Vincent (Councillor for Framlingham ward)	4	Respondent provided a E.coli level figure in an unspecified river.	Addressing the water quality of rivers in the district as a result of illegal discharge of sewage by private water companies is beyond the scope of this SPD.	None.
Langdon-Morris, Vincent (Councillor	5	Respondent submitted an average house price figure.	Comment noted.	None.



Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
for Framlingham ward)				
Gladman (Josh Plant)	6	Respondent supports aims of the SPD. Respondent of the view that requirements for Health Impact Assessments should be proportionate, easy to use/apply and bespoke to the site(s) being assessed. Respondent of the view that the SPD's guidance applies most to more strategic scale sites in sustainable locations.	Comment noted.	None.
Beccles Town Council (Chris Geenhill)	7	Respondent support aims of the SPD. Respondent recommends the SPD's length is reduced, that plain English is used, and that the document includes more signposting to key areas within the document.	The SPD's length, complexity and level of detail in the guidance has been reduced, including a review of the terminology used in favour of plainer English.	The SPD's length has been reduced and a summary box for each chapter has been added. Plainer English has also been used.
Pigeon Investment Management Ltd	41	Respondent questioned why reference has been made to undertaking further assessments where there is no policy requirement to do so.	The draft Healthy Environments SPD provides supplementary guidance for designers to use to assess and inform the quality of their proposed development's design in the context of supporting health, wellbeing and inclusivity for future occupants/users and existing neighbouring communities. The SPD provides guidance on the implementation of the design policies of the Local Plans, including but not limited to	None.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
			<p>SCLP11.1 and Policy WLP8.29, and is therefore not limited to providing guidance on the use of the Building for a Healthy Life guide. The SPD also has a wider scope, as it provides design guidance for developments that are not required through policy to be assessed using the Building for a Healthy Life guide, such as developments of fewer than 10 dwellings. Health Impact Assessments are an existing validation requirement for developments that surpass the stated thresholds in the Local Validation List and therefore must be conducted and submitted as supporting documents for these proposals. The design prompts listed at the end of each topic chapter are intended to be a helpful resource for designers to use to check the proposed scheme's design has been informed by the guidance in the SPD. Appendix 2: Healthy Environments Design Prompts collates these into a single list. It is not a requirement to demonstrate that the design prompts have each been considered and responded to in planning applications.</p>	

## Chapter 1 - Introduction - Key health challenges for East Suffolk

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Weir, Kirk	1	Respondent supports inclusion of health statistics and supports the wider determinants approach used in the guidance. Respondent requested that local NHS organisation publish data without advice. Respondent acknowledged health challenges in the district, particularly in Lowestoft and Felixstowe.	Support for the inclusion of health statistics in the SPD has been noted.	None.
Beccles Town Council (Chris Geenhill)	8	Respondent supports aims of the SPD, though believes it would benefit from being shorter, in plainer English and more internal signposting. The respondent identified a sentence that was not clear in this section of the document.	This text has been re-written to be clearer and a figure corrected.	The SPD's length has been reduced and a summary box for each chapter has been added. Plainer English has also been used.  Typo has been corrected.
Suffolk County Council - Planning and Growth	95	Respondent suggested additional health challenge data and information sources to be added to the 'Key challenges for East Suffolk' section of the Introduction chapter, including further data on age demographics and the	Additional data and links to external resources have been added.	Data and links to external resources have been added to the 'key

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		prevalence of hypertension within the district's population.		challenges for East Suffolk' section of the introduction chapter.

## Chapter 1 – Introduction - What are healthy environments?

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	59	Respondent identified a formatting error at paragraph 1.19 of the document.	This section has been restructured into two separate numbered paragraphs in order to make clearer that the more detailed list of healthy environment qualities has been curated for the SPD rather than being reproduced text from the NPPF, as the previous formatting may have erroneously suggested.	Formatting error has been corrected in accordance with consultation comment.

## Chapter 1 – Introduction - Health Impact Assessments

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Aldeburgh Town Council	39	In the respect of the Healthy Environments SPD consultation, the respondent suggests that guidance on avoiding adverse residential amenity impacts arising from installation and operation of air source heat pumps is added to the SPD. The respondent supports use of means of summarising the SPD's content it make its guidance more accessible.	<p>Guidance has been added to the Healthy Homes, Schools &amp; Workplaces chapter in the respect of air source heat pumps' potential to create residential amenity impacts through unacceptable noise; as well as basic design guidance, the added guidance directly references the assessment criteria that will be used to determine whether noise impacts are acceptable.</p> <p>'Key messages' boxes have been added to the beginning of each topic chapter to provide helpful summaries of key concepts and messages across the sections of the chapter.</p>	<p>Air source heat pumps and design guidance have been added.</p> <p>A summary box for each chapter has been added.</p>
Pigeon Investment Management Ltd	42	Respondent continues to support the requirement for Health Impact Assessments (HIA) to be required for planning application validation purposes. Respondent requested that the Suffolk-wide HIA is produced at the earliest opportunity to ensure that all subsequent planning application submissions contain all the information that the Council are requesting.	Support noted.	Health Impact Assessments (HIA) content was expanded (and moved into a new chapter, chapter 7) to better communicate the Council's expectations

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
				for the content of HIA reports in the interim before a Suffolk-wide HIA template is produced.

## Chapter 2 - Green Infrastructure – Introduction

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Beccles Town Council (Chris Geenhill)	9	Support intentions of document. Of the view that more signposting is needed in the document, and a reduction in its overall length. Definition of 'biophilic' should be defined.	The SPD has been edited to reduce its length, complexity, to reduce its level of detail and to use plainer English. A definition for the term 'biophilic design' has been added to Appendix 1: Glossary.	<p>The SPD's length has been reduced and a summary box for each chapter has been added. Plainer English has also been used.</p> <p>Definition of the term 'biophilic design' has been added to Appendix 1: Glossary.</p>
Historic England	28	Respondent of the view that the benefits of green infrastructure for improving the settings of heritage assets and mutual benefits for accessibility and placemaking that can be created through combining heritage assets and green infrastructure, should be stated more clearly in the document. Respondent supported existing references to heritage trails though thought this could go further. The respondent was of the view that the benefits of 'multi-	The Green Infrastructure chapter has been amended in various places to better reflect the mutual benefits of including heritage assets within green open spaces and/or improving their setting through landscaping, including enhancement, conservation and increased accessibility. Conservation of heritage assets has been itemised as an example of how green open spaces can be multi-functional under the 'multi-functional	Further reference to the conservation and enhancement of heritage assets has been added to the Green

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		<p>functional' green open spaces should acknowledge the mutual benefits of including and conserving heritage assets within them. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment and improving access to it. Respondent added that a 'network' approach to the delivery of green infrastructure should be taken. Respondent would like to see more guidance on appropriate maintenance of GI networks/spaces so they remain beneficial long-term and protect the historic environment. Respondent encouraged historic environment data to be used in Council's GIS-based projects. Respondent encourages direct engagement with Historic England for such projects.</p>	<p>green open spaces' section of this chapter. The 'maintenance agreements' section of this chapter has been expanded to include more detailed guidance and a specific reference to the need to consider any conservation activities that might be required for the appropriate stewardship of existing heritage assets on site.</p>	<p>Infrastructure chapter of the SPD.</p>
<p>Natural England</p>	<p>73</p>	<p>Respondent of the view that biodiversity should not be excluded from consideration in the design of healthy environments as this would not fully maximise the natural capital benefits this could bring, including clean air, improved water quality and flood risk management. Respondent added that the Green Infrastructure Principles included in Natural England's Green Infrastructure Framework state: "There is also a recognition that biodiverse environments are the foundation for the flow of other GI benefits and cannot be planned or managed in isolation from other GI benefits. Therefore, the design and</p>	<p>The SPD has been amended in various sections of the Green Infrastructure chapter to better acknowledge the wellbeing benefits of more biodiverse environments. The SPD does not however go into any technical detail on securing biodiversity net gain; separate guidance is expected to be drafted on this matter in due course.</p>	<p>The Green Infrastructure chapter has been amended in accordance with the consultation comment.</p>



Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		implementation of GI should achieve a measurable increase in biodiversity through the creation, restoration, enhancement and connectivity of new and existing habitats and sites.”		

