

# Consultation Statement

Rural Development  
Supplementary Planning Document

February 2024



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# 1 Introduction

The East Suffolk Council Rural Development 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 a broad range of rural issues and topics including guidance on barn conversions, rural worker dwellings, farm diversification, rural annexes, economic development, equestrian development and more.

This Consultation Statement was first produced to accompany the initial consultation on the proposed scope and content of the Rural Development SPD that was held for six weeks between 1 February and 16 March 2023. The responses to the initial consultation were used to inform the production of the Draft Rural Development SPD. The Draft Rural Development SPD was consulted on for eight weeks between 15 November 2023 and 10 January 2024.

This Consultation Statement has since been updated following the draft consultation on the Draft Rural Development 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 Rural Development 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.

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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/>.

## 2.1 Initial consultation

The initial consultation was carried out between 1 February and 16 March 2023. The following organisations and groups were consulted during the preparation of the SPD:

- Specific Consultation Bodies
- Neighbouring Authorities
- Town and Parish Councils
- Developers
- Agents
- Architects
- Planning Consultants
- Housing Associations
- Rural, farming and business associations Tourism Groups

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 November 2023 and 10 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.

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 1 February and 16 March 2023. An Initial Consultation Document was prepared to provide background information and an overview of the proposed scope and content of the SPD, followed by a five-question questionnaire for respondents to respond to. The consultation documents were made available on the East Suffolk Council website via this webpage:

<https://east Suffolk.inconsult.uk/ruraldevelopment2023/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, with a small number were notified by letter. 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 26 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/ruraldevelopment2023/listRespondents>.

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

The consultation of the draft SPD ran for eight weeks between 15 November 2023 and 10 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. 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 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 if they wanted to.

The consultation was advertised on the Council's website, as well as through the Council's social media posts; 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/Drafruraldevelopment23/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 0SD
- Woodbridge Library, New Street, Woodbridge, IP12 1DT

In total 14 individuals and organisations responded to the consultation. Between them they made 40 comments.

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

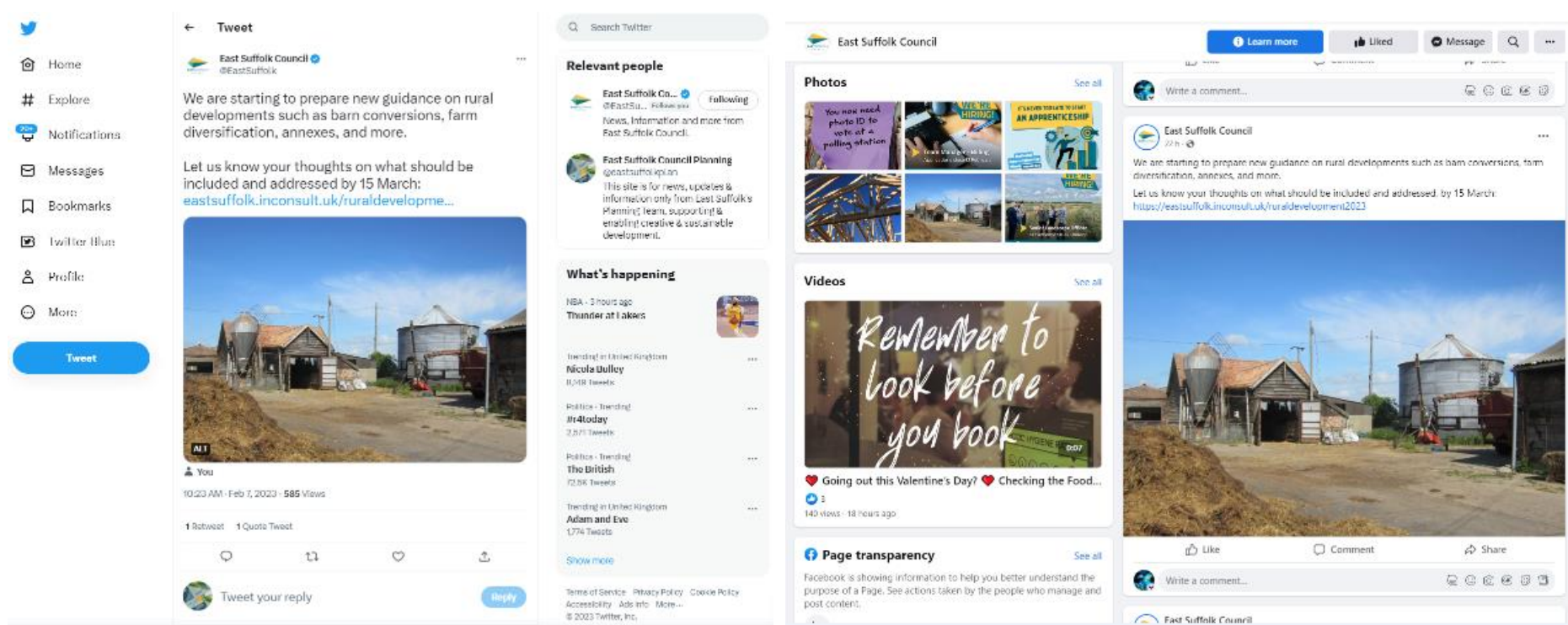
<https://eastsuffolk.inconsult.uk/Drafruraldevelopment23/listResponses>

## 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.

### Initial consultation – Feb 2023 – Mar 2023

Twitter / X	Facebook
01/02/2023	01/02/2023



## 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 content of the Rural Development Supplementary Planning Document to be appropriate?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	> Yes However emphasis needs to be given to protected areas of particular value to wildlife, peoples recreation, SSSI's, Ramsar's and areas in open countryside which impact an areas charactor etc. Planners must have the ability to act when such areas are threatened whereas currently guidance appears to be so restrictive that planning officers will freely admit that their hands are tied.	The comment is noted. It should be noted that an SPD cannot create new policy but can only clarify and expand upon existing policy. This SPD is focused on providing advice and guidance relating to development. Where appropriate the SPD will include reference to designing developments sensitively regarding wildlife and landscape character.  Parish councils can provide additional guidance on protecting wildlife and landscape character through the adoption of neighbourhood plans.	Reference to designing sensitively in regard to landscape character is included in chapter 2 Rural Workers Dwellings. Regard for the surrounding landscape is overall strategy No.3 for designing an annexe. A section on the Impact on the landscape and biodiversity is included in chapter 4 Rural Residential Curtilage Expansion. Sections on making a positive contribution to the landscape, landscape setting including boundary treatment and parking, the natural environment, and Habitats Directive and Habitats Regulations are included in chapter 5 Rural Buildings and Barn Conversions. A section on biodiversity protection is included in Chapter 6 Economic Development. A section on wildlife and landscape impact is included in chapter 7 Equestrian Development.



Bromeswell Parish Council (Verity Brown)	> Yes	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> Yes	Comment noted	No action
Brooks Leney (John Pearce)	> Yes	Comment noted	No action
Bromeswell Parish Council (Pamela Hembra)	> Yes	Comment noted	No action
Colin Hedgley	> Yes	Comment noted	No action
Framlingham Town Council (Neil Williamson)	> Yes	Comment noted	No action
Geoff Wakeling	> Yes	Comment noted	No action
Glenn Coles	> Yes	Comment noted	No action
Ipswich Borough Council (sally minns)	> Yes	Comment noted	No action
james mallinder	> Yes	Comment noted	No action
Jean Ellinor	> Yes More involvement of Parish Councils who know the character and culture of their village - not all villages are the same, even if they have the same size of population or number of houses !	We will consult Town and Parish Councils on the next stage of the development of this SPD which is the consultation on the draft SPD due to take place Autumn 2023. We will take into consideration all comments received.  Parish councils can provide additional guidance on character through the adoption of neighbourhood plans.	Parish and town councils will be contacted direct regarding the next stage of the SPD. Public consultation on the Draft SPD to be held in Autumn 2023
Jean Ellinor	> Yes	Comment noted	No action
Jill Pass	> Yes	Comment noted	No action

Juliet Blaxland (Juliet Blaxland)	> Yes	Comment noted	No action
Melton Parish Council (Pip Alder)	> Yes	Comment noted	No action
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	> Yes While the RD SPD covers many of the areas of development in the rural area it does not appear to reference that much of rural East Suffolk is located in a nationally designated Area of Outstanding Natural Beauty (AONB). Public bodies and statutory undertakers have a duty of regard to the purpose of the AONB when decision making (to conserve and enhance natural beauty)	The comment is noted. The project will look to provide guidance on landscape and protected designation considerations in relation to the topics covered in the Rural Development SPD. It should be noted that an SPD cannot create new policy but can only clarify and expand upon existing policy.	The SPD includes reference to Local Plan policy SCLP6.3 Tourism Development in chapter 6 Economic Development and Chapter Tourism. Reference to the AONB is made in Chapter 6 in sections on external lighting, noise, and additional community, cultural and tourism benefits. In chapter 6 there is a specific section on AONB and heritage coast. References to the AONB are also included in Chapter 7 Equestrian Development, Chapter 8 Tourism and Chapter 9 Small Scale Renewable Energy Generation.
The Benacre Company (Beverley Buggs)	> No It would be helpful if the SPD made specific reference to development within and relocated from Coastal Change Management Areas (and thereby included reference to Waveney Local Plan 2019 policies WLP8.25 and WLP8.25), recognising the important contribution that rural development in all areas, including within these areas, can (and needs to) make to economic development in the area.	The Coastal Adaptation SPD addresses development within the Coastal Change Management Areas (CCMA).	The Rural Development SPD aims to address a range of development issues that are common in East Suffolk. It was not considered necessary to provide guidance on development in the CCMA.
Ubbeston Parish Council (Julie Collett)	> Yes	Comment noted	No action

