



Cabinet

Members are invited to a **Meeting of the Cabinet** to be held in the Deben Conference Room, East Suffolk House, Melton, on **Tuesday, 4 June 2024 at 6.00pm.**

This meeting will be broadcast to the public via the East Suffolk YouTube Channel at <https://youtube.com/live/zMWHQ2ewZa0?feature=share>.

Members:

Councillor Caroline Topping (Leader of the Council), Councillor David Beavan (Deputy Leader and Housing), Councillor Paul Ashton (Corporate Services – Digital, Customer Services, HR and Assets), Councillor Jan Candy (Community Health), Councillor Tom Daly (Energy and Climate Change), Councillor Toby Hammond (Economic Development and Transport), Councillor Vince Langdon-Morris (Resources and Value for Money), Councillor Sally Noble (The Environment), Councillor Sarah Whitelock (Communities, Culture, Leisure and Tourism), Councillor Kay Yule (Planning and Coastal Management)

An Agenda is set out below.

Part One – Open to the Public

Pages

- 1 Apologies for Absence**
To receive apologies for absence, if any.
- 2 Declarations of Interest**
Members and Officers are invited to make any declarations of interests, and the nature of that interest, that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered.
- 3 Announcements**
To receive any announcements.
- 4 Minutes** **1 - 12**
To confirm as a correct record the minutes of the meeting held on 7 May 2024.

KEY DECISIONS

- 5 Healthy Environments Supplementary Planning Document ES/1967** **13 -**
Report of the Cabinet Member with responsibility for Planning and Coastal Management. **420**

Part One – Open to the Public		Pages
6	Revised East Suffolk Council Local Discretionary Rate Relief Policy ES/1968 Report of the Cabinet Member with responsibility for Economic Development and Transport.	421 - 435
7	Supplementary Housing Statement and Suffolk Landlords Booklet (Houses in Multiple Occupation) ES/1969 Report of the Deputy Leader and Cabinet Member with responsibility for Housing.	436 - 490
8	East Suffolk Council UK100 membership ES/1970 Report of the Cabinet Member with responsibility for The Environment.	491 - 498
 NON-KEY DECISIONS		
9	Tenant Engagement Strategy Consultation Launch ES/1971 Report of the Deputy Leader and Cabinet Member with responsibility for Housing.	499 - 535
10	Appointments to Outside Bodies for 2024/25 (Executive Functions) ES/1973 Report of the Leader of the Council.	536 - 546
11	Exempt/Confidential Items It is recommended that under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act.	

Part Two – Exempt/Confidential		Pages
12	Exempt Minutes <ul style="list-style-type: none"> • Information relating to the financial or business affairs of any particular person (including the authority holding that information). 	
 KEY DECISIONS		
13	East Suffolk Housing Pathway <ul style="list-style-type: none"> • Information relating to the financial or business affairs of any particular person (including the authority holding that information). 	
14	Housing Maintenance Procurement <ul style="list-style-type: none"> • Information relating to the financial or business affairs of any particular person (including the authority holding that information). 	

Close



Chris Bally, Chief Executive

If you require this document in large print, audio or Braille or in a different language, please contact the Democratic Services Team on 01502 523521 or email: democraticservices@eastsoffolk.gov.uk

Filming, Videoing, Photography and Audio Recording at Council Meetings

The Council, members of the public and press may record / film / photograph or broadcast this meeting when the public and press are not lawfully excluded.

The Council cannot guarantee public seating areas will not be filmed or recorded. By entering the Conference Room and sitting in the public seating area, those present will be deemed to have consented to the possible use of filmed images and sound recordings. If you do not wish to be recorded, please speak to a member of the Democratic Services team at the earliest opportunity.



The national Charter and Charter Plus Awards for Elected Member Development

East Suffolk Council is committed to achieving excellence in elected member development

www.local.gov.uk/Community-Leadership

Unconfirmed



Minutes of a Meeting of the **Cabinet** held in the Conference Room, Riverside, on **Tuesday, 07 May 2024 at 6:00 PM**

Members of the Cabinet present:

Councillor Paul Ashton, Councillor David Beavan, Councillor Jan Candy, Councillor Tom Daly, Councillor Toby Hammond, Councillor Vince Langdon-Morris, Councillor Sally Noble, Councillor Sarah Whitelock, Councillor Kay Yule

Other Members present:

Councillor Peter Byatt, Councillor Louise Gooch, Councillor Alan Green, Councillor Mark Jepson, Councillor Lee Reeves

Officers present: Chris Bally (Chief Executive), Chris Bing (Head of Legal and Democratic Services), Kerry Blair (Head of Operations), Kate Blakemore (Strategic Director), Cassandra Clements (Managing Director ESSL), Tom Darling-Fernley (Customer Experience Development Manager), Lorraine Fitch (Democratic Services Manager), Phil Harris (Strategic Communications and Marketing Manager), Andy Jarvis (Strategic Director), Nick Khan (Strategic Director), Sandra Lewis (Head of Digital, Programme Management and Customer Services), Matt Makin (Democratic Services Officer), Andrea McMillan (Interim Joint Head of Planning), Robert Newell (Finance Director ESSL), Dickon Povey (Principal Planner (Policy and Delivery)), Anthony Taylor (Senior Planner (Policy and Delivery))

1 Apologies for Absence

Apologies for absence were received from the Leader, Councillor Caroline Topping.

2 Declarations of Interest

Councillor Jan Candy declared an Other Registerable Interest in Item 10, Spa Beach Huts, Felixstowe, as she was a member of Felixstowe Town Council, She also declared a Disclosable Pecuniary Interest as she held a lease for a beach chalet in Felixstowe. Councillor Candy did not take part in any debate and she did not vote on item 10 of the agenda.

Councillor Mark Jepson declared a personal interest as a beach hut owner in Felixstowe.

3 Announcements

Cabinet Members

The Chair, Deputy Leader Councillor Beavan thanked Matt Makin, Democratic Services Officer for his work with East Suffolk Council and wished him well in his new job with Peterborough City Council.

4 Minutes

On the proposition of Councillor Candy, seconded by Councillor Hammond, it was unanimously

RESOLVED

That the Minutes of the meeting held on 9 April 2024 be agreed as a correct record and signed by the Chair.

5 Self-build Housing Supplementary Planning Document

Councillor Yule, the Cabinet Member with responsibility for Planning and Coastal Management introduced report **ES/1934** which related to the adoption of the Custom and Self-build Housing Supplementary Planning Document (the SPD).

East Suffolk had two Local Plans, the Suffolk Coastal Local Plan and Waveney Local Plan, which contain planning policies that relate to custom and self-build housing.

East Suffolk Council, alongside every other local planning authority, was subject to three legal duties in respect of custom and self-build housing, namely:

To hold a register of those interested in custom and self-build housing.

To have regard to that register when carrying out planning, housing, land disposal and regeneration functions, and

To grant enough planning permissions for custom and self-build housing to meet the demand on the register.

The Custom and Self-build Housing Supplementary Planning Document had been prepared in recognition of these legal duties and to support the implementation of planning policies.

The preparation of the SPD has been undertaken through an officer steering group and had involved officers from Planning Policy and Delivery, Major Sites, Design and Heritage, Infrastructure, Housing and had also been overseen by the Local Plan Working Group.

An initial consultation to inform the scope and content of the SPD was carried out between 1 February and 16 March 2023. In total 40 individuals and organisations responded to the consultation. The responses received to the initial stage of

consultation were used to inform the preparation of the draft SPD which was subsequently subject to a public consultation.

The second consultation was on the Draft SPD, which ran from 6 September until 18 October 2023. In total, 21 individuals and organisations responded to the consultation. Between them they made 71 comments. Various changes have been made to the SPD to address the comments received.

The SPD covers the following topics – Affordable custom and self-build housing, serviced plots, Community Infrastructure Levy, phasing, design codes, plot passports, marketing strategy, model conditions, and model section 106 obligations.

Once adopted the new SPD will form part of a suite of SPDs which are material considerations when determining planning applications.

Councillor Yule referenced the positive response from the Rural Services Network regarding the recently adopted Rural Development Supplementary Planning Document. The Rural Services Network state on their website that “East Suffolk Council’s new SPD is an exceptional example of guiding rural development in a way that balances growth with preservation.”

There were no questions from Cabinet Members

There were no questions from other Members present.

Councillor Yule offered thanks to officers for their work.

On the proposition of Councillor Yule, seconded by Councillor Candy it was unanimously

RESOLVED

1. That the Custom and Self-build Housing Supplementary Planning Document be adopted.
2. That the Head of Planning and Coastal Management be authorised, in consultation with the Cabinet Member for Planning and Coastal Management, to make any presentational or typographical amendments to the Custom and Self-build Housing Supplementary Planning Document prior to it being published.

6 Relocating Customer Services to Lowestoft Library

Councillor Ashton, the Cabinet Member with responsibility for Corporate Services - Digital, Customer Services, HR & Assets, introduced report **ES/1935** which related to the relocation of the of Customer Services to Lowestoft Library.

The decision would support relocation of East Suffolk Council’s front-facing reception and core contact centre from Marina Centre to Lowestoft Library. This was in direct response to the need to vacate the existing facility to enable the Cultural Quarter

development, forming one part of five projects of the Lowestoft Towns Deal. It would secure the provision of a tangible front-facing service option in the town centre.

Councillor Ashton detailed the cost implications of the relocation and refit as outlined in the report. There would be a combination of a lease and licence with Suffolk County Council and Suffolk Libraries which was an independent charity. The new space would require a refit. Office related furniture would be transferred and redeployed to the new location.

There were no questions from Cabinet Members.

Councillor Byatt queried if there was assurance of being able to offer a confidential space for customers should it be required. The Customer Experience Development Manager responded to state the layout of the space was self-contained and there was an intention to improve the offer for customers inclusive of there being confidential space available.

Councillor Byatt queried if the opening hours would be the same. Councillor Ashton responded that there would be consideration for opening hours. The Head of Digital and Programme Management added that there would be an intention for the Customer Service Centre to be open five days a week, which was an increase from the current three-day offer for walk in / face to face contact.

Councillor Ashton added that there would be flexibility in staff provision to respond to both walk in and telephone contact.

On the proposition of Councillor Ashton, seconded by Councillor Hammond, it was unanimously

RESOLVED

1. That the relocation of the Council's public reception and core contact centre from the Marina Centre to within part of Lowestoft Library be approved.
2. That the Council entering (a) a five-year lease with Suffolk County Council for the core contact centre space and (b) and a five-year licence to occupy with Suffolk's Libraries IPS Ltd for the public reception and back-office spaces be approved.
3. That the additional budget in the Capital Programme of £165,000 to support the relocation, and for this to be profiled across 2024-25 and 2025-26 as per paragraph 4.4, be approved.
4. That the use of Customer Services' existing revenue reserves to fund the addition to the capital programme.

7 North Falls Offshore Wind Farm – Nationally Significant Infrastructure Project – Application for development consent under the 2008 Planning Act – East Suffolk Council's position and delegation to enable full participation in the process

Councillor Daly, the Cabinet Member with responsibility for Energy & Climate Change, introduced report **ES/1936** which related to the North Falls Offshore Wind Farm.

East Suffolk Council (ESC) would be directly involved as a statutory consultee on a number of energy related Nationally Significant Infrastructure Projects (NSIPs). The examination process for applications when submitted to the Planning Inspectorate was very tight in terms of timescales for the submission of representations and responses, requiring the Council to have the ability to act very swiftly to enable full engagement in the process and represent the views of the council and local communities.

Councillor Daly guided attendees of the meeting through a presentation which was shared online and for those in the room.

The presentation summarised that:

The extension project to the existing 504MW Greater Gabbard Offshore Wind Farm

The North Falls was located 42km offshore - approximately 90km² (illustrated yellow on map).

Northern array abandoned due to offshore site constraints and SLVIA impacts on Suffolk and Essex Coast and Heaths National Landscape (formerly SCHAONB).

There would be up to 71 wind turbines – 397m tall.

Onshore connection was proposed at Lawford in Tendring, Essex.

DCO would include offshore connection options - potentially with the NGET SeaLink subsea cable reinforcement project between Suffolk to Kent – due to connect at Friston, East Suffolk.

The North Falls application for development consent was expected to be submitted in July 2024.

ESC was not the host authority – no NSIP infrastructure proposed in district.

ESC was a statutory consultee with a responsibility to respond to the relevant submissions to represent our view as the Local Authority.

ESC had been engaging in DCO pre-application process for Seascape and Landscape Visual Impacts (SLVIA) anticipated on the Suffolk and Essex Coast and Heaths National Landscape (formerly SCHAONB).

Councillor Langdon-Morris queried if there was infrastructure in place already regarding the options of going onshore at Tendering or at another location.

Councillor Daly responded that the North Shore Coordination Strategy invites applicants such as those discussed to come in on the Offshore Coordination Scheme. Northfalls have shown an interest which is why it had been left open to connect up on the offshore vision.

Councillor Whitelock advocated for the residents of Friston who continue to be negatively impacted by the work and future plans for work in the village and echoed the sense of desperation that residents feel.

Councillor Daly agreed with Councillor Whitelock and confirmed that in meetings they had questioned the need to potentially loop connections along the coastline rather than going directly to the end point.

Councillor Jepson queried what the options were to provide influence.

Councillor Daly stated that the role was within the consultation to advocate for the area and local communities. There was more for some and less for others. Regarding the item in question the emphasis was on minimising the visual impact and making sure the plans were clear and feedback could be provided on issues such as looping connections back into the area and coming onshore.

Councillor Byatt questioned if there was a mathematical grid which stated how far out you have to go and if there was a limit on how large the structures could be constructed in the future.

Councillor Daly responded that the technology supporting the turbines was fascinating and projected that there would come a point where there would be dis-economies of scale. Councillor Daly was not sure where there was a maximum size. Regarding the visual impact, participation in conversations would continue to ensure the Council's voice was heard.

Councillor Candy offered her support and added that her home residence overlooked the offshore wind farms from where she lived and she believed it to be a necessary part of the energy structure for the future.

On the proposition of Councillor Daly, seconded by Councillor Hammond it was unanimously

RESOLVED

That Cabinet:

1. Supported the position to not object to the North Falls project with a radial connection to Essex providing the offshore turbines do not have a significant impact on the Essex and Suffolk Coast and Heaths National Landscape but to also continue to support offshore coordination which reduces/minimises the extent of onshore infrastructure.
2. Delegated powers to the Head of Nationally Significant Infrastructure Planning Projects, in consultation with the specific Cabinet Member(s), to act on behalf of the Council in all activities associated with the examination and post examination/consent phases of the project including the signing of any legal agreements/side agreements/memorandum of understandings.

8 Five Estuaries Offshore Wind Farm – Nationally Significant Infrastructure Project – Application for development consent under the 2008 Planning Act – East Suffolk Council’s position and delegation to enable full participation in the process

Councillor Daly, the Cabinet Member with responsibility for Energy and Climate Change, introduced report **ES/1937** which related to the Five Estuaries Offshore Wind Farm.

East Suffolk Council (ESC) would be directly involved as a statutory consultee on a number of energy related Nationally Significant Infrastructure Projects (NSIPs). The examination process for applications when submitted to the Planning Inspectorate was very tight in terms of timescales for the submission of representations and responses, requiring the Council to have the ability to act very swiftly to enable full engagement in the process and represent the views of the council and local communities. In discussions between the Cabinet Member and the officer team, it had been agreed that a practical way forward for a number of these schemes is to present a report for Cabinet’s consideration and agreement in advance of the formal submission to the Planning Inspectorate (PINS) (noted however that Five Estuaries recently submitted their application to PINS on 25th March 2024).

Councillor Daly guided attendees of the meeting through a presentation which was shared online and for those in the room.

The Five Estuaries Offshore Windfarm was an extension project to the existing 353MW Galloper Offshore Wind Farm.

The Five Estuaries was located approximately 37km offshore – split across two arrays covering total 128km² with up to 79 wind turbines – 395m tall.

The onshore connection was proposed at Lawford in Tendring, Essex – there was no offshore connection options included in DCO order limits.

DCO application submitted for examination 25th March 2024.

ESC was not the host authority, there was no NSIP infrastructure proposed in district, however Lesser Black-backed Gull habitat compensation proposed at Orford Ness.

ESC was a statutory consultee with a responsibility to respond to the relevant submissions to represent the view of the Local Authority.

ESC had been engaging in DCO pre-application process for Seascape and Landscape Visual Impacts (SLVIA) anticipated on the Suffolk and Essex Coast and Heaths National Landscape (formerly SCHAONB).

ESC also engaging in habitat compensation discussions and had been engaging in the pre application process.

Councillor Langdon-Morris questioned why it seemed so easy for it to come onshore in Essex.

Councillor Daly responded that the other areas would have issue to onshore build.

Councillor Langdon-Morris followed up that regarding previous discussions around Aldeburgh and Southwold and if they were separate companies bringing power on onshore separately and if there was coordination of shared cables available.

Councillor Daly responded that they were engaged with the Offshore Coordination Scheme. There was lack of strategy , overview and central plan at the present time.

Councillor Byatt looking at new super turbines, touched on before and expressed concerns regarding cable capacity and infrastructure. Councillor Byatt queried how much success there had been in engaging with the suppliers to ensure they are looking after the environment as well as meeting the power need.

Councillor Daly stated that the Council was adamant in all responses that there is a desire for more offshore efforts which do not damage the onshore. There had been meetings with EDSO where various models of what offshore coordination could look like had been presented. Some of which were worse than what was in place already. There was engagement with Suffolk County Council colleague and to make the final model as community friendly as possible.

On the proposition of Councillor Daly, seconded by Councillor Hammond, it was unanimously.

RESOLVED

That Cabinet:

1. Supported the position to not object to the Five Estuaries project with a radial connection to Essex, providing the offshore turbines do not have a significant impact on the Essex and Suffolk Coast and Heaths National Landscape but to also continue to support offshore coordination which reduces/minimises the extent of onshore infrastructure.
2. Continued to closely monitor and scrutinise the potential residual seascape visual impacts introduced on the National Landscape. Whilst the project has reduced the proposed maximum wind turbine height to less than 400m tall, the closest wind turbines remain at a distance of 37km offshore which will be visible from the designated landscape.
3. Delegated powers to the Head of Nationally Significant Infrastructure Planning Projects, in Consultation with the specific Cabinet Member(s), to act on behalf of the Council in all activities associated with the examination and post examination/consent phases of the project including the signing of any legal agreements/side agreements/memorandum of understandings.

9 Resilience and Emergency Response Fund

Councillor Langdon-Morris, Cabinet Member with responsibility for Resources and Value for Money, introduced report **ES/1938** which related to the Reliance and Emergency Fund.

Storm Babet caused widespread flooding and disruption to East Suffolk between Friday 20 October and Sunday 22 October 2023. In response to the incident a Resilience Reserve of £500,000 was established at Full Council on the 21 February 2024. The report presented the terms of reference outlining how the reserve would be used, to be renamed as the Resilience and Emergency Response Fund.

Councillor Byatt queried if the Council could recoup any funds from residents household insurance for the hire of skips. Councillor Byatt also asked if there was any issue with procuring the hire of skips during that time and if there was scope to look at the Council having a fleet of skips for use.

The Head of Operations advised that during the storm clear up ESC was working with East Suffolk Services Limited (ESSL) who did provide skips and resources to assist. There could be an opportunity to reclaim some funding through the Bellwin scheme, which could support Council's additional costs due to the flooding incidents. The Head of Operations concluded that the wider remit was to understand what communities need and to consider how to prevent incidents from occurring.

Councillor Langdon-Morris added that it was important to have the provision to support the existing structures in place and increase the capacity of the Council to be able to respond if required. Councillor Langdon-Morris thanked Officers and the Chief Executive for their work on over the last 6 months.

On the proposition of Councillor Langdon-Morris, seconded by Councillor Noble who echoed support for the proposal. It was unanimously

RESOLVED

1. That the terms of reference for the Resilience and Emergency Response Fund outlined in Appendix A be approved.
2. That the appointment of a new 'Coordinator/Convenor' role and the associated supplementary budget requirement totalling £96,713 for an initial two years starting in 2024/25, to provide a communication, coordinating and enabling role for residents and communities, acting as a point of contact for residents to support them prior to, during and after a climate related emergency be approved.

10 Spa Beach Huts, Felixstowe

Councillor Paul Ashton, Cabinet Member with responsibility for Corporate Services – Digital, Customer Services, HR and Assets, introduced report **ES/1939** which related to Spa Beach Huts in Felixstowe.

The Spa Beach Huts were originally situated in an area between the Victorian shelter (bottom of Bent Hill) and the end of the Spa Gardens (where there is a community building known as "The Hut"), on Felixstowe Sea front. They have been there since the

1880s, and some of the huts are the original Victorian structures. Concerns about beach erosion in this area were first raised by the Felixstowe Beach Hut and Chalet Association (FBHCA) in July 2017. Diminishing sand levels forced the removal of huts onto the promenade that same year. Initially 9 huts were moved to their winter position on the prom, by the end of the year this had increased to the full 54.

The Council had since worked to relocate all beach hut owners into other locations across Felixstowe, however 14 beach hut owners had yet to be relocated. Working in partnership with the 14 beach hut owners the report presented to Cabinet a proposal to relocate the 14 beach hut owners back to their historic position, by way of situating them on platforms rather than directly on the sand.

Councillor Ashton commended the efforts of the 14 residents who have submitted a planning application to re site the beach huts on platforms near to where were before. Negotiations were close to being completed and the report was to finalise the process. There was some risk of damage to the platforms and concerns regarding the beach scene during the winter months. However, considering options and alternatives the re siting of the 14 huts was deemed a good solution. The beach hut owners would be taking the risk of the platforms and getting them built. East Suffolk Council would not be taking a significant financial risk in approving the recommendations.

There were no questions from Cabinet.

Councillor Jepson declared a personal interest as a beach hut owner. Councillor Jepson queried what would happen if the other beach hut owners wanted to move their beach huts back to the original location.

Councillor Ashton responded to state there had been consideration to the other 33 beach hut owners who had moved locations. The 14 remaining were sited further from the main heritage area than the others and if they wished to move back a planning process would need to followed. Councillor Ashton suspected there would be considerable challenges to planning applications and noted that liabilities for the platforms would sit with the beach hut owners.

Councillor Ashton clarified point two of the recommendations had some flexibility built in, that should the 20-year lease be something that the Council would want to change in negotiations, Councillor Ashton would have the authority to do this.

Councillor Candy did not participate in the debate and did not vote on the item.

On the proposition of Councillor Ashton, seconded by Councillor Daly it was by majority vote

RESOLVED

That Cabinet:

1. That the proposal to allow the Felixstowe Spa Beach Huts Association to build 14 beach hut platforms pursuant to planning permission DC/23/2089/FUL be approved.

2. That the Strategic Director for Corporate Services be delegated, in consultation with the Cabinet Member with responsibility for Corporate Services – Digital, Customer Services, HR and Assets, the authority to enter into an Agreement, on terms that best protect the Council’s interest, with the Felixstowe Spa Beach Huts Association (or any successor organisation) for the building of 14 beach hut platforms pursuant to planning permission DC/23/2089/FUL.

3. That the Strategic Director for Corporate Services be delegated, in consultation with the Cabinet Member with responsibility for Corporate Services – Digital, Customer Services, HR and Assets, the authority to enter into individual leases for a term of 20 years with the 14 Spa Beach hut owners who have yet to be successfully relocated elsewhere in Felixstowe.

11 Exempt/Confidential Items

It was proposed by Councillor Hammond, seconded by Councillor Ashton and by a unanimous vote

RESOLVED

That under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act.

12 Exempt Minutes

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

13 The Sale of 5 & 6 Newcombe Road, Lowestoft, Suffolk, NR32 1XA

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

14 East Suffolk Services Business Plan 2024-27

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

15 Proposed long lease of Notcutts (sports ground) Park

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

16 Minor acquisition of Land, Felixstowe Ferry

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

The meeting concluded at 7:40pm

.....
Chair



Committee	Cabinet
Date	04/06/2024
Subject	Healthy Environments Supplementary Planning Document
Cabinet Member	Councillor Kay Yule Cabinet Member with responsibility for Planning and Coastal Management
Report Author(s)	Jasmin Machen Planner (Policy and Delivery) jasmin.machen@eastsoffolk.gov.uk
Head of Service	Ben Woolnough Head of Planning and Coastal Management ben.woolnough@eastsoffolk.gov.uk
Director	Nick Khan Strategic Director nick.khan@eastsoffolk.gov.uk

Key Decision?	Yes
Is the report Open or Exempt?	OPEN

Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
---	----------------

Purpose/Summary

The purpose of this report is to recommend the adoption of the Healthy Environments Supplementary Planning Document ('Healthy Environments SPD'). The Healthy Environments SPD supports the implementation of policies relating to supporting health and wellbeing in the East Suffolk Council – Suffolk Coastal Local Plan and East Suffolk Council – Waveney Local Plan.

The Healthy Environments SPD provides guidance on a range of topics including the planning and design of the following provision for all ages and abilities and to increase inclusivity: green open spaces, play provision, sustainable drainage (SuDS) schemes, landscaping, Suitable Alternative Natural Green Space (SANG), active travel infrastructure, streets (via Suffolk Design: Streets Guide), homes, school sites, employment sites, centres, and community facilities.

The Healthy Environments SPD also includes guidance on the key health challenges for the district, Health Impact Assessments (HIA), and environmental quality matters, encompassing environmental protection and residential amenity matters.

Recommendation(s)

That Cabinet:

1. Adopts the Healthy Environments Supplementary Planning Document.
2. Authorises the Head of Planning and Coastal Management, in consultation with the Cabinet Member for Planning and Coastal Management, to make any presentational or typographical amendments to the Healthy Environments Supplementary Planning Document prior to it being published.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact

The Healthy Environments SPD particularly supports the following aims:

- **'Supporting sustainable transport'**: through providing planning and design guidance on active travel infrastructure and deferring to Suffolk County Council's Suffolk Design: Streets Guide (2022) for the design of healthier, safer streets.
- **'Restoring ecosystems and biodiversity'**: through providing planning and design guidance on green infrastructure, including increasing biodiversity for wellbeing benefits.
- **'Encourage food self-sufficiency'**: through promoting the provision of private or semi-private external space that is suitable for growing food at home, and planning and design guidance for allotments, community gardens and orchards.
- **'Preserve and maintain the district's beauty and heritage'**: through providing guidance on the mutual benefits of co-designing green infrastructure and heritage assets, and designing streets and active travel infrastructure that are appropriate for historic environments.

Sustainable Housing	<p>The Healthy Environments SPD particularly supports the following aims:</p> <ul style="list-style-type: none"> • ‘Deliver the right housing based on communities’ need’: through providing guidance on the planning and design of homes that meet needs by supporting healthy behaviours and that are set in a high quality environment. • ‘Promote housing developments which enhance wellbeing and protect the environment’: providing guidance on the design and delivery of residential developments for increased health and wellbeing is one of the key purposes of the Healthy Environments SPD. • ‘Promote community pride in homes and neighbourhoods’: through encouraging higher quality developments overall, particularly at neighbourhood scale, helping to support place attachment and pride of place.
Tackling Inequalities	<p>The Healthy Environments SPD particularly supports the following aims:</p> <ul style="list-style-type: none"> • ‘Reduce health inequality and improve wellbeing’: providing guidance on the design and delivery of developments that reduce health and social inequality and separation between different groups within communities is one of the key purposes of the Healthy Environments SPD. • ‘Take action to improve community safety and reduce anti-social behaviour’: supporting the delivery of safer streets and active travel infrastructure and more secure developments is one of the key purposes of the Healthy Environments SPD.
Thriving Economy	<p>The Healthy Environments SPD particularly supports the following aims:</p> <ul style="list-style-type: none"> • ‘Increase the economic viability of our towns’: through providing guidance on the creation of centres that are compact, complete and connected, therefore supporting businesses through enabling accessible and inclusive active travel to, from and within centres.

Justification for recommendations

1. Background

1.1 The Council has two adopted Local Plans: the East Suffolk Council – Waveney Local Plan (adopted March 2019) and the East Suffolk Council – Suffolk Coastal Local Plan (adopted

September 2020). The Local Plans each contain a number of policies relating to the health and wellbeing policy area, rather than a single dedicated 'health and wellbeing' policy in each Local Plan.

- 1.2 The Healthy Environments Supplementary Planning Document ('Healthy Environments SPD') has been prepared to support the implementation of policies contained in the adopted Local Plans that are relevant to this topic area, as well as being consistent with Government policy, principally that contained within the National Planning Policy Framework and supporting Planning Practice Guidance on the topic areas covered.
- 1.3 On adoption the Healthy Environments SPD will be a material consideration in the determination of applications for planning permission and listed building consent. An SPD cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses; this is the role of the Local Plans and Neighbourhood Plans. The Healthy Environments SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
- 1.4 There is currently no SPD for either of the former district areas that covers the quality of built environments for supporting health, wellbeing, and inclusion as a whole topic area; both areas have existing guidance relating to the design and delivery of new open space, though these documents are now dated.
- 1.5 The Healthy Environments SPD is intended to supersede the following documents:
 - SPG15 Outdoor Playing Space (2001) (playing fields and equipped play provision) – this relates to the former Suffolk Coastal area;
 - Waveney Open Space Provision & Developer Contributions SPD (2012) – this relates to the former Waveney area; and
 - The introduction section to the Waveney Green Infrastructure Strategy (2015) – this relates to the former Waveney area.
- 1.6 The Healthy Environments SPD is intended to support the delivery of the following Council strategies:
 - The Waveney Green Infrastructure Strategy (2015) (green open space provision in former Waveney area only)
 - Leisure Strategy (2021) (green open space, playing pitches and outdoor sports facilities, indoor and built sports facilities)
 - The East Suffolk Play Area Strategy 2022-2027 (2023) (equipped play provision)
 - The East Suffolk Cycling & Walking Strategy (2022) (active travel infrastructure provision)
 - The Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (2021) (Suitable Alternative Natural Greenspace provision)
- 1.7 The Healthy Environments SPD makes cross-references to other guidance documents provided by the Council where relevant, such as the Sustainable Construction SPD and Affordable Housing SPD.

- 1.8 The Healthy Environments SPD formally endorses use of Suffolk County Council’s Suffolk Design: Streets Guide (2022) to guide street and active travel infrastructure design and delivery, therefore giving the Guide more ‘weight’ for consideration in planning decisions.
- 1.9 The Healthy Environments SPD content has been produced in accordance with topic-specific national and county level key external guidance such as (but not limited to):
- Fields in Trust (2015) Guidance for Outdoor Sport and Play Beyond the Six Acre Standard (England)
 - CIRIA (2015) The SuDS Manual C753
 - Sport England (2023) Active Design 3
 - Suffolk County Council’s Suffolk Design: Streets Guide (2022)
 - Urban Design Group (2020) Building for a Healthy Life
 - Department for Transport (2020) Local Transport Note 1/20: Cycle Infrastructure Design (‘LTN 1/20’)
 - Department for Levelling Up, Housing & Communities (2021) National Design Guide
 - Department for Transport (2021) Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure
 - Natural England’s (2021) Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG)
 - Town and County Planning Association’s Healthy Homes Principles.
- 1.10 The document has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Planning and Compulsory Purchase Act 2004.
- 1.11 The Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended) require the Council to undertake consultation to inform the production of the Healthy Environments SPD and also, as a minimum, requires that the draft document is published for four weeks and that during that time it is available on the Council’s website and that hard copies are available for inspection in the Council’s offices.
- 1.12 The Council’s approach to engagement in the preparation of SPDs is set out in the Statement of Community Involvement. The Council engages in two rounds of consultation with external stakeholders, and the public. The consultations were advertised on the Council’s website, through social media posts and the draft consultation was advertised via a press release. Consultation documents were available on the Council’s website, in libraries and at the Council’s Customer Service Centres.
- 1.13 The first consultation was an initial consultation to inform the scope and content of the Healthy Environments SPD. The initial consultation was carried out between 26th September 2022 to 7th November 2022. The second consultation was on the Draft Healthy Environments SPD and the consultation ran from 15th November 2023 until 10th

January 2024.

- 1.14 The Healthy Environments SPD was prepared under the direction of a steering group which included internal officers and external health partners as members. The Steering Group members included:

Internal members

- Development Management
- Environmental Protection
- Specialist Services – Design
- Specialist Services – Landscape
- Economic Development
- Leisure Operations
- Planning Policy & Delivery

External members

- The NHS Suffolk and North East Essex Integrated Care Board (SNEE ICB)
- The NHS Norfolk and Waveney Integrated Care Board (N&W ICB)
- The Suffolk County Council Public Health team

- 1.15 The preparation process of the Healthy Environments SPD has also been overseen by the Council’s Local Plan Working Group.