## Chapter 2 - Green Infrastructure – Policy context

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Anglian Water Services Ltd	13	Respondent supports the SPD's content and the reference to the multi-functional benefits of green infrastructure, including minimising surface water flood risk through integrating sustainable drainage systems as part of a nature-based solution.	Support noted.	None.
Pigeon Investment Management Ltd	43	Respondent questioned whether reference to the content of the Building for Healthy Life guide (2020) throughout the SPD is necessary, as it is already referenced in adopted policy. Respondent felt that identification of the key policies of the Local Plan for green infrastructure delivery in the SPD is sufficient.	References to the Building for a Healthy Life have been included in the SPD where this is considered to be likely to be helpful to the reader.	None.
Natural England	74	Respondent requested that the full text of SCLP10.1: Biodiversity & Geodiversity be added to the policy context table.	This was not actioned as the policy context tables have been removed from the SPD in order to support the shortening and focusing of the overall document. Policy references in the 'quick reference' tables are now hyperlinked to the Council's website, where	None.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
			the policy and its supporting text can be read in full.	

## Chapter 2 - Green Infrastructure - Types of open space

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Broads Authority	19	Respondent would like Green Infrastructure chapter to note that the Broads Authority will have reference to the content of the SPD.	This has not been added to the Green Infrastructure chapter as it is sufficiently covered by an amendment in the Introduction chapter in response to another comment in that chapter.	None.
Sport England	33	Respondent requests that the definitions provided for playing fields, playing pitches, and the delineation of playing pitches within the SPD are adjusted to be more consistent with NPPF, General Permitted Development Order (2015) and Sport England's 'Playing Fields Policy and Guidance (2018)' definitions. Respondent suggested direct amendments to support this.	Amendments to definitions used in the document and in the Glossary were made in accordance with this response.	Definitions for playing fields, playing pitches, and delineation of playing pitches have been amended in the document and Glossary (Appendix 1).
Suffolk County Council - Planning and Growth	110	Respondent requested definition clarity on use of the term 'green open space' and 'open countryside' to ensure the reader understands the differentiation being made in terms of public accessibility and use. Respondent	The SPD has been amended to make the definition of green open space clearer.	The SPD has been amended to make the definition of

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		identified a typographical error in Table 7. Respondent also noted that Suffolk has no moorland, which was listed as an example of natural greenspace.		green open space clearer.

## Chapter 2 – Green Infrastructure - The benefits of open space - The community benefits of green open space

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Anglian Water Services Ltd	14	The table under paragraph 2.27 could also include the environmental benefit of water quality enhancement through plants filtering pollutants from surface water run-off.	This was added into Table 6.	Proposed addition added into table 6.

## Chapter 2 – Green Infrastructure - The benefits of open space - Open Space Methodology: Background

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	44	Respondent concerned that, for sites where SANG is a requirement, without adjustments to the Open Space Methodology a total quantity requirement for open space may incur over provision. Respondent of the view that the requirement for an overprovision of open space/SANG could have consequential negative effects on East Suffolk’s ability to deliver new homes and other facilities. Respondent of the view that the provision of SANG should form a component part of the overall green infrastructure provision for sites, rather than being considered as a ‘standalone’ provision.	The Open Space Methodology process and background supporting text has been amended to make the process clearer for sites where SANG is required to ensure a requirement akin to over provision is not incurred.	Open Space Methodology and associated supporting text has been amended.
Natural England	75	Regarding paragraph 2.36, the respondent recommends that the Natural England Accessible Greenspace Standards (as part of the Green Infrastructure Framework) are used. This guides Local Authorities to have at least three hectares of publicly accessible greenspace per 1,000 population and no net loss or reduction in capacity of accessible greenspace per 1,000 population at an area-wide scale. Local authorities specify capacity targets for all major residential development informed by a local accessible greenspace baseline, and taking into account local needs, opportunities and constraints.	The Council's local evidence documents for open space provision (the Open Space Report, 2021) identifies a need for future delivery of open space to be consistent with around five hectares per 1,000 people, which is consistent with the Natural England Accessible Greenspace Standards.	None.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	116	Respondent noted that references to specific paragraph numbers of the NPPF will need to be reviewed following recent updates.	References to the National Planning Policy Framework, including specific paragraph numbers, have been updated to be consistent with the December 2023 version.	References to the NPPF have been updated.

## Chapter 2 – Green Infrastructure - The benefits of open space - Play provision

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	45	Respondent of the view that new developments should not be expected to be used to address existing deficiencies in the play environment. Respondent of the view that the most appropriate route for the Open Space Methodology to be introduced is through the process of preparing the next Local Plan.	The Open Space Methodology's approach to new play provision is for 0.25ha per 1,000 people to be provided, which uses the Fields in Trust guide's (Guidance for Outdoor Sport and Play Beyond the Six Acre Standard (England), 2015) requirement. This approach is consistent with the Local Plan policies. This figure does not reflect existing deficits in the district identified through the Play Area Strategy 2022-2027.	None.
Ingleton Wood LLP & DLP Planning Ltd on behalf of Larkfleet Group, Chenery's Farm Partnership and the Beccles Townlands Trust	69	Respondent supported the approach of the play provision section in prioritising the quality of play experiences over a more simple approach based on the quantity of equipment pieces.  Respondent requested clarity over the play provision delivery requirements by occupancy for phased developments. The respondent	Text that clarifies the expectations for play provision delivery by occupancy on phased development sites has been added to the play provision section of this chapter.	Additional text on the expectations for play provision delivery by occupancy on phased development

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		<p>was of the view that the occupancy triggers for play provision should relate to specific residential phases and not to delivery of the entire site.</p>		<p>sites has been added.</p>
<p>Suffolk County Council - Planning and Growth</p>	<p>97</p>	<p>Respondent of the view that the play provision section (notably para 2.44) should make reference to the importance of 'doorstep play opportunities' and overall more child-friendly public realm rather than focus solely on more formal, play provision sites. The respondent recommended regard be given to the Child-Friendly Hackney SPD.</p>	<p>The SPD's Active Travel chapter defers heavily to the Suffolk Design: Streets Guide, which has an overall focus on making streets and active travel routes more safe, comfortable, accessible and inclusive of different ages and abilities, improvements to overall environmental quality, and providing healthier street environments.</p> <p>Designing healthier and safer streets for informal immediate-to-home play environments is therefore directed principally by the SDSG's guidance, rather than in this SPD. This SPD therefore focuses on more formal play provision.</p> <p>The SPD supports Play on the Way provision where it supplements a more comprehensive formal play offer (e.g. LEAPs), rather than in isolation; this is intended to ensure that an adequate range of play experiences and sensory stimulation is provided, and that equipment is properly maintained. However, a sentence has been added to the Active Travel chapter to make the connection to the role of streets in supporting children and young people's</p>	<p>Additional sentence has been added to the Active Travel chapter in accordance with the consultation comment.</p>