## 2. Are any specific elements of the Local Plan policies relating specifically to rural matters that you consider require additional guidance in the Rural Development Supplementary Planning Document?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	> Yes The views of residents, the councils concerned and planning officers should be given greater weight regarding development outside recognised parish and town boundaries and in open countryside. Comprehensive explanation should be required and made public when planning decisions are published.	All Planning Applications must be assessed against national, local and neighbourhood planning policies. All material objections are given weight when determining a planning application. An officer's report is published online for each planning application, the report details the recommendation for refusal or approval together with an explanation. We will consult Town and Parish Councils on the next stage of the development of this SPD which is the consultation on the draft SPD due to take place Autumn 2023. We will take into consideration all comments received.	No action required, but this comment relates more to development management process so will be brought to the attention of that department. Parish and town councils will be consulted at the next stage of the SPD.
Bromeswell Parish Council (Verity Brown)	> No	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> Yes 1. Conversion of farm buildings to holiday lets: this has the potential to cause loss of habitat to native wildlife, especially barn owls. There will also be an increase in traffic, particularly from the Deben Peninsula, on a road system what is already not fit for purpose and under considerable strain from HGVs and residential traffic. 2. Conversion of farm buildings to expensive homes that locals will be unable to afford:	1. The comment is noted and guidance on the protection of appropriate wildlife for farm building conversion will be included. 2. Policy SCLP5.8 and WLP8.1 set housing mix requiring a mix of sizes and types. Where the conversion results in a single unit a mix is less achievable. The rural SPD cannot enforce additional affordable units if not supported by the housing mix policies.	1. Guidance on the protection of wildlife during farm building conversions is included Chapter 5 in sections on Natural Environment, and Habitats Directive and Habitats Regulations. 2. No action as covered in the housing mix policies. 3. Guidance on wildlife protection and traffic management has been included where appropriate.

	<p>there is already a shortage of local affordable houses. The addition of more expensive properties will push up local prices making it even more difficult for young people, in particular, to be able to afford to live locally.</p> <p>3. Conversion of farm buildings/new build for business premises: These have the potential too to destroy native wildlife, and add to the already problematic road congestion.</p> <p>Overall, the increase in light, noise and traffic pollution needs to be seriously considered in terms of the effects on residents and native wildlife and specific guidance should be included in the proposed SPD</p>	<p>3. It is agreed that the SPD should provide guidance on biodiversity preservation and impact to the highway where appropriate.</p>	
<p>Brooks Leney (John Pearce)</p>	<p>&gt; Yes</p> <p>Conversion – care should be taken to not stifle innovative designs and the SPD should not be overly prescriptive. The prior approval process has been set out in the planning practice guidance and is well-established, so the SPD should be careful not to introduce new ‘interpretations of this process.</p> <p>Rural workers dwellings – a wider definition of a rural worker may be appropriate to allow for workers in industries, such as tourism are able to be accommodated at, or near to their place of work. This would reduce the need to travel to the workplace, provide better security for guests through a permanent presence on-site, and improve employment prospects through provision of subsidised accommodation. The ability to provide</p>	<p>Conversion - The guidance will encourage a high standard of design suitable to its location and will not aim to reduce innovation where it makes a positive contribution. The SPD will provide guidance to the existing legislation and policy and will not create new policy.</p> <p>Rural Workers Dwellings – What constitutes a rural worker suitable for a rural worker dwelling will be explored within the SPD. However, the requirement for the worker to live on site should be based on a functional need and is subject to a rigorous criterion. The SPD will provide guidance, but it cannot lower the threshold to where a rural worker dwelling is required.</p>	<p>Conversion - Guidance relating to conversion has been drafted to ensure design is of a high quality, appropriate to its location, but does not stifle innovation. Guidance is provided in Chapter 5 of the SPD.</p> <p>Rural Workers Dwellings – Guidance on what constitutes a rural worker dwelling has been included in Chapter 2 of the SPD.</p>

	<p>housing for rural workers would also benefit through reducing the impact on local housing stock. Within some rural business, multiple dwellings may be required for rural workers due to the scale of the operation.</p> <p>Farm Diversification/Economic Development – include ‘training; within the opportunities to help support upskilling the local workforce through providing facilities for training programmes.</p> <p>Tourism – Clarity in respect of what constitutes “medium and larger scale sites where commercial, recreational or entertainment facilities are provided” would be useful.</p>	<p>Farm Diversification/Economic Development –The Suffolk Coastal supporting policy text lists educational facilities as an example of farm diversification. The guidance within the Economic Development chapter will provide guidance applicable to educational facilities.</p> <p>Tourism - Agreed, whilst the definition is clear with the Waveney policy WLP8.15, clarity can be given to policy SCLP6.5 of the Suffolk Coastal Local Plan.</p>	<p>Farm Diversification/Economic Development – Guidance for development has been included in chapter 6.</p> <p>Tourism – The policy defines what constitutes medium and/or large scale in the Waveney Local Plan, this definition is not included in the Suffolk Coastal Local Plan so is expanded upon in chapter 8 of the SPD.</p>
Charsfield Parish Council (Pamela Hembra)	<p>&gt; Yes</p> <p>Consider the utilisation of rural bodies of water for leisure such as fishing or even if large enough more noisy pursuits. With the exception of the Broads, which are excluded as they have their own planning authority, there are bodies of water elsewhere in rural Suffolk.</p> <p>Note some diversifications can have an effect over quite a large distance if they are noise producing eg clay pigeon shooting.</p>	<p>The Rural Development SPD aims to address a range of development issues that are common in East Suffolk. The use of bodies of water features for leisure purposes as part of farm diversification is not a form of common development that requires planning permission that warranted further detailed guidance.</p> <p>It is recognised that some activities produce noise and this will be a consideration in determining any planning application.</p>	<p>The SPD does not provide guidance on water leisure activities. The SPD focuses on common forms of development in East Suffolk which would benefit from further details guidance.</p>
Colin Hedgley	<p>&gt; Yes</p> <p>See question 5</p>	<p>Answer detailed in question 5</p>	<p>No Action</p>
Framlingham Town Council	<p>&gt; Yes</p>		

<p>(Neil Williamson)</p>	<p>Guidance most particularly to commercial developments to adopt solar or wind power and the use of electric charging points – the lack of which in rural areas is a barrier in achieving net zero carbon emissions.</p>	<p>The Sustainable Construction SPD provides information to renewable energy projects and the Rural Development SPD will not seek to replicate this work, however additional guidance can be included.</p>	<p>A chapter on renewable energy has been included.</p>
<p>Geoff Wakeling</p>	<p>&gt; Yes Dwellings for rural workers need to have further guidance on what meets criteria with a clear framework for both applicants and planners to follow.</p> <p>It is simply not good enough to assume there is sufficient nearby housing for rural workers in agricultural or forestry. Living costs have soared, appropriate properties are lacking and the very fabric of a farm means they require land, and therefore are NOT within easy distances of towns and villages.</p> <p>Decades of development means that much land no longer has the traditional farmhouse as this has been sold and turned into residential or holiday accommodation. The volatile nature of farming also means many coming into the industry simply do not have the means to buy or even rent close by, making their farming business either virtually impossible or a physical and mental drain. High living overheads make starting a farm business extremely difficult whereas being granted rural dwelling allows otherwise expensive costs to be funnelled directly into the business.</p>	<p>Agreed, the Rural SPD will aim to provide clear guidance to apply to rural worker dwellings.</p> <p>The policy requires existing dwellings in the area to be considered first, but it states that the dwelling must be suitable and available. Guidance could be provided on what constitutes a suitable dwelling.</p> <p>The SPD will provide guidance on the suitability of properties and guidance to how recently sold or converted units are considered when determining a rural dwelling planning application.</p> <p>The Local Plans recognise the value and role that rural worker dwellings have.</p>	<p>Agreed, the Rural SPD provides clear guidance in relation to rural worker dwellings in chapter 2.</p> <p>Guidance has been provided on what constitutes a suitable dwelling for rural workers.</p>