- 1.16 Topic/issue-specific focus groups were also organised to support the preparation process, which included additional consultation with officers from the Ecology team and from East Suffolk Services (formerly Norse).

- 1.17 Under the Environmental Assessment of Plans and Programmes Regulations 2004 screening was carried out on the Draft Healthy Environments SPD to determine whether a full Strategic Environmental Assessment would be required. The screening concluded that this was not required. The Strategic Environmental Assessment Screening Opinion is appended to this report (Appendix D).

- 1.18 Habitat Regulations Assessment screening was also undertaken which concluded that implementation of the Healthy Environments SPD would not lead to likely significant effects on protected Habitat sites and that it is therefore not considered necessary to undertake an Appropriate Assessment. The Habitat Regulations Assessment Screening Statement is appended to this report (Appendix E).

2. Introduction

- 2.1 The guidance in the Healthy Environments SPD is intended to improve health and wellbeing outcomes for the communities of the district, as well as improving inclusion for people of all ages and abilities, and to reduce the experience of deprivation based in living environment quality and access to amenities. The Healthy Environments SPD’s planning and design guidance therefore supports the delivery of places that encourage health-supporting, enable inclusion, fair distribution of amenities, and provide higher

protection from environmental sources of harm and stress.

- 2.2 The essential elements for healthy environments identified in the Healthy Environments SPD include green infrastructure, streets and active travel infrastructure, healthy buildings (key buildings being homes, schools and workplaces) centres, community facilities and overall high environmental quality. The Healthy Environments SPD also provides guidance for applying key principles at neighbourhood level (Lifetime Neighbourhoods), and provides a chapter on the Council's expectations for Health Impact Assessments, where required.
- 2.3 The Healthy Environments SPD is intended to address matters that are known to regularly arise in development management relevant to this topic area, and will assist officers, applicants, Members, and consultees in the consideration of planning applications.

3. Proposal

- 3.1 Key areas of health and wellbeing that the Healthy Environments SPD is intending to support improved outcomes for health are:
- **overweight and obesity and related non-communicable diseases** – through encouraging provision of suitable food growing spaces, encouraging centres that are more accessible via walking and cycling, and encouraging healthcare facilities to be delivered within a holistic 'Wellbeing Hub' format in appropriate locations.
 - **inactivity** – through supporting the provision of high-quality active travel infrastructure, open space provision, community facilities for sport and active recreation, food growing spaces, and more accessible centres via active travel.
 - **loneliness and social isolation** – through supporting the provision of open space and community facilities that meet the needs of the community at all ages and abilities, and designing streets and homes that support positive neighbourly interaction.
 - **inclusion for all ages** – through supporting play for all ages, encouraging meaningful community engagement and the co-design of community facilities and open spaces to ensure that it meets the needs of all ages or the age group it is intended for (e.g. LEAPs), and encouraging the use of dementia-friendly design principles across the different elements of developments.
 - **inclusion of all abilities** – encouraging high levels of accessibility in the design of the different elements of developments to ensure an overall built environment that is enabling.
 - **inequality and deprivation** – encouraging the delivery of tenure-blind developments where homes, amenities and relative access to amenities are designed to be indistinguishable/fairly distributed, and supporting higher environmental quality overall and throughout developments.

- **direct harm from environmental sources** – providing guidance and cross references to external technical guidance on key environmental protection matters for important determinants such as noise, light, and air pollution.
- **residential amenity** – providing guidance on key matters for ensuring comfortable and pleasant settings for the enjoyment of home environments.
- **mental health** – providing background information on considerations relevant to mental health and groups with additional needs, and supporting the delivery of a mix of high-quality green open spaces, and incorporating tree plantings of the right kind in the right places, and wider landscaping for new developments.
- **life expectancy, healthy life expectancy and disability-free life expectancy** – through the combination of actions outlined in this document for delivering healthier environments for the district’s communities, it is intended that these metrics improve over time.

3.2 The Healthy Environments SPD is structured into seven chapters and four appendices. The chapters are intended to be read in document-order and are recommended to be designed into the layout of developments in the order that the chapters follow. The chapters include:

- **Chapter 1: Introduction** – provides an overview of the purpose and structure of the Healthy Environments SPD, defines key terms, and provides an overview of the key health challenges for East Suffolk that may be able to be addressed to some extent through built environment design.
- **Chapter 2: Green infrastructure** – including green open space, equipped play provision, playing fields, outdoor sports/recreation facilities, sustainable drainage systems (SuDS), trees and landscaping, green routes, and Suitable Alternative Natural Greenspace (SANG).
- **Chapter 3: Active travel** – including the use of dementia-friendly design principles in the design of spaces in the public realm.
- **Chapter 4: Healthy homes, schools and workplaces** – including environmental quality considerations (matters of environmental protection, residential amenity and creating overall attractive and functional living environments), dementia-friendly design, and tenure blind design principles at building and plot level for key buildings in the determination of health and wellbeing.
- **Chapter 5: Healthy centres and community facilities** – ensuring community facilities meet the needs of the community it serves considering matters such as age, ability and preferences, and supporting the NHS in their move towards more prevention-focused care and the roll out of holistic ‘Wellbeing Hubs’.

- **Chapter 6: Lifetime Neighbourhoods** – introduces the concept of ‘lifetime neighbourhoods’ as a holistic approach to ensuring residential development that meets the health, wellbeing and inclusion needs of people of all ages and abilities within communities.
- **Chapter 7: Health Impact Assessments** – provides guidance on what development requires Health Impact Assessment and guidance on undertaking the assessment.

3.3 The Healthy Environments SPD appendices include:

- **Appendix 1: Glossary** – a glossary of technical terms used in the document.
- **Appendix 2: Healthy Environments: Design Prompts** – a collation of the design prompts provided at the end of each chapter for designers to consider the quality of that element’s design.
- **Appendix 3: The Health Protocol** – guidance on engaging the Health Protocol for development that meets the agreed engagement thresholds in the former Waveney area of the district.
- **Appendix 4: Key external documents** – a list of the key external guidance relevant to this policy area ordered by chapter, including a summary of the Chief Medical Officer's 2019 recommendations for physical activity duration by age group.

3.4 The Healthy Environments SPD was subject to two rounds of consultation during its preparation. Details of the consultations carried out are contained in the Consultation Statement (Appendix B of this report).

3.5 The first was an initial consultation to inform the scope and content of the Healthy Environments SPD. The initial consultation was carried out between 26th September 2022 and 7th November 2022. In total 19 individuals and organisations responded to the consultation. The responses received to the initial stage of consultation were used to inform preparation of a draft document which was subsequently subject to a public consultation.

3.6 The Draft Healthy Environments SPD consultation ran between 15th November 2023 and 10th January 2024. The consultation was advertised on the Council’s website, as well as on social media. 1,779 emails and 28 letters were sent out at the start of the consultation to the consultees on the planning policy mailing list which includes Town and Parish Councils, individuals, and organisations including those who were previously contacted or responded to the informal stage of the consultation.

3.7 There were also a small number of additional organisations that were emailed and invited to review the Draft Healthy Environments SPD as their expertise was considered relevant to the topic area (see the Consultation Statement, Appendix B).

- 3.8 As part of the consultation an online briefing session was held for East Suffolk Councillors (7th December 2023) and another held for Town and Parish Councils (8th December 2023).
- 3.9 In total, 21 individuals and organisations responded to the consultation. Between them they made 116 comments. Half of the comments received (58 comments) were on Chapter 2 – Green Infrastructure.
- 3.10 The main themes of the comments received are summarised below; it should be noted however that many of the comments covered very specific matters and it is not possible to summarise all of them here in a succinct manner. The full consultation responses have been published on the Council’s consultation website and are summarised in the appended Consultation Statement along with details of how each comment has been responded to (see Appendix B and <https://eastsuffolk.inconsult.uk/DraftHESPD2023/consultationHome>).
- 3.11 The majority of the draft consultation responses received were positive, with only one objection raised. All comments supported the aim and scope of the Healthy Environments SPD; all suggested amendments related to the content of the guidance.
- 3.12 Changes have been made to address many of the comments received from respondents during the consultation. Changes have also been made to update the document, improve the clarity and understanding of the guidance, and improve the format for adoption. The key issues raised through the consultation are listed in the table below:

Key comments/messages	Amendments made
General comments and overall messages	
Document is overall too long and too complicated and therefore needs editing down.	The Healthy Environments SPD has been reduced in length and complexity, with a focus on improving the use of plainer English and reducing repetition and unnecessary detail.
Plainer English should be used throughout the document, particularly the Introduction chapter.	
Add an ‘Executive Summary’ section to the SPD or summary boxes at the beginning of chapters.	‘Key messages’ boxes have been added to each of the topic chapters.
More content could be replaced by cross references to external guidance.	Cross-references to key external guidance have been hyperlinked to increase navigability for readers.
Expand the Glossary to include more terms / reduce technical term use.	Additional terms were added to the Glossary (Appendix 1).
SPD implementation would reduce viability and developable area of sites and should be introduced/examined through the next Local Plan plan-making process.	Objection was noted. No amendments made.
Chapter 1: Introduction	
Make clear SPD will be used for development in the East Suffolk/Broads Authority area if formally endorsed.	Amended to make this clear.

Make clearer in Introduction chapter that healthy environments support communities to connect with nature and gains in biodiversity.	Amended to make this clear.
The Open Space Methodology needs to be clearer for sites where the provision of both Suitable Alternative Natural Greenspace (SANG) and other forms of open space (e.g. amenity green space) are required.	The Open Space Methodology's 'background' sub-section was edited to include specific guidance for sites where SANG is required.
Support for the development of a Suffolk-wide Health Impact Assessment (HIA) tool to support proposals for development over validation threshold. Encouraged HIA guidance to be produced as quickly as possible.	The Health Impact Assessment (HIA) guidance (for East Suffolk applications) was expanded and moved from the Introduction chapter into a new chapter (chapter 7) to make HIA expectations clearer in the interim between SPD adoption and the adoption of a Suffolk-wide HIA template.
Chapter 2: Green infrastructure	
Value of green infrastructure for enhancing the setting of heritage assets could be made clearer.	Text amended to make mutual benefits for heritage assets and green infrastructure clearer.
Wellbeing benefits of enhanced biodiversity to be further emphasized.	Text amended.
Anglian Water – Support for multi-functional SuDS guidance.	Multi-functional SuDS guidance retained.
Sport England – advised corrections to sport facility definitions & minimum standards to be used.	Recommended amendments made.
Definition of 'open space', 'green open space' and 'play provision' to be made clearer.	Definitions of terms revised and amended for clarity.
Natural England Green Infrastructure Framework (NEGIF) tools such as Urban Greening Factor should be referenced. Quantity rate figures for accessible green open space should be closer to 3ha per 1,000 people, as per the NEGIF.	Change not made. The Open Space Methodology is based on local evidence gathered through the evidence documents prepared to underpin the East Suffolk Leisure Strategy (2021), and therefore a figure closer to 5ha of open space per 1,000 people is more appropriate for new development in East Suffolk.
Open Space Methodology should be introduced through next Local Plan(s), not SPD.	The Open Space Methodology does not set new policy; text amended to make clear that the Open Space Methodology is intended to be used as a guide and starting point for open space design discussions on quantity and type(s) to be provided.
SANG guidance should be clearer on whether there are prescribed minimum ('essential') design quality expectations, or	The guidance has been amended to make clearer that the essential criteria is expected to be delivered as part of an overall bespoke approach, though an

whether a bespoke approach is expected for each site with SANG.	alternative approach may be appropriate when considered on a site-by-site basis.
Expansion of maintenance agreement guidance to include a preference hierarchy for different management agreement types	This has not been added as a hierarchy of general preference was not considered to be necessary. General guidance on supporting and effective agreement for supporting green infrastructure that delivers community value and that appropriately evolves over time retained and expanded instead.
Chapter 3: Active travel	
Chapter could be made shorter by removing content in favour of more cross-referencing to the Suffolk Design: Streets Guide (SCC, 2022)	Amendments made.
Add guidance on external lighting for active travel routes.	Street lighting is covered in the Suffolk Design: Streets Guide and therefore is not duplicated in the SPD. Considerations for external lighting more generally is covered under Healthy Homes, Schools & Workplaces chapter in the context of protecting residential amenity.
Chapter 4: Healthy homes, schools & workplaces	
Support for guidance on indoor air quality and greater use of mechanical ventilation with heat recovery systems (MVHRs).	The Council is limited in its ability to require sustainable construction and technologies above Building Regulations minimums.
Residential amenity – add air source heat pumps guidance.	Guidance added that provides links to external technical guidance on noise assessments and the Sustainable Construction SPD for further information.
Benefits of outdoor space should also list outdoor clothes drying.	Added.
Healthy schools section should be edited to ensure safeguarding from active travel routes through school sites.	Section amended to make clearer that routes should run to and from school sites, but not through.
Chapter 5: Healthy centres & community facilities	
Healthy centres guidance should encourage residential use in town centres more (for thriving centres).	Guidance on Local Plan policies, Class E and NPPF changes impacts on residential development within centres retained.
Chapter 6: Lifetime neighbourhoods	
Design guidance on the order that elements of the developed should be designed in should acknowledge that site-specific conditions may justify a different approach.	Wording amended to make clear that the guidance is of general applicability, reflecting the Council's preference for landscape-led design and therefore the undertaking of a process that reflects this.
Appendix 1: Glossary	

Definitions provided for open space, playing fields, playing pitches, and the delineation of playing pitches, should be provided within the glossary.

Glossary amended.

4. Financial implications

4.1 The production and adoption of the Healthy Environments SPD is covered by the existing budget of the Planning Policy and Delivery Team. As an SPD, it cannot and does not introduce any additional financial requirements upon developers beyond the Local Plan policy requirements.

5. Legal implications

5.1 The Healthy Environments SPD has been produced in accordance with the Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended).

5.2 An Equality Impact Assessment Screening opinion was produced to meet the requirements of the Equality Act 2010 (Appendix C).

5.3 The Healthy Environments SPD has been subject to a Strategic Environmental Assessment Screening Opinion in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (Appendix D).

5.4 The Healthy Environments SPD has also been subject to a Habitats Regulation Assessment Screening Statement, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) (Appendix E).

6. Risk implications

6.1 There are no risks envisaged in relation to the implementation of the recommendations.

7. Options

7.1 Adopt the Healthy Environments SPD meaning the Council has an up-to-date SPD to guide the implementation of the key planning policies for health and wellbeing.

7.2 An alternative option would be to not adopt the SPD and continue to implement the planning policies without the additional guidance.

7.3 However, this would be a missed opportunity to provide further clarification on the requirements of the policies, and address some of the frequently raised matters that come about through the development management process, and so ultimately support effective implementation of the relevant Local Plan policies.

8. Recommendations

That Cabinet:

1. Adopts the Healthy Environments Supplementary Planning Document.
2. Authorises the Head of Planning and Coastal Management, in consultation with the Cabinet Member for Planning and Coastal Management, to make any presentational or typographical amendments to the Healthy Environments Supplementary Planning Document prior to it being published.

9. Reason for Recommendations

9.1 Adoption of the Healthy Environments SPD will provide up to date guidance to assist with the implementation of the Council's Local Plan policies which relate to supporting health and wellbeing through the planning and design approaches taken to development.

10. Conclusions/Next Steps

10.1 If Cabinet accepts the recommendations, the Healthy Environments SPD will be published in accordance with Regulations and the Statement of Community Involvement and become a material consideration when determining planning applications.

Areas of consideration comments

Section 151 Officer comments:

This report does not have any financial implications to be considered.

Monitoring Officer comments:

The Monitoring Officer has been consulted and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

An Equality Impact Assessment was undertaken as part of the preparation of the SPD (Appendix C). The EQIA (Appendix C) screening exercise shows that the SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.

For the purpose of preparing this report, an Equality Impact Assessment has been undertaken the outcome of which is that the decision will not have equalities impacts. The assessment reference is EQIA604900069.

Safeguarding:

Not applicable.

Crime and Disorder:

Not applicable.

Corporate Services implications:

No issues raised.

Residents and Businesses consultation/consideration:

The SPD was subject to two rounds of consultation during its preparation. The first was an initial consultation to inform the scope and content of the SPD. The initial consultation was carried out between 26th September 2022 and 7th November 2022. In total 19 individuals and organisations responded to the consultation.

The Draft Healthy Environments SPD consultation ran between 15th November 2023 and 10th January 2024. As part of the consultation an online briefing session was held for East Suffolk Councillors (7th December 2023) and another held for Town and Parish Councils (8th December 2023). In total, 21 individuals and organisations responded to the consultation. Between them they made 116 comments.

Details of the consultations carried out are contained in the Consultation Statement (Appendix B of this report).

Appendices:	
Appendix A	Healthy Environments Supplementary Planning Document
Appendix B	Consultation Statement
Appendix C	Equality Impact Assessment Screening Opinion (November 2023) (produced to accompany consultation on Draft SPD).
Appendix D	Strategic Environmental Assessment Screening Opinion (November 2023) (produced to accompany consultation on Draft SPD).
Appendix E	Habitat Regulations Assessment Screening Statement (November 2023) (produce to accompany consultation on Draft SPD).

Background reference papers:		
Date	Type	Available From
2019	East Suffolk Council – Waveney Local Plan	<u>Adopted-Waveney-Local-Plan-including-Erratum.pdf (eastssuffolk.gov.uk)</u>
2020	East Suffolk Council – Suffolk Coastal Local Plan	<u>eastssuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf</u>
2023	National Planning Policy Framework	<u>National Planning Policy Framework (publishing.service.gov.uk)</u>
2021	Statement of Community Involvement	<u>Statement-of-Community-Involvement.pdf (eastssuffolk.gov.uk)</u>
2024	DASH EqIA EQIA604900069	Available upon request from <u>jasmin.machen@eastssuffolk.gov.uk</u>

HEALTHY ENVIRONMENTS

SUPPLEMENTARY PLANNING DOCUMENT

June 2024



How to use this document

The document comprises of 5 main chapters that each cover a different topic area related to the creation of healthy environments. The best way to navigate through the document is by using the interactive contents. By clicking on a specific chapter in the contents, it will automatically take you to that part of the document. Moreover, if you want to go to a different section quickly, the easiest way is to click the home symbol in the top right corner of the page. This will take you back to the contents where you can then select a different chapter. There is also a guide on the right-hand side of each page, this will show you what chapter of the document you are currently in and where that sits within the rest of the document. Throughout the document there are hyperlinks in the text that provide links to further information.

What is a Supplementary Planning Document?

Supplementary Planning Documents expand upon policy and provide further detail to support the implementation of policies in Local Plans. Whilst not a part of the development plan, they are a material consideration in the determination of planning applications and listed building applications. The Local Plan policies, which this SPD provides guidance on, can be viewed on the Council's website: www.eastsuffolk.gov.uk/localplan.

Contents

1	Introduction.....	1
2	Green Infrastructure.....	17
3	Active Travel	108
4	Healthy Homes, Schools and Workplaces.....	137
5	Healthy Centres and Community Facilities	159
6	Lifetime Neighbourhoods	185
7	Health Impact Assessments (HIAs)	208
	Appendix 1: Glossary of terms.....	218
	Appendix 2: Healthy Environments: Design Prompts (HEDP)	230
	Appendix 3: The Health Protocol.....	233
	Appendix 4: Key External Guidance	234

Abbreviations

BfHL	Building for a Healthy Life guidance	NHS	Suffolk and North East Essex Integrated Care System /
BNG	Biodiversity Net Gain	SNEE	Integrated Care Board
BS	British Standard	ICS/ICB	
C&WS	East Suffolk Cycling and Walking Strategy	NPPF	National Planning Policy Framework
CIL	Community Infrastructure Levy	PROW	Public Rights of Way
HIA	Health Impact Assessment	RAMS	Recreational Disturbance and Mitigation Strategy
HRA	Habitats Regulation Assessment	SANG	Suitable Alternative Natural Greenspace
LAP	Local Area for Play	SCC	Suffolk County Council
LEAP	Local Equipped Area for Play	SCLP	East Suffolk Council – Suffolk Coastal Local Plan
LSOA	Lower Super Output Area	SDSG	Suffolk Design: Streets Guide
MUGA	Multi-Use Games Area	SPD	Supplementary Planning Document
NEAP	Neighbourhood Equipped Area for Play	SuDS	Sustainable Drainage Systems
		WLP	East Suffolk Council – Waveney Local Plan



1 Introduction

- 1.1 East Suffolk faces a number of health and wellbeing challenges including an ageing population, overweight and obesity, inactivity, disability, smoking, hypertension, and areas of relatively high deprivation.
- 1.2 The planning and design of built environments has a crucial role to play in supporting communities' mental, physical and social health and wellbeing. Healthy environments enable and encourage health-supporting behaviours and lifestyles for people of all ages and abilities, and reduce the potential for environmental sources of harm and stress through providing adequate environmental quality. Through new developments, the Council's Local Plans seek to improve health and wellbeing by creating places which support physical, mental and social health through design, ensuring they are healthy, safe, social, accessible and inclusive for all. As well as supporting communities to connect with each other, healthy environments also support communities to connect more with nature and contribute towards biodiversity gains.
- 1.3 The Healthy Environments Supplementary Planning Document (SPD) therefore provides guidance for the planning and design of new residential development (including mixed-use developments with an element of residential), streets, green infrastructure, schools, workplaces, community facilities, and/or new retail centres. This guidance will be used in the consideration of applications when assessing the design quality of proposed developments and their consistency with policies relating to this policy area.
- 1.4 This SPD is adopted by East Suffolk Council and relates to the areas covered by the Suffolk Coastal Local Plan and the Waveney Local Plan. The Broads Authority, which covers part of the northernmost area of the district, are the planning authority for the Broads and have their own Local Plan (adopted May 2019) which includes a range of policies relevant to the content of this SPD, such as Policy DM45: Designing places for healthy lives and Policy DM7: Open space on land, play space, sports fields and allotments, the latter of which defers to the policies of the district council. Guidance contained within this SPD may therefore be relevant in the Broads Authority area.

The structure of the SPD

- 1.5 The SPD includes four main design guidance chapters (2. Green Infrastructure, 3. Active Travel, 4. Healthy Homes, Schools & Workplaces and 5. Healthy Centres & Community Facilities), followed by chapter 6, Lifetime Neighbourhoods, which provides guidance on bringing all of the essential elements together at development site level to provide high quality, healthy and inclusive neighbourhoods.
- 1.6 The four main design guidance chapters of the document (2-5) each cover what is considered an 'essential element' of healthy environments. The chapters are organised in accordance with the order that each of the essential elements are recommended to be planned and designed into the layout and detailed designs of proposed developments. The recommended order for the planning and design of essential elements starts with green infrastructure (an approach which is referred to in this document as a 'landscape-first' approach) and completes with individual community facilities. In more detail, the main chapters/essential elements are:



- **Chapter 2. Green infrastructure**, including green open space, equipped play provision, playing fields, outdoor sports/recreation facilities, sustainable drainage systems (SuDS), trees and landscaping, green routes, and Suitable Alternative Natural Greenspace (SANG).
 - **Chapter 3. Active travel**, including the use of dementia-friendly design principles in the design of spaces in the public realm.
 - **Chapter 4. Healthy homes, schools and workplaces**, including dementia-friendly design and tenure blind design principles at building and plot level.
 - **Chapter 5. Healthy centres and community facilities** that meet the needs of the community it serves.
 - **Chapter 6. Lifetime Neighbourhoods** introduces the concept of ‘lifetime neighbourhoods’.
- 1.7 The SPD also includes a short chapter on Health Impact Assessments (chapter 7), and four appendices – a glossary (Appendix 1); a resource for considering design quality based on the SPD’s guidance (Healthy Environments: Design Prompts, Appendix 2); guidance on use of the Health Protocol for guiding officer and health partner engagement for development that meets the agreed engagement thresholds in the former Waveney area of the district (Appendix 3), and; a list of the key external guidance relevant to this policy area ordered by SPD chapter, including a summary of the Chief Medical Officer's 2019 recommendations for physical activity duration by age group (Appendix 4).

The purpose of the SPD

- 1.8 The purpose of providing the supplementary planning guidance included in this document is to support the delivery of the visions and policies in the Suffolk Coastal Local Plan and Waveney Local Plan that relate to the achievement of healthier, more cohesive, active and enabled communities in East Suffolk over the plan period to 2036. Where successful and holistic, healthy environments support communities’ physical, mental and social health through:
- the creation and maintenance of healthy weight status;
 - more incidental and session-based exercise, including greater uptake of active travel and active leisure, sport and recreation activities;
 - improved access to nature and increased biodiversity;
 - providing living environments and community facilities that support positive social interactions within and between communities;
 - more years of life spent in good health and with good mobility; and
 - greater enabling and inclusivity of groups that may otherwise be excluded or inconvenienced by inappropriate design of the built environment.
- 1.9 The guidance in this document is intended to promote design approaches to new development that:
- meet needs for and improve the availability, access to, and quality of each of the essential elements of healthy environments for people of all ages, levels of ability, and for those with additional barriers to engagement, such as those on lower incomes;
 - provide homes, schools and workplaces that support healthy lifestyles and high environmental quality;
 - encourage healthier choices and support healthy lifestyles by making the healthier choice the easiest (or at least an easy) choice;
 - discourage behaviours by making the least healthy choice the least or less convenient choice, and;



- respond effectively to identified health and wellbeing challenges in the district/locality of the development, with ambitions to create health net gain in the area over time.
- 1.10 This SPD is also intended to reduce the experience of deprivation and inequality in the built environment through raising awareness of some of the barriers to engagement and the additional needs of some groups to support increased inclusion. Policy SCLP11.1 Design Quality and Policy WLP8.29 Design of the East Suffolk Local Plans set a policy requirement for major residential development to be assessed and perform positively against the Building for a Healthy Life¹ (2020) guide criteria. Though not a policy requirement, the design prompts included at the end of each of the main chapters are recommended to be used as an additional resource for critiquing the design quality of any development proposal including residential use, regardless of scale, where it is relevant and helpful to do so. The [Healthy Environments: Design Prompts \(Appendix 2\)](#) compiles the SPD guidance chapters' design prompts.
- 1.11 This document supersedes the guidance included in SPG 15 Outdoor playing space (2001), which applied to the Suffolk Coastal Local Plan area, and the remaining sections of the already partly superseded Open Space Provision & Developer Contributions SPD (2012), which applied to the Waveney Local Plan area.
- 1.12 The general design guidance included in the Waveney Green Infrastructure Strategy (2015) is superseded by this document, however the recommendations of the strategy for meeting open space needs in specific areas are considered to still be in date.
- 1.13 This document supports the implementation of the East Suffolk Cycling and Walking Strategy (2022) by providing guidance on the design and delivery of active travel infrastructure. This document also supports implementation of the East Suffolk Leisure Strategy (2021) and East Suffolk Play Area Strategy (2023) through providing design guidance (or links to external design guidance) for green open space, equipped play provision and outdoor sport and recreation facilities. This document also supports delivery of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (2021) through providing planning and design guidance for Suitable Alternative Natural Greenspace (SANG) provision.

Background

What is health and wellbeing?

- 1.14 The World Health Organisation's 1948 Constitution defined health as "a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity" and stated that "the enjoyment of the highest attainable standard of health is one of the fundamental rights of every human being without distinction of race, religion, political belief, economic or social condition".

¹ The policies refer to the Building for Life 12 guide, which was superseded in 2020 by the Building for a Healthy Life guide. These policies should be interpreted to be referring to the most up to date version of the guide.



- 1.15 **Table 1**, below, provides an overview of the main health and wellbeing pillars – physical, mental and social – and some of the key determinants of the status of each pillar. The planning and design of the built environment has either direct (e.g. air pollution impacts on body tissues) or indirect (e.g. attractiveness of health-supporting behaviours such as cycling/walking to work rather than driving) influence over the key determinants within each of the pillars.

Table 1: Key determinants of health status by health and wellbeing pillar

Health and wellbeing pillar	Key determinants of health status by health and wellbeing pillar
Physical	Body – adequate exercise and nutrition for strength, flexibility, endurance, and resilience to infection, stress and healing from injury or infection; independence and freedom from disease and infirmity; adequate access to treatment and care to meet physical health needs; adequate access to sunlight and natural light; adequate quality and quantity of rest; adequate sanitation and hygiene; genetic inheritance of physical health challenges.
Mental	<p>Mind – stimulation, experience and demands are adequately balanced with rest and relaxation; exposure to acute or chronic stress at individual, relational or system level; level of access to treatment and care to meet mental health needs; freedom from eco-anxiety; genetic inheritance of mental health challenges.</p> <p>Natural environment connection – access to and ability to have regular connection to the natural world including other species, natural systems, seasonality and climate and; opportunity to act as a steward to a specific natural environment of value or the wider natural world.</p> <p>Self-actualisation and spirituality – personal development; sense of purpose, meaning, feeling life is worthwhile and experiencing life satisfaction; experiences and lifestyle is in alignment with one’s values and preferences; sense of being connected to and influenced by something more powerful than oneself; the need to explore and travel for its own sake.</p>
Social	Social and place connections (‘roots’) – social and community connections meet needs for companionship, belonging, intimacy, empathy, play, and having at least one friend that feels safe and can be trusted and relied upon in times of difficulty; place connection, having a sense of being ‘rooted’ in a place due to relationships and experiences had in that place.

Key health challenges for East Suffolk

- 1.16 Across East Suffolk, there are significant variances and inequalities between different parts of the district, for example parts of Lowestoft experience relatively high deprivation when compared with some of the more rural parts of the district. The following table, **Table 2**, provides an overview of the key health and wellbeing challenges for the district.





Table 2: Key health and wellbeing challenges for East Suffolk

Health and wellbeing challenge	Key points for each challenge
Ageing population (ONS, Census 2021)	<ul style="list-style-type: none"> • 28% of East Suffolk’s population is over 65, compared with a national average of 18%. • 57% of East Suffolk’s population is ages 15-65, compared with a national average of 64%. • 15% of East Suffolk’s population are under age 15, compared with a national average of 17%. • There has been significant growth in the proportion of the population in older age groups between Census 2011 and Census 2021 – there has been an increase of 21.3% in people aged 65 years+, a decrease of 2.5% in people aged 15-64 years, and a decrease of 5.4% in children aged under 15 years².
Life expectancy inequalities (ONS, 2018-2020; ONS, Census 2011 ³ ; Suffolk Core20PLUS5, 2022) ⁴	<ul style="list-style-type: none"> • Life expectancy at birth is slightly higher for males than the national average (80.4/79.4 years of age). • Life expectancy at birth is slightly higher for females than the national average (83.8/83.1 years of age). • Significant life expectancy inequality between wards of the district: at the point to the Census 2011, a male born and living in Kirkley could expect to live to 73.9 years of age, whilst a male born and living in Otley could expect to live to 85.3 years of age. Similar gaps are seen in female life expectancy. • At Suffolk level, circulatory diseases (males) and cancer (females) are the leading causes of life expectancy gaps. • Some areas of the district lack adequate access to one or more of the following: food retail, green open space, play provision, community facilities and/or medical services.
Healthy life expectancy at birth⁵ (Suffolk) (ONS, 2018-2020) ⁶	<ul style="list-style-type: none"> • Suffolk average for males higher than the national average for males (67/63.1 years of age). • Suffolk average for males higher than the Suffolk average for females (67/64.4 years of age). • Suffolk average for females slightly higher than the national average for females (64.4/63.9 years of age).
Disability-free life expectancy at birth⁷ (Suffolk) (ONS, 2018-2020)	<ul style="list-style-type: none"> • Suffolk average for males slightly higher than the national average for males (63.7/62.4 years of age). • Suffolk average for males higher than the Suffolk average for females (63.7/60.6 years of age). • Suffolk average for females slightly below the national average for females (60.6/60.9 years of age).

² For further demographic change data for East Suffolk see: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000244/> and <https://www.suffolkobservatory.info/population/reports/#/view-report/9925e741b4b449c090dd87016ce0eae9/E07000244/G2>.

³ Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/articles/healthstatelifeexpectancyby2011censuswardsenglandandwales/2009to2013>

⁴ Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/bulletins/lifeexpectancyforlocalareasoftheuk/between2001to2003and2018to2020#life-expectancy-at-local-level>.