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
			independence as informal spaces to socialise and explore to ensure this is made clear. The walkability metric of 800m/10 minutes walk is intended to be used as a maximum acceptable distance, with a maximum of 400m/5 minutes preferred; formal play sites are unlikely to be visited by young children unsupervised.	
Suffolk County Council - Planning and Growth	99	Respondent feels that the phrasing of 'adequate buffer zone from the habitable rooms from homes' implies that the noise of children playing is not acceptable near homes. Respondent of the view that complaints about noise from children playing has often led to children not feeling like they are an accepted part of public space. Respondent suggests rewording this requirement to support inclusivity.	The use of varying buffer zones between formal play provision sites and the habitable rooms of homes is supported in the Field in Trust guide (Guidance for Outdoor Sport and Play Beyond the Six Acre Standard (England), 2015). Buffer zones help to support residential amenity and comfort. The use of the recommended buffer zones in the FIT guidance has therefore been retained.	None.

## Chapter 2 – Green Infrastructure - The benefits of open space - Green open space provision

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Ingleton Wood LLP & DLP Planning Ltd on behalf of Larkfleet Group, Chenery's Farm Partnership and	63	Respondent supports the approach that appropriately designed playing fields can also be used as the equivalent of amenity greenspace when not in use for formal sport activities.	Support noted.	None.

the Beccles Townlands Trust			
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## Chapter 2 – Green Infrastructure - The benefits of open space - Outdoor sport and recreational facilities

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Broads Authority	18	Respondent requested that consideration be given to the water use of artificial playing pitches, in the context of the water stress in East Anglia.	The necessity to consider this issue has been added to the SPD.	Consideration of water use for artificial playing pitches has been added to the SPD.
Sport England	34	Respondent suggested text to be added to the Open Space Methodology to increase alignment with the NPPF’s wording.	The suggested has been added to the SPD.	The suggested amended wording has been added to the Open Space Methodology.

## Chapter 2 – Green Infrastructure – The benefits of open space – Open Space Methodology: determining quantity and typology requirements

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
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Ingleton Wood LLP & DLP Planning Ltd on behalf of Larkfleet Group, Chenery's Farm Partnership and the Beccles Townlands Trust	64	Respondent supports flexibility in the 8 hectares of SANG provision per 1,000 people figure. Respondents agree that SANG should be planned and designed before other forms of green infrastructure.	Support noted.	None.
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## Chapter 2 – Green Infrastructure – The benefits of open space – Open Space Methodology: determining quantity and typology requirements – Stage 1: Green open space – quantity

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Beccles Town Council (Chris Geenhill)	10	The respondent suggested replacing the word 'typologies' with 'categories'.	The word 'typologies' was replaced with the word 'types' wherever possible.	'Typologies' has been replaced with 'types' where possible.
Ingleton Wood LLP & DLP Planning Ltd on behalf of Larkfleet Group, Chenery's Farm Partnership and the Beccles Townlands Trust	65	Respondent supports the SPD's approach to not requiring all four green open space types on all sites. Respondent supports the SPD's approach that the delivery of SANG should influence the rest of the site's open space design, and the SPD's approach that appropriately designed SuDS can count towards the green open space provision on site.	Support noted.	None.

## Chapter 2 – Green Infrastructure – The benefits of open space – Open Space Methodology: determining quantity and typology requirements – Stage 4: Green open space – selecting the appropriate typology(ies) for the location

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	76	Respondent not clear how the provision of Suitable Alternative Natural Greenspace (SANG) is to be factored into the Open Space Methodology calculation.	Guidance on factoring in of SANG provision into the Open Space Methodology calculation has now been added to the process and background test.	Open Space Methodology amended to include section on calculating SANG and open space provision where SANG is also required.

## Chapter 2 – Green Infrastructure – The benefits of open space – Open Space Methodology: determining quantity and typology requirements – Stage 5: Play provision – selecting the appropriate type(s)

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council – Planning and Growth	96	The respondent supports the SPD’s guidance on play provision. Respondent of the view that the SPD should emphasise the importance of engaging with girls (in	The draft SPD already includes guidance on engaging and co-designing with girls and young people more generally. This content has	Guidance on engaging and co-designing with girls and

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		particular) and young people in general, when designing play provision.  Respondent recommends Homes England guidance is referred to.	been moved to earlier in the chapter to increase its visibility.	young people has been moved to an earlier chapter.

## Chapter 2 – Green Infrastructure – Design principles by green open space typology – Allotments, community gardens, orchards and CSAs

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Anglian Water Services Ltd	15	Respondent notes that all allotments should include a water connection. Respondent would support guidance that promotes consideration of water recycling (e.g. rainwater harvesting) and reuse, or other sources of non-potable water for irrigation, where feasible and available.	The need for allotments to have a water connection and encouragement for allotment/community garden/orchard sites to consider water saving methods has been added to the SPD.	Consideration of water saving methods for allotments has been added to the SPD.
Broads Authority	23	Respondent encouraged the allotments section to include a requirement for rainwater harvesting methods to be used.	The SPD cannot introduce a policy that requires allotment sites to utilise means of rainwater harvesting or other water saving measures. However, guidance that encourages this has been added to the SPD.	Guidance encouraging the use of rainwater harvesting for allotments has been added to the SPD.

<b>Name/Organisation</b>	<b>Comment ID/Ref.</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Ingleton Wood LLP & DLP Planning Ltd on behalf of Larkfleet Group, Chenery's Farm Partnership and the Beccles Townlands Trust	66	Respondent supports the Open Space Methodology's inclusion of a 0.26ha per 1,000 people delivery rate for allotments as appropriate.	Support noted.	None.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Playing fields

<b>Name/Organisation</b>	<b>Comment ID/Ref.</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Sport England	35	Respondent suggested that Paragraph 2.102 should include the text in bold below. 'Playing fields should be of an appropriate scale and comply with relevant Sport England and national governing bodies of sport design guidance for the sport(s) they are intended to facilitate...'	This section has been updated in accordance with the requested change.	The suggested additional text has been added to the SPD.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Natural and semi-natural green space

<b>Name/Organisation</b>	<b>Comment ID/Ref.</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Ingleton Wood LLP & DLP Planning Ltd on behalf of Larkfleet Group, Chenery's Farm Partnership and the Beccles Townlands Trust	67	Respondent concerned that the SPD's section on nature immersion sets an unachievably high bar for the sensory context on sites in urban locations.	The wording of the nature immersion guidance in the Green Infrastructure chapter has been amended to better acknowledge what is reasonably possible in more urban contexts.	The wording of the nature immersion guidance in the Green Infrastructure chapter has been amended in accordance with the consultation comment.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Designing open spaces: general principles – Location