	<p>It is extremely important to give weight to a number of factors when determining dwellings for rural workers;</p> <ol style="list-style-type: none"> <li>1. Livestock welfare</li> <li>2. Crop security</li> <li>3. Financial needs</li> <li>4. Site security - both physical and bio</li> </ol>	<p>These factors will be considered in the SPD in what constitutes a functional need.</p>	
Glenn Coles	<p>&gt; Yes</p> <p>The use of Backland or large gardens should be encouraged as this would bring a lot more properties into the small rural communities, without taking further agricultural land out of production, the small amount of infill allowed, is not enough to supply the needs of local residents, most now when downsizing end up moving due to insufficient housing stock.</p>	<p>New build infill development is guided by the Housing in Clusters and Small Scale Residential Development in the Countryside SPD. The Rural SPD will not look to replicate this work although it will be referenced where appropriate.</p>	<p>No action required.</p>
Ipswich Borough Council (sally minns)	<p>&gt; Yes</p> <p>the Cross boundary development site known as Humber Doucey Lane should be referred to and that there may be other such sites coming forward.</p> <p>Cycling and walking and the role of your SPD on this and the Green Trail being developed around the rim of Ipswich</p>	<p>The Rural SPD will not directly provide guidance on policy SCLP12.24. As an allocation it is not a form of development the rural SPD is intending to explore.</p> <p>The role of the cycle and walking within rural development will be referenced where appropriate. The Green Trail is located in Ipswich and doesn't connect to East Suffolk. The East Suffolk and Cycling Strategy identifies numerous opportunities for trail and paths in East Suffolk.</p>	<p>Cycling and Walking has been referenced where appropriate to the rural development policies.</p>
james mallinder	<p>&gt; Yes</p>		

	<p>loss of habit for many of our native species - as traditional commercial buildings are converted to private dwellings and the general lack of control over the purpose of dwellings , often in one or two units they tend to be holiday lets or expensive 2nd homes or principle house</p> <p>Thus their development has little positive impact to the local community</p> <p>how do you break the behaviour of the landowner allowing a traditional built barn to fall into disrepair - erecting a metal and plastic building then claiming that the original barn will only survive if converted to a private home</p>	<p>The comment is noted and guidance on the protection of appropriate wildlife for farm building conversion will be included as part of the SPD.</p> <p>The SPD can only expand upon and guide development in accordance with existing policy. Accordingly, it cannot be used to govern buildings falling into disrepair. Depending on a number of factors a section 215 notice may be more appropriate. Providing guidance on new agricultural buildings was considered, but the majority of new agricultural buildings are built using permitted development rights not planning permission</p>	<p>Guidance on policies WLP8.11 and SCLP5.5 is has been provided in the chapter 5 on Rural Buildings and Barn Conversions.</p>
james mallinder		No text	No Action
Jean Ellinor	> No	Comment noted	No action
Jill Pass	> No	Comment noted	No action
Juliet Blaxland (Juliet Blaxland)	<p>&gt; Yes</p> <p>If a person/client/architect is not familiar with specific rural activities relevant to a planning application (hunt kennels, racing yards, unusual animals (bison etc), shooting etc) perhaps there could be a list of 'people</p>	<p>The SPD's role is to expand and provide guidance on the existing policy and cannot create a list of external consultants that can be privately contacted for advice.</p>	No Action



	to consult' for factual information which might help in the mutual understanding of the problem or need, culturally as well as practically, as sometimes planners seem not to understand anything about , for example, how working stable yard works.	However, the SPD itself will fulfil the role being helpful in understanding the requirements.	
Melton Parish Council (Pip Alder)	> Yes When the SPD discusses questions about the conversion of sites from rural to other employment eg retail industrial touristic, the impact of the change of activity on the road network needs to considered carefully. Turning a rural site surrounded by rural roads into an employment hub possibly generating many HGV movements can change the whole character of an area. Furthermore the impacts of increased traffic upstream and downstream of a development needs to factored into planning decisions.	Agreed, policies WLP8.14 and SCLP4.6 include criterion to ensure that development that converts rural buildings to residential use does not have a significant impact upon highway safety, local roads or the living conditions. The rural SPD provides the opportunity to provide additional guidance here.	Guidance on policies WLP8.14 and SCLP4.6 in relation to highway impact has been provided in chapter 5 in the section on access. The need for access to main road is noted in chapter 6 in the sections on road network and access.
Melton Parish Council (Pip Alder)	> Yes	Comment Noted	No Action
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	> Yes While noting that Local Plan policies cannot be changed at this stage and the Local Plan makes ref to tourism development in the AONB other types of development can have an impact on the AONB where they are proposed for the AONB or its setting. Additional Guidance on impacts on the AONB and how to avoid, minimise and mitigate them would be welcomed. This could come in the form of an overarching section of the RD	The comment is noted. The project will look to address AONB's in relation to rural tourism accommodation. Policy SCLP6.3 governs tourism development in areas of AONB.	In chapter 8 on tourism the SPD provides guidance and information on AONB criteria.

	SPD (preferred) or all individual LP policies. Ref could be made to AONB produced guidance, eg Use of Colour in design, defined Natural Beauty and Special Qualities document, AONB Partnership Position Statements and soon to be produced Lighting Guidance		
Ubbeston Parish Council (Julie Collett)	> No	Comment Noted	No Action

### 3. Are there any elements of national policy or aspects of the General Permitted Development Order that you consider require additional guidance in the Rural Development Supplementary Planning Document?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	> Yes Aspects of permitted development allow for inappropriate developments in unsuitable areas with little or no consideration of the views of local residents and their elected representatives. Examples are known of previous explicit planning conditions and objections appearing to be ignored and applications being permitted as a result. A requirement to clearly and fully justify and explain such decisions would help dispel concerns regarding what are often viewed as "questionable" decisions.	Permitted Development is set out within the government legislation and the SPD cannot change the processes.  All Planning Applications must be assessed against national, local and neighbourhood planning policies. All material objections are given weight when determining a planning application.  An officer's report is published online for each planning application that details the recommendation for refusal or approval together with an explanation.	No action
Bromeswell Parish Council (Verity Brown)	> No	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> Yes Please see response above: guidance on preserving native wildlife, minimising noise and light pollution, and ensuring an already over-burdened traffic system is not made worse.	Guidance on these topics will be provided within the rural SPD where appropriate.	Guidance on these topics have been provided within the rural SPD where appropriate.
Brooks Leney (John Pearce)	> No	Comment noted	No action
Charsfield Parish Council (Pamela Hembra)	> No	Comment noted	No action

Colin Hedgley	> Yes Part Q applications. It must be made clearer that the build should be on the footprint of the original building and encroaching over these limits will not be acceptable.	Class Q states that development is not permitted if: 'the development would result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point; This can be reinforced in the SPD with a section on class Q.	The class Q criteria is emphasised in the section Class Q Prior Approval Development.
Framlingham Town Council (Neil Williamson)	> Yes Permitted Development guidance to include environmental impact assessment as well as guidance on the structural information requirements and the other guidance proposed in the SPD.	Part Q does not necessarily require an EIA. The SPD will look to provide guidance regarding the environment where appropriate.  The SPD will look to provide guidance on the structural information required to support a PD prior approval application or a planning application.	Guidance on the Habitats Directive and Habitats Regulations and the need for ecological surveys, and the need for structural information has been included in chapter 5.
Geoff Wakeling	> No	Comment noted	No action
Glenn Coles	> Yes See Above	Comment noted	No action
Ipswich Borough Council (sally minns)	> No	Comment noted	No action
james mallinder	> Yes further information needed do not know	Comment noted	No action
Jean Ellinor	> No	Comment noted	No action
Jill Pass	> No	Comment noted	No action
Juliet Blaxland (Juliet Blaxland)	> Yes Clarity in plain English in fewest number of words possible.	It is agreed that the document should use plain English where possible to make it easy to use.	Use plain English wherever possible.

Melton Parish Council (Pip Alder)	> No	Comment noted	No action
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	> No Section 85 of the Countryside and Rights of Way Act 2000 notes that public bodies and statutory undertakers have a duty of regard to the purpose of the AONB when decision making (to conserve and enhance natural beauty). As much of East Suffolk is within the nationally designated landscape reference to it should be included in the RD SPD	The comment is noted. The SPD will have due regard to the AONB and provide guidance on development within and close to the AONB where appropriate.	The SPD has included references to the AONB throughout the document where relevant.
Ubbeston Parish Council (Julie Collett)	> No	Comment noted	No action

#### 4. Are you aware of any good practice in existing Supplementary Planning Documents from elsewhere that could be applied in East Suffolk?