⁵ Data based on self-assessments of health status using a scoring system.

⁶ Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/bulletins/healthstatelifeexpectanciesuk/2018to2020>.

⁷ Data based on self-assessments of disability using tiered system of level of impact on day to day activities.



Health and wellbeing challenge	Key points for each challenge
Disability (Census 2021, age-standardised) ⁸	<ul style="list-style-type: none"> East Suffolk average 18.8% (7.5% have day-to-day activities limited a lot/11.3% have day to day activities limited a little) is higher than the national average of 17.7%.
Deprivation inequality between wards (Indices of Multiple Deprivation, 2019) ⁹	<ul style="list-style-type: none"> East Suffolk ranked 20th out of the 20 local authorities in England with the largest gaps between their most income deprived and their least income deprived neighbourhoods (income inequality). Significant variation between wards – main pockets of deprivation in Felixstowe and Lowestoft. Waveney 007D in the Kirkley & Pakefield ward was the 25th most deprived Lower Super Output Area (LSOA) in England (out of 32,844 LSOAs).
Adult overweight and obesity rate (ages 18+) (OHID, 2021-22) ¹⁰	<ul style="list-style-type: none"> Adult overweight and obesity is at almost two thirds of the adult population of East Suffolk, which is similar to the national average (63.9%/63.8%). Areas of the district with poor access to food retail. Some areas of the district lack adequate access to one or more of the following: food retail, green open space, play provision, community facilities and/or medical services.
Other (Suffolk Core20PLUS5, 2022)	The following Integrated Neighbourhood Team (INT) areas had high levels of the following health challenges when compared to the national averages: <ul style="list-style-type: none"> Felixstowe: smoking, hypertension, Chronic Obstructive Pulmonary Disease (COPD) and cancer; Woodbridge: hypertension and cancer; Saxmundham & North East: hypertension and cancer; South Waveney: cancer, hypertension, COPD and severe mental illness; Lowestoft: hypertension, smoking, severe mental illness, COPD and cancer.
Child overweight and obesity rate at Year 6 (age 11) (OHID, 2021-22) ¹¹	<ul style="list-style-type: none"> Child overweight and obesity rate is over one in three children at age eleven and is higher than the national average (39%/37.8%). Areas of the district with poor access to food retail. Some areas of the district lack adequate access to one or more of the following: food retail, green open space, play provision, community facilities and/or medical services.

⁸ Disability and age are closely related, with older people being more likely to be disabled. Age-standardised proportions account for different age structures in populations and are more appropriate than crude percentages when drawing comparisons over time and across areas.

⁹ Data available at: <https://www.ons.gov.uk/visualisations/dvc1371/#/E07000244>.

¹⁰ Available at: <https://fingertips.phe.org.uk/search/adult%20overweight>.

¹¹ Available at: <https://fingertips.phe.org.uk/search/child%20overweight>.



Health and wellbeing challenge	Key points for each challenge
	<ul style="list-style-type: none"> Children and young people that are obese are around five times more likely to be obese in adulthood than those who are not obese¹², meaning the prevention of overweight and obesity occurrence in early life is key for supporting health and ability in adulthood.
<p>Adult inactivity (ages 18+) (Sport England Active Lives Survey, Nov 21-22)¹³</p>	<ul style="list-style-type: none"> Almost a quarter of the district’s population are ‘inactive’ (less than 30 minutes¹⁴ activity per week), though slightly lower than national average (23.8%/25.8%) One in ten are ‘fairly active’ (30-149 minutes per week), slightly lower than national average (10.4%/11.1%) 65.8% ‘active’ (at least 150 minutes a week), which is slightly higher than the national average (65.8%/63.1%). East Suffolk is therefore relatively active, though there is still considerable room for improvement. In the UK the population is on average 20% less active now than in the 1960s, and if current trends continue, will be 35% less active by 2030¹⁵. Some areas of the district lack adequate access to green open space, play provision, community facilities and/or medical services. The Chief Medical Officer’s 2019 recommendations for physical activity by age group is included in Appendix 4 of this document.
<p>Social isolation and loneliness (Great Britain) (ONS, 2023)¹⁶, (ONS, 2023)¹⁷</p>	<ul style="list-style-type: none"> In the period of December 2022 to January 2023, around a quarter (27%) of adults reported feeling lonely always, often, or some of the time in Great Britain. Approximately 7.1% of people in Great Britain (3.83 million) experience chronic loneliness, meaning they feel lonely ‘often or always. This has risen from 6% (3.24 million) in 2020, indicating that there has not been a return to pre-pandemic levels of loneliness.
<p>Mental health (Suffolk) (Suffolk Core20PLUS5, 2022); (Alzheimer’s UK, 2023)¹⁸</p>	<ul style="list-style-type: none"> People with a mental illness such as bipolar disorder or schizophrenia die on average 15-20 years sooner than the general population. The prevalence of people with severe mental illness is triple in the most deprived areas compared with the least deprived areas.

¹² Simmonds, M., Llewellyn, A., Owen, C. G., & Woolacott, N. (2016). Predicting adult obesity from childhood obesity: a systematic review and meta-analysis. *Obesity reviews: an official journal of the International Association for the Study of Obesity*, 17(2), 95–107. <https://doi.org/10.1111/obr.12334>.

¹³ Available at: <https://activelives.sportengland.org/Home/AdultData>.

¹⁴ Intense activity is considered to count as twice as much activity as more moderate activities in the Active Lives Survey; 75 minutes of intense activity would therefore be the counted as the equivalent of 150 minutes of moderate activity.

¹⁵ OHID (2022) All Our Health. Available at: <https://www.gov.uk/government/publications/physical-activity-applying-all-our-health/physical-activity-applying-all-our-health>.

¹⁶ ONS Opinions and Lifestyle Survey for Jan-Dec 2022 (Great Britain). Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/bulletins/publicopinionsandsocialtrendsgreatbritain/21december2022to8january2023>.

¹⁷ Campaign to End Loneliness (2023) *The State of Loneliness 2023: ONS Data on Loneliness in Britain*. Available at: <https://www.campaigntoendloneliness.org/wp-content/uploads/The-State-of-Loneliness-2023-ONS-data-on-loneliness-in-Britain.pdf>.

¹⁸ More information available at: <https://www.alzheimers.org.uk/about-dementia/risk-factors-and-prevention/air-pollution-and-dementia>.



Health and wellbeing challenge	Key points for each challenge
	<ul style="list-style-type: none"> East Suffolk has higher rates of dementia diagnoses than the national average, however this has a relationship with the generally older generation and may be reflective of healthcare services in East Suffolk being better at diagnosing dementia than other areas with comparative age structures. According to Alzheimer’s UK, various studies have indicated that there may be a link between air pollution and/or proximity to busy roads and the development of dementia. There are also potential links to living in deprived areas, which are generally more likely to have poorer quality living environments (e.g. reduced access to green open space and lower environmental quality, i.e. poorer air quality, higher exposure to noise, etc.).
Cancer (Suffolk) (Suffolk Core20PLUS5, 2022)	<ul style="list-style-type: none"> People from the most deprived communities are more likely to get cancer, be diagnosed at a late stage for certain types of cancer and are more likely to die from the disease.
Smoking rates (ages 18+) (OHID, 2022) ¹⁹	<ul style="list-style-type: none"> Smoking in East Suffolk is higher than the national average (15.2%/12.7%) According to Cancer Research UK, smoking is the largest cause of cancer in the UK, with 15% of cancers being caused by smoking²⁰.
Hypertension (all ages) (OHID, 2022/23) ²¹	<ul style="list-style-type: none"> 18.7% compares to 14.4% nationally.

1.17 Further information on the district’s health challenges can be accessed via the Office for Health Improvement & Disparities (OHID) ‘Fingertips’ dashboard²², the Suffolk Public Health Annual Reports²³, and the Suffolk Health and Wellbeing Board’s Joint Local Health and Wellbeing Strategy ‘Preparing for the Future’ (2022-2027)²⁴.

¹⁹ Available at: <https://fingertips.phe.org.uk/profile/tobacco-control/data#page/1/gid/1938132885/pat/6/ati/401/are/E07000244/iid/92443/age/168/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1>.

²⁰ More information available at: <https://www.cancerresearchuk.org/health-professional/cancer-statistics/risk>.

²¹ Available at: <https://fingertips.phe.org.uk/search/hypertension#page/1/gid/1/pat/6/ati/401/are/E07000244/iid/219/age/1/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1>.

²² Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/par/E12000006/ati/301/are/E07000244/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1>.

²³ Available at: <https://www.healthysuffolk.org.uk/jsna/annual-public-health-reports>.

²⁴ Available at: <https://www.healthysuffolk.org.uk/asset-library/health-and-wellbeing-strategy-2022-2027.pdf>.



What are healthy environments?

- 1.18 People are vulnerable to the wider economic, cultural, social and physical environmental conditions in which they live, which are collectively termed the ‘wider determinants of health’, as they extend beyond well as individual-level determinants. This is broadly depicted in Barton and Grant’s ‘health map’ model of wider determinants (right)²⁵.
- 1.18 A healthy environment is one that supports health and wellbeing holistically. This is through providing environments that enable healthy behaviours by making them possible/easier and more attractive to engage in, whilst also avoiding or reducing the potential for environmental sources of harm and stress, and avoiding designs that make less healthy behaviours easier and more attractive.
- 1.19 The guidance in this document aims to support the delivery of healthy environments for all and provides a more detailed concept of how this may be achieved. In more detail, ‘healthy environments’ can be understood to be those that:

- **support engagement in healthy behaviours** – using the design of the environment to support the community to engage in healthy behaviours such as consuming nutritious diets, engaging in play, incidental and session-based physical activity, socialising, spending time in nature, engaging in personal development opportunities, etc.
- **disincentivise unhealthy behaviours** – e.g. by avoiding the creation of car-dominated environments which support more sedentary lifestyles, and/or avoiding the oversaturation of hot-food takeaways;
- **provide high environmental quality**– potential sources of environmental harm such as unacceptable noise, loss of privacy, or poor air quality are removed or as a minimum are adequately mitigated so as to reduce stress on physical and mental health;
- **are designed using a ‘landscape first’ approach**, with green infrastructure being the first of the essential elements (e.g. green infrastructure, active travel infrastructure, homes, community facilities, etc.) to be planned and designed into developments;
- **meet the community’s needs for access to nature** by providing high quality green infrastructure, ideally with a mix of green open space typologies within active travel distance, including access to highly natural spaces that support ‘nature immersion’ experiences for users;

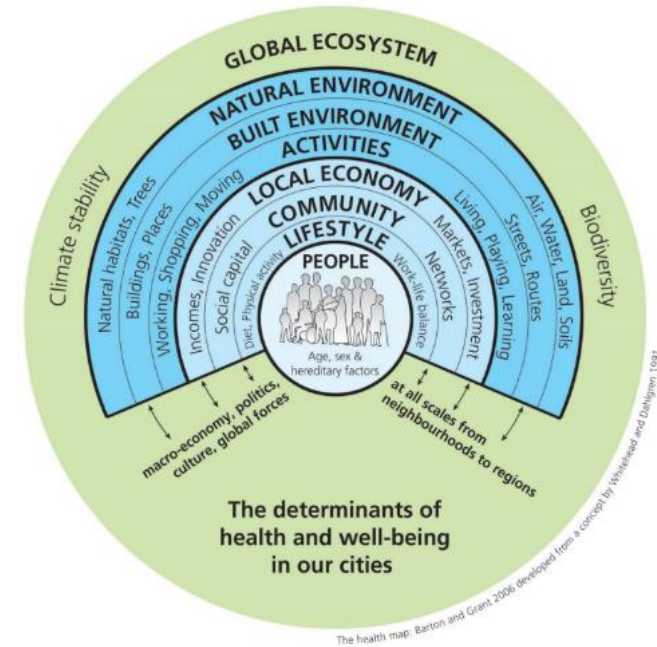


Figure 1: Barton and Grant’s ‘health map’ model of wider determinantsA

²⁵ Barton H and Grant M (2006) A health map for the local human habitat The Journal of the Royal Society for the Promotion of Health November. 2006 126: pp. 252-253.



- **are functional and interconnected** – by allowing users to move between the essential elements of the site conveniently and safely regardless of mobility level; routes reflect likely desire lines and ‘trip chains’ between key origins and destinations;
- **create spaces for the community to interact** – by providing relevant and accessible community facilities, open space, public space, and attractive shared social spaces for apartments, co-housing and extra care housing, communities are better enabled to interact and form relationships;
- **enable and widen inclusion** – improving accessibility for the inclusion of all ages and abilities through use of tenure blind, dementia-friendly and neurodiversity-friendly design principles, and providing access to amenities;
- **meet the community’s needs for goods and services** – either by direct provision on site or through providing sustainable transport links to existing provision within an acceptable distance via sustainable modes of transport that have been designed to be accessible and inclusive for all to use, and;
- **are attractive places that foster place attachment** – by using high quality landscaping and materials, incorporating the historic environment, and engaging the community in consultation, places and spaces that are attractive, useful and meaningful to the community are created, fostering greater feelings of place attachment and place identity.

What are lifetime neighbourhoods?

1.20 ‘Lifetime neighbourhoods’ is used as a term in this document to refer to major residential and mixed use (with residential) developments that provide high quality, healthy environments that are inclusive of all ages and abilities, and that through taking a holistic approach to the overall design, benefit from highly functional relationships between the different essential elements of the development. The design of lifetime neighbourhoods perform well when considered against the ‘design prompts’ at the end of each topic chapter of this SPD, and when assessed against the Building for a Healthy Life criteria. More information can be found in chapter [6 Lifetime Neighbourhoods](#).

Policy Context

- 1.21 The National Planning Policy Framework (NPPF) requires planning policies and decisions to safeguard and improve the environment, and ensure healthy living conditions (paragraph 123), and that they should aim to achieve healthy, inclusive and safe places (paragraph 96). Paragraph 96 lists high-level place qualities that support healthy lifestyles, which include (in summary): places that are pro-social, walkable and cyclable, well overlooked and have regular activity, feel safe, accessible and easy to navigate, and that support recreational exercise and nutritious diets. Paragraph 97 adds to this the importance of planning for and maintaining the social, recreational and cultural facilities and services the community needs.
- 1.22 The East Suffolk Council Local Plans – the Suffolk Coastal Local Plan (adopted 2020) and the Waveney Local Plan (adopted 2019), ‘made’ Neighbourhood Plans, and the Minerals and Waste Local Plan produced by Suffolk County Council, form the development plan for the district.



1.23 The Local Plans set out visions and strategies for the period to 2036. The following table, **Table 3**, lists the key strategic priorities of the two Local Plans which designing healthy environments support the delivery of.

Table 3: East Suffolk Local Plans’ strategic priorities relevant to the planning and design of healthy environments

East Suffolk Council – Suffolk Coastal Local Plan (adopted 2020)	East Suffolk Council – Waveney Local Plan (adopted 2019)
<ul style="list-style-type: none"> To support healthy, safe, cohesive and active communities through improving health, wellbeing and education opportunities for all.’ Promote high quality design across the Local Plan area. To enhance and protect the natural, built and historic environment and provide accessible green infrastructure and public open spaces. Improve the quality and provision of all types of infrastructure to support current and future requirements. 	<ul style="list-style-type: none"> To improve health, wellbeing and education opportunities for the population. To significantly improve the quality of urban design across the district. To enhance and protect the natural, built and historic environment. To improve the quality and provision of all types of infrastructure.

The following table, **Table 4**, provides an overview of the Local Plan policies that are key to the healthy environments topic area, structured by each chapter of the SPD (essential element of healthy environments).

Table 4: Key Local Plan policies by SPD chapter

SPD chapter / Essential element	Key policies – Suffolk Coastal Local Plan	Key policies – Waveney Local Plan
2. Green infrastructure Green open space, play provision, outdoor sports/recreation facilities, sustainable drainage systems, landscaping, green routes, and Suitable Alternative Natural Greenspace (SANG).	Policy SCLP8.2 Open Space Policy SCLP8.3 Allotments Policy SCLP9.6 Sustainable Drainage Systems Policy SCLP10.1 Biodiversity and Geodiversity Policy SCLP11.1 Design Quality	Policy WLP8.24 Flood Risk Policy WLP8.28 Sustainable Construction Policy WLP8.29 Design Policy WLP8.30 Design of Open Spaces Policy WLP8.34 Biodiversity and Geodiversity
3. Active travel infrastructure and streets Active travel infrastructure and streets, including use of dementia-friendly design principles in the public realm.	Policy SCLP7.1 Sustainable Transport Policy SCLP7.2 Parking Proposals and Standards Policy SCLP8.2 Open Space Policy SCLP11.1 Design Quality	Policy WLP8.21 Sustainable Transport Policy WLP8.29 Design Policy WLP8.30 Design of Open Spaces Policy WLP8.31 Lifetime Design





SPD chapter / Essential element	Key policies – Suffolk Coastal Local Plan	Key policies – Waveney Local Plan
<p>4. Healthy homes, schools and workplaces Buildings that support health, environmental quality (including residential amenity), dementia-friendly design and tenure blind design principles.</p>	<p>Policy SCLP5.7 Infill and Garden Development Policy SCLP5.8 Housing Mix Policy SCLP7.1 Sustainable Transport Policy SCLP9.2 Sustainable Construction Policy SCLP10.3 Environmental Quality Policy SCLP11.1 Design Quality Policy SCLP11.2 Residential Amenity</p>	<p>Policy WLP8.2 Affordable Housing Policy WLP8.21 Sustainable Transport Policy WLP8.28 Sustainable Construction Policy WLP8.29 Design Policy WLP8.31 Lifetime Design Policy WLP8.33 Residential Gardens and Urban Infilling (Residential amenity covered in various area-specific policies)</p>
<p>5. Healthy centres and community facilities Centres and community facilities that provide a healthy, attractive and useable centre environment and facilities that meet community needs.</p>	<p>Policy SCLP4.8 New Retail and Commercial Leisure Development Policy SCLP4.9 Development in Town Centres Policy SCLP4.10 Town Centre Environments Policy SCLP4.12 District and Local Centres and Local Shops Policy SCLP7.1 Sustainable Transport Policy SCLP8.1 Community Facilities and Assets Policy SCLP11.1 Design Quality</p>	<p>Policy WLP8.18 New Town Centre Use Development Policy WLP8.19 Vitality and Viability of Town Centres Policy WLP8.20 Local Shopping Centres Policy WLP8.21 Sustainable Transport Policy WLP8.22 Built Community Services and Facilities Policy WLP8.29 Design</p>
<p>6. Lifetime neighbourhoods Guidance on successfully combining the essential elements of healthy environments to support functionality, relationship and increased inclusivity.</p>	<p>All of the above.</p>	<p>All of the above.</p>

1.24 In addition to Local Plan policy, there are a range of policies, plans and guidance at national, county, and local level that have informed the content of the Healthy Environments SPD. These are listed in [Table 5](#) below.



Table 5: Policy context for Healthy Environments SPD

Level	Policy document	Key sections/chapter applicability
National	Department for Levelling Up, Housing and Communities – The National Planning Policy Framework (2023)	The social pillar of sustainable development and Chapter 8 Promoting healthy and safe communities.
	Department for Levelling Up, Housing and Communities – Planning Practice Guidance	<ul style="list-style-type: none"> • Air quality • Healthy and safe communities • Housing for older and disabled people • Housing: optional technical standards • Open space, sports and recreation facilities, public rights of way and local green space.
	Building for a Healthy Life²⁶ (2020) A Design Toolkit for neighbourhoods, streets, homes and public spaces	Policy SCLP11.1 Design Quality and Policy WLP8.29 Design of the East Suffolk Local Plans require major residential developments to perform positively when assessed for design quality using the Building for a Healthy Life ²⁷ guide’s assessment criteria.
	Department for Transport (2020) Local Transport Note 1/20: Cycle Infrastructure Design	Sets design requirements for active travel infrastructure.
	Building Regulations 2010 (as amended)	Minimum standards for accessibility, ventilation, sound resistance, etc.
	The Flood and Water Management Act 2010 (Schedule 3)	Mandatory requirement for sustainable drainage systems (SuDS).
County	Suffolk County Council (2022) Suffolk Design: Streets Guide	Active travel infrastructure and streets design guidance.
	Suffolk County Council (2020) Suffolk Green Access Strategy (Rights of Way Improvement Plan) 2020-2030	Public Rights of Way engagement and design guidance.
	Suffolk County Council (2023) Air Quality Strategy & Action Plan	Information and design guidance.
	NHS Suffolk & North East Essex ICS (2022) Green Plan	Future-proofing NHS estates and facilities.
	NHS Waveney & Norfolk ICS (2022) Green Plan	Future-proofing NHS estates and facilities.
	NHS Waveney & Norfolk ICS (2022) The Health Protocol	Engagement protocol for officers and health partners. See Appendix 3 – The Health Protocol .

²⁶ Birkbeck, D., Kruczkowski, S. with Jones, P., McGlynn, S. and Singleton, D.; published by the Urban Design Group and available at: <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>.

²⁷ Previously Building for Life 12, which was superseded by the Building for a Healthy Life guide in 2020. Policy SCLP11.1 Design Quality and Policy WLP8.29 Design should be interpreted using the most up to date version of the Building for a Healthy Life guidance.



Level	Policy document	Key sections/chapter applicability
Local	East Suffolk Cycling and Walking Strategy (2022)	The recommendations of the Strategy.
	Waveney Green Infrastructure Strategy (2015)	The overall guidance framework and area-specific recommendations of the Strategy.
	East Suffolk Strategic Plan: Our Direction 2028 (2023)	Supports all commitments, though most directly the ambition within the Thriving Economy pillar to ensure the Local Plans “work for local people, as part of a vision to provide them with affordable housing, good public services, and a healthy environment so that East Suffolk continues to be a great place to live and work”.
	East Suffolk Air Quality Strategy (2021)	The recommendations of the Strategy.
	East Suffolk Environmental Guidance Note (2020)	Sustainability considerations across the content of the SPD.

Neighbourhood plans

- 1.25 Made' neighbourhood plans form part of the development plan for the district and therefore the policies of made neighbourhood plans carry equal weight to local plan policies in determining planning applications in the neighbourhood area. Neighbourhood plans may also include policies on health-related topics.

2 Green Infrastructure



Green Infrastructure: Key Messages

- **Open space** includes ‘green open spaces’ and ‘equipped play provision’ sites that are intended for recreational use by the public – provides a wide range of benefits for people of all ages and levels of ability when designed to be adequately accessible and inclusive of different groups needs and preferences.
- **Green open spaces** include parks and gardens, amenity green space (which can include safely accessible, nature-led sustainable drainage system scheme features), allotments/community gardens or orchards, natural and semi-natural green space (e.g. woodlands), and active travel routes in a highly natural setting (‘green routes’). Depending on the design approach used to these typologies they can have a more formal purpose (e.g. flower gardens), functional purpose (site drainage), and/or natural purpose (e.g. semi-natural green spaces that facilitate ‘nature immersion’ experiences to visitors). High quality green open spaces are multi-functional, and have relationships with the other elements on site and other green open spaces on site and within the green infrastructure network. Green open spaces can be used to deliver biodiversity net gains where this does not detract from their primary purpose of providing recreation space.
- **Play provision** sites are formal activity sites with equipment intended to facilitate a range of unstructured, active play experiences (for children, such as Local Equipped Areas for Play) or fitness activities (for young people and adults, known as ‘Youth/Casual’ provision). Play provision can be provided for any intended age group(s) to meet open space requirements, though is best informed by engagement with the community, and assessment of what is currently lacking in quality or quantity terms within the walkable area from the development site.
- **Open Space Methodology** – major residential development sites that are required through their scale to directly provide open space for future occupants but do not have a set quantity or type requirement set out in the relevant Local Plan should use the Open Space Methodology to determine the appropriate quantities and type(s) of open space to be provided on-site.
- **Suitable Alternative Natural Greenspace** is high-quality, extensive (around 8ha per 1,000 people) natural or semi-natural green space that has been provided with the primary purpose of relieving recreational pressure on ecologically sensitive European Sites (e.g. the Deben Estuary), as per the outcome of an Appropriate Assessment under The Conservation of Habitats and Species Regulations (2017). Pressure is relieved by providing a highly attractive, high quality alternative offer closer to where people live, so that they are less likely or are less often going to visit European sites for recreational activities such as dog walking.
- **Tree** planting selection is encouraged to be led by the ‘right tree in the right place’ principle, and guided by the enhanced wellbeing benefits offered by a diversity of tree species (native or non-native, if the latter is more appropriate for the environmental context), particularly where they offer a variety of sensory experiences or otherwise contribute to the public realm alongside other forms of landscaping (e.g. provide shade, reduce noise pollution, and/or offer visual screening).
- **Maintenance Agreements** should be discussed and agreed early, should provide for maintenance of the open spaces on site in perpetuity, be led by a Landscape and Ecological Management Plan, be designed and works undertaken by appropriate professionals, informed by engagement with the community, appropriately resourced, monitored and regularly reviewed as the maintenance needs of open spaces change over time.



2 Green Infrastructure

Introduction

2.1 Green infrastructure makes an important contribution to the health, wellbeing, and social cohesion of communities. Exercise, play, relaxation, socialisation, and access to nature are all essential to the health and wellbeing of people of all ages and levels of ability. Green infrastructure should therefore be seen as a critical and intrinsic part of developments, particularly developments that include residential use.

2.2 In the East Suffolk Local Plans and in this SPD, the term ‘green infrastructure’ includes:

- **Green open spaces** – spaces that are provided and/or made accessible for use by the public to meet their needs for outdoor recreation (exercise and social interaction), time in nature, and for growing food for their household’s consumption, e.g. parks and gardens, amenity green space, natural and semi-natural greenspaces, allotments, community gardens, community orchards, playing fields, etc.
- **Play provision** – equipped spaces with the purpose of facilitating unstructured active play experiences (e.g. climbing, spinning, swinging), informal sport (e.g. 5-a-side-football), outdoor fitness activities (e.g. horizontal bars) and informal outdoor performance (e.g. outdoor stage and seating). Play provision can be for small children only (LAPs²⁸), children and young people (LEAPs²⁹ and NEAPs³⁰), and/or for young people and adults (Youth/Casual³¹). Play provision is usually delivered within or adjacent to a type of green open space and provided with a landscaped setting;
- **Green routes:** cycling and walking routes set in a high quality, immersive natural setting, safely segregated from motorised vehicles;



Access to opportunities for social forms of exercise and play is important for people of all ages and abilities.

²⁸ Local Area for Play – small, landscaped areas for small children only.

²⁹ LEAPs – Local Equipped Area for Play, which are larger than LAPs and meet the needs of a wider age range of children and young people up to the age of 16.

³⁰ NEAPs – Neighbourhood Area for Play, which are larger than LEAPs and provide a wider variety of play experiences for children and young people up to the age of 16 and include informal sport provision.

³¹ Youth/Casual – play provision for young people and adults (ages 11+). Youth/Casual provision includes a wide range of play infrastructure, such as (but not limited to) exercise equipment for outdoor gyms, smaller Multi-Use Games Areas (MUGAs), zip lines, adult swings, skate parks, outdoor performance spaces, and outdoor structures for social gathering.



- **Planting** (trees, shrubs, grasses, flowers, etc.) and **landscaping**: these features to provide a more attractive, natural setting to developments (soft landscaping), to increase the accessibility of green open spaces (hard landscaping), and/or to create a noise or visual buffer (bundling).
 - **Sustainable drainage systems (SuDS)** that are nature-led and multi-functional, including features such as swales, ponds and ‘rain gardens’, and;
 - **Green roofs** and **green walls**. The quality, relative location and design details of proposed green infrastructure is critical to its useability, accessibility, inclusivity and value to communities. The guidance included in this chapter has therefore been produced to help ensure green infrastructure is consistently delivered to an appropriate standard of quality and sufficient quantity, and with an appropriate variety of types to meet the needs and preferences of different groups.
- 2.3 This chapter comes first in the order of design guidance chapters in this document to encourage this essential element to be planned and designed into development schemes first, which is known as taking a ‘landscape-first’ approach. All other essential elements (streets and active travel routes, buildings, centres, etc.) are therefore expected to be planned and designed in a way that gives high priority to the accessibility and quality of the scheme’s green infrastructure, and creates functional relationships between these elements and the green infrastructure.
- 2.4 The guidance in this SPD is focused on the design of healthy environments for people. Whilst the value of biodiversity for health and wellbeing value is recognised, technical guidance on the creation and protection of wildlife habitats, ecological mitigation and biodiversity net gain is not covered in depth in this document. More information on these matters and contact details for the Ecology team can be found via the Council's website³².

Policy context for green infrastructure

Key policies and guidance for green infrastructure

- 2.5 The below table provides a ‘quick reference’ guide to the key Local Plan policies that the guidance included in this chapter support. All policies should be read in full, including their supporting text, and should be considered in the context of the relevant Local Plan when read as a whole.

³² East Suffolk Ecology Team <https://www.eastsuffolk.gov.uk/planning/design-heritage-ecology-trees-landscape-and-rights-of-way/ecology/>



Table 6: A quick reference guide to the key Local Plan policies related to green infrastructure

Key guidance areas	Key Local Plan Policies	Key documents/design guidance
<ul style="list-style-type: none"> Open Space Methodology Design principles by green open space type Designing open spaces: general principles Suitable Alternative Natural Greenspace (SANG) Trees, landscaping, green routes, and sustainable drainage systems Play provision (all ages) Maintenance agreements 	<ul style="list-style-type: none"> Policy SCLP8.2 Open Space Policy SCLP8.3 Allotments Policy SCLP9.6 Sustainable Drainage Systems Policy SCLP11.1 Design Quality Policy SCLP10.1 Biodiversity and Geodiversity Policy WLP8.24 Flood Risk Policy WLP8.28 Sustainable Construction Policy WLP8.29 Design Policy WLP8.30 Design of Open Spaces Policy WLP8.34 Biodiversity and Geodiversity 	<ul style="list-style-type: none"> Natural England (2021) Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) Natural England (2023) Green Infrastructure Framework CIRIA (2015) The SuDS Manual Trees & Design Action Group (2019) Tree Species Selection for Green Infrastructure: A Guide for Specifiers BS 5837:2012 Trees in relation to design, demolition and construction: recommendations Sport England (2023) Active Design Guide Make Space for Girls – Research Report 2023 Suffolk County Council (2022) Suffolk Design: Streets Guide Suffolk Flood Risk Management Partnership (2023) Suffolk Flood Risk Management Strategy – Appendix A Sustainable Drainage Systems (SuDS): A Local Design Guide East Suffolk Council – Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy Habitat Regulations Assessment Record East Suffolk Council (2021) East Suffolk Open Space Report East Suffolk Council (2021) East Suffolk Playing Pitch and Outdoor Sports Strategy East Suffolk Council (2023) East Suffolk Play Area Strategy 2022-27

2.6 The National Planning Policy Framework (NPPF) makes clear that the provision of open space is central to the achievement of sustainable development. Paragraph 97 states that planning policies and decisions should (inter alia) plan positively for open spaces to enhance the sustainability of communities and residential environments. Specifically on trees, paragraph 136 states that planning policies and decisions should ensure that:

- new streets are tree-lined (unless there are clear, justifiable, and compelling reasons why this would be inappropriate),
- opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards),
- that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and
- that existing trees are retained wherever possible.



- 2.7 Paragraph 136 also advises that applicants and Local Planning Authorities should work with Highways Officers and Tree Officers to ensure that the right trees are planted in the right places, and that solutions are found that are compatible with highways standards and the needs of different users. Paragraph 186 of the NPPF adds to this that significant planning weight will be given to the retention of ancient or veteran trees.
- 2.8 In January 2023 the Government published a policy paper that reviewed the impacts of making sustainable drainage systems (SuDS) a legal requirement for all new developments above householder scale, by implementing Schedule 3 to The Flood and Water Management Act 2010. It is anticipated that implementation of this will be made in 2024.
- 2.9 The Building for a Healthy Life guide³³ (the successor of ‘Building for Life 12’) is endorsed by Policy SCLP11.1 Design Quality and Policy WLP8.29 Design of the Local Plans. The policies require all major residential developments to perform positively when assessed against the assessment criteria of the guide. The Building for a Healthy Life guide includes various sections that are relevant to the planning and design of green infrastructure and is recommended to be reviewed alongside the guidance in this document for developments that involve major residential development.
- 2.10 East Suffolk has a rich and varied landscape and is home to important designated landscapes such as the Suffolk & Essex Coast & Heaths National Landscape. Local landscape character is an important consideration in the design of green infrastructure and can help to inform planting and habitat creation. Proposals for new green infrastructure across East Suffolk should be informed by the Suffolk Coastal Landscape Character Assessment (2018) and the Waveney District Landscape Character Assessment (2008)³⁴, and any updates to these documents which may follow in the future.
- 2.11 Suffolk County Council have produced a Suffolk Design: Streets Guide (2022)³⁵, which includes guidance on the Highways Authority’s requirements for street tree plantings. The Suffolk Design: Streets Guide includes guidance on appropriate spacing, the minimum distances between trees and other street elements, and the minimum canopy heights (for sufficient clearance area underneath) for street trees. The Suffolk Flood Risk Management Partnership have also recently updated the Suffolk Flood Risk Management Strategy, which inter alia includes a sustainable drainage systems design guide in Appendix A of the document.