<b>Name/Organisation</b>	<b>Comment ID/Ref.</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Pigeon Investment Management Ltd	46	Respondent supports para 2.123, which outlines that a landscape-first approach should be used for the design of development site layouts, though are of the view that this may not always be possible given the constraints of some sites.	Comment noted.	None.
Natural England	77	Respondent welcomes the inclusion of the point at paragraph 2.126.	Support noted.	None.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Designing open spaces: general principles - Multi-functional green open spaces

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	47	Respondent of the view that Figure 3 should have made clearer which green open space types SANG can be delivered as. Respondents cross-referenced their comments made in relation to paragraph 2.39.	The figures have been updated to make clear which green open space types can function as SANG.	Figures 3 & 4 in the Green Infrastructure chapter have been updated to be clearer.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Designing open spaces: general principles > Making green open space 'work harder' through design

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	48	Respondent supports para 2.133. Respondent of the view that all schemes should be designed to a high standard of quality and there should not be a higher bar for sites that provide less than the Open Space Methodology calculation would otherwise require.	Support noted.	None.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Designing open spaces: general principles > Safety and security

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Broads Authority	22	The respondent asked whether the SPD should provide guidance on the lighting of open space to the effect of being limited to where justified and appropriately designed.	Guidance on external lighting more generally is included in the Healthy Homes, Schools & Workplaces chapter rather than the Green Infrastructure chapter.	None.
Broads Authority	24	Respondent supports motion-sensor activated lighting.	Motion-sensor activated lighting is not generally supported in a residential context due to the adverse residential amenity impacts; this type of external lighting is likely to be appropriate in only very limited circumstances.	None.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Suitable Alternative Natural Greenspace (SANG)

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Ingleton Wood LLP & DLP Planning Ltd on behalf of Larkfleet Group, Chenery's Farm Partnership and the Beccles Townlands Trust	68	Respondent supports the purpose of SANG set out in the SPD. Respondent supports the SPD's approach with flexibility for the expected overall quantum of SANG (approximately 8ha per 1,000 people) based on site specific considerations and public engagement.	Support for referenced sections noted. The wording around the Council's preference for a single continuous parcel of SANG has been amended to be more responsive to sites where site-specific constraints justify an alternative approach.	The wording of the nature immersion section and the Council's SANG preference has been

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		<p>Respondent does not support draft SPD's wording regarding the Council's preference for SANG to be provided as "a single continuous parcel". The respondent is of the view that there will often be constraints that will require multiple, interconnected parcels to be delivered. Respondent of the view that multiple connected parcels do not preclude a well-designed strategic site with high quality SANG provision.</p> <p>Respondent noted that the concept of linear SANG features with green corridors which offer a choice of routes is supported by Natural England's Guidelines for the Creation of SANG (August 2021).</p> <p>Respondent noted that, Table 16 sets out that entrance to SANG links/routes are essential to be located within 100m of all homes and Paragraph 2.163 states that the SANG area must be easily accessible from all areas of the development. Respondent is of the view that on strategic sites this could not be achieved without linear features being incorporated. It is the respondent's view that it should be an expectation, not an exception, that this form of SANG will come forward on most strategic sites.</p>	<p>The wording of the nature immersion section has been amended to be more responsive to the constraints of sites in a more urban context.</p>	<p>amended in accordance with the consultation comment.</p>



Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		<p>Respondent does not support the draft SPD's requirements for nature immersion experiences in SANG for sites in a more urban context.</p> <p>Respondent supports SPD's guidance on appropriate design and incorporation of SuDS into SANGs.</p>		

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Purpose of SANG: European sites in East Suffolk

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	78	Respondent noted errors at paragraph 2.148: (1) 'Minsmere-Walberswick (SPA)' should be '(SPA and Ramsar site)', and (2) 'Benacre to Easton Bavents Lagoon SAC' is not listed in the Suffolk Coast RAMS Strategy.	These errors have been corrected.	Errors have been corrected in accordance with the consultation comment.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Designing SANG provision

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	49	The respondent queried why the Green Infrastructure chapter included essential	Paragraph 2.155 of the consultation version of the SPD has been edited to make clear that all	Clarification that the SANG

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		<p>design criteria for all Suitable Alternative Natural Greenspace (SANG) provision in Table 16, whilst also acknowledging that the appropriate design for SANG provision will vary from site to site. The respondent gave their support to well-designed SANG provision, but were of the view that SANG provision's design should be considered on a bespoke basis. The respondent was of the view that the identified essential design criteria for SANGs are not listed in the East Suffolk Council - Suffolk Coastal Local Plan (2020), and only limited site-specific criteria was listed for the SANG required for the South Saxmundham Garden Neighbourhood site allocation (Policy SCLP12.29). The respondent was of the view that the SANG essential design criteria should be considered and examined through the next Local Plan process. The respondent noted that paragraph 2.158 sets an expectation for SANG to be delivered as a single continuous parcel. The respondent was of the view that this should be removed and replaced with a masterplan-led approach that is bespoke to every site. The respondent supported the guidance stating that where multiple parcels must be delivered, this would be supported where all essential elements are able to be delivered.</p>	<p>of the content of the SANG chapter of the SPD, including the Design Quality Matrix, form the starting point for a bespoke SANG design for sites where SANG is required.</p> <p>The immediate66 supporting text to the Design Quality Matrix has also been amended to make clearer that where site-specific matters impact the ability for essential criteria to be delivered, then an alternative approach may be justified.</p> <p>Paragraph 2.158 of the consultation version of the SPD has been edited to make clear that SANG is expected to be delivered as a single continuous parcel wherever possible, as this is the Council's preference for delivery.</p> <p>Where site constraints mean multiple parcels must be delivered, this will be supported where it can be demonstrated that all of the essential criteria set out in the SANG Design Quality Matrix can still be delivered and that each of the parcels are well linked with high quality active travel routes.</p>	<p>chapter is a starting point for where SANG is required has been added to the supporting text of the SANG Design Quality Matrix.</p> <p>The text on parcels has also been amended to make clearer the Council's preference rather than requirement.</p>

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	79	Respondent requested clarification on how strategic sites are defined.	<p>Strategic sites are those that help to meet the priorities and strategy identified for achieving the overall vision of the adopted Local Plan.</p> <p>Strategic sites are usually large sites that have been identified and allocated for the delivery of housing and key infrastructure to support planned growth, often making a significant contribution towards the overall housing delivery planned over the Local Plan's plan period.</p> <p>The requirement for SANG has generally been identified through site allocations on large, strategic sites, or other sites where this has been deemed necessary to mitigate recreational pressure on European sites.</p>	None.
Natural England	80	The respondent recommended that signage/information to householders to promote SANG areas for recreation, and a commitment to the long term maintenance of SANG areas, are added to Table 16.	Wayfinding signage within the SANG areas has been added to the essential criteria in this table for Tiers 1 and 2 and as desirable criteria for Tier 3, where SANG areas are likely to be relatively small areas and therefore may not require internal signage.	The SANG Design Quality Matrix criteria has been amended to include wayfinding signage.
Natural England	81	Respondent of the view that the Suitable Alternative Natural Greenspace (SANG) Design Quality Matrix (previously Table 16) should include dog ponds for Tiers 1 and 2, noting that tick and flea treatment on dogs can be harmful to aquatic life in designated	Dog ponds have not been itemised in the SANG Design Quality Matrix, however reference has been made to them in both the general principles green section and the 'dog walking in SANG areas' section, as it was considered relevant for both SANG and non-	References to dog ponds has been added to the Green Infrastructure chapter.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		site water features. Respondent of the view that there should be separate dog ponds and wildlife ponds, and the latter should be fenced.	SANG green open space provision, and that they may form part of 'dogs-off lead areas', which are already itemised in the table.	