<b>Respondent Name</b>	<b>Comment</b>	<b>Council Response</b>	<b>Action</b>
Barnby parish council (Ian Bond)	> No	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> No	Comment noted	No action
Bromeswell Parish Council (Verity Brown)	> No	Comment noted	No action
Brooks Leney (John Pearce)	> No	Comment noted	No action
Charsfield Parish Council (Pamela Hembra)	> No	Comment noted	No action
Colin Hedgley	> No	Comment noted	No action
Framlingham Town Council (Neil Williamson)	> No	Comment noted	No action
Geoff Wakeling	> No	Comment noted	No action
Glenn Coles	> No	Comment noted	No action
Ipswich Borough Council (sally minns)	> No	Comment noted	No action
james mallinder	> No	Comment noted	No action

Jean Ellinor	> No	Comment noted	No action
Jill Pass	> No	Comment noted	No action
Juliet Blaxland (Juliet Blaxland)	> No	Comment noted	No action
Melton Parish Council (Pip Alder)	> No	Comment noted	No action
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	<p>&gt; No</p> <p>See joint DPD for Arnside and Silverdale AONB at <a href="https://www.arnsidesilverdaleaonb.org.uk/what-we-do/advice/development-plan-document-arnside-silverdale-aonb/">https://www.arnsidesilverdaleaonb.org.uk/what-we-do/advice/development-plan-document-arnside-silverdale-aonb/</a> that notes:</p> <p>A dedicated Development Plan Document (DPD) for the whole of the AONB has been prepared jointly by South Lakeland District Council and Lancaster City Council. This plan, which complements the Arnside &amp; Silverdale AONB Management Plan 2019-24, is the first in the country to be prepared in this way to apply policies and allocations across the AONB.</p> <p>The AONB DPD summarises the development and planning considerations for the area by saying that within the Arnside &amp; Silverdale AONB housing, employment, services, infrastructure and other development will be managed to contribute towards meeting the needs of those who live in, work in and visit the area in a way that: conserves and enhances the landscape, the natural beauty, and the special qualities of the AONB; creates vibrant, diverse and sustainable communities with a strong sense of place; and maintains a thriving local economy.</p>	<p>We are grateful to Suffolk Coast &amp; Heaths and Dedham Vale AONBs for their recommendations. The documents will be read, and any lessons learnt incorporated into the Rural Development SPD. However, this SPD aims to address recurring issues experienced in commonly submitted planning applications in East Suffolk.</p>	<p>References to the AONB have been made throughout the SPD and links to Suffolk Coast &amp; Heath and Dedham Vale AONB Guidance for Planning in the AONB and the Management Plan have been included in chapter 8 on Tourism.</p>
Ubbeston Parish Council (Julie Collett)	> No	Comment noted	No action

## 5. Do you have any other comments for us to consider in drafting the Rural Development Supplementary Planning Document?

Respondent Name	Comment	Council Response	Action
Barnby parish council (Ian Bond)	Whilst there is a need for development, this should be weighed against the potential for damage to the character of an area and the damage to wildlife caused by infringement into rural areas. The establishment of parish and town boundaries was originally aimed at protecting open countryside and the perception is that permitted development is often granted with little or no consideration of these issues.	Permitted development rights are set out in national legislation and not subject to Local Planning Authorities Local Plans and consideration.	No action
Bromeswell Parish Council (Verity Brown)	No, thank you.	Comment noted	No action
Brooks Leney (John Pearce)	No	Comment noted	No action
Colin Hedgley	Much more weight should be given to Parish Council comments, in fact if the PC does not support an application then the planning authority must give very good reasons why it should be overruled.	All Planning Applications must be assessed against national, local and neighbourhood planning policies. All material objections are given weight when determining a planning application. An officer's report is published online for each planning application that details the recommendation for refusal or approval together with an explanation.  We will consult Town and Parish Councils on the next stage of the development of this SPD which is the consultation on the	Consult Town and Parish Council on the draft SPD.



		draft SPD due to take place Autumn 2023. We will take into consideration all comments received.	
Felixstowe Town Council (Ash Tadjrishi)	The Town Council welcomed the Initial Consultation on the Rural Development Supplementary Planning Document but do not feel able to add any further comment.	Comment noted	No action
Framlingham Town Council (Neil Williamson)	<p>An emphasis on the use of environmentally friendly materials, including maximum re-use of existing materials in conversions, and, where applicable the use of locally sourced materials in order to reduce the impact of delivery vehicles on local roads and adding to vehicle emissions. Environmental considerations should be at the heart of all planning decisions.</p> <p>The SPD should provide guidance on the incorporation of permitted access paths within Rural Development to encourage the use of the countryside by all.</p>	<p>The Sustainable Construction SPD provides information on environmentally friendly materials, re-use of existing materials and locally sourced materials, but information can also be included in this Rural Development SPD where relevant.</p> <p>Guidance on access in both rural and urban areas is being provided in the Healthy Environment SPD which is under development.</p>	The SPD, particularly in chapter 5 on rural buildings and barn conversions, includes information on environmentally friendly materials, re-use of existing materials and locally sourced materials.
Glenn Coles	When rural properties have very large gardens, these should be encouraged to be used for housing, especially where it doesn't cause spread along the roadways, this would thicken the housing stock rather than a elongating the area.	New residential development is not permitted in the Countryside (outside of settlement boundaries) except where specific policies in the two Local Plans indicate otherwise. The Clusters and Small Scale Residential Development SPD provide guidance on character and appearance.	No action.
Henstead with Hulver Street Parish Council (Colbridge)	Henstead with Hulver Street Parish Council have considered this consultation and have no issues with the proposals.	Comment noted	No action

Ipswich Borough Council (sally minns)	None	Comment noted	No action
james mallinder	<p>yes this document should be user friendly for local residents and parish councils</p> <p>it needs to highlight what aspects are considered to allow those giving comments to be meaningful</p> <p>there is much conflict between local land owners wanting to develop their buildings largely for their own interest with lack of concern in the local community opinion or for that matter what impact these developments have locally</p> <p>increase in traffice . noise . light pollution etc</p> <p>east suffolk needs to support communities not one particular interest</p>	<p>It is agreed that the document should have a user-friendly layout and presentation.</p> <p>The Rural Development SPD is to provide clear guidance on a range of issues which should reduce any ambiguity regarding what types of development are permitted and therefore conflict.</p>	Ensure a user-friendly presentation of the SPD.
Jean Ellinor	Parish councils need to be more involved at the earliest possible stages of planning - especially in small villages where even modest development can have a big impact	Town and Parish Councils are consulted on all Planning Applications. An SPD cannot create new policy but can only clarify and expand upon existing policy. The policies that impact rural development do not require developers to consult with Parish Council prior to submitting planning applications.	No action.
Jill Pass	Re-development in the countryside should be avoided.	Redevelopment can preserve buildings of historic or architecture value, enable farms to diversify and provide economic benefits. The SPD will provide advice and	No action, but guidance will be provided on agricultural 'redevelopment' particularly in relation to barn conversions.

	<p>There is an issue with the 'bypass' techniques used, such as creating a dwelling for holiday purposes then not policing them.</p> <p>I know of 3 properties that are supposed to be holiday only and are all used as permanent residential.</p>	<p>guidance on types of re-developments that are appropriate.</p> <p>Any properties with conditions restricting the use of a dwelling for holiday rental should be reported to East Suffolk Council if they are being used as permanent residences, so that enforcement action can be considered.</p>	<p>Furthermore guidance on the holiday condition in relation to the policies SCLP6.5 and WLP8.15 will be provided.</p>
<p>Juliet Blaxland (Juliet Blaxland)</p>	<p>We need open-mindedness about architectural types, eg 'big tin barns and grain silos' and 'crinkly tin' have been a familiar sight in the rural landscape for at least 50 years, so are therefore part of the rural vernacular as surely as pantiles and timber planks etc. We should cherish our existing traditional and/or listed buildings, but also embrace the possibilities with new types. Green roofs could be encouraged, not only for reasons of blending in, but also for helping the insects and birds etc, ie replacing the land footprint stolen by the building, by putting it back on the roof.</p> <p>STRONG NEGATIVE in rural areas is 'creeping suburbanisation aesthetic', eg please consider rules about non-building elements, specifically: fencing (discourage suburban panel fences and fussy designs, encourage timber post and rails or black metal 'estate fencing'), gates (eg timber 5-bar gates or black metal to suit rural fencing types), drive and track surfaces (gravel, tarmac, farm tracks etc not paving blocks),</p>	<p>It is agreed that there are a variety of rural buildings which no longer serve their original purpose and maybe suitable for conversion.</p> <p>It is agreed that suburban design aesthetics are not necessarily appropriate in rural settings and design guidance is needed.</p>	<p>The chapter on Rural Buildings and Barn Conversions includes advice on converting a variety of rural buildings. The chapter includes information on design and materials with links to the Sustainable Construction SPD.</p>