Open space: definitions

- 2.12 The term ‘open space’ is defined in the Glossary of the National Planning Policy Framework (Annex 2) as “...all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity”.
- 2.13 The term ‘open space’ is defined in paragraph 8.9 of the supporting text of Policy SCLP8.2: Open Space of the East Suffolk Council – Suffolk Coastal Local Plan as:

³³ Birkbeck, D., Kruczkowski, S. with Jones, P., McGlynn, S. and Singleton, D (2020) Building for a Healthy Life: a design toolkit for neighbourhoods, streets, homes and public spaces. Available at: https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf.

³⁴ Landscape Character Assessments available at <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/>.

³⁵ Available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas>.



“Open space which is accessible can be provided through formal facilities such as playing pitches and courts, but also through informal spaces such as village greens, woodlands, beaches, and public rights of way which collectively contribute to healthy communities and active lifestyles. Open space such as countryside which provides a visual sense of openness is not included within this policy as normally those areas are not publicly accessible, other than on Public Rights of Way”.

- 2.14 This policy refers to both ‘open space and recreational facilities’, though the term ‘recreational facilities’ is not defined in the supporting text. This term can be understood to encompass both built indoor sports/leisure facilities (e.g. leisure centres) and equipped play provision (of all types and for all ages).
- 2.15 Built indoor sports/leisure facilities delivered through new development are managed on a bespoke site-by-site basis in accordance with identified local needs at the time of delivery and may also be influenced by the availability of additional funding opportunities (e.g. CIL). Because of this complexity, generic guidance on the design and delivery of built indoor sports/leisure facilities has not been included in the SPD. However, planning and design guidance for play provision has been included.
- 2.16 Paragraph 8.177 of the supporting text for Policy WLP8.30 Design of Open Spaces of the East Suffolk Council – Waveney Local Plan defines ‘open space’ as those that are accessible and meet the needs and expectations of the local community, and that support high quality of life for residents and visitors. It identifies ‘open space’ as inclusive of: wildlife areas, natural greenspace, parks and gardens, amenity greenspace, play space, allotments and green corridors.
- 2.17 The terms ‘green open space’ and ‘play provision’ are used in this SPD in order to make the distinction between the two broad types of open space that are likely to be provided on site and that will therefore benefit from SPD guidance.

East Suffolk Cycling & Walking Strategy

- 2.18 In 2022 East Suffolk Council adopted the East Suffolk Cycling and Walking Strategy³⁶. This document includes recommendations for the creation of new active travel infrastructure (cycling and walking routes and cycle parking provision) and the improvement of existing active travel infrastructure in the district. The Strategy largely focused on:
 - utility trips – strategic routes that are intended to facilitate safer, more direct, accessible, and more convenient routes for commuting to work and school and trips to centres for meeting day to day needs;
 - recommendations for the creation of ‘key corridor’ routes – connecting the district’s largest settlements to each other and to their nearby market towns or villages), which included Ipswich, Martlesham, Woodbridge, Melton, Felixstowe and Lowestoft;
 - recommendations for improving routes within Felixstowe and Lowestoft’s central areas;

³⁶ Accessible via: <https://storymaps.arcgis.com/collections/4bd40e1d6e6c4637a7fceb840827c843>



- recommendations for improving walking and cycling connections to/from and within sites allocated in the Local Plans, and;
- recommendations for routes intended for principally leisure purposes – improving Public Rights of Way routes to support cycling and walking activities for fitness, time spent in nature, dog-walking and general wellbeing benefits of these activities.

2.19 Active travel infrastructure and green infrastructure are recommended to be the first two essential elements that are planned and designed into developments to support the creation of healthy environments and lifetime neighbourhoods. The design quality and useability of these two essential elements mutually benefit from being co-designed and delivered together. An example of this may be a shared use path that is segregated from vehicles using SuDS features, such as rain gardens and tree plantings.

East Suffolk Leisure Strategy and East Suffolk Play Strategy 2022-27

- 2.20 The East Suffolk Leisure Strategy (2021)³⁷ is comprised of an overall strategy document and supporting evidence documents for directing future leisure developments in the district. The evidence documents of relevance to green infrastructure delivery include:
- The East Suffolk Playing Pitch and Outdoor Sports Strategy (2021) – forecasts demand for playing pitch improvements and new provision in East Suffolk to 2036, and;
 - The East Suffolk Open Space Report (2021) – identifies deficits in the current provision of key green open space types (amenity green space, natural and semi-natural green space, parks and gardens and allotments) and recommends quantity rates for the delivery of new provision through development in East Suffolk to 2036.
- 2.21 The East Suffolk Play Area Strategy 2022-27³⁸ (2024) provides an overview of the current quantities, level of quality, community value, and spatial distribution of different types of play provision throughout East Suffolk. The Strategy is supported by an interactive map that shows key information for each of the play sites assessed³⁹.

³⁷ All Leisure Strategy documents except the Play Area Strategy 2022-27 are available at: <https://www.eastsuffolk.gov.uk/leisure/sport-and-leisure-development/east-suffolk-leisure-strategy/>.

³⁸ Available at: <https://www.eastsuffolk.gov.uk/assets/Leisure/Parks-and-open-spaces/Play-Spaces/East-Suffolk-Play-Area-Strategy-2023-2027.pdf>

³⁹ Available at: <https://eastsuffolk.maps.arcgis.com/apps/instant/sidebar/index.html?appid=5dd3a4416b274c1baf499b0e6203a058>



- 2.22 The evidence documents of the East Suffolk Leisure Strategy and East Suffolk Play Area Strategy update some of the Waveney Green Infrastructure Strategy's (2015) evidence base (e.g. provision quantity by population figures), however its recommendations are still generally considered to be up to date.
- 2.23 The Leisure Strategy documents' evidence base, and the methodology and design guidance included in this chapter together supersede the guidance that was provided in SPG15: Outdoor Playing Space (2001) and the Open Space Provision & Developer Contributions SPD (2012).

Neighbourhood Plans

- 2.24 'Made' neighbourhood plans form part of the development plan for the district and may include policies that relate to the design and location of open space within the neighbourhood plan area, amongst other policy topics.
- 2.25 Neighbourhood Plan policies should be deliverable and reflect available evidence such as open space needs assessments, consultation and co-design events with the community, and use of the Open Space Methodology.



Amenity greenspace at Buckton Place, Leiston

The benefits of open space

The community benefits of green open space

- 2.26 The below table, **Table 7**, provides a summary of some of the key green open space functions and benefits for health and wellbeing:

Table 7: Key health and wellbeing benefits of green open space

Benefit	Description
Habitat and food sources for wildlife	Green open spaces can help to providing habitat and food sources for wildlife, which helps to support nature recovery and may help to increase local biodiversity. This supports nature-based leisure activities such as birdwatching and walking. More biodiverse natural settings provide more varied sensory stimulation, and therefore more enjoyment, and supports higher quality 'nature immersion' experiences.



Benefit	Description
Food production	Providing appropriate spaces for food production and habitat for the pollinator species that support higher yields help to improve communities' nutrition, weight status, activity levels and overall physical and mental health. Communal food production spaces (e.g. allotments and community gardens) provide the additional benefit of promoting community interaction and cohesion.
Environmental quality: air pollution capture	As well as producing oxygen, trees absorb carbon dioxide (CO ₂), ozone (O ₃), nitrogen dioxide (NO ₂), and capture particulate matter on their leaves. This acts as a natural barrier, reducing damage to human tissues.
Physical activity and play space	Green open space provides a suitable space for formal and informal outdoor sports, play, and group or individual physical exercise (e.g. jogging, dog walking, leisure cycling). Green open spaces are usually the settings of organised community fitness leisure activities, such as parkruns© and Green Gym® activities (or local equivalent) ⁴⁰ .
Direct health benefits: hypertension and dementia	Green open space access may reduce risk of hypertension ⁴¹ and dementia ⁴² .
Mental health benefits	Time spent outside in nature is a mental health need in itself, and therefore the adequate integration of nature with development is critical. Time spent in an immersive natural setting may boost mood, reduce stress, restore the brain's capacity to handle subsequent stress, to commit information to memory, and to sustain directed attention ⁴³ . Green open spaces can also be used as the setting of green social prescribing activities.
Promotes time spent outside	Time spent outside in natural light supports adequate Vitamin D synthesis, alertness and internal body clock regulation. Green open spaces may also provide respite areas with cleaner air than otherwise found in centres, transport corridors and some indoor environments – indoor air quality can often be poor, particularly in buildings with gas appliances and/or with poor ventilation.
Provide public facilities	Together with their leisure functions, green open spaces are often the setting for important public facilities such as public toilets, bins and benches.
Provides an attractive environment	The integration of green open space and other natural forms of green infrastructure (e.g. green roofs, walls, rain gardens, landscaped areas, etc.) into built developments significantly increases their attractiveness.

⁴⁰ Green gym activities are typically more vigorous food production, maintenance or conservation tasks intended to give volunteers a workout that is also productive and social. Although there is currently no Green Gym branch in East Suffolk, similar organisations exist such as GoodGym, which has a branch in Ipswich. More information as available at: <https://www.tcv.org.uk/greengym/> and <https://www.goodgym.org/v3/areas/ipswich>.

⁴¹ See Zhao, Y., Bao, W. W., Yang, B. Y., Liang, J. H., Gui, Z. H., Huang, S., Chen, Y. C., Dong, G. H., & Chen, Y. J. (2022) *Association between greenspace and blood pressure: A systematic review and meta-analysis*. The Science of the Total Environment, 817, 152513. Available at: <https://doi.org/10.1016/j.scitotenv.2021.152513>.

⁴² Slawsky, E.D., Hajat, A., Rhew, I.C. et al. Neighbourhood greenspace exposure as a protective factor in dementia risk among U.S. adults 75years or older: a cohort study. *Environ Health* 21, 14 (2022). <https://doi.org/10.1186/s12940-022-00830-6>

⁴³ See literature on attention restoration and stress reduction theory, e.g. Kaplan and Kaplan (1989) and Ulrich et al (1991).



Benefit	Description
Reduces deprivation and increases inclusivity	<p>Green open spaces are free for all to use , which is of increased value to households on lower incomes and young people under 18, who may have limited access to commercialised or age-restricted spaces.</p> <p>Green open space can help to offset some of the mental health pressure arising from poor quality and/or overcrowded housing, as well as general stress and exposure to poor quality environments (e.g. noise and air pollution).</p> <p>As well as more active physical activities, green open spaces provides a low stimulation space for relaxation and gentle recreation activities such as reading and sunbathing, which also support health and wellbeing. Low stimulation spaces can be important enablers for people that are neurodiverse or have mental health challenges, as they help to provide relief from higher stimulation environments (such as town centres).</p> <p>Green open space can also be a great enabler for people to exercise at a pace, structure and intensity that suits them, in accordance with their level of fitness, ability and preferences. This is of particular value where alternatives might be less suitable or preferred (e.g. gyms or fitness classes), provided that accessibility requirements are met (e.g. wide, smooth, well-draining and bound-surfaced paths for enabling wheelchair users).</p>
Education and fostering an ‘environmental stewardship’ mindset	<p>Living close to nature increases awareness of its beauty, functionality and value for its own sake than living in environments that are deficient in access to nature. This fosters communities’ conviction to protect nature for its own sake. Green open spaces offer opportunities for on the community to increase their knowledge of plants and wildlife, food growing, and skills that can be taught in an outdoor setting. This may have added co-benefits such as increased volunteering opportunities and eco-tourism in the area, increasing community cohesion and income.</p>
Fosters an ‘environmental stewardship’ and ‘pride of place’ mindset	<p>Attractive, distinctive green open spaces helps to support communities’ pride of place and place attachment. This may have added co-benefits such as increasing investment and tourism in the area.</p>
Water attenuation and quality	<p>The roots of plants capture surface water as it percolates, slowing surface water run-off speeds and reducing the risk of flooding, whilst also filtering pollutants.</p>
Environmental quality: sound attenuation and privacy	<p>Tree plantings and landscaped bunds can act as effective noise pollution buffers and may provide visual screening.</p>
Shade and shelter	<p>Trees, shrubs and hedgerow can help to provide shelter from wind and rain, and shade from the sun.</p>

2.27 Together with providing space for recreation, green open spaces provide important ecosystem services for people and our habitats, such as cleaning the air, reducing and slowing surface water, providing shade in hot weather, providing space and pollinator species support for the production of food. People also need regular



access to natural spaces that are rich and biodiverse in terms of plants and wildlife species, for its own sake. In this document, the term ‘green open space’ also includes publicly accessible open ‘blue’ spaces (e.g. ponds, lakes and accessible, nature-led sustainable drainage system schemes).

The community benefits of play provision for children

- 2.28 Play is the work of the child: social and physical play is critical for their health, wellbeing and development into confident, resilient and healthy adults; it is not simply a ‘nice to have’. High quality spaces for play are therefore expected to be a priority in the design of built environments where children will live. High quality play provision is supportive of each of the key pillars of healthy child development, which can be summarised at a high level as:
- Physical health (aerobic fitness, muscle and bone strength, flexibility, outside play supports maintenance of healthy vitamin D levels and healthy gut flora),
 - Social skills and social health (cooperative play, sharing and negotiation),
 - Emotional development and wellbeing (supports self-regulation and competitive forms of play supports healthy relationship with competition), and
 - Mental development (motor skills – e.g. jumping, swinging and balancing, proprioception, and understanding limitations/potential of the body; risk management, and; problem solving skills).

The community benefits of play provision for young people and adults

- 2.29 Play provision for young people and adults (11+) is referred to as ‘Youth/Casual’ play provision in this document. Play provision is an important ‘equaliser’ between different groups within communities as it is free to use and can be designed to ensure high levels of inclusivity and relevance to the needs of the communities it serves. Free to use equipped spaces support social interaction in a healthy context, builds self-esteem and fitness, reduces the experience of deprivation, and helps to promote the adoption of healthy lifestyles. Provision within easy walking distance of homes is of enhanced importance to households with barriers that limit their access to opportunities for play, exercise, relaxation and/or access to nature, such as households with lower incomes.
- 2.30 These spaces are often especially effective where they have been co-designed through consultation with local young people, as this supports a sense of community ownership and ensures the provision meets their needs. The Council therefore support and encourage developers to co-design Youth/Casual play provision with young people and adults.

Open Space Methodology: Background

Introduction

- 2.31 The Healthy Environments SPD guidance supersedes SPG15: Outdoor Playing Space (2001, former Suffolk Coastal area) and the Open Space Provision & Developer Contributions SPD (2012, former Waveney area). These documents previously provided methodologies for the calculation of open space quantity requirements and



open space design guidance. The evidence documents that supported the East Suffolk Leisure Strategy (2021)⁴⁴ and East Suffolk Play Area Strategy 2022-27 (2023)⁴⁵ have informed the Open Space Methodology included in this chapter of the SPD.

- 2.32 The Open Space Methodology should be used for the calculation of open space requirements on major residential sites that do not have an open space quantum and/or type specified in the relevant Local Plan or relevant made Neighbourhood Plan. Open space quantum/type requirements are usually specified in site allocation or infrastructure policies.
- 2.33 Where open space requirements have been specified in a site allocation policy in the relevant Local Plan or made Neighbourhood Plan, the Council expects these specific requirements to be delivered unless material considerations clearly indicate that an alternative approach would deliver more value to future and existing communities.
- 2.34 The Open Space Methodology should be used alongside any requirements identified through the appropriate assessment process of The Conservation of Habitats and Species Regulations 2017 (“The Habitats Regulations”), such as the requirement for Suitable Alternative Natural Greenspace (SANG) to protect habits sites from recreational pressure.
- 2.35 Where SANG (as high quality natural/semi-natural green space) is to be delivered as part of a wider mix of open space types, the calculation of the SANG quantity (approximately 8ha per 1,000 people) should be done first, and then the calculation of all green open space types besides natural/semi-natural greenspace done following this, and then these totals added together to give the total indicative figure for how much green open space overall should be provided. This methodology is intended to be used as a starting point for finding the appropriate quantity and mix of open space types for sites where these requirements have not been stated in a site allocation policy or other policy document, and therefore this total may need to be revised up or down based on site-specific considerations.

Policy

- 2.36 To ensure that needs are met, paragraph 102 of the National Planning Policy Framework (NPPF) states that planning policies should be based on robust and up-to-date assessments of open space needs, sport and recreation facility needs and the opportunities for new provision. Information gained from these assessments should be used to determine what provision is needed, which plans should then seek to accommodate.
- 2.37 The approach of the East Suffolk Council – Waveney Local Plan (adopted 2019) to the delivery of open space was informed by the findings of the Waveney Open Space Needs Assessment (2015) and the recommendations of the Waveney Green Infrastructure Strategy (2015). These documents provided a robust evidence base for identifying where, how much, and what types of open spaces would be required to support planned growth in the district over the Local Plan period to 2036.

⁴⁴ Available at: <https://www.eastsuffolk.gov.uk/leisure/sport-and-leisure-development/east-suffolk-leisure-strategy>.

⁴⁵ Available at: <https://www.eastsuffolk.gov.uk/leisure/parks-and-open-spaces/play-spaces/>.



Quantity and type requirements were therefore able to be specified in site allocation policies throughout the Waveney Local Plan, for example, Policy WLP2.14 Land North of Union Lane in Oulton site allocation specifies the requirement for 0.4ha of open space that includes a Local Equipped Area for Play (LEAP).

- 2.38 On sites that have not been allocated in the Waveney Local Plan, Policy WLP1.3 Infrastructure makes clear that open space should be provided on all residential development sites of 1 hectare or more in size and should be designed in accordance with the needs identified in the Waveney Green Infrastructure Strategy and Waveney Open Space Needs Assessment. The design guidance in this SPD supersedes the design guidance in the Waveney Green Infrastructure Strategy and should therefore be given regard to instead. However, recommendations for improvements that have been included in the Waveney Green Infrastructure Strategy for the local area of the site should be considered and factored into the design of open space provision, where relevant.
- 2.39 The East Suffolk Council – Suffolk Coastal Local Plan (adopted 2020) did not have a green infrastructure strategy in place at the time of its preparation, and the existing evidence base from the Leisure Strategy (2014) documents were considered to be out of date. The Suffolk Coastal Local Plan’s open space policy, Policy SCLP8.2 Open Space, makes clear that new residential development will be expected to contribute to the provision of open space and recreational facilities (i.e. built indoor sport/leisure facilities and play provision) in order to benefit community health and wellbeing. The criteria of various site allocation policies make clear that open space provision is required, though they are not prescriptive in the quantity or type required for the site.
- 2.40 To ensure open space needs are still generally met over the plan period, the Suffolk Coastal Local Plan states in paragraph 8.12 that the Council will use the Fields in Trust benchmark figure of 2.4 hectares of open space per 1,000 people to calculate requirements, apart from when local evidence demonstrates the need for an alternative approach. Since adoption of the Local Plan in September 2020, the new East Suffolk Leisure Strategy, which covers the whole of the East Suffolk district – was adopted in 2021, which now provides this evidence.
- 2.41 Major residential development in the former Suffolk Coastal area on both allocated and windfall sites, and major residential development on windfall sites in the former Waveney area over the 1 ha size threshold, should follow the Open Space Methodology included in this chapter when determining the required quantities and type(s) of open space that is to be provided on-site, or equivalent financial contribution provided for.



Figure 2: East Suffolk Community Partnership Areas



Play provision: background

- 2.42 As noted in the [Policy context for green infrastructure](#) section, the East Suffolk Play Area Strategy 2022-27 was adopted in 2023. The Play Area Strategy 2022-27 provided an overview of the quantities, quality, community value and spatial distribution of different types of play provision throughout the district at the time of surveys. It is supported by a GIS map⁴⁶ of the findings of the assessments and the strategic priorities for improvements/expansion and consolidation of play sites over the period to 2027.
- 2.43 The Fields in Trust guide for outdoor sport and play⁴⁷ (FIT) provides recommendations on the minimum quantities and sizing of open space provision to meet needs. The FIT guide sets a minimum play provision quantity rate of 0.25 hectares per 1,000 population, and a minimum equipped play provision area size of 0.04 hectares, i.e. the minimum dimensions for a Local Equipped Area for Play (LEAP).
- 2.44 The Play Area Strategy 2022-27 ('the Play Strategy') identified that there were insufficient quantities of play provision space in all of the Community Partnership areas – with an overall district average quantity rate of just 0.1 hectares per 1,000 population being achieved. The Play Strategy also identified that much of the existing play provision was lower quality than needed, is not accessible and/or inclusive enough, and/or does not meet the needs of children over six years of age.
- 2.45 Table 2.1.1 in the Play Strategy included an overview of each of the Community Partnership Area's quantity rates, which is reproduced in [Table 8](#), below.

Table 8: Play provision quantity rates by Community Partnership Areas in 2021

Community Partnership Area	Play provision sites			
	Number of sites	Total hectares	Current provision quantity rate (based on 0.25 hectares per 1,000 population expectation)	Average quality rating (Minimum quality standard met = >59%)
Area 1	20	3.37	0.21 (0.04 deficit)	48%
Area 2	54	4.56	0.14 (0.11 deficit)	55%
Area 3	37	2.78	0.12 (0.13 deficit)	63%
Area 4	24	2.73	0.08 (0.17 deficit)	53%
Area 5	28	2.46	0.14 (0.11 deficit)	55%
Area 6	31	2.82	0.08 (0.17 deficit)	53%

⁴⁶ Available at: <https://eastsuffolk.maps.arcgis.com/apps/instant/sidebar/index.html?appid=5dd3a4416b274c1baf499b0e6203a058>.

⁴⁷ The Fields in Trust (2015) Guidance for Outdoor Sport and Play Beyond the Six Acre Standard: England. Available at: <https://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England.pdf>.



Community Partnership Area	Play provision sites			
	Number of sites	Total hectares	Current provision quantity rate (based on 0.25 hectares per 1,000 population expectation)	Average quality rating (Minimum quality standard met = >59%)
Area 7	54	3.30	0.05 (0.20 deficit)	59%
Area 8	32	2.53	0.11 (0.14 deficit)	47%
East Suffolk	280	24.55	0.10 (0.15 deficit)	55%

- 2.46 The Play Strategy also identified absolute catchment gaps in Lowestoft, Beccles, Woodbridge, Kesgrave and Felixstowe (see Table 2.2.2 of the Strategy). Of the 280 play provision sites across East Suffolk, only 43% rated above the Play Strategy’s quality threshold.
- 2.47 As the minimum quantity rate for play provision is expected to be 0.25 hectares per 1,000 people, **Table 7** shows that none of the Community Partnership Areas currently have enough play provision area. These figures do not discount the sites which are poor quality, nor does it disaggregate the extent to which the needs of different age groups are met by current provision. This means that it is likely that needs for new, expanded and improved play provision across the district is likely to be even higher than the Strategy data suggests.
- 2.48 In response to the findings of the Play Strategy the Council has concluded that a degree of over-delivery of new play provision, expansion and improvements to existing play provision and consolidation of lower quality/value existing play provision is needed to redress the quantity and quality deficits identified. The Council is therefore now actively transitioning away from numerous small, limited age-range equipped play provision sites (such as Local Areas for Play, LAPs) and towards fewer but larger, more accessibly located, higher quality, and wider age-range play provision sites (such as Neighbourhood Equipped Areas for Play, NEAPs).
- 2.49 It should be noted that entirely new on-site provision may not always be the solution that provides the most community value – the expansion and improvement of existing provision that is within walking distance (within a 10 minute/800m walk) of the site via a developer contribution may better deliver this. For this reason, it may be preferable for smaller development sites without a policy requirement for direct delivery of play provision on-site to make developer contributions for an existing site’s expansion instead.
- 2.50 This is likely to be the more appropriate option for smaller scale development sites whereby any new on-site play provision would likely be minimal in extent and quality, and therefore relatively unappealing when compared with an expanded existing site nearby.
- 2.51 Similarly, sites where strategically a larger NEAP and or Youth/Casual ‘play destination’ is hoped to be delivered, which would have an expanded catchment area (up to 1km / 12 minutes’ walk), this may also be of more community value than piecemeal, small on-site provision on multiple smaller development sites within that area.
- 2.52 The expansion of an existing play provision site (as an alternative to on-site provision) should be considered where the existing site:



- is within easy walking distance of the development site (a maximum of 10 minute/800m walk, though ideally 5 minutes/400m),
- has scope for the required amount of expansion to accommodate the demand arising from the residential growth the development accommodates,
- would be easier to make more accessible, inclusive and higher quality/variety of play experiences than onsite provision, and/or,
- can still maintain appropriate buffer zones /whether on-site provision could maintain appropriate buffer zones (see [Play provision](#) section for design guidance).

2.53 Where this option is being considered, developers are encouraged to seek site bespoke pre-application advice. The ability for on-site delivery to meet quantity and quality requirements (including appropriate buffer zone from homes)

2.54 The Strategy supports this approach through recommending a priority level for improvements and/or expansion of all of the existing play provision sites across the district (at the time of the survey), making it easier for developers and the Council to identify opportunities for suitable sites to be expanded in lieu of on-site provision, where this would deliver more community value.

Green open space provision: background

2.55 The Open Space Report (2021), which provided evidence for the East Suffolk Leisure Strategy (2021) and updates some of the Waveney Green Infrastructure Strategy's (2015) data, identified deficits in current green open space provision by Community Partnership Area and type (e.g. parks and gardens). These documents conclude with recommendations on how open space provision can be improved and rebalanced across the district through future development.

2.56 Though the Leisure Strategy documents update some of the Waveney Green Infrastructure Strategy's evidence base (e.g. provision quantity by population figures), its recommendations for green infrastructure improvements in the former Waveney area are still generally considered to be up to date. Where it is unclear whether a recommendation is still up to date, developers of major residential sites located in the former Waveney area are encouraged to seek site bespoke pre-application advice.

2.57 Newer, more up to date local evidence on the quantity, quality and variety of existing green open space provision within walking distance of the proposed development, and evidence of community need and aspirations for new/improved existing provision will be considered where provided. Similarly, evidence on site specific constraints will also be considered.



Playing fields: background

- 2.58 A ‘playing pitch’ is a delineated area of 0.2ha or more which is used for association football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, American football, Australian football, Gaelic football, shinty, hurling, polo or cycle polo. ‘Playing fields’ are outdoor grass fields that accommodate at least one playing pitch⁴⁸. Playing fields are maintained with short grass (year round), visible sport markings, and at least basic equipment for the sports they are intended to facilitate (e.g. goal posts).
- 2.59 The delivery of new playing fields is managed through Local Plan policies Policy WLP8.22 Built Community Services and Facilities and Policy SCLP8.2 Open Space and are directly required in some site allocation policies included in the Waveney Local Plan.
- 2.60 Where playing fields are able to be made accessible to the wider community, they can be designed and landscaped to offer additional community benefits, essentially performing the same function as ‘amenity green space’ when not in use for outdoor sporting activities (their primary intended use). When not in use for sport activities, playing fields can provide a suitable space for activities such as reading, walking, running, sunbathing, and informal games (e.g. casual frisbee).
- 2.61 Well landscaped playing fields that provide a more natural setting for playing pitches may also offer some biodiversity and access to nature benefits, though this is usually limited. This is because the need to prioritise their primary intended use by keeping them open, maintained and free of plantings in the pitch area(s), together with the necessary human activity (i.e. potential for noise/disturbance), reduces their ability to provide ‘nature immersion’ benefits to community users. This makes playing fields a less valuable option compared with other green open space types where meeting needs for access to nature is the primary goal.
- 2.62 The level of community value playing fields may provide depends on factors such as:
- the anticipated demand for space for outdoor sporting activities in the local area/arising from the development (considering matters such as anticipated demographics of future occupants),
 - whether other green open space types will be delivered on site/alternative forms of (accessible) green open space in the area, meaning these needs will be met, and
 - the quality and extent of the landscaped areas.
- 2.63 The delivery of playing fields (and built/outdoor sport facilities) should be based on robust and up-to-date assessments of need (including quantitative or qualitative deficits or surpluses), which is provided through the Leisure Strategy 2021 evidence documents. As community demand for playing fields is usually lower than for other green open space types, they are provided less frequently and have larger catchment areas. The Council’s approach to the delivery of playing fields (and

⁴⁸ As per definition included in Sport England (2018) Playing Fields Policy and Guidance. Available at: <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/playing-fields-policy-and-guidance.pdf>.



artificial playing pitches) is therefore to provide them in smaller quantities but more precise locations than other forms of open space, in response to identified local demand.

- 2.64 Where playing fields are required for specific sites, they will either have been identified in the criteria of site allocation policies or will otherwise be required on a site-by-site basis for larger, more strategic-scale sites in accordance with the identified needs arising from the proposed development.
- 2.65 As the delivery of playing fields is more closely managed by the Council, playing fields are not separately itemised in the Open Space Methodology. Where delivered, playing fields can count towards the development’s amenity green space requirements arising from use of this methodology, where the design is likely to provide wider benefits.

Where there is no demonstrated evidence of local need for playing fields or capacity to take on management of the asset, the Council is unlikely to support the inclusion of playing fields in proposals.

Open Space Methodology: determining quantity and type requirements

- 2.66 The Open Space Methodology is structured into five steps. The methodology is intended to help developers of major residential developments that do not already have specified open space requirements in a development plan policy.
- 2.67 As can be seen in **Figure 3**, the first three steps help developers to determine the approximate **quantity** of open space that the Council will expect them to provide (calculated according to community needs by type and then totalled for an overall total). The fourth and fifth steps will then help developers to identify **which type(s)** of open space are likely to be most appropriate for delivery in the site’s location (steps 4-5), in accordance with localised community need by type, and what types will likely deliver the most value in that location.

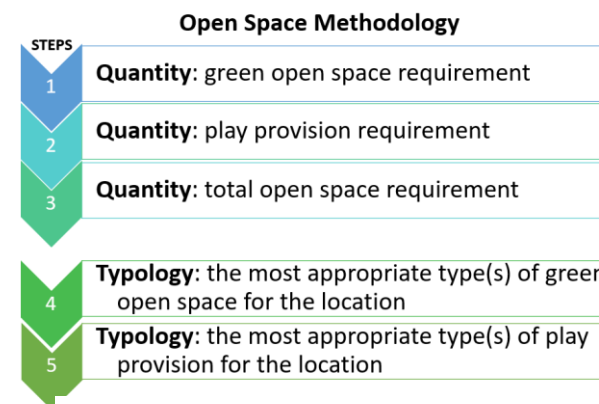


Figure 3: Open Space Methodology process

Open Space Methodology: Suitable Alternative Natural Greenspace (SANG) specific considerations

- 2.68 Large, strategic scale sites that are required to deliver SANG (large-scale natural/semi-natural green space designed to relieve recreational pressure on sensitive habitats sites), such as Garden Villages and Garden Neighbourhoods, are expected to achieve a quantum of around 8 hectares per 1,000 people and a very high standard of quality.



- 2.69 Although Suitable Alternative Natural Greenspace (SANG) meets community needs for natural/semi-natural green space and may also meet needs for play provision if an equipped play site (e.g. LEAP) is included within it, it is unlikely to meet all of the open space needs for a large site. Where the required additional quantities and types of open space for these sites have not been stated in a site allocation policy, a separate additional layer of quantity calculation/type identification for the other forms of open space is required. **The Open Space Methodology should be used for this purpose.**
- 2.70 As SANGs are usually of significant scale, it is recommended that requirements for SANG are planned and designed in before the other forms of green infrastructure on the site (i.e. open space, green routes, SuDS, landscaping, etc.). The SANG calculation of 8ha per 1,000 people should be done first, to provide a benchmark quantum. Step 1 of the Open Space Methodology (green open space quantities) should then be adjusted to remove the quantity rate for natural/semi-natural green space from the calculation, as the SANG will be expected to meet the new community's needs for this typology on site. It may also be appropriate for other green open space quantity rates to be proportionately reduced, with the exception of allotments (as other forms of green open space cannot meet needs for allotments).
- 2.71 It should be noted that, while use of the Open Space Methodology will provide an approximate guide to the appropriate amount and types of open space to be provided, larger sites with SANG will require a bespoke approach. Therefore, for these sites outcomes from use of the Open Space Methodology should be taken as a starting point from which to engage in pre-application discussions with officers regarding quantities, types and appropriate design approaches.
- 2.72 Planning and design guidance on SANG requirements is included in the [Suitable Alternative Natural Greenspace \(SANG\)](#) section of this chapter.