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Active travel infrastructure in SANG areas

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	82	Respondent of the view that lighting should be designed to prevent adverse impacts to wildlife, including bats.	Guidance on lighting is covered in the Healthy Homes, Schools and Workplaces chapter.	None.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Nature immersion in SANG areas

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	83	Respondent of the view that emphasis should be added to the importance of native species, as enhancing biodiversity also contributes to greater nature immersion.	The SPD's guidance identifies biodiversity as having both wellbeing and nature immersion experience benefits. It does not prescribe that biodiversity gains in the interests of	None.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
			supporting nature immersion experiences must be limited to gains in native species only.	

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Maintenance of SANG areas

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	84	<p>Respondent recommends the following hierarchy of preference for management:</p> <ol style="list-style-type: none"> <li>1) Gold Standard - LPA.</li> <li>2) Silver Standard - Parish Councils or Registered Charities/eNGOs/Land Trust</li> <li>3) Bronze Standard - developers keep the SANG or through Management Companies.</li> </ol> <p>The respondent was of the view that developer management of SANG areas has risks associated as the developer could later withdraw.</p> <p>The respondent suggested the alternative of agreeing maintenance agreements where the Local Authority has 'Step In Rights' which allow the them to take over management of</p>	<p>No change. The Council's preference is for SANG areas to be maintained by the developer through a maintenance contract that is regularly reviewed (at least every five years) and that provides the potential for resident groups to take stewardship of key areas for conservation and restoration purposes, if the community wants to take this responsibility on. The SPD's guidance reflects the Council's stance on this matter.</p>	None.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		the SANG if the developer fails to maintain the SANG properly.		

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Biodiversity in SANG areas

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	85	<p>Respondent of the view that for BNG to be delivered on SANG, the SANG should achieve nature conservation outcomes that exceed obligations under the SANG guidance. Respondent encouraged that additional/enhanced features at SANGs are informed by local nature or wildlife strategies. Respondent recommended that the BNG calculations for the SANG are done separately, to ensure a clear audit trail and allow for demonstration of the additional biodiversity unit uplift beyond the minimum SANG requirements. Respondent recommended that consideration be given for other ecosystem services provided by the SANG and design should ensure BNG does not compete with these but delivers alongside them.</p> <p>Respondent of the view that BNG features should not conflict with the SANG’s principal purpose. Respondent of the view that, for the purposes of the BNG calculation, the baseline value of the SANG is the site with the Habitat</p>	<p>Technical guidance on the achievement of biodiversity net gain (BNG) through Suitable Alternative Natural Greenspace (SANG) provision is beyond the scope of this document. Separate BNG guidance is intended to be produced after this SPD’s adoption.</p>	None.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		<p>Regulation key required habitat features incorporated. Respondent of the view that enhancements should be additional to count towards BNG, in that the enhancements would not have taken place in the absence of the BNG funding (or commitment of funding) and the biodiversity benefit (as measured through the metric) should not also be claimed to compensate for another project’s biodiversity impact. Respondent recommended the CIEEM, CIRIA, IEMA Good practice principles for development and The British Standard for Biodiversity Net Gain (BS 8683) be followed.</p>		
Natural England	86	<p>Regarding paragraph 2.186, the respondent was of the view that the design of green open space including SANG provision should be aligned with any relevant nature recovery priorities set out in the Suffolk Local Nature Recovery Strategy, and contribute to the Nature Recovery Network (NRN) and the national target to create and restore wildlife rich habitats and protect at least 30% of land. The respondent advised that The Suffolk LNRS will agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities, and will sit alongside the other LNRSs nationwide to help deliver the NRN.</p>	<p>The Suffolk Local Nature Recovery Strategy has not yet been produced, and therefore cannot be made reference to in this document.</p>	None.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Trees, landscaping, green routes and sustainable drainage systems – Trees

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Broads Authority	20	Respondent recommended that the issue of water smart landscaping be considered as the East is an area of water stress.	Text to this effect has been added to the 'Trees, landscaping, green routes and sustainable drainage systems' section of the Green Infrastructure chapter.	Coverage of East Anglia's water scarcity issues added to Green Infrastructure chapter.
Natural England	87	Respondent of the view that native trees should be the only preference as they contribute to the climate resilience of the native ecosystem. Respondent recommends review of the Urban Tree Manual by Forest Research and the Nature Networks Evidence Handbook. Respondent recommends that the Green Infrastructure Framework Tree Canopy Cover Standard and the Urban Greening Factor are considered.	<p>The Council is of the view that native trees are likely to be most appropriate in rural areas, though in more urban locations it may be more beneficial to select non-native species that are better suited to a more dynamic, urban environmental context, and are therefore more resilient to the impacts of climate change.</p> <p>The Council therefore takes the approach of 'the right tree in the right place', rather than supporting only native species of tree in all locations.</p> <p>The Green Infrastructure Framework Tree Canopy Cover Standard and the Urban Greening Factor are not appropriate for inclusion in the SPD due to lack of sufficient</p>	The 'Trees, landscaping, green routes and sustainable drainage systems' section of the Green Infrastructure chapter was updated to make the Council's approach clearer, in response to



			policy context to justify their inclusion; the Green Infrastructure Framework standards and tools will be reviewed and considered as part of the future Local Plan planmaking process.	this comment.
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## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Trees, landscaping, green routes and sustainable drainage systems - Street trees and trees in hardscape environments

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Anglian Water Services Ltd	16	<p>The respondent agreed that tree planting can help integrate the natural environment with the built form.</p> <p>Respondent advised that street tree installations should be designed to take account of minimising impacts on underground utilities.</p> <p>The respondent advised that there must be sufficient capacity to accommodate rooting habits, without impacting the function of underground assets.</p> <p>The respondent advised that sewer or lateral drain should not be located closer to trees/shrubs than the canopy width at mature height, except where special protection measures are provided.</p>	Comments noted.	None.

		<p>The respondent advised that a tree should not be planted directly over sewers or where excavation onto the sewer would require removal of the tree.</p> <p>The respondent advised that to minimise the risk of root damage, tree planting should provide good growing conditions. The respondent supported the reference to the 'Trees in Hard Landscapes: A Guide for Delivery'.</p>	
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## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Trees, landscaping, green routes and sustainable drainage systems > Green routes

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	111	The respondent noted that at paragraph 2.202 of the draft SPD it stated that 'green routes typically run under the canopy of trees'. The respondent commented that in Suffolk effort is made to avoid Public Right of Way (PRoW) routing under tree canopies, and Suffolk's Position Statement on Solar Farm	The wording of the SPD's Green Routes guidance has been adjusted to describe them as 'typically lined with trees', instead.	Wording amended to 'typically lined with trees'.