	<p>language used (eg not a 'driveway' in rural areas!)</p>		
<p>Martlesham Parish Council (Susan Robertson)</p>	<p>Martlesham Council (MC) would like to see rural development which is well designed, and which incorporates sustainable construction methods and greener energy.</p> <p>MC would also like to see reference to the Suffolk Quiet Lanes project, ensuring that rural development continues to preserve these lanes as safe places for people to use for exercise and active forms of travel.</p> <p>Any rural development in Martlesham should provide safe access to the properties and consider the existing problems which occur as a result of heavy traffic already using rural lanes to avoid the A12 and A14 congestion.</p> <p>We would not wish to see rural development which results in increased traffic in rural areas, but we welcome greater connectivity for use by pedestrians and cyclists.</p> <p>When planning for any development in Martlesham, the effect of additional congestion in the retail park should be considered.</p> <p>There should be specific design codes concerning rural development within Special Landscape Areas and AONBs.</p>	<p>The Sustainable Construction SPD provides information on sustainable design and construction, but information can also be included in this Rural Development SPD.</p> <p>It is agreed that the SPD could reference the Suffolk Quiet Lanes project where appropriate and provide guidance on safe access to properties, traffic and pedestrian and cyclist connectivity.</p> <p>It is agreed that developments within Special Landscape Areas and AONB have specific design issues that could be addressed through additional guidance.</p>	<p>The SPD includes information on Sustainable design and construction together with links to the Sustainable Construction SPD.</p> <p>Information on the Suffolk Quiet Lanes project, safe access to properties, traffic and pedestrian and cyclist connectivity has been included where appropriate.</p> <p>The SPD has addressed the specific design issues in Special Landscape Areas and AONB where appropriate.</p>

Melton Parish Council (Pip Alder)	None	Comment noted	No action
Mutford Parish Council (Mrs Colbridge)	Mutford Parish Council suggests that, following an increase in the use of Airbnb and other commercial accommodation brokers for residential property, tighter regulation is required to avoid possible issues with increased traffic and on-road parking in rural areas. Tighter planning enforcement is also required to avoid abuse of rules around self-catering homes changing to a full-time residency.	<p>Whilst it is recognised that this form of development occurs within rural areas it is part of a wider issue covering urban areas, market towns and villages. Accordingly, any guidance addressing this issue may be best located elsewhere.</p> <p>Any properties with conditions restricting the use of a dwelling for holiday rental should be reported to East Suffolk Council if they are being used as permanent residences, so that enforcement action can be considered.</p>	No action
National Trust (Sandra Green)	The scoping document states 'many farmers are also considering opportunities to increase biodiversity or to undertake 're-wilding' projects and in some cases planning permission may be required for such projects' but then does not go on to include these types of projects in the issues for which detailed guidance will be provided, which it would be helpful for the document to include.	<p>It is agreed that the SPD should provide guidance on biodiversity where relevant.</p> <p>The Rural Development SPD aims to address a range of issues arising from built development that are commonly found in planning applications submitted to East Suffolk Council. Re-wilding is not considered to be a common issue that requires additional guidance to provide in this SPD.</p>	Information on Habitats Directive and Habitats Regulation is provided in chapter 5.
Natural England (Sir/Madam)	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of	It is agreed that the SPD should provide guidance on biodiversity where relevant.	Information and guidance has been provided in chapter 5

	<p>present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p><b>Green Infrastructure</b> This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should ‘Take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species</p>	<p>The Rural Development SPD aims to address a range of issues arising from built development that are commonly found in planning applications submitted to East Suffolk Council. Additional information and guidance where related to rural forms of built development could be included.</p>	
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	<p>to move around, within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> <li>• green roof systems and roof gardens;</li> <li>• green walls to provide insulation or shading and cooling;</li> <li>• new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).</li> </ul> <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is included within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice</p>		
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	<p>Guidance for Green Infrastructure and Biodiversity".</p> <p><b>Biodiversity Enhancement</b>          This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p><b>Landscape Enhancement</b>          The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape</p>		
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	<p>through sensitive siting and good design, avoiding unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed to do so, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p><b>Other Design Considerations</b> The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p> <p><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b> A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural</p>		
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	environment, then, please consult Natural England.		
Suffolk Coast & Heaths and Dedham Vale AONBs (Simon Amstutz)	Thank you for the opportunity to comment	Comment noted	No action
Suffolk Wildlife Trust and Norfolk Wildlife Trust (Ellen Shailes)	<p>Scope and Content of the Rural Development Supplementary Planning Document (SPD)</p> <p>There is currently limited reference to biodiversity with the proposed Scope and Content of the SPD and we wish to highlight the need for this SPD to consider impacts to biodiversity. We welcome the reference to ‘opportunities to increase biodiversity or to undertake ‘re-wilding’ project’ in the section on Farm Diversification and we recommend that biodiversity should also be referenced within the other sections of the SPD, with relevant examples of potential impacts to biodiversity as well as potential enhancements within rural developments. The Council has a statutory duty under Section 40 of the Natural Environment and Rural Communities Act 2006 (NERC Act) to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of its normal functions such as policy and decision-making. The Council has a number of policies in the Waveney and Suffolk Coastal Local Plans which are relevant to this duty, including Policy</p>	<p>The Rural Development SPD aims to address a range of issues arising from built developments that are commonly found in planning applications submitted to East Suffolk Council. Additional information and guidance where related to rural forms of built development could be included.</p> <p>It is agreed that the SPD should highlight that Rural buildings and barns often support protected species such as bats.</p> <p>It is agreed that the SPD should provide guidance on external lighting and the impact on wildlife, particularly in relation to equestrian developments.</p> <p>It is agreed that the SPD should provide guidance on the role that rural gardens can have in providing habitats for a variety of wildlife.</p> <p>It is agreed that the SPD should reference the impacts of development and farm diversification on protected sites, priority</p>	<p>Include guidance and reference to:</p> <ul style="list-style-type: none"> <li>• Highlight that protected species such as bats live in rural buildings and barns,</li> <li>• Impact of external light on wildlife particularly in relation to equestrian developments,</li> <li>• The role rural garden have in providing habitats, and</li> <li>• Impact of development and farm diversification on protected sites, priority habitats, and County Wildlife Sites due to lighting, noise and recreational disturbance.</li> </ul>

	<p>WLP8.34 and Policy SCLP10.1, which could be referred to in this SPD.</p> <p>Rural development can have a significant impact on protected and Priority species. Rural buildings and barns in particular often provide important habitats for protected and Priority species such as bird and bat species. There are specific impacts for each different type of rural development which should be highlighted within the SPD, such as those highlighted in the section on equestrian development in relation to external floodlights and potential wildlife impacts. Lighting of equestrian developments in the countryside can cause particular harm to roosting, commuting and foraging bats. Hedgehogs can also be impacted by rural development, as they often rely on small areas of habitat within rural gardens and farmland for hibernation, which could be impacted by some of the rural development highlighted within this SPD. The whole local population of hedgehogs can be wiped out by developments affecting small pockets of habitat which are suitable for hibernation. Rural gardens can be important habitats for a variety of other wildlife including invertebrates, birds, bats, mammals, reptiles, plants and fungi which are now largely absent from surrounding intensively farmed arable land.</p> <p>We would also welcome reference within the SPD to impacts on protected sites and Priority</p>	<p>habitats, and County Wildlife Sites due to lighting, noise and recreational disturbance.</p>	
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	<p>habitats, with specific reference to County Wildlife Sites (CWSs). In particular, economic development and farm diversification in the countryside has the potential to impact Priority habitats and CWSs. County Wildlife Sites are designated for their regional value for wildlife and form an important part of the nature recovery network providing crucial steppingstones between nationally important wildlife sites. There is significant potential for CWSs to be impacted by rural development, and it is important that the mitigation hierarchy is followed and impacts are avoided in the early stage of development design. Indirect impacts of rural development on biodiversity should also be highlighted within this SPD, including lighting, noise and recreational disturbance.</p> <p>Farm diversification for example through the provision of camping, glamping or caravan sites can cause increased recreational disturbance to protected sites and Priority habitats. In some quiet, rural locations only a small increase in visitors to a site can damage wildlife interest. These potential impacts should be highlighted in the SPD with reference to sensitive habitats such as estuaries where increased recreational disturbance from rural development may have significant impact and therefore may not be appropriate.</p>		
<p>Tuddenham St Martin Parish</p>	<p>The response from Tuddenham St Martin Parish Council to this initial consultation document is that it is important that weight is</p>	<p>All Planning Applications must be assessed against national, local and neighbourhood planning policies. All</p>	<p>Consult Town and Parish Council on the draft SPD.</p>

<p>Council (Parish Clerk)</p>	<p>given to Parish Council comments as not all small villages are the same and any development should also take into account the size, character and location of the small village.</p>	<p>material objections are given weight when determining a planning application.</p> <p>We will consult Town and Parish Councils on the next stage of the development of this SPD which is the consultation on the draft SPD due to take place Autumn 2023. We will take into consideration all comments received.</p>	
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## Appendix 3: Initial Consultation Bodies

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

- Elected members
- Developers / landowners / agents / Architects
- Parish / Town Councils
- Suffolk County Council
- Broads Authority
- Great Yarmouth Borough Council
- South Norfolk Place Shaping Team
- South Norfolk District Council
- Babergh and Mid Suffolk District Council
- Ipswich Borough Council
- Natural England
- Environment Agency
- Suffolk Wildlife Trust
- River Waveney Trust
- Suffolk Coast and Heaths AONB
- National Trust
- Countryside Alliance Foundation
- Housing Associations / Groups
- Acorus Rural Property Services
- Home Builders Federations
- DEFRA
- NFU – East Anglia Region
- Tenant Farmers Associations
- Campaign for the Protection of Rural England
- Suffolk Farming & Wildlife Advisory Group
- CEFAS
- Anglian Water Services Ltd
- Norfolk Geodiversity Partnership
- Halesworth Tourism Group

## 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
- Suffolk and North East Essex Integrated Care Board
- Disability Forums
- Sustrans
- Sport England
- Fields in Trust
- Housing associations
- Other national, regional and local organisations and groups related to health, wellbeing, communities and natural environment.