Step 1: Green open space – quantity

- 2.73 This step in the Open Space Methodology should be followed for all major development sites with residential use where a quantity requirement for green open space provision has not been specified the relevant adopted Local Plan or made Neighbourhood Plan.
- 2.74 The Open Space Report (2021)⁴⁹ identifies the current quantity rate (hectares of provision per 1,000 people) for each of the four key green open space types in each of the district's Community Partnership Areas in Tables 4.1 (parks and gardens, p.21), 5.1 (natural/semi-natural greenspace, p.27), 6.1 (amenity greenspace, p.36) and 7.1 (allotments, p.47).
- 2.75 The Open Space Report then identifies the quantity rates required for delivery going forward for each of the key types in order to bring the district's provision up to a desirable level through development over time. These quantity rates for future provision are provided in [Table 9](#), below (reproduced from Table 9.3.1 of the Open Space Report, p.63).

⁴⁹ East Suffolk Council (2021) Open Space Report. Available at: <https://www.eastsuffolk.gov.uk/assets/Leisure/East-Suffolk-Leisure-Strategy/Open-Spaces-Assessment.pdf>.



Table 9: Quantity rates for the future provision of green open space in East Suffolk by type

Green open space type	Quantity rates for East Suffolk (hectares per 1,000 population)
Parks and gardens	0.22
Natural and semi natural green space	3.64
Amenity green space	0.92
Allotments	0.26
Total green open space requirement	5 hectares per 1,000 population

- 2.76 These figures (in Table 9, above) are expected to be used for the green open space quantity calculations (as per Table 10, below). The exception to this is if newer local evidence strongly indicates the need for a different approach in the area local to the development site. Submission of newer evidence of need/quantities of provision will be considered if able to be adequately demonstrated to be robust.
- 2.77 The next factor to be included in the quantity calculation is the average rate of occupancy per dwelling, and therefore need arising from the population growth the development will accommodate. The Open Space Report identifies an average occupancy rate figure of 2.4 people per household across the East Suffolk district. To put this into context, this means a completed 100 dwelling scheme can reasonably expect to accommodate around 240 people.
- 2.78 The number of dwellings proposed and their anticipated occupation rate should be multiplied by the quantity rate figure for each of the key green open space types, and then the subtotals for each type added up to produce an overall total of green open space quantity required. The below example calculation (see Table 9) is based on a 100 dwelling scheme:

Table 10: Example calculation to determine the overall quantity of green open space required in a 100 dwelling development

Growth x quantity rate	Minimum green open space quantity to be planned for in this example
$(100 \times 2.4 = 240 \text{ people}) \times \text{parks and gardens } (0.22) / 1,000 \text{ people}$	0.053 hectares
$(100 \times 2.4 = 240 \text{ people}) \times \text{natural/semi-natural green space } (3.64) / 1,000 \text{ people}$	0.87hectares
$(100 \times 2.4 = 240 \text{ people}) \times \text{amenity green space } (0.92) / 1,000 \text{ people}$	0.22 hectares
$(100 \times 2.4 = 240 \text{ people}) \times \text{allotments } (0.26) / 1,000 \text{ people}$	0.06 hectares
Minimum total green open space to be planned for:	= 1.2 hectares of <u>green open space</u> is required

- 2.79 Where appropriate, exceedance of these figures in proposals will be supported – these quantity rates are to be used as the basis for site’s minimum requirements unless there are material considerations (such as newer local evidence or site-specific considerations) that indicate the need for a different approach to overall quantity.



2.80 This overall figure for green open space is to then be taken forward onto the next steps of the Open Space Methodology, where the overall quantity to be delivered provides the context through which to identify which types of green open space would be best to deliver on site, in terms of meeting local needs and delivering the most community value. The quantity figures for each type that the calculation produces does not mean that the Council necessarily expects all four of the key green open space types need to be delivered on every site. This is instead intended to provide the developer with a benchmark expectation for the overall minimum quantum to be delivered before moving on to identify the most suitable type(s) for delivery on-site. These figures can also be used to guide a proportionate developer contribution for the limited instances where off-site provision of green open space may be most appropriate.

Step 2: Play provision – quantity

2.81 The East Suffolk Play Area Strategy 2022-27 (2023) did not identify and specify a minimum quantity rate for the delivery of play provision for children (i.e. LEAPs and NEAPs) or for Youth/Casual play provision (i.e. skate parks, outdoor gyms, zip lines, etc.) in the district. For simplicity, the Open Space Methodology uses the Fields in Trust (FIT) guide’s recommended figure of 0.25 hectares per 1,000 people to calculate the minimum quantity of play provision required. This overall calculation of quantity is inclusive of both main categories of play provision (for children and Youth/Casual) – a subsequent step in the Open Space Methodology will help to identify which type(s) are best delivered on site for meeting community needs and maximising community value. The below example is based on a 100 dwelling scheme at the average occupancy rate of 2.4 people per dwelling:

Table 11: Example calculation to determine the quantity of play provision required in a 100 dwelling development

Growth x quantity rate	Minimum play provision quantity to be planned for in this example
$(100 \times 2.4 = 240 \text{ people}) \times \text{play provision } (0.25) / 1,000 \text{ people}$	0.06 hectares
Minimum total play provision to be planned for:	= 0.06 hectares of <u>play provision</u>

2.82 As a result of the district-wide deficit, developers of residential sites can expect proposals that voluntarily exceed this quantity figure to be supported by the Council, provided the location of the play provision is suitable and sustainable for enhanced provision, i.e. there is a large enough population to benefit from enhanced provision. Other factors that will be considered is the design, materials, and whether a secure, sustainable maintenance agreement is able to be agreed.

2.83 It should be noted that in some locations it may be of more value to the community to proportionately extend and improve existing off-site play provision to accommodate the development’s growth. This can be achieved through developer contributions towards increasing the variety and quality of equipment and play experiences, to increase accessibility for walking and cycling, and to increase the number and variety of inclusive play equipment on the site. However, it should be noted that this option may not always be available as there will be many factors that influence deliverability of improvements to existing sites. This option will only be considered where the existing site to be improved is accessible within easy walking distance (maximum of 10 minutes’ walk/800m) from the site, and would be likely to deliver the most value for the community compared to on-site provision, or is necessary due to site-specific constraints.



Step 3: Quantity totals – total open space requirements

2.84 The two open space categories’ (green open space + play provision) quantity subtotals can then be added together to provide the full open space quantity requirement for the site, as can be seen in the example in **Table 12**, below:

Table 12: Example calculation to determine the total quantity of open space provision required in a 100 dwelling development

Growth x quantity rate	Minimum open space quantity to be planned for in this example
(100 x 2.4 = 240 people) x parks and gardens (0.22) / 1,000 people	0.053 hectares
(100 x 2.4 = 240 people) x natural/semi-natural green space (3.64) / 1,000 people	0.87hectares
(100 x 2.4 = 240 people) x amenity green space (0.92) / 1,000 people	0.22 hectares
(100 x 2.4 = 240 people) x allotments (0.26) / 1,000 people	0.06 hectares
(100 x 2.4 = 240 people) x play provision (0.25) / 1,000 people	0.06 hectares
Minimum total open space to be planned for:	= 1.26 hectares of <u>open space</u> is required

2.85 Wherever possible, both categories of open space (green open space and play provision) should be provided, rather than pooling the total quantity requirement and delivering only one category. However, it is acknowledged that there may be local circumstances where allocating the full open space requirement to exclusively one category may deliver the most community value, e.g. when there is already ample high quality play provision within walking distance (within a 10 minute/800m walk) of the site, the delivery of only green open space on-site may be appropriate.

Step 4: Green open space – selecting the appropriate type for the location

2.86 On sites where Suitable Alternative Natural Greenspace (SANG) is required, this should be factored into both the quantity calculations and the proposed mix of types of green open space to be provided on the site. See the [Open Space Methodology: Suitable Alternative Natural Greenspace \(SANG\) specific considerations](#) section above for details.

2.87 Table 9.3.2 of the Open Space Report (2021, p.64) shows the balances of green open space provision by Community Partnership Area at the time of the assessments. The Open Space Report also identified gaps in provision at settlement level by type (see Tables 9.2.2, 9.2.3 and 9.2.4, pp.61-62), excluding allotments. However, as this evidence is at quite a high level (the Community Partnership Areas typically each cover multiple parishes), this data should be used as an indicator to inform priorities for investigation at a lower level, i.e. local assessments of the accessibility and quality of green open space provision within walking distance from the site (10 minutes/800m), if any. Natural England’s Green Infrastructure Framework Map tool can be used for this purpose, however, site visits to existing local green open space provision is recommended to help ‘ground truth’ any of the evidence found through desktop assessment tools.



- 2.88 As noted in a previous step, it is not expected that all four key green open space types are delivered on every site. It may however be appropriate, particularly for larger sites, to provide multiple green open space types to ensure needs are met and to support design ambitions, e.g. the creation of character areas. The provision of multiple types should be particularly considered for sites where, through consultation with the local community, it has been determined that a mix of types in smaller quantities would be of more value to the community than one single type in a larger quantity, e.g. the creation of a small allotment site and various small woodland areas, rather than one single large park at the development's heart.
- 2.89 The overall location and existing characteristics of a site may also give a strong steer on the appropriate type(s) of green open space to be provided on site – e.g. on a more rural site, the retention of existing on-site spinneys for the creation of a more extensive woodland as natural/semi-natural green space provision. Policy SCLP11.1 Design Quality and Policy WLP8.29 Design make clear that proposals should take account of any important landscape or topographical features and retain and/or enhance existing landscaping and natural and semi-natural features on site. Having prioritised their retention and enhancement, the existing natural features on site are expected to be significant determinants of which type(s) of green open space are to be provided on site. Ideally, retained natural features should be incorporated into open space (green open space or play provision) so that the community can benefit from them, however it may also be possible and appropriate to retain them as private garden features.
- 2.90 The selected green open space type(s) should be clearly indicated through submitted application documents (including on site plans and within the Design and Access Statement and the Statement of Community Involvement, where appropriate) to demonstrate how engagement with the Council, community, stakeholders and consultees have influenced the mix of types and the site's overall design approach to its green infrastructure.
- 2.91 It should be noted that sustainable drainage system (SuDS) schemes which have been designed to be safely accessible, nature-led, and appropriately planted and landscaped so as to be attractive and usable spaces can be considered part of the green open space offer of a site. SuDS schemes that have been designed to this level of quality can be considered interchangeable with amenity greenspace and can therefore count towards the requirement for this type, as well as the requirement for green open space provision on site more generally. Further guidance on the delivery of SuDS is available in the [SuDS: Multi-functional, nature-led sustainable drainage systems](#) section of this chapter.
- 2.92 Consideration should be given to needs met (or not met) through the provision (or lack of provision) of private external space, particularly at ground level in the way of private rear gardens, when assessing both quantities and types of open space to be provided. The provision of private rear gardens will help to meet the needs of some open space types more than others, depending on design e.g. allotments (space to grow food, though this is less social in a private context) verses natural/semi-natural green space (for immersion in nature, though larger more rural gardens may be more suited to meeting this need).
- 2.93 The likely demographics of the future occupants of the proposed development should be factored into the type selection, quantities of each type, and the detailed design considerations for the green open space (and play) provision. Households on lower incomes are likely to benefit the most from more and higher quality green open space and play provision.



Step 5: Play provision – selecting the appropriate type(s)

2.94 New play provision delivered in East Suffolk can consist of:

- **Local Equipped Areas for Play (LEAPs):** 0.04ha+ – aimed at people up to age 16 – LEAPs provide multiple equipment stations for varied play experiences.
- **Neighbourhood Equipped Areas for Play (NEAPs):** 0.1ha+ – aimed at people up to age 16 – NEAPs provide a more comprehensive variety of equipment stations and play experiences than LEAPs and usually include outdoor sport provision/smaller Multi-Use Game Areas, (e.g. a five a side football pitch) too; NEAPs are often sometimes with Youth/Casual provision to provide a holistic play destination for all ages.
- **Youth/Casual:** 0.1ha+⁵⁰ – intended for use by young people (ages 11-16) and adults (17+) only – it includes a wide range of facilities such as skate parks, outdoor gyms, zip lines, youth shelters, smaller MUGAs, etc.

2.95 In addition to these types are:

- (Supplementary) **Play on the Way:** various sizes – play equipment that is delivered on a supplementary basis to a LEAP, NEAP or Youth/Casual that is being delivered elsewhere on-site, and in relatively close proximity. Play on the Way is usually located along routes between key origins and destinations for children (e.g. between home and school) or key community locations (e.g. outside community facilities/local shops, etc.). Play on the Way equipment can be aimed at any age of user, with Play on the Way for young people and adults being typically more fitness focused. Examples include sets of swings, horizontal bars, leapfrog features, boulders/climbable features, stepping stones, permanent hopscotch grid, etc.
- (Limited circumstances) **Local Area for Play (LAPs):** 0.01ha+ - aimed at children under the age of six only; it should be noted that as this type is of limited value to the community and play provision for small children is generally over provided for in the district, LAPs will only be supported in very limited circumstances. LAPs may be appropriate for use in a similar way to Play on the Way equipment, where they supplement a more comprehensive LEAP or NEAP offer elsewhere on the site. However, in general the preference will be for LEAPs and NEAPs to meet the needs of all ages of children and young people (i.e. up to age 16).

2.96 The type and design of new play provision will be expected to be responsive to the new community's age demographics. This will be influenced by factors such as the types and sizes of homes being delivered, accessibility of the homes, their proximity to local schools and Employment Areas, etc.

2.97 The design of play provision should also be responsive to the play experience needs not currently met through existing provision within the local, walkable area from the site (10 minutes/800m radius) to ensure the new community has access to a more complete equipped play offer locally.

⁵⁰ 'Youth/Casual' play provision is a large sub-category that includes smaller facilities such as youth shelters which individually take up considerably less area than 0.1ha, but in will practice would normally be delivered as part of a wider overall Youth/Casual offer in excess of 0.1ha of provision. For example, a youth shelter might be provided as a supplementary facility to support use of a skate park or small Multi-Use Games Area (MUGA).



- 2.98 Buffer zones should also be factored into type selection, particularly where relevant due to site layout/size constraints. LEAPs require a minimum buffer zone from homes of 20 metres, whilst NEAPs and Youth/Casual require a larger buffer zone of 30m. Also, where Youth/Casual is delivered on a site that also provides a LEAP or NEAP, it is recommended that a distance of at least 30m is maintained between these two types of play provision so that young people and adults are not dissuaded from using the Youth/Casual provision due to the presence of children in that space.
- 2.99 Play provision designs should be clearly indicated through submitted application documents (including on site plans and within the Design and Access Statement and the Statement of Community Involvement, where appropriate) to demonstrate how engagement with the Council, community, stakeholders and consultees have influenced the design of the provision.
- 2.100 More information on play provision types can be found in the [Play provision](#) section in this chapter.

Open Space Methodology: Troubleshooting

Issue 1: The site's play provision requirement is less than the minimum area for play provision

- 2.101 The minimum area required for a LEAP is 0.04 hectares, and whilst Youth/Casual provision varies, it generally requires an area within the region of 0.1+ hectares, with the exception of youth shelters, though these are best integrated into a wider Youth/Casual provision site. A smaller development, such as a 50 dwelling site, could incur a requirement for 0.03ha (or less if smaller) of play provision through the Open Space Methodology, falling under this minimum play provision area threshold. This does not mean that accessible play space is not needed by the future community of the development, and therefore potential options to still meet this need should be considered. The following circumstances and potential solutions may apply:
 1. **New play provision is still delivered on site at an overprovision of the requirement:** play provision is still delivered in a valuable quantity and quality on site, and this voluntary over provision is recognised as planning gain and a material consideration in the overall planning balance. However, voluntary additional play provision should not come at the cost of other policy requirements being able to be met, e.g. affordable housing.
 2. **New play provision is still delivered on site as Play on the Way or a LAP:** Whilst the delivery of Play on the Way (where not co-delivered with a LEAP or NEAP elsewhere on site) and Local Areas for Play (LAPs) is generally discouraged, there may be local circumstances where this is appropriate and delivers more value than no new play provision at all. Where sites are to incorporate smaller play provision than a full LEAP, the Council will expect it to be designed in a way which ensures it is still valuable to the community and integral to other uses of space on the site. In these instances, the play provision will always need to be managed privately, as it is not cost effective for the Council to manage very small play provision sites.
 3. **No play provision is provided on site:** as the scale of the development meant that the minimum area for a LEAP standard of play provision was not triggered as a requirement through the Open Space Methodology, there remains the option to not provide any equipped play provision. In this situation, more focus is recommended to be placed on the design of the green open space(s) provided on site to ensure they support equipment-free forms of play for all ages (e.g. through the use of topographical contours) and/or includes exceptional features such as public art provision.



- 2.102 To be clear, where a site allocation policy in the relevant Local Plan or made Neighbourhood Plan specifies the requirement for a site to provide equipped play provision, then this should be provided regardless of what the outcome might be of running the proposed scheme's details through the Open Space Methodology calculations. The exception to this is if there are other material considerations that indicate an alternative approach would deliver the most community value.
- 2.103 Where on-site play provision is not delivered or under provided, the unmet needs of the community and additional pressure on existing play facilities will be recognised by the Council and can be addressed through Neighbourhood Plans or Parish Infrastructure Investment Plans⁵¹. This may justify the investment of Neighbourhood Community Infrastructure Levy (CIL) or support the case for Town and Parish Councils to bid for District CIL for enhancing their area's play facilities.

Issue 2: The site's play provision requirement is not able to be met on-site

- 2.104 In exceptional circumstances when a site is required to deliver at least 0.04 hectares of play (in the form of a LEAP, NEAP and/or Youth/Casual provision) but it is for whatever reason unable to achieve that, the following options may be considered:
1. **New off-site provision:** In exceptional circumstances it may be considered suitable, or occasionally more appropriate, to deliver new off-site play provision in lieu of on-site provision. For example, a large, flatted development in an urban area where there is an adjacent existing amenity green space and the delivery of new equipped play provision in that location would be likely to provide more value to the community than a more enclosed on-site offer. Where this solution is proposed, the off-site provision should be within easy walking distance of the site (within 10 minutes/800m, ideally 5 minutes/400m), supported by appropriate active travel infrastructure, and well overlooked by existing or new development. Any off-site provision should ideally be achieved as a direct delivery in agreement with the owner of the proposed location. A financial contribution secured by Section 106 agreement should only be used where there is an identifiable project to spend that funding on and it is a demonstrated deliverable form of mitigation.
 2. **Repurpose the requirements:** in very limited circumstances, where on site play is not practical or achievable (in full or in part), it may be acceptable for the play provision requirement to be repurposed for more (or higher quality) green open space on site. This option may be acceptable where existing play provision within walking distance of the site (within 10 minutes/800m) is already high quality and in sufficient quantity and variety to meet the needs arising from the new development. Where this option is taken, it is encouraged that the design focus of the extra green open space facilitates unstructured play (e.g. through the use of topographical contours) and/or includes exceptional features such as public art provision.

Issue 3: New green open space provision requirement is unable to be met on site

- 2.105 If due to site-specific constraints the total quantity of green open space provision that is required cannot reasonably be accommodated on site, there are two potential options:

⁵¹ Available at: <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/parish-support/>.



New off-site provision of green open space – may be appropriate if it is still within easy walking distance (within 10 minutes/800m, ideally 5 minutes/400m) and was demonstrated to be able to be made safely and inclusively accessible via active modes of travel. This would have to be identified as part of the application site to ensure that it can be secured by condition and/or Section 106 agreement. As an example, this could be achieved through incorporation and enhancement of an area of agricultural land near to the site. Where on-site provision is considered to be undeliverable, it should be demonstrated why an off-site approach would be of higher health and wellbeing value to the community (as well as for other purposes, such as biodiversity gains). It may, for example, be more advantageous overall by also connecting wildlife habitats and providing high quality ‘green routes’ (see [Green routes](#) section) between the two areas, making it comparatively more beneficial than on-site provision where this may not have been necessary. Such an approach should not be used as a means to justify a greater development density than that which is set out in the adopted Local Plan or made Neighbourhood Plans if a density rate has been specified (e.g. 30 dwellings per hectare).

Make what quantity of green open space *can* be accommodated ‘work harder’ through higher design quality – if this option is taken, the Council’s expectations in terms of design quality and multi-functionality of the reduced quantity of provision will be significantly higher. More information on how to achieve this is provided in the [Making green open space ‘work harder’ through design](#) section of this chapter.



Design principles by green open space type

Parks and gardens

2

Parks and gardens are typically more ‘manicured’ forms of green open space, e.g. providing short-mown grass lawns, low density woody planting and areas of ornamental herbaceous plantings.

Parks and gardens are principally for informal physical exercise and recreation activities such as running, dog walking, yoga, reading, sunbathing, informal games, and unstructured play, etc.

Parks and gardens are a very flexible type of green open space, and are therefore often the setting for other infrastructure, such as sustainable drainage systems (SuDS), public art, sport/leisure facilities and play provision.

Parks and gardens vary considerably in size, though in East Suffolk tend to be relatively large spaces.



Elmhurst Park, Woodbridge.

- 2.106 Parks are generally becoming more natural, with denser plantings and more areas left ‘wild’ (often the area’s edges are left to grow wild, or through the use of designated inaccessible zones), so as to support better habitat for wildlife, biodiversity and to provide people with higher quality ‘nature immersion’ experiences closer to home.
- 2.107 Parks that include ponds and lakes in a landscaped setting (where ‘green’ and ‘blue’ are combined) provide more enhanced wellbeing benefits due to the additional relaxation benefits of combining them. This approach is therefore supported where appropriate, considering other factors that may affect the appropriateness of green open space design for the site, such as biodiversity net gain requirements.



Amenity green spaces

Amenity green spaces are principally for day to day community use (e.g. for routine dog walking) and to enhance the appearance of residential developments.

Amenity green space is typically a smaller-scale, accessible, low-biodiversity green space. It is typically characterised by short-mown grass, a variety of plantings, and may include a nature-led sustainable drainage system (SuDS) scheme and/or boundary planting scheme. Amenity green spaces often also include play provision within them.

Amenity green space is typically located immediately adjacent to homes, or within very short walking distances. They tend to provide dog walking routes through and within them, seating, and space for informal exercise and relaxation activities.



Amenity green space at Laureate Fields, Felixstowe.

- 2.108 Amenity green spaces are principally for use in combination with landscaping to improve the overall appearance and performance (if a SuDS scheme is included) of residential developments.
- 2.109 Where possible, amenity green spaces should provide a variety of tree species, seating, and where appropriate should include general waste bins and dog waste bins when adjacent to or crossed by key walking routes.
- 2.110 Poorly designed and small-scale amenity green space can have the appearance of being 'left over' development space, rather than being an asset of amenity value to the community, meaning care must be taken to ensure it delivers as much value as an alternative green open space type would. The purpose of every space should be addressed in Design and Access Statements.



Natural and semi-natural green space

‘Natural’ green space is publicly accessible green open space where human control and activities are minimal, so that a feeling of naturalness is allowed to predominate. This supports high quality ‘nature immersion’ experiences for users of these spaces. Natural green space is native and so are largely left ‘wild’ to self-manage, with the help of minimal conservation activity as and when needed. In the context of open space provision, examples of natural green space include, publicly accessible woodland, scrub, grassland, heathland and wetlands.

‘Semi-natural’ green space is publicly accessible green open space as described above but that has been evidently altered by humans to make it more accessible. This may include spaces where accessible natural-surfacing (or bound, more accessible) footpaths have been created, the addition of basic facilities like litter/dog waste bins, benches, and way finding signage, and/or clearance has occurred to create open areas (e.g. picnic areas).

For the avoidance of doubt, these types do not include former agricultural fields, where evidence of human activity is typically high and biodiversity is low, unless substantial landscaping/planting/other restoration efforts have been made.



Walk Farm Wood, Martlesham

2.111 Natural and semi-natural green spaces tend to be large in size, consist of native plantings and habitat, and able to provide high quality ‘nature immersion’ experiences through the minimisation of ‘urban’ sensory experiences such as the sound and sight of vehicles, industry and non-residential buildings. This can be achieved through positioning the area away from higher activity areas, streets and roads and the use of buffer landscaping through planting dense, varied and layered plantings (throughout and around the edges, e.g. tree and shrub belts) and/or earthworks (bunds).



Allotments, community gardens or community orchards

Allotments, community gardens or community orchards are social spaces for non-commercial food production, where produce is for households' own consumption.

Allotment sites are usually organised into 250sqm plots that are each assigned to one household or are later subdivided for multiple households.

A community garden functions as one cooperatively managed growing space that is tended to by members that then share the garden's produce between them; the focus is often on organic, heritage variety, permaculture and/or otherwise pollinator-/soil-friendly forms of cultivation.

A community orchard is a sub-type of community garden, where co-operative cultivation through trees and shrubs produces fruit and nuts, often with a focus on heritage varieties.



Allotment plots at Kingston Field, Woodbridge.

- 2.112 Allotments and community gardens/orchards provide highly social spaces, making them powerful tools for building relationships and securing health net gains within communities. Allotments and community gardens provide direct physical (activity and nutrition), mental and social health and wellbeing benefits as well as indirect benefits of providing relief for households on food costs. Co-operative forms of food growing is often an important enabler for people with limited time (e.g. full-time working, caring responsibilities) to access food growing and to build relationships with people in their local community.
- 2.113 Allotments and community gardens/orchards therefore provide benefits across all life stages and levels of ability, particularly where sites are made highly accessible, have toilet facilities, and have community buildings/sheltered areas where allotment holder/member meetings and events can be held; on larger/more urban-located sites, these spaces may need to be suitable for a permanent or 'pop-up' shop or café.
- 2.114 Private and/or community growing spaces are particularly important for supporting development without appropriate private gardens for food production, such as homes with very small gardens or flatted development.
- 2.115 Allotment sites and community gardens should be secure by being enclosed with fencing and a lockable gate (plot holders/member access only by key). Wherever possible they should have direct or close by vehicle access for loading/unloading purposes, and ideally parking to increase inclusivity.



- 2.116 Allotment and community garden sites should include accessible paths within them, ideally throughout, though to at least a handful of accessible plots (which can be prioritised for those with reduced mobility). Allotment and community garden sites are encouraged to provide accessible plots that are suitable for the installation of wheelchair-accessible raised beds.
- 2.117 Allotments must be provided with a water connection; on larger sites various taps should be provided throughout the site in accessible locations. Allotment sites are encouraged to use means of harvesting rainwater so as to reduce extraction of potable water.
- 2.118 For contaminated sites, together with residential areas, the areas where food may be grown must also be fully remediated. This may be aided and add further reassurance to growers though raised beds.
- 2.119 It is essential that allotment management and transfer of ownership is well covered in the Section 106 agreement and any Community Cohesion Strategy. Allotments on development sites should have genuine community ownership or governance. Commercial/private run allotments, where plots are marketed and leased by companies are not an acceptable solution for development provision.
- 2.120 As per the guidance of The National Society of Allotment and Leisure Gardeners (NSALG), the standard plot size for individual allotment plots is 250 square metres (0.025 hectares). However, in practice many households will be interested in more manageably sized 'half-plots' or 'quarter-sized' plots or may take on a full plot but informally share it with another household. Notwithstanding this, unless engagement with the Town and Parish Council has indicated a different approach should be taken, allotment provision via new developments (i.e. directly provided on site) is expected to be provided using standard plot sizes per household.
- 2.121 The yield productivity of allotments (and food produced in domestic gardens) can be supported through pollinator-friendly plantings provided throughout the various types of green infrastructure provided on site. Supporting pollinator species to have adequate access to plants in flower during the warmer months of the year should be factored into maintenance agreements.
- 2.122 Community orchards will be supported, particularly where locally distinct heritage varieties are planted⁵².
- 2.123 Community Supported Agriculture schemes (a CSA – usually a small commercial farm that is supported by the community through labour in exchange for free or discounted fresh produce) will be supported where community engagement has indicated interest. The scheme can count as a contribution towards the overall green infrastructure and biodiversity net gain for the site, however, depending on the intended operations, it may not be able to be considered a form of green open space due to restrictions to public access outside of work party times. An East Suffolk example of a CSA is The Oak Tree Low Carbon Farm in Rushmere St. Andrew.

⁵² More information on traditional East of England varieties of fruiting trees can be found via the University of East Anglia's Orchards East Forum advice resources, accessible via: <https://www.uea.ac.uk/web/groups-and-centres/orchards-east/research-resources/orchard-advice>.



Playing fields

Playing fields are outdoor grass fields that accommodate at least one playing pitch (a delineated area of 0.2ha or more which is used for association football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, American football, Australian football, Gaelic football, shinty, hurling, polo or cycle polo). Playing fields are maintained with short grass (year round), visible sport markings, and at least basic equipment for the sports they are intended to facilitate (e.g. goal posts).

Playing fields may be suitable for use as the equivalent of amenity greenspace when not being used for sports activities, particularly where soft landscaping has been used to create a natural setting. Artificially surfaced playing pitches (e.g. 3G pitches) are covered in the [Healthy Centres & Community Facilities](#) chapter.



Crown Meadow, Lowestoft.

- 2.124 Playing fields should be of an appropriate scale and comply with relevant Sport England and national governing bodies of sport design guidance for the sport(s) they are intended to facilitate, provided with appropriate equipment (e.g. goal posts), and be kept well maintained with short grass and appropriate sport markings.
- 2.125 Playing fields should be well linked to active travel routes, though consideration will also need to be given to ensuring adequate car parking. Playing fields will therefore generally require car parking provision in order to facilitate the movement of users with sport equipment and parking for 'away' teams. Ideally, this should not be a dedicated car park but instead opportunities for wider shared car parking should be considered, such as within a local centre, community centre or shared with a new school (provided it allows evening and weekend use). Failure to provide sufficient parking may cause parking issues on surrounding streets. Any car park provided for a playing field should not be included in the space calculations for this use.
- 2.126 Playing fields may need to include a storage building for sports and maintenance equipment, and on larger sites a sports changing/pavilion facilities may be required. In some cases, such facilities can be integral to a community centre. Such a building should be designed to sizes and criteria recommended by Sports England and secured via a Section 106 agreement.
- 2.127 Where planting and landscaping has been used to provide the field with a more natural setting, some playing fields can effectively perform the same function as 'amenity green space' when not in use for sport activities. Playing fields can provide a suitable space for informal recreation and fitness activities like reading, sunbathing, running, informal games (e.g. casual frisbee games), etc. However, playing fields are more limited in their ability to provide 'nature immersion' relaxation benefits and may be less preferred spaces for informal recreational uses of green open spaces, particularly if extensive plantings has not been provided in the playing



field's setting to offset the necessary open, low-biodiversity area for the playing pitch(es). However, some uses, such as dog walking, can create conflicts in use of the space (due to dog waste, risks to user safety, etc.). There may also be issues with wildlife digging holes in the field if unenclosed. It may therefore be considered necessary for some playing fields to be fully fenced, such as those intended to be used primarily by children (e.g. school playing fields). The exception to this is where there is demonstrable demand for outdoor sport activity space locally and where needs for other forms of green open space will also be met.

2.128 Due to the above considerations, community demand for playing fields is usually lower than for other green open space types (subject to local circumstances). The delivery of playing fields (and artificial playing pitches) should be based on robust and up-to-date assessments of the need for playing pitches and sport facilities (including quantitative or qualitative deficits or surpluses), which is provided through the Leisure Strategy evidence documents. The Council's approach to the delivery of playing fields is for delivery to be closely managed, with fewer sites but in more precise locations in accordance with need, and with larger catchment/walkability areas (up to 1.2km/15 minutes' walk) than other forms of green open space. Provision should be supported by Council and community engagement to ensure it meets local needs and that there is adequate local capacity to take the asset on. Where there is no demonstrated evidence of local need for playing fields or capacity to take on management of the asset, the Council is unlikely to support the inclusion of playing fields in proposals.