		Development requires 20m distance between trees to avoid overhanging branches. This is to ensure air and light can reach the PRow and avoids leaf litter on the PRow.	
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## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Trees, landscaping, green routes and sustainable drainage systems - Multi-functional, nature-led sustainable drainage systems (SuDS)

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Historic England	29	The respondent was of the view that reference should be made to the consideration of archaeology in the planning and design of SuDS due to the potential for irreplaceable resources to be damaged. The respondent stated that on sites that includes or has the potential to include heritage assets with archaeological interest, LPAs should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. The respondent stated that buried waterlogged archaeology may be at particular risk from changes in the water environment. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS. The respondent added that in order to maintain the preservation of organic materials, it is essential that the conditions which contributed to their	Guidance on appropriately considering potential impacts on archaeology in the planning and design of SuDS is beyond the scope of this SPD's guidance. The matter of protecting archaeology is addressed in the Local Plans' respective Archaeology policies and supporting text, and the Council's Historic Environment SPD (2021).	None.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		survival (waterlogged; anoxic) remain the same. The respondent suggested that the SPD should discuss how these sorts of sites will be managed, and made reference to the Historic England 'Preserving Archaeological Remains' guidance (2016).		
Pigeon Investment Management Ltd	50	Statement at paragraph 2.313 that “Where SuDS schemes have been designed to be nature-led, made safely accessible and ultimately contribute amenity value to communities they serve, SuDS can be considered part of the green open space offer on-site” is fully supported.	Support noted.	None.

## Chapter 2 – Green Infrastructure - Design principles by green open space typology - Trees, landscaping, green routes and sustainable drainage systems - Green roofs and green walls

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	88	Regarding paragraph 2.221, the respondent recommended that the design and management of green roofs meet the GRO Green Roof Code. The respondent also recommended regard be had to the Urban Greening Factor Design Guide.	Reference to the GRO Green Roof Code has been added to the Green Roofs and Walls section of the Green Infrastructure chapter.	Reference to the GRO Green Roof code has been added to the Green Roofs and Walls section of the Green

	Infrastructure chapter.
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## Chapter 2 – Green Infrastructure - Play provision - Play Provision for Children Design Quality Matrix

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	98	The respondent queried why metal or plastic materials are considered the "gold standard" for equipped play provision unless the equipment is located in a SANG. The respondent was of the view that natural materials can also deliver high quality play-spaces.	The Council has a general preference for non-natural materials for play equipment and activity areas as these materials are typically more durable and accessible and therefore inclusive. However, the wording of the SPD does not preclude natural material play provision if it is able to be demonstrated to be adequately durable and accessible, or otherwise of more value to the scheme as a whole to be delivered with natural materials (such as when delivered within a Suitable Alternative Natural Greenspace).	None.

## Chapter 2 – Green Infrastructure - Youth/Casual: Play provision for young people and adults

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	51	Respondent stated that the SPD is not clear on whether Youth/Casual provision should be provided in addition to the play provision quantity rate of 0.25ha per 1,000 population.	The wording of the SPD has been amended to make this clearer. Play provision, regardless of type, should be delivered at a rate of 0.25ha per 1,000 people - the	The wording on Youth/Casual provision has

		The respondent stated that they consider that this should account for play provisions as a whole, including youth/casual provision.	expectation is that the type(s) which would offer the most value to the community are what's delivered; the appropriate type can be assessed and identified using the methodology set out in the SPD's guidance.	been amended in accordance with this comment.
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## Chapter 2 – Green Infrastructure - Maintenance agreements

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	89	Regarding paragraph 2.292, the respondent recommended that the guidance should state an expectation that developments should be accompanied by a Landscape and Ecological Management plan, to help ensure they are managed in the right way for both wildlife and people.	Text to this effect has been added to the 'Maintenance agreements' section of the Green Infrastructure chapter.	Additional text has been added to the 'Maintenance agreement' section of the Green Infrastructure chapter in accordance with the consultation comment.

## Chapter 2 – Green Infrastructure - Design prompts: Healthy Environments Master Checklist

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
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Natural England	90	The respondent recommended that an additional design prompt be added to the Green Infrastructure chapter: "Is there an opportunity for the development to integrate with the aims of the Local Nature Recovery Strategy and contribute to the Nature Recovery Network?"	This has not been added into the SPD as the Suffolk Local Nature Recovery Strategy has not yet been produced.	None.
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### Chapter 3 - Active Travel - Key policies and guidance for active travel

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Sport England	36	Respondent supports this guidance included in the Active Travel chapter, and considers it to be consistent with key Active Design guide principles. The respondent suggest that a cross-reference to the Active Design Guide (2023) be added, along with a reference to the Active Travel England standing advice note: active travel and sustainable development (2023).	These documents have been added to the quick reference table's list of key external documents for the Active Travel chapter of the SPD.	References to the Active Design Guide (2023) and the Active Travel England standing advice note: active travel and sustainable development (2023) have been added.
Pigeon Investment Management Ltd	52	The respondent notes that the Active Travel chapter refers to various external documents,	The Active Travel chapter's content has been reviewed to reduce its length and complexity, and as part of this review some	The SPD's length has been reduced,

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		and questioned whether it is necessary to repeat what has been said elsewhere.	of the content that was duplicated with the Suffolk Design: Streets Guide (2022) has been removed and cross-references added instead.	including the content of the Active Travel chapter.  Content duplication of the Suffolk Design: Street Guide (2022) has been removed and replaced with references.

### Chapter 3 - Active Travel - Introduction

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Broads Authority	26	Respondent of the view that the Active Travel chapter would benefit from a section about push scooting and wheeling, and a section about scooter parking.	The definition of 'active travel' includes 'wheeling', and 'wheeling' includes use of push scooters. References to the need to consider push scooter sand push scooter parking in the design of active travel infrastructure have been added to the Active Travel chapter of the SPD.	References to the need of considering push scooter and associated parking has been added to the active travel



Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
				infrastructure of the SPD.
Historic England	30	<p>The respondent was of the view that active travel interventions should protect and enhance the historic environment through using appropriate materials and minimising visual and street clutter. The respondent suggested use of Historic England's Streets for All guide, as well as use of the Historic England website's resource on transport and the historic environment.</p> <p>The respondent advised that they would welcome reference to the historic environment in sections relating to green infrastructure, sustainable drainage and active travel. The respondent also recommended that the document draw on the knowledge of conservation officers, the county archaeologist, and local heritage groups.</p>	<p>The Active Travel chapter has had “The historic environment should also be factored into the design of active travel routes, with care taken to provide appropriate access and views of heritage assets, and to manage visual clutter and street clutter that may detract from the experience of them” added to it. The Green Infrastructure chapter also acknowledges the mutual benefit that wider landscaping and green open space provision provides to the setting and experience of heritage assets.</p>	Text has been added into the Active Travel and Green Infrastructure chapters, in accordance with the consultation comment.
Suffolk County Council - Planning and Growth	102	<p>Respondent of the view that the SPD has not been written in a way that will have the desired impact.</p> <p>Respondent of the view that the SPD would have the desired impact if paragraph 3.7 included barriers to active travel such as: 1. Lack of awareness of the benefits of active travel. 2. Lack of confidence in using active travel.</p>	<p>The use of an SPD to directly raise awareness of the benefits of active travel and to increase confidence in using active travel in the district may be limited in its effectiveness.</p> <p>However, the purpose of the Active Travel chapter's guidance is to encourage and support the planning and design of active travel infrastructure that is safe, comfortable, attractive, direct, accessible,</p>	None.