### **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
- Forestry Commission
- Homes England
- Network Rail
- Norfolk County Council
- Suffolk Constabulary
- Theatres Trust
- NHS Suffolk and North East Essex Integrated Care Board
- Norfolk & Waveney Integrated Care Board

### **General consultation bodies**

- British Horse Society
- Royal Town Planning Institute (RTPI)
- Town and Country Planning Association
- West Suffolk Council

### **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
Twitter	15 <sup>th</sup> November 2023	 <p><b>East Suffolk Council</b> @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><b>East Suffolk Council</b> @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 🌟 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."

Poster



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.

## 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?

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

✉ [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 Rural Development Supplementary Planning Document (November 2023).

### Chapter 1 Introduction - Context

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
National Highways (Sir/Madam)	1	National Highways does not predict that the contents and items covered within the SPD will have any adverse impact on the Strategic Road Network (SRN). National Highways do not have any specific comments on the SPD. Standing advice was provided regarding climate change, the UK's aim to achieve net zero carbon status by 2050, and that action is needed to support a modal shift away from car travel	Comments noted.	No changes have been made to the SPD because of these comments.
Aldeburgh Town Council (Town Clerk)	10	Aldeburgh Town Council is pleased with the protection afforded by the National Landscape (formerly AONB) and seeks protection of the "curtilage" around the National Landscape, setting of the town and its countryside.	This Supplementary Planning Document (SPD) aims to provide advice and guidance to support planning policies in the Suffolk Coastal Local Plan and Waveney Local Plans. The SPD cannot set new planning policies, specific requirements or targets. The SPD cannot provide new planning policy protection for the "curtilage" of National Landscapes (formerly Areas of Outstanding Natural Beauty), the setting of Aldeburgh town or its surrounding countryside.	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	16	Request to mention the Broads in paragraph 1.2, particularly the impact of development on the setting of the Broads.	It is agreed that reference should be made to the Broads Authority area and the impact that development could have on the setting of the Broads.	Reference to the Broads has been made in paragraph 1.2.
Martlesham Parish Council (Diane Linsley)	19	Martlesham Parish Council notes the consultation documents should be circulated as widely as possible and each section should include a summary. The Parish Council supports the ideas in the document.	<p>The consultation was circulated widely with emails and letters sent to everyone on the with full details provided in the Consultation Statement.</p> <p>Each chapter has an introduction, a section briefly outlining the key planning policies addressed in the chapter, and policy guidance section that lists the topics covered in the chapter. We trust this provides a sufficient summary/ overview of the chapters contents for the reader.</p> <p>Support for the SPD is appreciated.</p>	No changes have been made to the SPD because of these comments.
Historic England (Debbie Mack)	26	Historic England welcomes references to heritage and the historic environment, and consider the SPD through and consistent with Historic England's advice.	Support for the SPD is appreciated.	No changes have been made to the SPD because of these comments.
Historic England (Debbie Mack)	28	Historic England encourages drawing on the knowledge of local conservation officers, the county archaeologist and local heritage groups.	During the drafting the SPD planning officers met regularly with a Steering Group that included Design and Conservation Officers. The SPD has been widely consulted on with comments received from the Suffolk County Council Archaeological Service.	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Benacre Company (Lucinda Hutson)	34	The Benacre Company in their conclusion have noted they want some changes to the SPD.	The comments provided by Benacre Company have been appreciated and responses to these detailed comments have been made in the relevant sections of the SPD.	Changes made in the relevant sections of the SPD.
Aldeburgh Town Council (Town Clerk)	36	Aldeburgh Town Council wishes to see permitted planning applications and their conditions fully implemented, particularly in regarding to landscaping. The Town Council suggests that the SPD reminds developers not to allow landscaping and other areas without which planning would be refused to remain incomplete. Aldeburgh Town Council congratulates East Suffolk Council for producing these policy documents. The Town Council notes that it is not represented on East Suffolk Council's Planning Committee and would welcome more direct contact with the Planning Department, such as short reports, briefings / precis is available and appropriate to alter it to any significant alterations and changes to the rules and regulation affecting the area.	Compliance and enforcement are important planning matters, but they are not matters for this SPD which seeks to provide detailed guidance to support planning policies in the Local Plans. East Suffolk Council recommends Aldeburgh Town Council report any and all compliance and implementation issues to East Suffolk Enforcement Officers in the Planning Department so they can be investigated and potentially action taken were necessary. Support for this SPD is appreciated. Where appropriate the SPD will amended in response to consultation comments received. East Suffolk Council will continue to consult Town and Parish Councils on the development of relevant planning documents and hold regular Town and Parish Forums.	No changes have been made to the SPD because of these comments.
Suffolk County Council (Georgia Teague)	40	References to the NPPF need updating following the publication of latest version in December 2023. References	It is agreed that references to the NPPF and National Landscapes all need updating.	All references to the NPPF and National Landscapes have been updated.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		to the AONB need changing to the new name, National Landscapes.		

## Chapter 2 Rural Worker Dwellings

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Kettleburgh Parish Council (Sonia Frost)	8	Concern that temporary accommodation, such as caravans or portacabins, could be converted to a permanent dwelling. A temporary dwelling should not become a precursor to a permanent permission being granted.	If the council deems it necessary to impose a temporary condition then it is a matter of monitoring and enforcement to ensure that a permanent form of accommodation is not created as opposed to a matter to be addressed within the SPD.	No changes have been made to the SPD because of these comments.

## Chapter 3 Rural Annexes

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Hollesley Parish Council (Judi Hallett)	4	Hollesley Parish Council totally disagree that an annex must share services.	Shared services including mains utility connections with the main dwelling are considered a characteristics of an annexe. Where an annexe does not meet the characteristics listed in paragraph 3.10, there is a risk that it will form an independent, new dwelling.	No changes have been made to the SPD because of these comments.
Liberal Democrats (Jules Ewart)	11	The respondent does not consider distance to alienate an annexe from a main dwellings and that greater flexibility should be given to	In rural locations larger plot sizes offer the opportunity for sizeable extensions, the construction of a detached buildings or the conversion of an ancillary/ outbuilding. In rural locations extra care must be taken that	No changes have been made to the SPD because of these comments.



Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		properties near the village envelope.	the proposed development is ancillary and well related as an annexe and does not result in the creation of new dwelling that is contrary to planning policy.	
Liberal Democrats (Jules Ewart)	12	The length of caravan stated in paragraph 3.28 is short and needs reviewing.	The length of caravan stated in paragraph 3.32 is taken from the Caravan Sites Act 1968. The SPD cannot set new planning policies or review national legislation.	No changes have been made to the SPD because of these comments.
Liberal Democrats (Jules Ewart)	13	States that the current document is not visionary enough and they would encourage greater independence from the main dwelling.	In rural locations larger plot sizes offer the opportunity for sizeable extensions, the construction of a detached buildings or the conversion of an ancillary/ outbuilding. In rural locations extra care must be taken that the proposed development is ancillary and well related as an annexe and does not result in the creation of new, independent dwelling that is contrary to national and local plan policy. The government, through the NPPF, does not support the creation of isolated dwellings in the countryside.	No changes have been made to the SPD because of these comments.
Liberal Democrats (Jules Ewart)	14	Paragraph 3.10 has an urban gauge and should have rural version.	Paragraph 3.10 lists the characteristics of an annexe. These characteristics are relevant to rural locations but may also apply to urban locations.	No changes have been made to the SPD because of these comments.

## Chapter 4 Rural Residential Curtilage Expansion

No comments received.