Designing open spaces: general principles

2.129 Green open spaces are recommended to be designed in accordance with the following design considerations:

Accessibility and inclusivity

2.130 All green open spaces and play provision should be accessible by walking and cycling. Acceptable walking distances depend on which type of open space is being provided – varying from 5 minutes/400m to 15 minutes/1.2km. Consideration should be given to how some groups may cover less distance in these travel times than others, and therefore these distances should be seen as maximums. Where relevant, topographical influences on active travel should also be factored in.

2.131 The layout of green open spaces should respond to where and how people are likely to want to access and move around/through them. This should help to reduce the incidence of 'holes in the fence/hedge' and avoid the development of unattractive **desire lines**. The layout should therefore be responsive to:

- the planned access points, which in turn should respond to the key origins and destinations around the green open space (e.g. homes, schools and workplaces);
- any key natural features (e.g. a lake), or features of interest such as sculpture/public art and retained heritage features that are in the space;
- whether the space will accommodate any community facilities (e.g. a community centre), and;



- whether the space will have one or more accessible walking routes (at least 2 metres wide with a smooth, flat, bound, non-slip and free-draining surface treatment to support safe wheeling), and if so, the need to prioritize the routes that are most direct/short and flatter than less accessible routes.

2.132 All open space types should have at least two entry and exit points to allow movement through them and support user safety. To help ensure open spaces are used and moved through how they are intended to, access points should be clearly identifiable, accessible and overlooked with natural surveillance. Larger provision is recommended (SANG is required) to provide at least one shorter and accessible circular route within the space (less than 1.5km is recommended). Gates into any enclosed areas (e.g. flower gardens) should be wide and lightweight, making them easily operable. Shared paths (intended for both cycling and walking) within parks and gardens should be 3 metres wide to allow walking in small groups and for cyclists to safely overtake other users. Further guidance on active travel infrastructure can be found in the [Active Travel](#) chapter.

2.133 Where existing green open space or play provision borders with the site (i.e. having been delivered by a neighbouring development) and there is a clear opportunity to create a pedestrian/cyclist connection to it, developers are expected to undertake the necessary negotiations in order to create this connection.

2.134 Open space should not be ‘tucked away’ out of sight from the existing communities within walking distance of the new provision – it should be visible, well overlooked through natural surveillance, and open for all to use.

2.135 Open spaces should also be located so as to provide similar walking distance access from all housing tenures present on site to ensure the development’s layout is consistent with tenure-blind design principles, as required through the Building for a Healthy Life guide (2020).

2.136 Regard should also be given to the East Suffolk Cycling and Walking Strategy (2022) as the delivery of some of the recommendations (particularly for allocated sites) may need to influence the proposed layout and design of the development site, which in turn may influence the layout and design of open spaces.

2.137 Larger green open spaces should include wayfinding signage, such as finger posts, route marker posts, maps, or QR code links to further information online. Text on signs should be large and in a clear font. Where appropriate, text should be supplemented or replaced with clear iconography, e.g. internationally recognisable symbols to indicate public toilet facilities.



A surfaced footpath across Beccles Common, with playing fields either side.



- 2.138 All amenity green space and parks and garden provision should include benches and bins, and where appropriate for the location, consideration should be given to the provision of public toilets or for community toilet agreements⁵³. Where public toilets are directly provided, the provision of a Changing Places standard toilet will be encouraged and supported.
- 2.139 All styles of seating used should be inclusive of wheelchair users by having sufficient clearance around them to accommodate them, and in the case of picnic tables, an extended end of the table to facilitate table access to the wheelchair user. Seating should also be accessible to those with reduced mobility, using appropriate seat heights, depths, and arm rests. It is recommended that designs are consistent with the guidance of BS 8300-1:2018 for street furniture.

Location

- 2.140 As covered in the [Lifetime Neighbourhoods](#) chapter, the location of the site's green infrastructure is recommended to be the starting point for development site layout, which is known as a 'landscape first' approach). The design of other elements of the development (streets, buildings, active travel routes, etc.) should respond to the site's green infrastructure.
- 2.141 On larger sites open space (with the exception of amenity greenspace) should ideally be located close to centres, community facilities, and/or schools/key routes between homes and schools to ensure it is well used, provides the most value to the community, and supports the development in having a discernible 'heart'.
- 2.142 Open spaces located in exposed site frontage locations, especially when adjacent to busy roads, should be approached cautiously as they can be less inviting.
- 2.143 Amenity green space that is likely to be heavily used for dog walking or will facilitate dog training is likely to be best located close to residential areas and on development edges.
- 2.144 In all instances green open space is expected to be located in a tenure-blind way, i.e. with no one tenure type disproportionately benefitting from closer proximity to it.



Source: Susdrain

Nature-led SuDS features can be incorporated into parks and gardens, amenity green spaces and natural/semi-natural green spaces.

⁵³ An agreement whereby regular funds are paid to a nearby business to provide free ongoing public toilet access at their premises. Community toilet agreements will be expected to provide access to an accessible toilet, and ideally also baby changing facilities. They should not be limited to RADAR key access only.

Multi-functional green open spaces

2.145 High quality green open spaces are multi-functional, providing benefits for play, recreation, drainage, nature immersion, supporting biodiversity, socialising, enhancing the historic environment, and so on. High quality green open spaces have strong functional relationships with the other elements (e.g. housing, active travel infrastructure, centres, etc.) and the wider green infrastructure network. Consideration should be given to where there may be opportunities to connect green infrastructure across the whole of the site (residential gardens, green open space, sustainable drainage systems, street trees, etc.) for the continuous movement of people in a natural context as well as supporting the safe, free movement of wildlife.

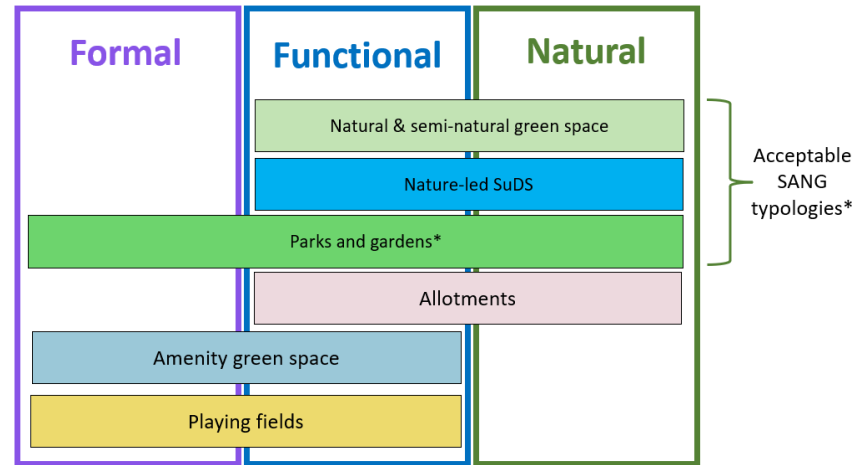
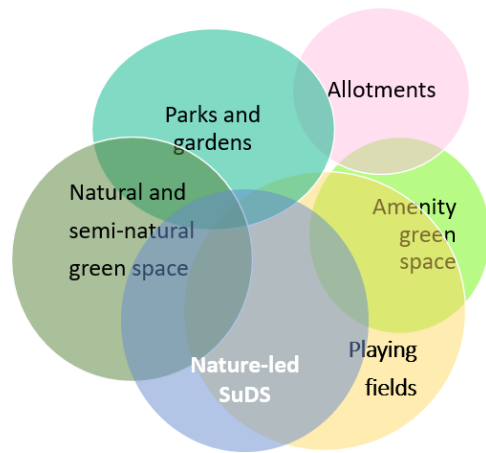


Figure 4 (left) Venn diagram showing which types can be accommodated within/alongside other types.

Figure 5 (right): diagram showing the typical qualities each of the key green open space types take, and therefore which types might be best suited depending on the scheme designer’s objectives.

*‘Parks and gardens’ can be designed in a range of formats. Where provided in a more semi-natural format, such as through including denser planted areas, wildflower areas, ‘wild edges’ and use of native plantings, or otherwise create natural connections between SANG areas, they may be able to count towards the overall SANG requirements.



2.146 The green open space provision on development sites should be planned and designed for flexibility – allowing them to be used by a wide range of different groups, ages and abilities for a wide range of different activities. The below diagrams show which green open space types best work together when combined, due to their types’ typical qualities.

2.147 The key benefits of co-delivering different green open space types is covered in more detail in **Table 13**, below (NB: duplicates have been removed):

Table 13: Matrix showing the key benefits and risks of co-delivering different green open space types

Type	Relationship	Key benefits from co-delivery	Risks of co-delivery
Allotments	Allotments and natural and semi-natural green space	The co-location of these types may provide an environment where pollinators are able to thrive, as well as a generally more peaceful and natural environment, benefiting allotment holders’ yields and health and wellbeing.	Allotments are semi-formal spaces often with associated structures, paraphernalia and human activity, and this can detract from the landscape quality of natural and semi-natural green space.
	Allotments and parks and gardens	The co-location of these types supports the allotments to be more accessible to allotment holders/community garden members (and visitors), as well as providing community visibility to the benefits of growing food, promoting wider participation.	Allotments need to be carefully designed to ensure that they complement the appearance and use of these spaces. Some attention to anti-social behaviour risks to allotments may be necessary (e.g. high quality fencing provision).
Natural/semi-natural green space	Natural/semi-natural green space and parks and gardens	Co-locating these types could be achieved through providing the parks and gardens with denser planted areas and ‘wild edges’.	Methods of management may not be compatible. Attempting to co-locate could create mixed messages for residents about how they are to use the spaces and the purposed they serve. There is a risk that blending these types dilutes the quality of the other, resulting in an overall poor quality space.
	Natural/semi-natural green space and SuDS	SuDS schemes that are soft landscaped/planted to create an attractive, resilient and plant and wildlife-rich pond/wetland environment, can be used to create new (or integrate with existing) natural and semi-natural green space, supporting increased biodiversity.	Excessive engineering and safety features with some SuDS can compromise the landscape quality and enjoyment of natural and semi-natural green space.
	Natural/semi-natural green space and green routes	Green routes are most ideally situated within a semi-natural green space environment. The ‘gold standard’ for green route design is for them to be sheltered by	Attention needs to be given to higher levels of activity in areas with high biodiversity value, particularly if any areas have or will need to be cordoned off for conservation purposes.



Type	Relationship	Key benefits from co-delivery	Risks of co-delivery
		trees/hedgerow and natural, wild plantings on both sides of an appropriately surfaced route. This is intended to help provide an ‘immersive’ natural environment experience for pedestrian and cyclists.	
SuDS (nature-led)	SuDS and parks and gardens	SuDS schemes can be integrated into parks and gardens provided that it is safely accessible and adds amenity value.	Consideration should be given to the design and relative location of SuDS to play provision, if included within the park/gardens (see Play provision section).
	SuDS and green routes	SuDS and green routes can be co-located using linear SuDS features, such as ‘rain gardens’, that run alongside the green routes (and other active travel infrastructure types).	Ability to manage SuDS and green routes side by side needs to be considered. Safety of users of the green route should also be considered.
	SuDS and amenity green space	SuDS and amenity green space are able to be combined where the SuDS is nature-led and provides amenity value to users of the amenity green space.	Consideration should be given to the design and relative location of SuDS to play provision, if included within the amenity green space (see Play provision section).
Amenity green space	Amenity green space and green routes	Amenity spaces can be connected to each other using green routes, and green routes can run through them.	There is a risk that blending these types dilutes the quality of the other, resulting in an overall poor quality space.
Green routes	Green routes and parks and gardens	Parks and gardens can be connected to using green routes, and green routes can run through them.	N/A
	Green routes and playing fields	Playing fields can be connected to using green routes, and green routes can be oriented around the perimeter of playing fields, where able to be made safe for users.	Attention needs to be given to conflicts between dog walkers and sports pitch users.
Parks and gardens and playing fields	Parks and gardens and playing fields	Playing fields can be accommodated within larger parks and gardens provision, which may also help to make them more accessible and visible, encouraging wider community participation.	Careful attention needs to be given to the transition between the two spaces and how they are managed.



2.148 Play provision can be delivered within natural/semi-natural green space, amenity green space or parks and gardens. Further guidance is provided in the [Play provision](#) section of this chapter.

2.149 Green open spaces can and are often co-located with public facilities such as public toilets, bins, benches, shelters, water fountains, dog lead tethering points and with areas for ‘pop up’ food service pitches. Green open spaces are encouraged to be teamed with centres and/or key community facilities (see [Healthy Centres & Community Facilities](#) chapter), mutually enhancing their value to the community. Green open spaces are often the settings for community events (farmers markets, village fetes, parkruns®, etc.), green social prescribing activities, and educational activities.

2.150 Seating can either be located in ‘primary’ or ‘secondary’ locations – i.e. along primary routes with heavy footfall (for people watching and natural surveillance of the space) or in semi-private locations (ideal for more private conversations, nature immersion, reading, etc.).

2.151 Dedicated dog ponds (i.e. purposely provided for dogs to swim in) not only help to protect ecologically sensitive wildlife ponds, but also provide dogs and dog owners with an additional reason to visit a green open space, supporting its use by the community. Dog ponds will be supported in appropriate locations.

2.152 Green open spaces and enhanced landscaping approaches may be able to make valuable contributions towards the local economy by attracting more people into the area. Where particularly distinctive in quality or overall design they may support place attachment and tourism from visitors. Consideration should be given to how the open space can be made higher quality and more ‘unique’, such as through the incorporation of distinctive features such as:

- An especially broad variety of native plantings and thematic ornamental plantings (e.g. a ‘white’ garden);
- the integration of enhanced recreational facilities e.g. pétanque, picnic areas, mazes and ‘giant’ games (e.g. giant chess boards);
- educational trails (wildlife or local heritage on-site) to help create a sense of place and tangible link with local history;
- incorporation of blue features (ponds, lakes, streams, fountains, etc.);
- thematic seating, shelters and wayfinding signage, and/or;
- public art/landmark features.



Semi-natural greenspace leading to residential area. Melton Woods, Melton.



Making green open space 'work harder' through design

2.153 There are occasionally circumstances where the full expected quantum of green open space (as identified through site allocation policy criteria or use of the Open Space Methodology) cannot be delivered on-site, but on-site delivery is preferred or otherwise necessary versus nearby off-site delivery. In these instances, it will be necessary for what provision is able to be delivered is to 'work harder' by being higher in overall quality and being more space efficient. Examples of this could be achieved include (but are not limited to):

- increasing the density, maturity and diversity of trees, shrubs and perennial plants planted to create richer and more diverse natural environments;
- providing a mix of two types of green open space where this would serve to mutually enhance their community value, e.g. allotments/community garden within a small park to increase use and interest;
- (if appropriate) incorporation of an expanded and higher quality play provision offer where this would serve to mutually enhance their community value;
- (as appropriate to type) creation of highly distinctive 'feature areas', such as flower gardens, rock gardens, woodland, heritage asset feature areas, dog ponds and/or dog training areas;
- Incorporating a heritage asset into a green open space and enhancing its setting with landscaping and accessibility improvements, mutually benefitting the quality, experience and accessibility of both the green open space and the heritage asset(s);
- upgrading the quality of materials and features that would otherwise have been used in the hard landscaping scheme;
- incorporating 'blue' features such as ponds, lakes or wetlands as part of or in addition to a nature-led SuDS scheme;
- (if appropriate) incorporation of splash pads for use during warmer months of the year;
- adding an additional mural/public art piece;
- upgrading the quality of active travel routes to/from the space to 'green routes' standard;
- provision of higher quality and quantity of public facilities, including benches, bins and (if appropriate) public toilets, particularly where this provides a new Changing Places facility;
- locating and orienting the space to ensure key areas receive plenty of sunlight, though also provides some areas of shade and shelter;
- (if appropriate and causes no residential amenity impacts) provision of a viewing platform over the space.



Portal Woods, Martlesham



Safety and security

- 2.154 The buildings around green open spaces should be designed and oriented to provide these spaces with good natural surveillance, whilst also balancing this with occupants' needs for privacy and reduction of noise. The exception to this is larger natural and semi-natural greenspaces, as these spaces are intended to provide users with a 'nature immersion' experience which could be undermined by significant overlooking from buildings.
- 2.155 If a green open space is intended to be operable outside of daylight hours, then appropriate artificial lighting may be expected to be provided along walking and cycling routes. The design of artificial lighting needs to be considered alongside biodiversity objectives and residential amenity impacts. Design guidance on artificial lighting is covered in the [Healthy Homes, Schools & Workplaces](#) chapter.
- 2.156 Fencing around open spaces will only be supported where it is necessary for safety and security, is attractive, and does not exclude people with reduced mobility. Fencing should be provided with accessible gates or 'gaps' that are of an appropriate accessible width for wheelchair and pushchair access (2m+). Knee rails and chain rails around green open spaces are not encouraged and will not be supported unless sufficient quantity and width of gaps at access points are provided for people with reduced mobility.
- 2.157 Access points should be teamed with appropriately surfaced active travel routes.
- 2.158 Allotment sites should be fully enclosed with fencing, and accessible only via a lockable gate.
- 2.159 Where both SuDS and play provision are provided on site, it is recommended that they are located at least 30 metres apart, unless the design of the SuDS scheme/feature is designed in such a way that it is very unlikely to pose a safety risk to children, or the play provision is fenced (though this is less preferred). Fencing around SuDS will only be supported in limited circumstances, with the preference being to 'design out' the need for people to be excluded from accessing the space due to safety concerns.



Footpath 7, Woodbridge

Nature immersion and sensory stimulation

- 2.160 Having access to nature immersion experiences is important for individual and community health and wellbeing. Nature immersion experiences are best supported through the provision of the natural/semi-natural greenspace type of green open space, though other forms can contribute where significant plantings and landscaping creates an enhanced natural environment that provides a sense of escape and relief from built environments. The quality of 'nature immersion' experiences is supported by:



- The minimisation of day-to-day ‘urban’ sounds or sights are experienced whilst within the main SANG area/parcel (e.g. movement of vehicles, sound of industry, views of commercial buildings, etc.);
- high quality, diverse, and layered planting/landscaping scheme that includes an area(s) of dense trees with layering (floor, understory, canopy, emergent layers) and ‘left wild’ areas, such as native hedgerow edgings or wildflower areas;
- undulating landscape (with walking routes deliberately routed up and down undulations with the exception of accessible routes, where provided) and high-point views of natural landscapes and skies;
- good air quality, and;
- sensory stimulation from high quality natural environment – see [Table 14](#) below:

Table 14: Human senses and how they can be positively stimulated through design approaches to green infrastructure provision.

Sense	Recommendations on how to integrate sensory stimulation into green infrastructure design
Sight	<p>Use soft landscaping techniques to make even shorter distance circular walks through natural/semi-natural green spaces feel visually stimulating, varied in experience throughout, and ultimately feel longer and more immersive.</p> <p>Provide a mix of plantings that will display a wide range of colours, including various hues of green. Ideally, plantings should be considered in terms of maximising flowering year round (e.g. incorporating plants like mahonia, which flower in the winter/early spring) to ensure spaces have a variety of colour (and scent) for as much of the year as possible.</p>
Sound	<p>Focus on providing habitat and food sources that attract a range of vocal bird species to support the experience of bird song, and tree species that give significant ‘wind through the trees’ experiences (e.g. poplars).</p> <p>Support users to not be able to hear urban’ day-to-day sounds (e.g. sounds of vehicle movement or industry) when in the space by locating the main enjoyment areas away from main roads, the parking area (if applicable) or buffer landscaping techniques (i.e. using dense planting and/or bunds to create a sound barrier).</p> <p>Incorporation of blue infrastructure with movement (i.e. streams, fountains, waterfall features, etc. rather than still ponds) may also positively contribute to the soundscape.</p>
Touch	<p>Include plants with a variety of different textures in bark/leaves.</p>
Smell	<p>Include a range of scented flowering trees and perennial plants in planting mixes; train climbing plants along walls or wires to help keep their flowers at head level. Provide a variety of plantings that will maximise year round flowering.</p>
Taste	<p>Plant trees and herbs that provide an edible fruit, nut, or leaf.</p>



Suitable Alternative Natural Greenspace (SANG)

- 2.161 The majority of the East Suffolk district falls within the 13km ‘Zone of Influence’⁵⁴ of European sites – Special Protection Areas (SPA) or Special Areas of Conservation (SAC) – or Ramsar sites, which are collectively known as ‘habitats sites’.
- 2.162 Residential development within most of the district area that creates growth has the potential to adversely impact these sites by increasing recreational activities within them. Recreational activities – such as walking, dog walking, cycling, play, swimming, and other water sports – can be damaging to habitats sites. This is due to the resulting direct or indirect impacts on plant or animal species, degradation of their habitat, or due to overall ‘wear and tear’ impacts on fragile natural environments.
- 2.163 ‘Suitable Alternative Natural Greenspace’ (SANG) is a form of large scale, exceptionally high quality natural/semi-natural green open space that is provided with the primary purpose of deterring people away from use of European sites for day to day recreation activity purposes. It is intended that, by providing an alternative recreation space that is sufficiently attractive and accessible, the otherwise increased volume of regular recreational visits arising from the development is avoided, helping to protect the district’s European sites.
- 2.164 The technical report⁵⁵ for the Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy (‘RAMS’) for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils assessed the impacts of implementing the Local Plan policies on European sites. Through the Biodiversity and Geodiversity policies (Policy SCLP10.1 and Policy WLP8.34), the current Local Plans require any development with the potential to impact on a European site within or outside of the district to be supported by information to inform a Habitats Regulation Assessment (HRA), in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions). If, through the Appropriate Assessment (AA) process, it is identified that a development will result in an Adverse Effect on the Integrity (‘AEOI’) of a European site, mitigation measures will be required to fully address the impact. The RAMS considers delivery of SANG as one of the appropriate forms of mitigation for residential sites where the HRA process has identified its provision as necessary to avoid the AEOI of European sites.



Alde-Ore Estuary, protected by the Alde-Ore Estuary SPA/Ramsar and Orfordness-Shingle Street SAC

⁵⁴ GIS map available at: <https://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=ec07051688d9460e918d3cc69829f9be>.

⁵⁵ Hoskin, R., Liley, D. & Panter, C. (2019). Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>.



- 2.165 The Natural England guidelines for SANG⁵⁶ are currently focused on the provision of large areas of natural greenspace (i.e. minimal evidence of alteration/impact by humans) that are purchased by pooled funds from multiple developments. East Suffolk does not currently have an arrangement for this type of SANG delivery. Instead, the RAMS recommended that “implementation of the measures to protect European sites will predominantly be through developer contributions, applied to planned growth coming forward. Where SANGs are required, these will form part of a development proposal.” The Council therefore expects the direct delivery of SANGs on sites where a requirement for them has been identified.
- 2.166 For the avoidance of doubt, SANG provision is expected to be delivered in addition to RAMS contribution payments.
- 2.167 The two Local Plans use different terms to refer to mitigation site provision consistent with the RAMS approach to SANG. The East Suffolk Council – Suffolk Coastal Local Plan uses the term ‘SANG’ and the East Suffolk Council – Waveney Local Plan uses the term ‘Country Park’. These terms are interchangeable, but as ‘SANG’ is the more accurate term and avoids perceptions of a Country Park having a wider strategic role for use by communities beyond the development site, the term ‘SANG’ is used throughout this guidance only.
- 2.168 ‘Annex I’ of The Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Habitat Regulation Assessment (HRA) Record⁵⁷ outlines the requirements for on-site mitigation of recreational pressure arising from developments in excess of 50 dwellings. In practice this guidance is applied to the expectations for smaller sites (50+ dwellings, ‘Tier 3’ mitigation sites) as more strategic scale sites, such as those providing in excess of 150 dwellings (‘Tier 2’ mitigation sites) or the larger site allocations, such as the Garden Neighbourhoods (800+ dwellings, ‘Tier 1’ mitigation sites) incur significantly higher requirements. It should be noted that though the guidance in this chapter of the SPD is applicable to all Tiers of SANG, much of the guidance will only be helpful for the delivery of Tier 1 and Tier 2 scale of SANG. The essential, desirable and ‘gold standard’ design criteria for all three Tiers of SANG is available in the [Suitable Alternative Natural Greenspace \(SANG\) Design Quality Matrix](#) section.

Purpose of SANG: European sites in East Suffolk

- 2.169 The European sites that are recognised as being vulnerable to recreational disturbance resulting from development within the East Suffolk area currently are:
- Alde-Ore Estuary Special Protection Area (SPA and Ramsar site);
 - Benacre to Easton Bavents (SPA);
 - Deben Estuary (SPA and Ramsar site);
 - Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC);
 - Minsmere-Walberswick (SPA and Ramsar);
 - Orfordness to Shingle Street (SAC);

⁵⁶ Natural England (2021) Guidelines for Creation of Suitable Alternative Natural Greenspace

⁵⁷ Available at: <https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>



- Sandlings (SPA); and,
- Stour and Orwell Estuaries (SPA and Ramsar site).

2.170 The purpose of each of the European site designations is summarised below:

- **Special Protection Areas (SPA)** are special sites designated under the EU Birds Directive to protect rare, vulnerable and migratory birds. In Suffolk SPA designations are commonly in place for the protection of wading birds and birds that feed and rest on the water edge, who are in the process of transition before embarking on thousands of miles of travel to their wintering or nesting areas. Suffolk also has many nesting birds which are rare and important, and many of them nest on heaths and beaches or at the edge of water, such as on saltmarsh or near estuaries.
- **Special Areas of Conservation (SAC)** protect the habitat so that these species have safe places to nest, feed, and rest, as well as allowing other wildlife species such as rare plants and flowers to thrive.
- **Ramsar Sites** are internationally important wetlands which are home to rare species.

Purpose of SANG: recreational pressure on European sites

2.171 Suitable Alternative Natural Greenspace (SANG) provision is intended to reduce disturbance to protected species and their habitat and protect fragile natural environments by providing an attractive alternative space for recreation, thus reducing visitor numbers/frequency of visits to European sites.

2.172 Disturbance to protected species and the natural environment, e.g. erosion, sedimentation, removal or degradation of vegetation, and direct destruction of habitat, can be caused by various direct or indirect pressures. In Suffolk, birds are especially sensitive as they are present in this location both when they are nesting and during their annual migration, when they are resting and feeding in preparation for their upcoming journey. The birds that come to Suffolk during their migration are in the process of flying thousands of miles to breed or to overwinter in places like the Arctic, South America, or Africa. Having adequate time, space, and food to build up their energy reserves allows these birds to continue their lifecycle. Each time a migrating bird is disturbed it uses calories which it then must regain. In the worst cases this can mean the bird does not have adequate energy to complete its migration and dies.

2.173 The birds that nest on the Suffolk coast and heaths often do so on beaches, or nest on the ground of open areas in the heathlands and forests. Each time the nesting bird feels threatened (perceives a predator to be near their nest), they will move away from the nest and will try to distract that predator. Pedestrians, cyclists, dogs, or vehicles making noise or getting too close to the nest may trigger this process. Each time the bird moves off the nest, their eggs/chicks are vulnerable to becoming too cool or overheating, and if it is raining, getting wet. If this happens too frequently their eggs/chicks will die, and the bird will not have raised any young. The adult may also make themselves vulnerable to actual predators during this process. More directly, people may step on/drive over a nest with eggs/chicks, a dog may kill adult birds/chicks, or chicks can become separated from their parents and die.



2.174 The Suffolk coast is home to sensitive habitats that rare and protected species rely on for their survival. Areas such as vegetated shingle, saltmarshes and estuaries are easily disturbed, and invasive species can be introduced into them via the soles of shoes. Examples of invasive non-native species are Japanese knotweed, Himalayan balsam, and *Rhododendron ponticum*. These species displace the rare flora in these settings and change the environment.

2.175 Examples of harmful recreational activities that could be diverted by providing high quality SANG include (but are not limited to):

- **Walking, causing 'sky lining'**: when people walk (with or without a dog) along a river or sea wall, they (or the shadows they cast) can appear large and threatening to the birds below that wall. They are also sharply outlined if the sun is behind them, or there is no higher land or vegetation to soften the effect. Birds will perceive them as a predator and leave their nest/fly away. A well-designed SANG provides an alternative and attractive location for leisure walking.
- **Dog walking**: birds perceive dogs as predators, so proximity to dogs can cause disturbance and mortality. Dogs may also directly attack birds and chicks. Dogs are likely to cause more disturbance when they are not kept on the lead. If the SANG provides an appropriate area and attractive routes for dogs to be walked/let off the lead, then this has the potential to significantly reduce disturbance to birds than if no mitigation is provided.
- **Cycling**: similar to sky lining, when cycling on the river/sea walls disturbance can occur through the visual shapes and sounds arising from the activity. A well-designed SANG provides an alternative and attractive location for leisure cycling.
- **Kite flying**: kites cast shadows and birds perceive the shadow to be an aerial predator, so will take evasive action to draw that predator away from their nest. Just half an hour of kite flying has the potential to cause distress to the bird and potential loss of its nest or chicks due to overheating or cooling. Providing a safe area where kites can be flown in a SANG could help reduce this disturbance.

Biodiversity in SANG areas

2.176 Some sites will have significant existing biodiversity and landscape value. Surveys should be undertaken to check for any ecological constraints, prior to SANG development. It is important to note that if any existing constraints are present on the site, then relevant surveys and management practices will be needed to ensure they are not impacted by the increased recreational activity.

2.177 Subject to national guidance, it may be possible to incorporate mandatory Biodiversity Net Gain (BNG) requirements into SANG areas. However, if this is proposed it must be clearly demonstrated that the BNG habitats to be created and maintained are compatible with the proposed increased recreational use of the area, and that this use will not be detrimental to achieving long term BNG condition targets.

2.178 Technical guidance on the achievement of BNG through SANG is beyond the scope of this document; proposals that intend to meet some of the site's BNG through its SANG provision are advised to directly discuss the feasibility of this with the Ecology team at pre-application stage. Separate BNG guidance is intended to be produced after this SPD's adoption.



Designing SANG provision

- 2.179 SANG delivery in East Suffolk should focus on high quality, natural or semi-natural greenspaces that are easily accessible. SANG areas should be designed to meet the range of day-to-day recreational needs of the community for natural/semi-natural green open space, with a particular focus on providing for the needs of dog walkers, as dogs present the largest threat to habitats sites. SANG areas should be designed to ensure inclusivity for of all ages and abilities. The design quality of SANG provision is a high priority for the Council, and therefore it is expected that provision will be adequate in both quantity and quality terms.
- 2.180 According to the scale, location, any site-specific policy requirements and constraints on the development, the appropriate design approach to meet SANG requirements will vary from site to site. The guidance in this chapter – including the [Suitable Alternative Natural Greenspace \(SANG\) Design Quality Matrix](#) criteria – should therefore be taken as the general starting point for the design of SANG provision, with the planning and design approaches to SANG on individual sites informed by pre-application discussions with the Council.
- 2.181 SANG areas must be well integrated into the development, with walkability given high priority in the design process. As large-scale SANG is only required on larger, strategic scale sites, these sites would be expected to be subject to masterplanning. Masterplanning will help to ensure that the development meets the policy requirements of the relevant Local Plan (including any site-specific criteria for allocated sites) and the site-specific requirements arising from the development proposal’s Habitats Regulations Assessment. The engagement expectations on masterplans are set out in the Statement of Community Involvement (SCI)⁵⁸.
- 2.182 The quantity guidance figure for the provision of SANG that the Council will expect is around **8 hectares of SANG per 1,000 people**, which should be calculated based on an **occupancy rate of 2.4 people per home**.
- 2.183 SANG is expected to be delivered as a single continuous parcel wherever possible, as this is the Council’s preference for delivery. Where site constraints mean multiple parcels must be delivered, this will be supported where it can be demonstrated that all of the essential criteria (see [Table 16](#) below) can still be delivered, and that each of the parcels are well linked with high quality active travel routes (ideally of ‘green route’ standard – see [Green routes](#) section).
- 2.184 Sustainable drainage systems (SuDS) can be incorporated into SANGs where this does not conflict with the SANG’s recreational function. SuDS features should be safely accessible unless this is not reasonably possible without unacceptably reducing its primary function (to drain surface water). SuDS features that are not safely accessible will be required to be fenced. SuDS schemes that include basin features within 30m of play provision may also require fencing if the play provision cannot be (a) located further away or (b) fenced instead of the SuDS. See the [SuDS: Multi-functional, nature-led sustainable drainage systems](#) section for more detailed guidance on SuDS.
- 2.185 [Table 15](#) (below) provides a quick reference guide on the Council’s general SANG design priorities in accordance with development scale. The table is structured into three tiers of development scale. All ‘essential’ criteria will be expected to be delivered on all sites unless site-specific circumstances justify an alternative approach.