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
			inclusive and convenient for people to use, therefore supporting higher rates of use.	

### Chapter 3 - Active Travel - Key policies and guidance for active travel infrastructure design - Enabling active travel: walkability and cyclability

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	103	Respondent recommended expanding paragraph 3.22 to state that walking for leisure for children and young people focuses on much shorter distances, such as a short route around the neighbourhood or to a nearby play space.	The walkability metric used in the SPD is a maximum of 10 minutes walking time (up to 800m), though ideally 5 minutes (up to 400m), to reach play provision sites for children and young people (LEAPs and NEAPs) or up to 12 minutes (up to 1km) for Youth/Casual provision. The 10 minutes/800m walkability metric is consistent with the Suffolk Design: Streets Guide for most trips on foot.	None.

### Chapter 3 - Active Travel - Key policies and guidance for active travel infrastructure design - Enabling active travel: walkability and cyclability - (1) Walking - utility walking trips

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	53	The respondent commented regarding the criteria listed at paragraph 3.26 that these	Comment noted.	None.

		principles should be integrated into the design from the outset, rather than active travel infrastructure being 'bolted on' later in the design process.		
Suffolk County Council - Planning and Growth	104	Add proximity to paragraph 3.26. Distance is the most importance factor influencing whether someone will walk. Locating local facilities within walking distance is important.	The walkability metric used in the SPD is a maximum of 10 minutes walking time (up to 800m), which is consistent with the Suffolk Design: Streets Guide for most trips on foot. Distance may not be the most important factor influencing whether someone will walk, particularly for leisure journeys where covering an extended distance (for exercise purposes) is an objective of the walk.	None.

### Chapter 3 - Active Travel - Key policies and guidance for active travel infrastructure design - Enabling active travel: walkability and cyclability - (2) Walking - leisure walking trips

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Natural England	91	Respondent identified that at paragraph 3.33 an 's' was missing from 'Habitats Regulations Assessment'.	This typographical error has been corrected.	Typo has been corrected.
Suffolk County Council - Planning and Growth	112	The respondent requested that paragraph 3.31 be amended to state that Public Rights of Way may not always be able to be improved/delivered to a standard appropriate for wheeling; this should be an expectation where conditions and locations allow.	This section has been updated in accordance with this comment.	Paragraph has been amended in accordance with this comment.

		The respondent identified an error where Section 278 agreement was stated in the guidance rather than Section 106 agreement.	
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### Chapter 3 - Active Travel - Key policies and guidance for active travel infrastructure design - Enabling active travel: walkability and cyclability - (3) Cycling - utility trips

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	105	The respondent recommended that paragraph 3.36 referred directly to LTN 1/20 and the Suffolk Streets Design Guide.	These references were not added to this paragraph as the design guidance is made reference to in the design guidance of the chapter, rather than the background sections on trip types.	None.

### Chapter 3 - Active Travel - Key policies and guidance for active travel infrastructure design - Designing active travel infrastructure to enable active travel for all: key principles

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Broads Authority	25	Regarding paragraphs Paras 2.135 and 3.42, respondent of the view that motion sensor activated lighting would be beneficial.	The SPD does not encourage the use of motion sensor activated lighting, particularly in a residential environment, due to the potential for adverse residential amenity impacts.	None.

## Chapter 3 - Active Travel - Key policies and guidance for active travel infrastructure design - Designing active travel infrastructure to enable active travel for all: key principles - Core principles

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	106	The respondent was of the view that a summary of the Suffolk Design: Streets Guide in para 3.46 may not be necessary as direct reference is made to the need for development to comply with the Streets Guide.	<p>The Active Travel chapter has been edited for overall length and complexity, and to defer more heavily to the content of the Suffolk Design: Streets Guide (2022).</p> <p>The section referred to has been substantially re-written as part of this overall process to focus the content on the key points to be made in the Council's document.</p>	None.

### Chapter 3 – Active Travel – Key policies and guidance for active travel infrastructure design – Designing active travel infrastructure to enable active travel for all: key principles – Dementia-friendly design for active travel routes and streets

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council – Planning and Growth	107	Respondent commented that dementia friendly design can also help other sections of the population, such as those who are neurodiverse, children, and those who might be unsure about active travel.	Comment noted.	None.

### Chapter 3 - Active Travel - Key policies and guidance for active travel infrastructure design - Infrastructure typologies guide

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	113	Respondent stated that the definition of permissive routes is incorrect, as permissive routes are not linked to agreements. The respondent advised that there can be a Licence Path Agreement between a landowner and the Highway Authority which creates a de-facto PRow but only for a specified number of years (usually 10). The respondent continued that a permissive route otherwise has no official engagement or involvement of the Highway Authority, and its use can be removed at any time.	The reference to permissive routes has been removed from the SPD. Permissive paths agreements are unlikely to form part of proposals for new development and therefore are not necessary to cover in the guidance.	References to permissive routes were removed.

## Chapter 3 - Active Travel - Key policies and guidance for active travel infrastructure design - Cycle parking provision and design

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Broads Authority	21	Respondent requested guidance on cycle parking and push scooter parking, particularly in the context of open space.	The Active Travel chapter has a sub-section on cycle parking. The value of active travel infrastructure suitable for push scooter parking is referenced in the chapter.  The expectation that push scooter parking will be provided for open spaces (particularly play provision) is also included in the Green Infrastructure chapter.	Green infrastructure chapter amended to include references to push scooter parking.
Suffolk County Council – Planning and Growth	114	Respondent reported that the Suffolk Guidance for Parking 2019 has been updated as of October 2023.	References to this document have been updated throughout the SPD.	References have been updated throughout document.

## Chapter 3 – Active Travel – Key policies and guidance for active travel infrastructure design – Cycle parking provision and design – Location: non-residential

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council – Planning and Growth	115	Respondent requested that the direct link in footnote 74 to the Suffolk Guidance for Parking document be redirected to the	The link in the footnote has been amended.	The link in the footnote has been amended.

		relevant area of the Suffolk County Council website.	
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## Chapter 4 - Healthy Homes, Schools and Workplaces - Key Local Plan policies for Healthy Homes, Schools & Workplaces

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	54	The respondent noted that the Healthy Homes, Schools and Workplaces chapter refers to various other external documents, and questioned whether there is a need to cross-reference them.	<p>The SPD cross-references other, relevant external guidance documents so that this content does not have to be reproduced in the SPD, which would extend its length and complexity.</p> <p>Cross-referencing to external documents also serves to future-proof the document, ensuring that when these documents are updated, readers are able to access the latest version of the guidance (e.g. the periodically updated Suffolk Guidance for Parking document).</p>	None.

## Chapter 4 - Healthy Homes, Schools and Workplaces - Design guidance: Healthy Homes

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	55	Respondent supported SPD's inclusion of design guidance for producing healthier homes. Respondent suggested that the SPD	The Council's SPDs are not structured according to stage in the planning process, as design matters should be considered as	None.



Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		clarifies that some information will be unknown at Outline Application stage, and instead will be refined at Reserved Matters stage.	early on in the process as possible. The SPD has therefore not been restructured.	