## Chapter 5 Rural Buildings and Barn Conversions

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Hollesley Parish Council (Judi Hallett)	5	Much of Chapter 5, Rural buildings and barn conversions, imposes endless rules about why conversions should not be contemplated.	Guidance is provided to assist in the implementation of planning policy and ensure the buildings are converted in a way that respects the original character of the building and ensures the building continues to have a positive impact on the character of the rural landscape.	No changes have been made to the SPD because of these comments.
Suffolk County Council Archaeological Service (Sir/Madam)	2	<p>Overall Historic England is very pleased with the guidance referring to conversions of rural buildings and barns.</p> <p>In section 5.38 add that a Heritage Statement should accompany any planning application for the conversion of historic agricultural buildings.</p> <p>In section 6.106 add reference to Suffolk HER and that a Heritage Statement should accompany any planning application for airfields with historically important buildings.</p>	It is agreed that paragraphs 5.38 and 6.108 should include reference to a Heritage Statement and that paragraph 6.108 should also include reference to a Suffolk Historic Environment Record (HER).	Paragraphs 5.38 and 6.108 updated to include references to Heritage Statements and Suffolk HER respectively.
Suffolk County Council (Georgia Teague)	20	Paragraph 5.12, 5.16, 5.14, 5.118, 5.135, 5.137, 5.141, and 5.143 should read “Flood Risk Assessment for any site at risk of flooding from any source.”	The relevant paragraphs quote from the General Permitted Development Order which cannot be changed. However, it is agreed that the SPD references to flood risk should be updated and links to the LLFA added.	A footnote has been added to the relevant text that states “The December 2023 NPPF requires a Flood Risk

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		<p>Paragraph 5.123 should include a link to the LLFA.</p>		<p>Assessment for any site at risk of flooding from any source.” A reference to Suffolk County Council as the Lead Local Flood Authority has been added to paragraph 5.126 together with a website link.</p>
<p>Historic England (Debbie Mack)</p>	<p>27</p>	<p>Para 5.4 The first sentence should also refer to the historic environment.</p> <p>Para 5.6 After the first sentence an additional sentence should be inserted to read: Opportunities should be sought to enhance the setting of listed buildings by the use of traditional design and techniques and appropriate external treatment.</p> <p>Para 5.8 We suggest that the text should make clear that Listed Building Consent will be needed for listed buildings for greater clarity.</p> <p>New para between 5.19 and 5.20, to explore the importance of</p>	<p>It is agreed that the SPD should be updated as suggested.</p>	<p>Paragraph 5.5 (formerly 5.4), 5.7 (formerly 5.6), and 5.9 (formerly 5.8) updated and new paragraphs 5.4 and 5.21 added.</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		<p>considering the most appropriate use of a barn.</p> <p>Para 5.20 We very much welcome this detailed section.</p>		
Benacre Company (Lucinda Hutson)	31	<p>The principle of utilise existing outbuildings or additional ranges for accommodation and storage rather than proposing any new extensions is supported, but it is likely to make a large number of traditional and smaller buildings totally unviable for conversion. These buildings are likely to be underutilised and fall into disrepair. Where there is an obligation to repair it can be a financial burden on the owner.</p> <p>The document should promote utilisation of these buildings in a sustainable manner to maintain them as part of the local heritage. It would be beneficial to comment on how applications will be viewed where buildings cannot be viably converted or utilised without additions or extensions.</p> <p>Rural buildings are often isolated and will almost always be required</p>	<p>The SPD aims to support the conversion of barns in a sustainable manner. Extensions should not be necessary but paragraph 5.58 notes that “limited extensions to the original building may be appropriate in exceptional circumstances if it enables the character of important internal spaces to be retained.” It is agreed that additional guidance regarding extensions should be provided.</p> <p>It is agreed that barn conversions are typically dependant on the private car.</p>	<p>New paragraph 5.4 has been added to clarify that barn conversion are typically dependant on the private car. Paragraph 5.59 has been added stating that justification for extensions should be provided in the Design and Access Statement or Heritage Statement.</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		via car. This should not preclude their conversion to the most suitable and economic use.		
Suffolk County Council (Georgia Teague)	38	It is recommended that chapter 5 is expanded to encourage suitable travel/ accessibility for all.	Barns are often permitted despite limited or no access to suitable public transport to enable the re-use and retention of the redundant buildings.	In chapter 5 a new paragraph 5.4 has been added to explain why the conversion of barns is permitted in rural and remote locations where the user may be dependant on the private car for transport.

## Chapter 6 Economic Development

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Suffolk County Council Archaeological Service (Sir/Madam)	3	Suffolk County Council Archaeology supports the guidance about the conversion of rural buildings and barns. It makes the importance of these buildings clear and it is good to see reference to the Suffolk Historic Environment Record and the Historic Farmsteads project. SCC also supports statement that historic airfields contain historic	Agreed. Paragraph in chapter 5 to be amended to refer to Heritage Statement. Paragraph in chapter 6 to be amended to refer to heritage assessment and Suffolk Historic Environment Record.	Add sentence to end of paragraph 5.38 to read: 'Any planning application for the conversion of an historic agricultural building should be accompanied by a Heritage Statement.' Add sentence to the end of paragraph

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		<p>buildings.</p> <p>Add text to paragraph 5.36 to state that a Heritage Statement should accompany applications for conversion of historic agricultural buildings. This, together with reference to the Suffolk Historic Environment Record, could also be added to paragraph 6.106.</p>		<p>6.108 to read: 'Any planning application for the conversion of an historic building should be accompanied by a Heritage Statement. Applicants seeking information on the history of a building should refer to the Suffolk Historic Environment Record.'</p>
<p>Broads Authority (Natalie Beal)</p>	<p>17</p>	<p>Paragraphs 6.23-6.25 - Need to provide guidance about biodiversity enhancements, particularly for development not subject to biodiversity net gain.</p> <p>Paragraphs 6.16, 6.29, 6.30 and 6.31 - Need to prove that lighting is justified.</p> <p>Paragraph 6.32 - Amend text to make reference to The Broads.</p> <p>Paragraph 6.35 - Amend text to make reference to The Broads.</p> <p>Paragraph 6.40 - Ament text to state that junction design should</p>	<p>Paragraphs 6.23-6.25 - Agreed.</p> <p>Paragraphs 6.16, 6.29, 6.30 and 6.31 - Agreed.</p> <p>Paragraph 6.32 - Agreed.</p> <p>Paragraph 6.35 - It is agreed that a reference to the Broads should be added. However the impact on the Broads should be minimised rather than eliminated as this is a more realistic and practical approach.</p> <p>Paragraph 6.40 - Agreed.</p> <p>Paragraph 6.69 (title) - Agreed.</p> <p>Paragraph 6.69 (text) - Agreed.</p>	<p>Previous paragraphs 6.24 and 6.25 replaced by new paragraph 6.25 that addresses biodiversity comments. Extra sentence added to end of paragraph 6.16 regarding security lighting. Extra sentence added to end of paragraph 6.30 regarding external lighting. Paragraph 6.32 and 6.35 updated with</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		<p>avoid removal of hedgerows.</p> <p>Paragraph 6.69 - Add reference to The Broads to the title.</p> <p>Paragraph 6.69 - Add reference to the setting of The Broads to the text.</p> <p>Paragraph 6.70 - Delete text at end of paragraph 6.69 and insert new title to refer to the Setting of Heritage Assets.</p> <p>Paragraph 6.79 - Amend text to make reference to the setting of The Broads.</p> <p>Paragraph 6.82 - Amend text to make reference to the setting of The Broads.</p> <p>Paragraph 6.124 - Amend text to make reference to the setting of The Broads.</p>	<p>Paragraph 6.70 - Agreed.</p> <p>Paragraph 6.79 - Agreed.</p> <p>Paragraph 6.82 - Agreed.</p> <p>Paragraph 6.124 - Agreed.</p>	<p>references to the Broads. - Paragraph 6.40 updated to include reference to the design of junctions and hedgerows. Paragraph 6.71 - Add '...and The Broads' to the end of the title and update references to the Broads in the text. New title added above paragraph 6.72. References to the Broads added to paragraph 6.80, 6.83, and 6.126.</p>
Suffolk County Council (Georgia Teague)	21	<p>Paragraph 6.18 - Add link to Local Flood Authority website.</p> <p>Paragraph 6.104 - Amend sentence 4 to state that a Floor Risk Assessment for sites that are</p>	<p>Paragraph 6.18 (now 6.19) - Agreed. Text amended.</p> <p>Paragraph 6.104 -It is agreed that text should be amended.</p>	<p>Paragraph 6.19 - Additional sentence added: 'Suffolk County Council is the Lead Local Flood Authority for Suffolk.</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		at risk of flooding from any source.		It is responsible for planning and coordinating the County's response to flooding.' Website address added as a footnote. Paragraph 6.104 - Sentence 4 amended to read as follows: 'A Flood Risk Assessment is required for all development sites that are at risk of flooding from any source.'
Suffolk County Council (Georgia Teague)	22	Reference in paragraphs 6.54 and 8.39 to the Suffolk Guidance for Parking needs updating to refer to 2023 version.	It is agreed that references to the Suffolk Guidance for Parking, NPPF and National Landscapes all need updating.	References to the Suffolk Guidance for Parking, NPPF and National Landscapes have all been updated.
Environmental Protection, East Suffolk Council (Environmental Protection)	24	The text fails to mention wider air quality issues. Reference is made to air quality standards PM2.5 and PM10.	Reference to PM2.5 and PM10 is too detailed for this SPD. General text about minimising dust and air quality will be added instead.	Additional text added to the end of paragraph 6.33: 'New proposals should also be designed so as to minimise dust and maintain air quality.'



Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Bentwaters Park Ltd (Sir/Madam)	29	<p>Evolution Town Planning is acting on behalf of the owners of Bentwaters Airfield and Debach Airfield. It objects to paragraphs 6.101, 6.103, 6.104, 6.105 and 6.106. This is because Bentwaters Parks and Debach Airfield were both converted from airfield to employment uses many years ago. As such, issues such as drainage and sewerage, flood risk, landscape impact and contamination have been resolved. Therefore these paragraphs should not apply to well established employment sites, unlike newly converted airfields.</p>	<p>Agreed. The text will be amended to make clear that it only applies to airfields recently converted to employment uses.</p>	<p>Paragraph 6.103 - Add sentence at end to read: 'Some former airfields have longstanding commercial uses and so these issues will already have been resolved.' Paragraph 6.105 - Amend sentence 1 to read: 'Some sites that are only just being converted to employment may be contaminated from previous uses.' Paragraph 6.106 - Add sentence at end to read: 'Many of these issues will already have been resolved where there are longstanding and well-established employment uses.' Paragraph 6.107 - Amend sentence 1 to read 'The impact of proposals for new</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
				conversions to employment use...'
Bentwaters Park Ltd (Sir/Madam)	30	<p>Objection received to paragraph 6.103 in the section on the Development of Former Airfields in chapter 6. The respondent wants the SPD to distinguish between developing and undeveloped former airfields. The respondent also wants flexibility when preparing planning applications for development on airfields that have well established industrial/ employment areas, particular at Debach and Bentwaters.</p>	<p>Planning applications for airfield developments should address land contamination, sewerage facilities, flood risk and drainage issues.</p> <p>Planning Policy SCLP12.35: Former airfield Debach requires investigation of contamination, adequate sewerage facilities, a Flood Risk Assessment, and a drainage strategy.</p> <p>Planning Policy SCLP12.40: Bentwaters Park states "the Council will permit new employment uses where they will not breach site, environmental and highway constraints identified and conditioned in the planning permission C/10/3239 approved 11/12/2015. Outside of those limits new employment uses will be permitted where they are supported by robust evidence which confirms that their individual and cumulative impacts are acceptable. In both circumstances, proposals should conform to local and national planning policy, particularly with regard to the environmental designations on and in close proximity to the site."</p> <p>Advice and guidance in the SPD is considered appropriate to support the implementation of the local plan policies.</p>	<p>Paragraph 6.105 has been updated to specify that requirement are subject to existing planning policy requirements.</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Benacre Company (Lucinda Hutson)	32	<p>Further clarity is needed about how diversity guidance applies to estates, where farming is one of several activities.</p> <p>Guidance needs to support a wide range of farm diversification uses. It is necessary that diversification schemes meet local demand.</p>	<p>It is agreed that further text is needed about how guidance applies to the management of large estates.</p> <p>The text also need to acknowledge the wide range of diversification schemes that exist. However, it will be added that each proposal for a diversification scheme will be decided on its merits.</p>	<p>The following text has been added to the end of paragraph 6.122 - 'The management of large estates can include a number of different activities, including farming. However, it is important that the farming element is protected alongside other uses. The Council is supportive of diversification schemes but does not want these to be at the expense of the original agricultural business.' The following text has been added to the end of paragraph 6.123 - 'There are many types of diversification. The Council will consider proposals for different types of diversification schemes on their</p>

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
				merits. Some of the most common types of diversification are considered later in this chapter'

## Chapter 7 Equestrian Development

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Hollesley Parish Council (Judi Hallett)	6	It appears that it is the presumption that equestrian development will be damaging, and your job is to stop it. We disagree with this presumption.	It is the intention that guidance assists in the implementation of planning policy and ensures that equestrian development positively impacts the character of the rural landscape and natural environment. It is not the presumption that all equestrian development is damaging, however where potential issues arise, mitigation measures need to be implemented to reduce negative impacts.	No changes required.
Suffolk County Council (Georgia Teague)	39	Support given for paragraphs 7.29 and 8.41.	Support appreciated.	No changes have been made to the SPD because of these comments.

## Chapter 8 Tourism Accommodation

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Liberal Democrats (Jules Ewart)	15	Suggests that the holiday condition requirement is rewritten to be temporary in accordance with its business need.	The SPD can provide guidance on its existing policies, but cannot rewrite the existing holiday condition requirements. Whilst the exact wording of the holiday condition can be guided by the SPD (an example condition is included), it must retain the key requirements of the policy. These are: permit holiday use only, restricted to a continuous period of 56 days by one person or persons within one calendar year, plus require a	No changes have been made to the SPD because of these comments.

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
			register of all lettings, to be made available at all times.	
Environmental Protection, East Suffolk Council (Environmental Protection)	23	Asked whether the document covers the different patterns of behaviour exhibited by residents of tourist accommodation compared to occupants of a residential property.	It is recognised that there may be different patterns of behaviour between normal residential properties and tourist accommodation with the potential for more disruption, accordingly a paragraph has been added to the next to reflect this.	A new paragraph 8.48 has been added.
Benacre Company (Lucinda Hutson)	33	<p>Wished to understand how the desire for year round tourism and holiday condition restrictions can be balanced.</p> <p>Also wished to have text that supports where existing parking and transport issues can be addressed by an application.</p>	<p>The desire for greater levels of year-round tourism has been put forward in the two local plans and the Tourism Strategy that helped inform them. The policies do not provide a preference to permanent or temporary structures, but there are additional criteria placed upon applications for permanent tourism accommodation. This is because permanent accommodation can come under pressure to be occupied for full time residential use. The policy allows for a diversity of accommodation types subject to a criteria will ensuring inappropriate residential development is not an outcome.</p> <p>Developments within East Suffolk would be expected to meet other policy such as WLP8.29, WLP8.21, SCLP7.1, SCLP7.2 and SCLP11.1 which outline parking requirements as well as the need to meet parking standards provided by Suffolk County Council. These policies are universal and do not specifically relate to topics in the Rural Development SPD.</p>	No changes have been made to the SPD because of these comments.

## Chapter 9 Small Scale Renewable Energy Generation

Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
Broads Authority (Natalie Beal)	18	Add information on the Broads and refer to the Landscape Character Assessment.	It is agreed that additional reference to the Broads and the Landscape Character Assessment should be added.	New paragraph 9.42 added which includes reference to wind turbines, the Broads and the Broads Landscape Character Assessment.
Environmental Protection, East Suffolk Council (Environmental Protection)	25	Additional information required for sections on biomass boilers, wind turbines and anaerobic digestion plants, including the need for air quality assessments and consideration of noise impacts.	It is agreed that additional information should be included.	New paragraph 9.34 added regarding the impact of biomass boilers on air quality and the need for an air quality impact assessment. New sentence added to end of paragraph 9.38 regarding noise impact of wind turbines. New sentence added to beginning of paragraph 9.49 regarding air quality assessments for anaerobic digestions plants.

<b>Name/ Organisation</b>	<b>Comment ID/ Ref.</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Aldeburgh Town Council (Town Clerk)	35	Aldeburgh Town Council requests stronger guidance on air source heat pumps including signposting to other sources of information. The Town Council requests guidance on air source heat pumps' suitability, noise insulation, running costs, and need for secondary means of heating.	It is agreed the document could provide more information regarding heat pumps.	New paragraph 9.42 added which includes reference to wind turbines, the Broads and the Broads Landscape Character Assessment.
Environmental Protection, East Suffolk Council (Environmental Protection)	37	Heat pumps have the potential to generate noise, and this should be considered during the design.	It is agreed that heat pumps can generate noise, and this should be noted in the SPD.	New paragraph 9.28 added regarding heat pump noise.

## Chapter 10 Wastewater Management in Rural Areas

<b>Name/ Organisation</b>	<b>Comment ID/ Ref.</b>	<b>Comment Summary</b>	<b>Council Response</b>	<b>Action</b>
Hollesley Parish Council (Judi Hallett)	7	The document makes it clear that not only new property, but existing property with private sewerage systems, must comply with the current regulations for new property regarding this.	Comment noted.	No changes have been made to the SPD because of these comments.
Anglian Water Services Ltd (Tessa Saunders)	9	Anglian Water welcomes reference to their role as the statutory sewerage undertaker for East Suffolk. The PR24 Business Plan 2025-2030 sets out Anglian Water plans for the	Comments noted.	No changes have been made to the SPD because of these comments.



Name/ Organisation	Comment ID/ Ref.	Comment Summary	Council Response	Action
		future. The comments set out the three conditions that must be met for Anglian Water to provide a public sewer.		

**Write to us**



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