⁵⁸ East Suffolk Statement of Community Involvement, available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Statement-of-Community-Involvement/Statement-of-Community-Involvement.pdf>.



The delivery of ‘desirable’ and ‘gold standard’ criteria will be strongly supported where appropriate for the specific site being considered. Individual site requirements/constraints may justify a different set of design priorities than those listed below, which will be identified through discussions with the Council.

Suitable Alternative Natural Greenspace (SANG) Design Quality Matrix

Table 15: Suitable Alternative Natural Greenspace (SANG) Design Quality Matrix

Development scale tier	Essential criteria	Desirable criteria	‘Gold standard’
Tier 1: Over 800 homes (Includes all Garden Village and Garden Neighbourhood allocations)	<ul style="list-style-type: none"> • High-quality, informal natural/semi-natural greenspace areas populated with naturalised, diverse and layered planting and landscaping. • SANG designed to support ‘nature immersion’ experiences through natural environments and sensory separation from wider urban environment. • At least two access points into/from the SANG from residential development areas. • Access to active travel routes to main SANG area(s) within 100m of all homes. • Main SANG area(s) less than ten minutes’ walk (800m from all homes). • At least one longer (2.7km+) circular route for walking (on site or part on site and part via PROW network). • A shorter (around 1.5km) circular accessible walking route (on site or part onsite and part via PROW network) to support wheeling. • A route for leisure cycling (on site or part on site and part via bridleways of PROW network) – can be combined with walking routes as shared use paths. 	<ul style="list-style-type: none"> • Main SANG area(s) less than five minute walk (400m from all homes). • Active travel routes delivered to ‘green routes’ standard of quality. • Play provision (plus dog lead tether points near any play areas). • Cycle parking and maintenance stations. • Blue infrastructure/water feature (e.g. lake, pond, multi-functional SuDS). • Creation/maintenance of undulating landscape. • Habitat restoration. 	<ul style="list-style-type: none"> • Main SANG area(s) less than two minute walk (200m from all homes). • High quality rural views. • Public art.



Development scale tier	Essential criteria	Desirable criteria	'Gold standard'
	<ul style="list-style-type: none"> • (where SANG is parcelled) Provision of active travel routes to fully connect parcels to each other. • Provision of dedicated dogs-off-lead area(s). • Provision of wayfinding signage and interpretation boards (including information on the purpose of SANG) within the SANG. • Provision of accessible benches. • Provision of general waste bins and dog waste bins. 		
Tier 2: Over 150 homes	<ul style="list-style-type: none"> • High-quality, informal natural/semi-natural greenspace areas populated with naturalised, diverse and layered planting and landscaping. • At least two access points into/from the SANG from residential development areas. • Access to active travel routes to main SANG area(s) within 100m of all homes. • Main SANG area(s) less than ten minutes' walk (800m from all homes). • At least one longer (2.7km+) circular route for walking (on site or part on site and part via a well-connected PROW network). Reliance on access to PROW through on-road routes may not be accepted. • A shorter (around 1.5km) circular accessible walking route (on site or part onsite and part via PROW network) to support wheeling. • (where SANG is parcelled) Provision of active travel routes to fully connect parcels to each other. • Provision of dedicated dogs-off-lead area(s). 	<ul style="list-style-type: none"> • Main SANG area(s) less than five minute walk (400m from all homes). • SANG designed to support 'nature immersion' experiences through natural environments and sensory separation from wider urban environment. • Active travel routes delivered to 'green routes' standard of quality. • A route for leisure cycling (on site or part on site and part via bridleways of PROW network) – can be combined with walking routes as shared use paths. • Play provision (plus dog lead tether points near any play areas). • Cycle parking provision. 	<ul style="list-style-type: none"> • Main SANG area(s) less than two minute walk (200m from all homes). • High quality rural views. • Creation/maintenance of undulating landscape. • Public art. • Habitat restoration.



Development scale tier	Essential criteria	Desirable criteria	'Gold standard'
	<ul style="list-style-type: none"> • Provision of wayfinding signage and interpretation boards (including information on the purpose of SANG) within the SANG. • Provision of accessible benches. • Provision of general waste bins and dog waste bins and dog lead tether points near any play areas. 	<ul style="list-style-type: none"> • Blue infrastructure/water features (e.g. pond, lake, fountains). 	
Tier 3: Over 50 homes	<ul style="list-style-type: none"> • High-quality, informal natural/semi-natural greenspace areas populated with naturalised, diverse and layered planting and landscaping. • At least two access points into/from a main area of natural space open space. • At least one longer (2.7km+) circular route for walking (on site or part on site and part via a well-connected PROW network). Reliance on access to PROW through on-road routes may not be accepted. • A shorter (around 1.5km) circular accessible walking route (on site or part onsite and part via PROW network) to support wheeling. • Dedicated dogs-off-lead area(s). • Provision of accessible benches. • General waste and dog waste bins. 	<ul style="list-style-type: none"> • A route for leisure cycling (on site or part on site and part via bridleways of PROW network) – can be combined with walking route(s) as shared use paths. • Cycle parking provision. • Play provision (plus dog lead tether points near any play areas) • Wayfinding signage and interpretation boards (including information on the purpose of SANG) within the SANG. 	<ul style="list-style-type: none"> • SANG supports 'nature immersion' experiences through natural environments and sensory separation from wider urban environment. • Active travel routes delivered to 'green routes' standard of quality. • Blue infrastructure/water features (e.g. pond, lake, fountains). • Creation/maintenance of an undulating landscape. • High quality rural views. • Habitat restoration.

2.186 There is a general expectation that all tiers will use high quality design, materials, construction, and planting mixes suitable for the landscape and soil type present on site.



Location and layout of SANG areas

- 2.187 SANG can be at the centre of the development site or at the edge – the location should be directed by the need to make it as accessible, attractive, relevant and valuable to the community as possible.
- 2.188 The starting point for any SANG should therefore be to identify the existing ecological, natural and/or historical features on the site, together with the most desirable contours of the site’s topography (as this can create interest and promote use of the SANG for exercise). It is likely to be the most efficient use of land to locate the SANG area where these existing attractive features are in highest abundance (e.g. grassland, heathland, woodland) and to further expand the existing diversity of plantings/enhance existing contours, as appropriate. This area can then be prioritised for the SANG’s location.
- 2.189 The layout of the SANG, similar to all other open space provision, should respond to key origins and destinations in the area and the existing Public Rights of Way (PROW) network.
- 2.190 Consideration should be given to how to best enhance the setting of historical features on site through approaches to landscaping, providing mutual enhancements to the enjoyment of these amenities.
- 2.191 As can be seen in [Table 14](#), it is critical that the SANG is easily accessible from all areas of the development. Where provided, play provision should be easily accessible for pedestrians and cyclists travelling with small children, and therefore not situated too ‘deep’ into the SANG. Where provided, the shorter and more accessible 1.5km circular walking route should be able to be directly accessed from at least one of the access points into the SANG.



Information board at Long Strops, Martlesham.

Active travel infrastructure in SANG areas

- 2.192 For all three SANG tiers a 2.7km+ (30 mins+) circular route is expected to be provided either on site or in combination with suitable surrounding suitable PROW routes that are able to be connected to (i.e. to further extend the route and achieve at least the minimum required route length). It may therefore be necessary for existing PROW routes to be upgraded and enhanced (e.g. upgrading footpaths to bridleways to allow cycling) or improved through widening, surfacing, or for entirely new PROW routes to be created. Ideally, the full routes would be accommodated on site, as the landowner then retains control over their entire routes’ maintenance in perpetuity.



- 2.193 At least one shorter 1.5km (around 20 minutes' walk) accessible circular walking route should be provided for use by people with reduced mobility and therefore wheeling (wheelchair, pushchair, etc.) or using another mobility aid. The accessible route should be provided either on site in full or part on site and part via connectivity to suitable PROW routes. Where topographical undulation occurs on the SANG area of the site, the accessible route(s) should be routed to avoid as much of the level changes on site as possible. The accessible 1.5km circular walking route should be able to be joined from at least one access point into the SANG.
- 2.194 The accessible route will require use of a suitable surface treatment that balances the safety and comfort of those using wheels with the aesthetic and functional needs of a natural setting. The accessible route is therefore recommended to be surfaced using a durable, non-slip surfacing, free-draining treatment that does not create resistance and discomfort for those using wheels. Bound surfacing such as asphalt may not be appropriate for the accessible route in all locations; generally more natural material surface materials will be preferred, if demonstrably suitable.
- 2.195 All other routes are recommended to be either left unsurfaced (earth, sand, or mown grass) where footpaths, or for a smoother unbound and free-draining surfacing treatment (such as hoggin) to be used for routes intended for both cyclist and pedestrian use (i.e. shared use paths).
- 2.196 Shared use paths and dedicated cycle routes through SANGs are intended to be used for leisure cycling only, and therefore are not required to meet the higher surfacing specifications that are needed to support safe higher-speed commuter cycling (smooth and bound surfacing, e.g. asphalt). However, they will still be expected to be as wide, so as to ensure the safe passing of pedestrians and other cyclists, and to support cycling two abreast.
- 2.197 In instances where the Council has confirmed that a site's SANG requirements can be partly met through the provision of active travel routes (normally needing to be delivered to 'green routes' standard), the design requirements will be determined on a site-specific basis through discussions with the Council.
- 2.198 The provision of wayfinding signage, maps and interpretation that are designed to be suitable for the natural setting of the SANG will be supported. Consideration should be given to how wayfinding signage can be made more accessible, such as through the use of recognisable iconography, raised way markers or braille, or through providing digitalised versions of maps and local information through QR code scanning technology.
- 2.199 Benches should be built to accessible specifications to ensure those with reduced mobility can lower and raise themselves safely to/from them. It is recommended that designers have regard to BS 8300 to inform the designing in of accessibility into SANG areas.
- 2.200 Further design guidance can be found in the [Active Travel](#) chapter of this document.

Wayfinding signage for SANG

- 2.201 SANG areas should include wayfinding signage within them, and any active travel routes between them and residential areas. Occupants of the development should be consulted on the naming of SANG areas, through phased engagement exercises structured around parcel and SANG area delivery over the course of the site's delivery to ensure that early and late occupants have equal opportunity to feed into the naming of SANG areas (and possibly other features on the site such as street names and other open space areas).



- 2.202 The term ‘SANG’ should not be included in the names of SANG areas or on signage, but should be explained in interpretation boards, which explain to users what the purpose of the SANG provision is.

Dog walking in SANG areas

- 2.203 Dogs off-lead areas should, as a minimum, consist of a fully enclosed or otherwise remote unenclosed area so that dogs can run and play freely without the risk of escape. This area should be out of the way of pedestrian and cyclist movement so that this area can be used by dog owners to train and engage with their dogs with few distractions, and to keep cyclists and pedestrians safe from dogs off-lead.
- 2.204 Dedicated dog ponds (for dogs to swim in) help to protect ecologically sensitive wildlife ponds – both directly from disturbance, and from the harmful effects of tick and flea treatments. The inclusion of dog ponds in SANG areas are useful for ensuring the SANG performs its primary purpose and mitigates the highest risk to protected species of European sites (dogs/dog walking). Dog ponds will therefore be supported in SANG areas if the site is suitable.



Seating in a secondary position within a green open space.

Nature immersion in SANG areas

- 2.205 SANG should have the feeling of a high-quality natural area and should be desirable to spend time in. SANG should be immersive. While in the main SANG area (or main parcel, if parcelled) people should feel that they are in an as completely natural setting as possible. Wherever possible, they should therefore not be able to hear traffic on roads, railways or other sources of noise from significant human activity (e.g. industrial operations). Visibility of homes and other community infrastructure buildings from the main area/parcel is acceptable, but are still encouraged to be avoided if possible through the approach to location, landscaping and planting. In order to be able to meaningfully achieve the ‘feeling of being immersed in nature’, realistically the main area/parcel are likely to need to be at least 2 hectares in size. See [Nature immersion and sensory stimulation](#) section for more details.
- 2.206 The sensory richness and variety that is provided as users walk or cycle through a natural/semi-natural environment setting is also an important design quality indicator to consider. This can effectively be supported by taking a similar approach to built environment design ‘character areas’, where different areas of the SANG provide different experiences and settings, e.g. woodland to heathland to grassland to a lake, etc.
- 2.207 Other desirable features include the incorporation of edible plantings, scattered scrub, and/or incorporation of open water. The routing of walking and/or cycling routes around the perimeter of the SANG should be avoided if possible, as this makes it more likely that everyday ‘urban’ sights and sounds will be experienced by



visitors, detracting from their immersion in nature experience. The use of bunds, banks, planting, landscaping or fencing may be required to reduce visual and audible distractions.

Play provision in SANG areas

- 2.208 The integration of play provision (equipped areas of play for children or Youth/Casual provision) into SANG areas is desirable for all tiers, where the design is appropriate for the natural setting. The inclusion of play provision within SANG areas is not essential as it may be of more value for it to be located elsewhere within the development site (e.g. along a key route between the neighbourhood's primary school and residential areas in a parks and gardens area of open space).
- 2.209 Play provision in SANG areas should be designed using durable natural materials and respond aesthetically to the natural setting. Where wood is used, it must be securely fixed to the ground and not positioned in a location that makes it vulnerable to sitting in water or other likely causes of rot or damage from trees. Coated metal equipment can be used where the coating is in a natural colour, such as dark green. Loose materials, such as tree bark, are unlikely to be supported as they reduce wheelchair accessibility and needs more maintenance than rubber/PVC matting or wet pour.
- 2.210 Larger Youth/Casual provision such as skate parks are unlikely to be considered appropriate within SANGs.
- 2.211 Play provision for children should only be enclosed with fencing if located in a dogs off-lead area, or there are other unacceptable risks to children's safety present such as sustainable drainage system features that are not safely accessible. Play provision should have dog tethering points outside of the activity area to reduce safety risks to children. Gates into fenced activity areas should be of a type that can be easily operated by those with a wheeled mobility aid, wheelchair or wider pushchairs. If no unacceptable risks are present, the general preference is for play provision to remain unfenced.
- 2.212 Benches should be provided near to activity areas so that parents and guardians can safely supervise children. Play provision (particularly when catering for small children) should be easily accessed from at least one access point into the SANG so as to reduce time spent walking/cycling with small children.
- 2.213 Play provision should be supported by a proportionate amount of cycle and push scooter parking.
- 2.214 Play provision requirements and design guidance is covered in more detail in the [Play provision](#) sections of this chapter.

Vehicle and cycle parking for SANG areas

- 2.215 SANG provision in East Suffolk would not normally be expected to provide vehicle parking spaces, as the intention is for the SANG to be primarily used by the resident community of the development. However, a limited amount of accessible parking spaces may be provided within the development area and within a short walking distance of the SANG to support the inclusion of those with limited mobility. Consideration should be given to the placement of accessible parking in relation to the SANG's access points, and in particular the accessible 1.5km circular walking route (which should be able to be directly accessed from at least one access point into the SANG).



2.216 Cycle parking and cycle maintenance stations provision for SANGs will be strongly supported. Where play provision is provided, additional adjacent cycle and push scooter parking will be supported.

Landscape edges in SANG areas

2.217 The edges of a SANG serve as a transition between the natural environment and surrounding urban or semi-urban development. The design of these edges should be carefully considered to ensure visual harmony and to consider any impacts on safety, biodiversity and usability arising from the design. Key considerations for landscape edges are as follows:

- **Blending the SANG in with its surroundings:** SANG edges should seamlessly merge with its wider natural setting. The planting of native species helps the SANG to blend into the surrounding landscape and means the SANG plantings are also likely to be more resilient, require minimal maintenance, and may provide valuable sources of food and habitat for local wildlife. Where fences or walls are used as boundary treatments, the materials, scale and height of boundaries proposed will be expected to be well integrated aesthetically with the natural setting.
- **Buffer landscaping at the edges of the SANG:** Abrupt transitions between SANG areas and built-up areas of the development should be avoided. The use of 'buffer landscaping' at the edges of SANG areas help to create a sense of transition from one type of space to another, support a high quality 'nature immersion' experience for users of the SANG, and reduce noise and light pollution from adjoining residential areas. Buffer landscaping can be created using plantings (e.g. native shrub mixes and retention/creation of woodlands) or bunding/site topography to act as a screen/barrier. Gradients of vegetation should be considered from the tree canopy layer to shrub layer to grasses layer, as users move from the core of the SANG to access points at the edges.
- **Road edges:** Busy vehicular routes adjacent to SANG should be avoided as much as possible. In the vast majority of locations any road edge should be limited to shared surface routes and private drives and not through routes. Street parking edges should be avoided as should dominant frontage parking to dwellings. Street lighting should be avoided or kept to an absolute minimum on SANG edges.
- **Habitat connectivity:** landscape edges should be designed to allow for wildlife movement, ensuring there are corridors or passages for animals to safely navigate between the SANG and surrounding areas.
- **Building design:** Design Codes should be formed to address the specific building scale, character and materials for SANG edges. They should recognise the importance of the natural emphasis and buildings should not detract from that. Good passive surveillance of SANG edges is encouraged but excessive use of large windows should be avoided as this can create unacceptable light pollution to such areas.



Delivery of SANG areas

- 2.218 Where SANG will be delivered in parcels, the order of delivery should help to ensure (a) early occupants of the development have access to some established SANG provision, and (b) late occupants of the development have the opportunity to feed into the design of the final areas of SANG provision. This helps to ensure that the community feel heard and invested in the SANG provision, supporting good levels of use and stewardship. It is recommended that the organisation of SANG delivery also factor in how long the natural and other landscaping features (e.g. active travel routes within the SANG) will take to become established and useable; SANG parcels that are likely to take the longest to establish and become usable should therefore be prioritised for first delivery, where possible.

Maintenance of SANG areas

- 2.219 SANG provision must be supported by a maintenance agreement that ensures it is maintained in perpetuity; this would be secured by a Section 106 agreement.
- 2.220 This may mean putting some funds into investment to provide financial support for the SANG's maintenance into the future alongside maintenance/management charges paid by residents of the development.
- 2.221 Maintenance agreements/arrangements should be produced through a Community Cohesion Strategy, ensuring such management is community led. These agreements may need to be reviewed as the development builds out, and may need to be reviewed every five years to ensure maintenance activity/charges are appropriate. Financial planning will be needed to ensure that sufficient maintenance can be completed on a regular basis to keep the SANG in a usable and inviting state, and repair any infrastructure that is installed as and when needed (e.g. paths, benches, play equipment).

Trees, landscaping, green routes and sustainable drainage systems

Trees

- 2.222 Trees are an essential part of healthy environments. Whether in a green open space, streetscape, part of a SuDS scheme, a town centre, or in a residential garden, there is a tree species that will thrive and will help to provide community health and wellbeing benefits.
- 2.223 The key benefits of trees include (but are not limited to) improving air quality, providing shade, shelter, privacy, noise reduction, carbon capture, pollutant capture, supporting local wildlife and increased biodiversity, improved drainage, improving the attractiveness of developments (**biophilic response**), a sense of being connected to nature and seasonality, (where relevant) food, and nature immersion experiences.
- 2.224 The preservation of existing trees on development sites is desirable, and applicants should comply with the recommendations and guidance set out in 'BS 5837:2012 Trees in relation to design, demolition and construction: recommendations' to inform their assessment and ensure their successful retention and protection.



- 2.225 The Trees & Design Action Group (TDAG) have published a comprehensive guidance document, ‘Tree Species Selection for Green Infrastructure: A Guide for Specifiers’⁵⁹ which is recommended by the Council for the appropriate selection of tree species for planting schemes. The TDAG guide includes ‘Tree Selector’ matrices that allow the user to find suitable tree species based on proposal-specific or site environment-specific criteria, or in accordance with the designer’s design priorities for the proposal (e.g. a canopy coverage target, to achieve year round flowering, foliage colour, etc.). The TDAG guide also provides key information for each of the individual tree species that are included within the Tree Selector matrices so that users can look up specific species they have in mind, or find out more information about the environmental needs, ornamental value, and maintenance requirements of species. The TDAG guide does not comment on individual species’ biodiversity value. It should be noted that native *Crataegus* (hawthorn), *Quercus* (oak) and *Salix* (willow) are especially strong choices in this regard, though their suitability for planting and appropriate location within the layout will vary from site to site.
- 2.226 In the interests of biosecurity, sustainability and wellbeing, the Council will encourage all tree stock to be sourced from UK plant nurseries, and for a mix of species to be planted; no one species should dominate the planting mix. Providing a mix of species not only provides a more attractive and interesting (sensory variety), biodiverse, and disease resilient planting scheme, but will reduce concentrations of single pollen types. This may help to reduce the experience of allergies (hay fever) for some members of the surrounding community. UK nursery stocklists are readily available if requested.
- 2.227 In the interests of sensory variety and reducing costs associated with the remediation of pests and disease (poor biosecurity), a useful planting scheme design principle to follow is to ensure that no more than:
- 30% of any one family (e.g. *Rosaceae*),
 - 20% of any one genus (e.g. *Prunus*), or
 - 10% of any one species (e.g. *Prunus cerasus* – sour cherry) is included in the planting scheme.
- 2.228 Whilst native tree species are favourable for their ecological value, climate change resilient (including drought resilient and low water use) planting schemes are also a high priority for the Council. The Council will take the ‘right tree in the right place’ approach, and where climate-resilient planting is likely to be of enhanced value in more ‘urban’ locations, native planting is likely to be more appropriate in rural locations, and in the creation of natural/semi-natural greenspace. Consideration should therefore be given to ensuring that species are selected to suit their location. This may mean choosing species that are more heat and drought resistant, or that are otherwise more able to handle rapid, dynamic changes in environmental conditions.
- 2.229 It is encouraged that trees that produce edible fruit or parts are included in the planting scheme for green open spaces, particularly in locations away from sources of air pollution. More information on tree species with edible parts can be obtained through literature sources on agroforestry and foraging in the UK, though some common examples are provided below for quick reference:

⁵⁹ Trees & Design Action Group (2019) Tree Species Selection for Green Infrastructure: A Guide for Specifiers. Available at: <https://www.tdag.org.uk/tree-species-selection-for-green-infrastructure.html>.



Table 16: Examples of tree species with edible parts

Tree species	Edible part
Apple, pear, plum, mulberry, blackthorn (sloe), fig, quince, cherry	Fruit
Rose (rosehips), magnolia	Flowers
Linden	Leaves
Hazel, walnut, sweet chestnut	Nuts

- 2.230 Planting schemes that prioritise sensory stimulation through the provision of a range of colours, heights, canopy shapes, textures, scents, edibility, leaf shapes and/or year-round flowering are encouraged where appropriate to the setting, and where this would provide biodiversity benefits. Particular consideration should be given to canopy shape variation, as fastigate trees (where the tree’s branches grow upwards, and typically have small canopy areas) are generally overrepresented in the public realm.
- 2.231 Once the selection of the appropriate species for the site has been completed, the appropriate distribution and density of provision should be considered. The ideal planting scheme design for a development would ensure that all occupants of a residential development are able to see trees from the windows of their home, and for the neighbourhood to have good tree canopy coverage when in leaf (it should be noted that broadleaf trees are likely to be more effective in this regard than conifers).

Street trees and trees in hardscape environments

- 2.232 Street tree planting should be designed in accordance with the Suffolk Design: Streets Guide’s (2022) guidance (see ‘Trees and planting’, Appendix B ‘Trees near the highway,’ and Appendix H ‘Street Elements’), or any subsequent updated guidance on street trees that is produced or endorsed by the Highways Authority.
- 2.233 The planting of trees in hardscape environments that are not streets, such as within a town square, should be informed by the practical guidance included in the TDAG guide, ‘Trees in Hard Landscapes: A Guide for Delivery’ (2014)⁶⁰.

Buffer landscaping at open space edges

- 2.234 The use of landscaping to create visual and noise buffers between open spaces and other uses is recommended, particularly on sites where minimal buffer zones are provided between homes and play provision (see [Play provision](#) section for minimum buffer zones between homes and equipped play provision sites).

⁶⁰ Available at: <https://www.tdag.org.uk/trees-in-hard-landscapes.html>.



2.235 ‘Buffer landscaping’ around the perimeter of open spaces can help to: create a sense of transition from one type of space to another, support a high quality ‘nature immersion’ experience for users of the SANG, and reduce noise and light pollution from adjoining residential areas. Buffer landscaping can be created using plantings (e.g. native shrub mixes and retention/creation of woodlands) or bunding/site topography to act as a screen/barrier.

Green routes

2.236 ‘Green routes’ are active travel routes that are completely segregated from vehicles and set in high-quality, landscaped, natural setting. Green routes are typically lined with trees, shrubs and hedgerow, and are flanked by verges of wild, native plants.

2.237 Green routes can be created using any of the fully segregated active travel infrastructure typologies. However, green routes are normally expected to be delivered for both cycling and walking purposes. Where relevant, designs that are appropriate for also supporting equestrian use may be supported.

2.238 The quality of proposed green routes will be considered against the below criteria:

- **Natural:** the quality and variety of landscaping and planting used to create the green route’s natural setting;
- **Sensory:** the extent of exposure to ‘urban’ sights and sounds (from vehicles, industry, non-residential buildings, etc.) and air quality whilst using the green route – reflecting the quality of the routing through the site, the landscaping (including buffering techniques where needed) and the planting used;
- **Nature immersion:** the overall ability for the green routes to provide nature immersion benefits;
- **Accessibility:** the quality of the overall design and surfacing, and the degree of accessibility and inclusivity for pedestrians and cyclists (and where of particular relevance to the location, equestrian) – they should be 3 metres wide, and may benefit from a form of internal segregation using visual indicators such as different textures/colours used for the surfacing of each side, tactile paving (using ‘ladder’ and ‘tram’ to indicate user sides) at the start/end/junctions of routes, and/or kerbing (e.g. Cambridge kerb) between the two sides.
- **Safety:** the degree of segregation from vehicles (with the expectation that they will be completely segregated from vehicles for at least most of their length, with interaction happening only at unavoidable junctions with streets);

- **Leisure value:** whether the green routes are considerably extensive on-site, and/or are well connected to off-site bridleways, particularly if they are also of green route standard);
- **Usability:** The indicated permeability of the route from different locations on site will also be considered; the extent to which they serve to connect different open spaces on-site and/or within the local area to each other, and; the extent to which they serve to connect open spaces to homes (or other key destinations such as schools, community facilities or centres), and;

2.239 Green routes can contribute towards meeting the site's overall green open space (but not play provision) requirements, though in most cases this will only be supported where delivered in combination with at least one other more 'open' type of green open space on site. This approach is intended to help ensure that a range of recreational needs are met for new communities. Green routes lack extensive open areas which limits their useability for sport, dogs off-lead activities, and other activities that require more 'open' forms of recreation space.

2.240 There may be rare acceptable exceptions to this approach, such as where green routes have been provided to a particularly high level of quality, and where needs for more 'open' forms of green open space are able to be sufficiently met locally (e.g. a nearby playing field with spare capacity able to absorb increased use arising from the development). The submission of evidence to demonstrate existing available capacity, or the potential to increase local green open space capacity sufficiently through investment, may be required; a developer contribution towards improvements may therefore be required in these limited circumstances.

2.241 Green routes can be co-located alongside SuDS scheme features such as swales and rain gardens. Where appropriately designed, green routes can potentially serve both human and wildlife functions (the latter acting as 'wildlife corridors'), providing habitat and food sources for wildlife and providing a safer means for both humans and wildlife to travel between green open spaces/landscaped areas.

2.242 Green routes may be artificially lit to increase the safety of users, if appropriate to the location and any potential harm to wildlife and residential amenity can be adequately mitigated through appropriate design and terms of operation.

2.243 More detailed guidance on active travel infrastructure design is available in the [Active Travel](#) chapter.



(Top) Green route, Kesgrave
(Bottom) Green route, Carlton Colville



SuDS: Multi-functional, nature-led sustainable drainage systems

Sustainable drainage systems (SuDS) are surface water drainage systems that are designed to mimic natural drainage, in contrast with more hardscape solutions. To be considered SuDS they must take account of water quantity (flooding), water quality (pollution), biodiversity (wildlife and plants) and amenity.

SuDS are now an essential surface water management component of all major development sites and may in the future be mandatory for more forms of development.

SuDS are of enhanced value to communities when they are designed to be 'nature-led'. This is achieved through being appropriately planted and landscaped and made safely accessible.



A nature-led sustainable drainage system (SuDS) scheme.

- 2.244 Paragraph 175 of the NPPF states that major developments should incorporate SuDS unless there is clear evidence that this would be inappropriate, and that where possible, they should provide multi-functional benefits. This can be interpreted to mean that they are expected to have amenity, water quality and biodiversity value. It should be noted that SuDS are likely to become mandatory for all developments above householder level from 2024.
- 2.245 East Suffolk works closely with, and relies upon, Suffolk County Council as the Lead Local Flood Authority for expertise in this respect. The Suffolk Flood Risk Management Partnership have recently updated the Management Strategy, including 'Appendix A – Sustainable Drainage Systems (SuDS): a Local Design Guide'⁶¹, which should be referred to. For street-based SuDS, the Suffolk Design: Streets Guide (2022, pages 47-52) should also be referred to⁶². More general industry standard technical guidance is available through CIRIA's 'The SuDS Manual'⁶³.

⁶¹ Available at: <https://www.suffolk.gov.uk/asset-library/2023-sf3967-scc-suffolk-flood-risk-appendix-a2.pdf>.

⁶² Available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas>.

⁶³ Available at: https://www.ciria.org/CIRIA/CIRIA/Item_Detail.aspx?iProductCode=C753.



- 2.246 Policy SCLP9.6: Sustainable Drainage Systems and Policy WLP8.28 Sustainable Construction of the East Suffolk Local Plans make clear that developments of 10 or more dwellings (‘houses’, in the Waveney area), or non-residential developments with upwards of 1,000 sqm of floorspace (or on sites of 1 hectare or more in the SCLP area), will be expected to provide SuDS.
- 2.247 Policy SCLP9.6: Sustainable Drainage Systems and WLP8.24 Flood Risk require SuDS to be integrated into the landscaping scheme and green infrastructure provision of the development and contribute to the design quality of the scheme.
- 2.248 Policy SCLP11.1 Design Quality and Policy WLP8.29 Design require the proposed design of new major developments to perform positively when assessed against the criteria of The Building for a Healthy Life (2020) guide. The guidance indicates that the “capturing and managing of water creatively and close to where it falls using features such as rain gardens and permeable surfaces” and “allow[ing] people to connect with water” will earn a ‘green’ assessment score.
- 2.249 In this SPD, the term ‘nature-led SuDS’ is used to refer to schemes where the drainage functionality is largely performed using a variety of suitable plantings within a soft-landscaped, undulating scheme, rather than more ‘hardscape’ solutions (e.g. plastic crate soakaways). Nature-led SuDS mimics and enhances natural greenfield drainage capacity for managing water quantity and quality and creates habitat. Nature-led SuDS can be creating using features such as swales, detention basins, retention ponds, rain gardens and the creation of wetland⁶⁴. SuDS should support biodiversity and can contribute towards meeting the site’s biodiversity net gain (BNG) requirements.
- 2.250 Similarly, the term ‘multi-functional SuDS’ is used to refer to SuDS schemes that, together with their primary function of surface water drainage, are designed to be attractive and safely accessible enough to provide amenity benefits and additional green open space to the communities it serves.
- 2.251 Ideally, SuDS should be integrated into the wider open space provision and streetscape rather than provided in a separate ‘tucked away’ location on site. This helps to ensure the scheme provides adequate amenity value and increases the attractiveness of the environment.



Nature-led SuDS feature in a higher density development.

⁶⁴ More information on nature-led SuDS components can be found on susdrain’s website, available at: <https://www.susdrain.org/delivering-suds/using-suds/suds-components/suds-components.html>.

2.252 Hardscape or inaccessible solutions would not be able to be considered part of the green infrastructure on site and are therefore only likely to be supported on major sites in very limited circumstances. It should be noted that permeable pavements or grate systems are not currently considered to be appropriate for adoption by the Highway Authority due to the high maintenance costs.