## Chapter 4 - Healthy Homes, Schools and Workplaces - Design guidance: Healthy Homes - Healthy homes qualities

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	56	Respondent supports the minimum requirement accessibility standard M4(2) for all new homes.	Comment noted.	None.
Suffolk County Council - Planning and Growth	100	Respondent suggest that paragraph 4.57 be expanded to include the provision of outdoor spaces to for clothes drying, as this can help reduce washing being hung indoors to minimise creating damp and mould.	The suggested text has been added.	Additional text has been added to the Healthy Homes, Schools and Workplaces chapter in accordance with the consultation comment.
Cllr Stephen Molyneux	119	Respondent supported inclusion of indoor air quality in paragraphs 4.45-4.47. Respondent	SPDs cannot set new policy, as this is the role of the Local Plans. Whilst the SPD	Sections 4.31 and 4.33 were

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
		<p>highlighted the impact of poor air quality on health a provided references to two relevant incidents recently reported in national news. Respondent commented that poorly installed ventilation systems can result in higher energy consumption. Respondent recommended amendment of para 4.47 to encourage greater uptake of mechanical ventilation with heat recovery. Respondent commented that lower energy bills will have a huge impact on the mental well-being of those living in fuel poverty. Respondent recommended use of natural materials to make indoor environments healthier, and provided the example of hemp. Respondent commented that the combination of natural materials, high airtightness and mechanical ventilation with heat recovery would provide healthy homes.</p>	<p>cannot require mechanical ventilation with heat recovery (MVHR), if proposed on a voluntary basis the Council would support this in principle; the SPD highlights the health and wellbeing benefits of MVHR.</p> <p>Whilst the SPD cannot require the use of natural materials, the Council will support this in principle where appropriate.</p> <p>Guidance on mechanical ventilation and sustainable materials is available in the Council’s Sustainable Construction SPD.</p>	<p>amended to make clear that the Council supports the use of materials that support drier and less humid internal environments, and recognise the additional health and wellbeing benefits of mechanical ventilation systems that also recover heat and filter incoming air.</p>

## Chapter 4 – Healthy Homes, Schools and Workplaces – Healthy schools

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council – Planning and Growth	108	Respondent supported para 4.86. Respondent did not support the statement that access should be provided through schools sites as this is a safeguarding issue.	The 'healthy schools' section has been amended to make clearer that active travel routes should not be routed through school sites, only to and from them.	'Healthy schools' section has been amended in accordance with the consultation comment.

## Chapter 4 - Healthy Homes, Schools and Workplaces - Healthy workplaces

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	109	Expand this section to include active travel routes to and from workplaces.	Reference to the importance of active travel to and from workplaces has been added to the Healthy Homes, Schools & Workplaces chapter.	Active travel reference added to the 'Healthy workplaces' section of the Healthy Homes, Schools & Workplaces chapter.

## Chapter 5 - Healthy centres and community facilities - Introduction: creating healthy centres

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Woodbridge Town Council	12	<p>Respondent concerned about the impact of second home/holiday let ownership impacts on Woodbridge town centre's vitality due to under occupancy.</p> <p>Respondent feels SPD should address these matters and include guidance on increasing the attractiveness of town centre homes for permanent residency.</p> <p>Respondent supports the provision of walking and cycling infrastructure between homes and centres for new developments.</p> <p>Respondent of the view that the SPD needs to be more user friendly and in plain English.</p>	<p>It is beyond the scope of the SPD to address high levels of second home ownership and holiday let ownership in areas of the district, which is a known challenge and currently a difficult issue to adequately address through Local Plan policies.</p> <p>The SPD includes a chapter on Healthy Centres &amp; Community Facilities that highlights the benefits of centres that include (and are therefore supported by) residential use within their overall mix, as well as the benefits of centres to users when made more accessible, compact, connected and complete in their offer.</p> <p>The overall SPD has been edited for length and to be in plainer English.</p>	<p>The SPD's length has been reduced and a summary box for each chapter has been added.</p> <p>Plainer English has also been used.</p>

## Chapter 6 - Lifetime Neighbourhoods - Introduction - The essential elements for lifetime neighbourhoods

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	57	Respondent supports the consideration of all essential elements as part of development schemes' design, but does not support the SPD's recommended order for essential elements to be designed, as they are of the view that this should be determined on a site by site basis.	<p>Comment noted.</p> <p>The SPD provides guidance in the Lifetime Neighbourhoods chapter on the 'layering order' for essential elements of developments (i.e. green infrastructure, active travel infrastructure/streets, homes, etc,) that is intended to assist designers in appropriately prioritising the planning of green infrastructure provision and movement so that these elements lead the layout and placement for other elements. Use of the ordering suggested is not a requirement.</p> <p>As stated by the respondent, where site-specific considerations justify a different approach this is likely to be acceptable and may not necessarily result in a reduced quality scheme over one that followed the guidance more closely.</p>	None.

## Chapter 6 – Lifetime Neighbourhoods – Design prompts: Healthy Environments Master Checklist

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Pigeon Investment Management Ltd	58	<p>Respondent suggested restructuring the guidance depending on whether it is to be applied at the outline or reserved matters stage, as specific details may not be available at outline stage.</p> <p>The respondent questioned the value of considering the NHS Live Well Framework in the assessment of proposals design quality as this is not included as a requirement in the Local Plan policies.</p> <p>The respondent sought further clarification on this matter.</p>	<p>The Council does not structure SPD guidance by application type, as planning and design guidance is applicable from the very start of the process.</p> <p>The reference to the NHS Live Well Framework has been removed from the design prompts for the Lifetime Neighbourhoods chapter.</p>	Reference to the NHS Live Well Framework has been removed from the design prompts list.

## Appendix 1 - Glossary of terms

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Sport England	37	Respondent of the view that the definitions provided for 'open space', 'playing fields', 'playing pitches', and the delineation of playing pitches, should be provided within the glossary and be in accordance with the definitions provided in the NPPF, the 2015	The definitions for these terms were added to the Glossary.	Definitions for 'open space', 'playing fields', 'playing pitches', and the delineation of

		Order, and Sport England’s Playing Fields Policy and Guidance (2018).		playing pitches have been added to the Glossary.
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## Appendix 2 - Healthy Environments Master Checklist - What is the Healthy Environments Master Checklist?

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Suffolk County Council - Planning and Growth	101	Respondent suggested that the checklist could include the need for ‘neurodiverse-friendly signage’; respondent suggested that signage could be provided at a lower level for wheelchair and mobility scooter users.	Guidance on the provision of accessible and inclusive signage has already been included in the main body of the SPD; a design prompt on this specific detailed matter has not been included as the design prompts are intended to address higher level design principles of the topic area covered by the chapter they relate to.	None.

## Appendix 4 - Key External Guidance

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
Sport England	38	Respondent supports inclusion of Active Design guide in the Lifetime Neighbourhoods chapter of the SPD. The respondent would also like to see the Active Design guide and Active Travel England's Standing Advice Note: Active travel and sustainable development	References to these documents have been added to the respective chapters' quick reference tables.	References to the Active Design Guide (2023) and the Active Travel England

		(October 2023) to be added to the Active Travel chapter's quick reference table's list of key external guidance documents.		standing advice note: active travel and sustainable development (2023) has been added.
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