2.253 Along with other green infrastructure on site, the necessary location of SuDS is recommended to be the starting point for the layout of all developments that require SuDS. This is to help ensure that sufficient space is available for them to function –in the sense of both their primary function (drainage of surface water) and in their secondary functions (amenity green space, increasing attractiveness of development, etc.). The integration of suitable SuDS generally requires around 15% of a site’s total area.

2.254 Adding amenity value to SuDS scheme designs can be achieved through:

- **Ensuring the SuDS are safely accessible and therefore count towards amenity green space provision:** designing SuDS features, particularly SuDS basins, so that they do not have steep sides (instead gently sloping sides that are stable), do not have significant level drops, and are designed so that they are unlikely to retain deep water (considered to be a maximum of 1m of water at its deepest point when full).

If site specific considerations mean that this is not achievable without reducing the effectiveness of the SuDS scheme’s primary function of surface water drainage, then the SuDS should be fenced off with supporting signage that makes clear that the features are unsafe to access. The fencing used should minimise negative visual impact and should ideally allow for views into the SuDS features.

It should be noted that the fencing off of SuDS features will cause them to be excluded from being counted towards the meeting of the site’s green open space requirements.

- **Integrating SuDS features into other green open space types on site:** the integration of SuDS schemes into other green open space types may serve to mutually enhance the benefits of the provision. This may be particularly effective where the SuDS scheme includes features that retain water, acting as ponds (or other ‘blue’ infrastructure features).



A SuDS scheme that doubles as a small park.



- **Integrating smaller or more linear SuDS features (e.g. swales and rain gardens) into residential plots, streets, and along active travel routes:** as well as improving the attractiveness of these spaces, another co-benefit of this multi-feature approach is capturing surface water run off closer to where it falls, potentially reducing the need for a single large SuDS feature that's limited to one location on the site.

- 2.255 It is preferred that SuDS features, are designed in a way that minimises safety risks, making them accessible to the community and able to be left unfenced. As an extra precaution to protect the safety of small children, safely accessible SuDS basins should be located at least 30m away from play provision. Where site-specific conditions mean that SuDS features must be located within 30m of play provision, then the Council's preferred option is to fence the play provision rather than fence the SuDS features.
- 2.256 Safely accessible SuDS do not otherwise need to be fenced. Very small or otherwise demonstrably low-risk SuDS features (e.g. very shallow rain gardens) can be located closer to play provision without being fenced. In some instances, it may be necessary to produce a report on risks through the Royal Society for the Prevention of Accidents (RoSPA).
- 2.257 The design of SuDS for environmental sustainability purposes is covered in more detail in the East Suffolk Sustainable Construction Supplementary Planning Document (2022)⁶⁵.

Residential gardens

- 2.258 Residential gardens are important contributors to health and wellbeing through providing private/semi-private recreation, food growing and relaxation space, as well as wider benefits such as supporting the site's drainage and biodiversity. Though the landscaping of residential gardens can be changed by owner occupiers, setting a precedent for gardens (front and/or back) to be green and well planted with trees, shrubs and ornamental plants helps to encourage occupiers to keep them 'green' . Greener front gardens also help to provide a more attractive and convivial street scene, where neighbours may feel more comfortable to interact. Opportunities to integrate on-plot trees within gardens as part of the overall residential landscape design approach will usually be strongly supported, and should be demonstrated clearly in plans and Design and Access statements. Consideration should be given to ensuring sufficient sunlight, particularly morning sun, to gardens.

⁶⁵ Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf>.



- 2.259 Following permaculture principles, it is recommended that plants that need the most maintenance or most frequent access (e.g. culinary perennial shrub herbs like rosemary, sage, lavender and thyme) are planted closest to home's access points (i.e. the back door), and those that require the least maintenance and access are planted the furthest away (e.g. ornamental trees).
- 2.260 Balconies are expected to be designed to enable at least some plants and some food growing to be possible, such as tomato or bean plants, by being able to bear the weight of pots or small planters. Consideration should be given to ensuring balconies receive sufficient sunlight, particularly morning sun. For flatted developments consideration should also be given to the positioning of balconies in terms of privacy and residential amenity (i.e. noise) impacts.
- 2.261 Inaccessible 'Juliet' style balconies are generally not recommended for flatted development, where this represents a missed opportunity to provide occupants with some useable private external space. Juliet balconies may be acceptable in locations where there is a demonstrable reason why projecting balconies would not be appropriate.
- 2.262 The provision and design of private external space should be factored into the design of green open spaces that support the development, as this may influence which types of green open space will provide the most community value to deliver.



Green roof on the Adnams Distribution Centre, Reydon.

Green roofs and green walls

- 2.263 Green roofs and green walls support the **biophilic design** of buildings. Besides direct wellbeing benefits, green roofs and green walls provide multiple other benefits for buildings, such as: improving their appearance, increasing the building's insulation (and therefore more constant internal temperature), improved air quality, increased fire safety arising from the green roof's moisture or the green wall's watering systems, and reduced transfer of noise to and from the building.
- 2.264 The GRO Green Roof Code (2021)⁶⁶ is recommended as guidance on the installation and delivery of green roofs.
- 2.265 Green roofs and green walls will be supported in appropriate locations and on appropriate buildings, though care needs to be taken to ensure that the watering and construction demands of such features do not result in a more unsustainable outcome than the greening benefits of the planting.
- 2.266 Notable local examples of green roofs and green walls is the Adnams Distribution Centre in Reydon and the central Norwich M&S branch (Rampant Horse Street), respectively.

⁶⁶ Available at: <https://www.greenrooforganisation.org/2021/03/05/the-gro-code-of-best-practice-2021/>.



Play provision

- 2.267 Play is important for the health and wellbeing of people of all ages. The appropriate design of play provision will depend on whether it is intended to cater to the play needs of children, children and young people, young people and adults, or for all ages. This section of the document will provide an overview of the key play needs of each of these age groups, and will provide design guidance to ensure quality, value, variety, accessibility, and inclusivity.
- 2.268 The East Suffolk Play Area Strategy 2022-27 (2023)⁶⁷ should be the starting point for assessing the quality and value of existing play provision in the local area (within easy walking distance of the development site), referred to in this section as ‘the play environment’. The Play Area Strategy is supported by an interactive GIS map⁶⁸.
- 2.269 The Play Area Strategy’s findings will help developers to identify opportunities to increase the quantity, variety, accessibility, inclusivity, and overall quality of the play environment within walking distance of their development. This will benefit both future occupiers of the development as well as existing communities and support the communities to interact and build connections.
- 2.270 The quality of the existing play environment and the level of local need can be informed by the Play Area Strategy and through engagement with the local community, including Town and Parish Councils. Town and Parish Councils often know their local provision and community needs well and therefore may be able to give direction on which play experiences are not currently being provided, through what residents have previously voiced a desire for.



Local Equipped Area for Play (LEAP), Sandlings (Martlesham)

⁶⁷ The East Suffolk Play Area Strategy 2022-2027 document is available at: <https://www.eastsuffolk.gov.uk/assets/Leisure/Parks-and-open-spaces/Play-Spaces/East-Suffolk-Play-Area-Strategy-2023-2027.pdf>.

⁶⁸ The East Suffolk Play Area Strategy 2022-2027 interactive GIS map is available at: <https://eastsuffolk.maps.arcgis.com/apps/instant/sidebar/index.html?appid=5dd3a4416b274c1baf499b0e6203a058>. Information on how to use this map is available via the ‘Details’ tab.



Play provision for children: site types

2.271 The following types of play provision for children will be supported in the district:

Local Equipped Areas for Play (LEAPs)

2.272 'LEAPs' are principally designed for children up to age of 10 (inclusive of 'small children' 0-6 and 'older children' 7-10), with some LEAPs – particularly larger LEAPs – also providing equipment and play experiences that are appropriate for young people (ages 11-16). The required size of LEAPs, or whether multiple LEAPs are needed on site, will depend on the Open Space Methodology calculation's indicated quantity requirement, as well as qualitative factors such as the wider play environment around the site. LEAPs are smaller and less holistic in their provision than NEAPs, in that they do not provide informal sport provision.



A hard surfaced area for playing five-a-side football, provided to support the Kingston Fields Play Area (NEAP), Woodbridge.

Neighbourhood Equipped Areas for Play (NEAPs)

- 2.273 'NEAPs' are larger than LEAPs (minimum activity area of 1,000sqm), provide informal sport provision, and are usually designed to meet the needs of children up to age 16. As with LEAPs, expectations for the scale and number of play experiences provided by age group of NEAP provision will depend on the scale of the development that the play provision must support, and the local play environment.
- 2.274 NEAPs also differ from LEAPs in that they normally include (at least) a hard surfaced activity area for children to play five-a-side football, which requires a minimum area of 465sqm (as per FIT guidance⁶⁹). This surfaced area may be provided as a simple hard surfaced asphalt area (smaller) or an open textured porous macadam, polymeric, or artificial grass-surfaced form of Multi-Use Games Area⁷⁰ (larger, with a minimum area of 800sqm, as per FIT guidance).
- 2.275 Multi-Use Games Areas to support NEAPs should have markings for multiple sports (at least a primary and secondary sport), depending on need/local availability of similar facilities and the surface treatment used (i.e. five-a-side football, tennis, basketball, athletics, rugby and/or netball). More information on the surfacing options for Multi-Use Games Areas can be found in the [Youth/Casual: Multi-Use Games Areas](#) section.

⁶⁹ Fields in Trust (2015) Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard (England). Available at: <https://fieldsintrust.org/insights/policy-hub/guidance-for-outdoor-sport-play>.

⁷⁰ See Sport England's 'ASOS – Type 4 or 5 MUGA with sports lighting' document for the basic dimensions of the principal play area of small MUGAs, available at: <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/asos-type-4-or-5-muga-with-sports-lighting.pdf?VersionId=APDIOvrsPDEUTh1Pkdt0UQj0W.8TieAG>. Detailed guidance on the design of MUGAs of all sizes is available in Sport England's Artificial Surfaces for Outdoor Sport Design Guidance Note (2013), available at: https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/artificial-surfaces-for-outdoor-sports-2013.pdf?VersionId=t.3rEH_hWpkMZ.am24nSILAAFDgQ4Lpz.



2.276 NEAPs are often combined with Youth/Casual provision, other community and public facilities, and/or located near schools and centres. This co-location is intended to help create 'play destinations' for all ages and abilities to use, and to ensure the provision is well used over its lifetime.

2.277 Both LEAPs and NEAPs tend to be located within green open spaces (which is encouraged), though there may be rare exceptions to this.

'Play on the way'

2.278 'Play on the way' provision is usually very small scale and directly attached to key walking routes or key buildings for communities, particularly where relevant to families with children e.g. routes to schools, areas outside libraries, primary care buildings, etc. Play on the way will generally only be supported where delivered on supplementary basis to LEAPs and NEAPs elsewhere on the site, rather than on its own. This helps to ensure a high quality play environment.

2.279 Play on the way provision is intended to support the overall design quality and inclusivity of a development. Play on the Way equipment can be aimed at any age of user, with Play on the Way for young people and adults being typically more fitness focused. Examples include sets of swings, horizontal bars, leapfrog features, boulders/climbable features, stepping stones, permanent hopscotch grid, etc.

2.280 Due to its minor scale, play on the way provision does not require cycle and scooter parking.

Changes to provision for small children (up to age 6 only)

2.281 Unless specified in a site allocation policy, Local Areas for Play (LAPs) (up to age 6) provision is no longer supported by the Council, except for in exceptional circumstances where there is a clear and demonstrable need for play provision that caters to the needs of small children only. The Council instead expects new LEAPs and NEAPs to meet the needs of all ages up to either age 10 or up to age 16 (as appropriate depending on scale of the development, local play environment and needs).

2.282 As per the Play Area Strategy, going forward the Council will progressively consolidate existing low quality and limited play provision sites (particularly LAPs) into to fewer but larger, higher quality, more inclusive, varied, better located, and wider catchment area play provision sites. **This is intended to support higher community value of the retained/expanded sites and to be more cost effective in managing the sites owned by the Council.**



Play provision for small children incorporated into a LEAP at Beccles Common.



Play provision for children: site design

- 2.283 Play is critical to the process of how children develop physically (strength, fitness, flexibility and maintaining a healthy weight), mentally (imagination, motor skills, self-esteem, problem-solving and risk management/ 'risky play' skills), socially (language, making friends, sharing, playing co-operatively, resolving conflict) and their relationships with the physical – natural and built – world around them. Play is very important for mental health and wellbeing at all ages, though is particularly so for children. The Chief Medical Officer's 2019 recommendations for the duration of physical activity per day/week by age group is included in [Appendix 4](#) of this document.
- 2.284 The design of outdoor equipped play provision for children should therefore provide a holistic workout across these key development categories, shifting the conventional mindset from simply providing enough pieces of play equipment to providing holistic play experiences that meet children's needs for informal play.
- 2.285 The Play Area Strategy did not identify and specify a quantity rate figure for play provision for children in East Suffolk. The Fields in Trust guideline figure of 0.25 hectares of play space per 1,000 people is therefore used to calculate the minimum play provision space (i.e. total activity area) requirement. This total area figure should be calculated using the dwelling occupancy rate of 2.4 people per dwelling.
- 2.286 The number of individual pieces of play equipment required for play provision sites for children (LEAPs or NEAPs) should be informed by the scale of the development (using the [Open Space Methodology](#) to determine the required minimum area and play provision site type and how many):
- a) play experiences,
 - b) sensory experiences, and
 - c) pieces of inclusive equipment must be provided on the play provision site(s) serving the development.
- 2.287 Consideration can also be given to the current child yield figures for new housing developments in Suffolk, and to the overall housing type mix (i.e. family homes are likely to accommodate more children than retirement developments). However, regardless of development scale-based requirements, the overall quality of the proposed play provision in terms of supporting children's health, wellbeing, safety, and cognitive, social, and motor skill development is what is most important and therefore should be the central focus of any play provision site design. Full details of the qualitative requirements of play provision sites for children can be found in the [Play Provision for Children Design Quality Matrix](#), later in this section.



Trim trail set within amenity green space and soft landscaping at Martello Park (NEAP), Felixstowe



- 2.288 Consideration will therefore be given principally to the number and variety of different **play experiences** that the play provision offers as a whole, rather than a simple count of the number of equipment pieces that have been proposed for it. Larger, more complex pieces of play equipment provide the opportunity for multiple different play experiences – e.g. climbing, balancing, jumping and sliding rather than just one single play experience, e.g. sliding – and are therefore often more space efficient and may be more cost effective to provide than multiple individual pieces of equipment.
- 2.289 LEAPs should provide at least 10 different play experiences for each age group catered to. NEAPs are expected to provide more than 10 different play experiences for each age group catered to. For both LEAPs and NEAPs at least 6 play experiences should be appropriate for wheelchair users by being accessible from a seated position. Further guidance on the Council’s expectations for play experiences can be found in the [Creating play experiences](#) section.
- 2.290 The design focus for play provision for children should be on providing:
- **Play experiences:** creating an adequate number and variety of play experiences, and ensuring that they are provided in a way that is appropriate for each age group that is being catered to;
 - **Sensory experiences:** creating an adequate variety of sensory experiences;
 - **Inclusive play:** ensuring inclusivity by providing inclusive equipment and accessible activity spaces and seating;
 - **Durability:** ensuring durability through the choice of materials for equipment and matting, and the location of the play provision within the site (considering matters such as exposure to sunlight, risk of rot, etc.), for the anticipated lifetime of the play provision;
 - **Accessibility:** ensuring the communities within walking distance of the provision can easily discover and access the play provision it, as is not ‘tucked away’ or otherwise made exclusive to residents of the development; access to the site via walking and cycling is supported through the provision of high quality active travel infrastructure between homes/schools/green open space/other play provision and the new play provision site (as appropriate);
 - **Replaceability:** designed to be easily maintained and replaced when needed;
 - **Co-locating with green open space:** providing an attractive natural setting for the play provision, usually through locating it within green open space;
 - **Tenure-blind design:** ensuring provision is tenure-blind by being equally accessible to homes of all tenures, without bias;
 - **Safety:** ensuring the provision is safe for children to use by locating it away from health and safety risks or otherwise adequately mitigating them; ensuring adequate natural surveillance from footfall and (if applicable) nearby buildings; use of appropriate materials; Play provision for children should be located at least 30m away from identified potential sources of risk to children’s safety. Play provision can be fenced if fencing is necessary to decrease the risk to an acceptable level;
 - **Sheltered:** LEAPs and NEAPs should also incorporate at least some shade from a form of shelter, such as an umbrella, shade sails, trees or other sheltering structure to help protect children from sunburn and heat stroke;
 - **Supporting high residential amenity:** providing adequate buffer zones from LEAPs (20m) and NEAPs (30m) to the habitable rooms of homes and other buildings with sensitive receptors, if applicable.



- 2.291 On-site play provision is expected to be delivered in full before 50% of the dwellings on site are occupied. Play provision should be a key consideration in the phasing design of any development. For later phases of development after occupation has commenced, the new residents of the development should be engaged with. It is essential that developers make the location of play provision on their developments absolutely clear to potential buyers of homes on the development in any marketing material and sales plans⁷¹.
- 2.292 As noted in the [Open Space Methodology](#) section of this chapter, under some circumstances it may deliver better value for local children if an existing play provision site that's nearby (within easy walking distance) is expanded and/or improved, rather than new provision be delivered on the site (particularly if the offer would be quite limited in quantity and quality). This possibility is covered in more detail in the [Open Space Methodology](#) section.
- 2.293 Play provision can be delivered within 'natural/semi-natural green space', 'amenity green space', or 'parks and gardens' types of green open space. Appropriate planting and landscaping around play provision sites are encouraged to add sensory and relaxation value for users.
- 2.294 Play provision should not be located in a 'tucked away' location out of sight from the existing community – it should be visible and open for all to use that are within walking distance of the provision. The location of play provision sites should balance walkability from key points of origin for children, such as their homes and schools, and sources of pollution (noise, poor air quality), risks such as roads, dogs off-lead areas and some SuDS features. It is preferred that SuDS features, particularly SuDS basins, are designed in a way that minimises safety risks, making them safely accessible to the community (including children) and are therefore able to be left unfenced. SuDS and play provision is covered under the [SuDS: multi-functional, nature-led sustainable drainage](#) section.



Fenced LEAP at The Sandlings, Martlesham – the fencing design is appropriate for its space setting.



Sensory play boards, Langer Park, Felixstowe (LEAP).

⁷¹ Issues have previously occurred where this was not done, and it has caused miss-selling claims and community conflict.

- 2.295 Where trees are used to provide shade, the tree and its canopy radius area at maturity should be located so that it does not cover the play provision's activity area. This helps to minimise the impact of droppage onto the play equipment and matting, and in turn maintenance costs (e.g. clearing and cleaning of algae build up). This also reduces risks to children from droppage. Tree roots or tree sap may also damage the equipment, matting, benches or bins, shortening the lifespan of the provision. The use and placement of tree species that produce fruit should be considered carefully, as this may attract wasps.
- 2.296 Materials should be as safe, durable, location appropriate, and sustainably sourced as possible. Where not in a sensitive natural setting (such as within a SANG), the play equipment included in LEAPs and NEAPs are best constructed of metal with plastic coatings and reinforced rope. Treated wood is generally discouraged for children's play equipment, particularly in locations of poor drainage and poor sunlight, due to concerns about durability. However, in natural and semi-natural green open space settings, use of appropriate natural materials (e.g. wood, stone, undulating grass landscaping, etc.) are generally preferred. Developers will be expected to evidence measures taken to increase the durability of natural materials, where used. Play equipment will be expected to meet the minimum British Standard, BS EN 1176.
- 2.297 Where reasonably possible, children's play provision is encouraged to be sourced from local suppliers and is encouraged to incorporate the use of recycled and/or sustainably sourced materials, providing they are able to be demonstrated to be satisfactorily durable.
- 2.298 Matting should be rubber/PVC, such as wet pour surfacing. These materials will help to ensure the equipment is durable, more easily maintained (particularly when compared with loose materials like wood chip) and more easily repaired and replaced when needed.
- 2.299 All play provision sites are expected to be accessible and inclusive of children with disabilities, by providing inclusive play equipment and making appropriate adjustments to activity areas. Loose materials such as bark for the surfacing of activity areas is not supported as this reduces wheelchair accessibility. Active travel routes to play provision sites must be accessible to wheelchair and other wheeled mobility aid users.
- 2.300 The minimum public facilities to be provided on site are benches and bins. Where possible, benches and dog tether points should be provided both inside and outside of the provision to support adults with dogs (not permitted in the play provision site) to supervise children.
- 2.301 Consideration should be given to targeted engagement with girls in the community, to ensure the design of the provision is inclusive by being relevant and attractive to them, and to ensure that they feel safe and welcome to use it.



Inclusive basket swing, Beccles Common (LEAP)



Climbing net for a climbing play experience, Beccles Common (LEAP)



Creating play experiences

- 2.302 'Play experiences' are movements or activities that encourage the development of children's physical, mental and social skills such as imagination, motor skills, social play and problem solving. Multiple play experiences can be created using one comprehensive equipment station, or equipment can provide just one or two play experiences (e.g. a stand-alone slide provides for both climbing the ladder and sliding).
- 2.303 It should be noted that some play equipment will be able to be used by small children, older children and young people (e.g. a play tunnel that's large enough), whilst others may only be suitable for older children and young people (e.g. horizontal bars), or only suitable for younger children (e.g. small slides). It is therefore recommended that a mix of age-group specific equipment is provided in every LEAP/NEAP design.
- 2.304 A local best practice example of providing a range of age-group appropriate equipment within one play provision site is at the Martello Park NEAP in Felixstowe (see below).



Comprehensive play equipment for small children at Martello Park (NEAP), Felixstowe.



Comprehensive play equipment aimed at older children and young people at Martello Park (NEAP), Felixstowe.



Play Experience Matrix

2.305 The below table, **Table 17**, lists different movements and skills that play equipment can facilitate and develop in children and young people (though is not an exhaustive list). It also provides suggestions for types of play equipment to develop them should be considered in the design of play provision. Columns have been added to the table so it can be used as a tool to check the quality of the proposed play provision’s design in terms of offering an appropriate range and variety of play experiences per age group:

Table 17: Play experience types and examples of play space design that provide for them

Play experience: movement/skill type developed	Examples of play equipment types that are appropriate for creating the play experience	Age groups provided for (as applicable)			Comments
		0-6 Y/N	7-10 Y/N	11-16 Y/N	
Balancing	Trim trail logs, slack lines, stepping stones, leapfrog posts, balance/wobble boards				
Social play, including playing games, sports, unstructured imaginative play and games that require co-operation and sharing	General activity area – available open space for unstructured play (e.g. playing tag and imaginative games), or for specific games (e.g. giant snakes and ladders board, or lines and goals for 5-a-side football)				
Running	Running track oval, multi-station trim trail, splash pads (running through water jets)				
Jumping and landing	Play equipment at a height above ground level, swings, trim trail, tyre snake, trampolines (including wheelchair accessible trampoline)				
Spinning	Roundabout, satellite carousel				
Rolling, tumbling, turning	General play space area – space for unstructured play				
Throwing, catching, hitting, kicking and aiming	General play space area – inclusion of small multi-activity area				
Climbing, scrambling, traversing and pulling	Boulders, climbing frame with climbing nets (‘spacenet’s’), climbing ropes, fireman’s pole, traverse climbing wall, rope traverse (trim trail), (ascent of) play towers, wheel-over structure (for wheelchair users) and play tunnels				
Rocking	Spring rocker				
Swinging,	Swings, trapeze bar (with or without gymnastics rings), zip line				



Play experience: movement/skill type developed	Examples of play equipment types that are appropriate for creating the play experience	Age groups provided for (as applicable)			Comments
		0-6 Y/N	7-10 Y/N	11-16 Y/N	
Sliding	Slides, fireman’s pole				
Brachiating and hanging	Horizontal bars (‘monkey bars’), parallel bars (wheelchair accessible), climbing frames				
Imagination	Play spaces that use motifs on the surfacing or walls (if applicable) or other interactive sensory elements to create a themed environment (e.g. ‘jungle’, ‘arctic’, ‘zoo’, ‘under the sea’, etc.); themed structures e.g. pirate ship climbing frame, a playhouse, etc.				
Problem-solving and risk management/‘risky play’ skills	Equipment provides a range of heights (e.g. elevated climbing frame, swings, monkey bars) and widths (tunnels that must be scrambled through) and facilitates games that require problem solving.				
Other	N/A				
Total for each age group (as applicable):					

2.306 LEAPs or NEAPs should provide at least six play experiences that are accessible from a seated position. Some examples of inclusive play equipment and correlating play experiences are:

- Basket, ‘memory’ and wheelchair style swings (swinging);
- Accessible slide (sliding);
- Wheelchair-friendly trampolines (bouncing);
- Wheelchair-friendly roundabouts (spinning);
- Wheelchair accessible structures, e.g. a boardable ‘pirate ship’ (climbing);
- Parallel bars (climbing/hanging);
- Puzzle games (problem solving), and/or;
- Sensory play equipment accessible from a seated position.



Sensory Stimulation Matrix

2.307 Play provision for children under the age of 11 is also expected to incorporate sensory stimulation into its design. The below table, **Table 18**, shows examples of how sensory stimulation may be incorporated into designs:

Table 18: Senses and examples of design qualities/equipment for providing sensory stimulation

Sense	Examples of how to integrate into play provision design	Provided? Y/N	Comments
Sight	Use of colour, theme, equipment at different heights; integration of ‘fairground mirrors’ or kaleidoscopes; integration with green open space for views of nature		
Sound	Equipment that makes sounds, for example bells that can be rung, wind chimes, a wheel can be turned to create sound, giant xylophone, etc.; integration with green open space for natural sounds (bird song, wind through trees, etc.)		
Touch	Incorporation of different materials, textures and mediums (e.g. splash pads for use in warmer months); integration with green open space		
Smell	Integration of play provision with green open space with flower scents		
Taste	Integration of play provision with green open space with productive species (though fruit trees that may attract wasps should not be used)		
Total provided:			

2.308 Sensory stimulation may be of enhanced value to children with impairments to their senses, for example, play provision that produces sounds may be of enhanced value to children with visual impairment.

Buffer landscaping around play provision for children

2.309 The use of landscaping to create visual and sound buffers between play provision and other uses is recommended, particularly on sites where minimal buffer zones are provided between homes and play provision (see [Play Provision for Children Design Quality Matrix](#)) to screen and reduce the transfer of noise to surrounding homes. ‘Buffer landscaping’ can be created using plantings (e.g. native shrub mixes and retention/creation of woodlands) or bunding/site topography to act as a screen/barrier.



Play Provision for Children Design Quality Matrix

2.310 The below assessment matrix provides an overview of all of the key design specification considerations for play provision for children. The table is organised into columns that show ideal ‘gold standard’ of provision, the ‘essential’ standard of provision, and what would be an unacceptable standard of provision. Where the ‘gold standard’ and ‘essential’ columns are merged, the contents can be read to be essential. NB: Design guidance for Youth/Casual provision (ages 11+, i.e. young people and adults) is covered in the next section of the document and is therefore not covered in [Table 19](#).

Table 19: Play Provision for Children Design Quality Matrix

Play equipment for children: design quality indicators	‘Gold standard’ of provision	Essential standard of provision	Unacceptable standard of provision	Comments
Minimum play quantity provision (where quantity is not stated in site allocation policy)	0.25 hectares of play provision area per 1,000 population (e.g. 330 homes occupied each by 2.4 people incurs 0.2ha of play provision) Approximately 1 piece of play equipment per 33 children/young people up to age 16 years (based on current child yield per dwelling figures), though quality, range and diversity variety of play experiences for each age group is prioritised over meeting a set quantity of equipment pieces.		Insufficient provision to support growth.	
Walkability minimums	<ul style="list-style-type: none"> LEAP – 400m / 5 min walk NEAP – 1km / 12 mins walk Play on the way – N/A <p>Connected to several accessible active travel route to homes.</p>	<ul style="list-style-type: none"> LEAP – 800m / 10 min walk NEAP – 1km / 12 mins walk Play on the way – N/A <p>Provision is connected to at least one accessible active travel route to homes.</p>	Not connected to an accessible active travel route.	
Range of play experiences provided	<ul style="list-style-type: none"> LEAP – at least 10 different play experiences provided for each age group NEAP – More than 10 different play experiences for each age group At least 6 of these play experiences should be accessible from a seated position (appropriate for wheelchair users) Play on the way – N/A 		Fewer play experiences provided than required; repetition of play experiences rather than providing a wider range; insufficient play experiences accessible from a seated position.	



Play equipment for children: design quality indicators	'Gold standard' of provision	Essential standard of provision	Unacceptable standard of provision	Comments
Ages catered to	<ul style="list-style-type: none"> LEAP (smaller) –ages up to 10 years LEAP (larger) – ages up to 16 NEAP – ages up to 16 years Play on the way – N/A 		Insufficient age range catered to.	
Age appropriate design	<p>NEAP: care has been taken to separate children’s play provision (ages up to10) from provision intended for young people’s use (ages 11-16) so as to avoid reducing the attractiveness of the provision for the intended ages. This separation should be at least 30m.</p> <p>LEAP(s) and Youth/Casual provision on the same site: care has been taken to separate the LEAP (where intended for ages up to 10) and the Youth/Casual provision (ages 11+) to reduce younger children’s use of the Youth/Casual provision, therefore reducing its attractiveness for the intended age groups. This separation should be at least 30m.</p>		Younger children’s play equipment and provision for people aged 11+ are positioned too close to each other, reducing its attractiveness to the intended age groups.	
Inclusivity	<p>LEAPs and NEAPs: At least 6 play experiences should be accessible from a seated position (appropriate for wheelchair users) due to provision of inclusive play equipment.</p> <p>Benches are provided. Public toilets or community toilet access in provided, ideally including a Changes Places facility.</p>	<p>LEAPs and NEAPs: At least 6 play experiences should be accessible from a seated position (appropriate for wheelchair users) due to provision of inclusive play equipment.</p> <p>Benches are provided.</p>	No benches provided; no accessible play experiences/inclusive play equipment provided.	
Sensory	LEAP/NEAPs: all 5 senses engaged and accessible from a seated position (appropriate for wheelchair users)	LEAP/NEAPs: 3+ senses engaged and accessible from a seated position (appropriate for wheelchair users)	Senses insufficiently engaged / sensory equipment is inaccessible.	



Play equipment for children: design quality indicators	'Gold standard' of provision	Essential standard of provision	Unacceptable standard of provision	Comments
Cycle and push scooter parking provision	LEAP/NEAPs: provide cycle and push scooter parking		No or too little cycle and/or push scooter parking.	
Recommended minimum area / dimensions	LEAP: 0.04ha / 20 x 20 metres – minimum activity zone of 400sqm NEAP: 0.1ha / 31.6 x 31.6 metres: <ul style="list-style-type: none"> • minimum activity zone of 1,000sqm comprising an area for play equipment and activity area, plus • a hard surfaced area of at least 465sqm (equivalent of the minimum area needed by children to play five-a-side football) or MUGA (at least 800sqm, as per FIT guidance) with appropriate surfacing and sport markings to best meet the needs of older children and young people age. 		Provision is too small or otherwise inappropriate in overall design.	
Buffer zones and use of buffer landscaping	Play on the way and LEAPs: 20 metre min separation between provision and the habitable room façade of a dwelling and buffer landscaping is used. NEAP: 30 metre min separation between provision and the boundary of the nearest dwelling and buffer landscaping is used.	Play on the way and LEAPs: 20 metre min separation between provision and the habitable room façade of a dwelling NEAP: 30 metre min separation between provision and the boundary of the nearest dwelling.	Buffer zone is insufficient	
Materials used	Metal with plastic coating for equipment and reinforced rope, rubber/PVC tile matting or wet pour for the play space area; recycled materials are used throughout; natural materials (including treated wood) for SANG-based play provision.	Treated wood for equipment where demonstrated to be durable (in a non-SANG context); other rubber surfacing used for activity space; some recycled materials used.	Untreated wood or plastic; no recycled materials have been used.	



Play equipment for children: design quality indicators	'Gold standard' of provision	Essential standard of provision	Unacceptable standard of provision	Comments
Security	The play provision is fenced and accessed via one or more accessible, lightweight gate(s), where appropriate.		Fencing not used; area made less accessible through use of inappropriate gate(s).	
Co-location with supporting facilities (Nearby access to)	LEAP/NEAP: Public toilets or community toilet agreement toilet access, including a Changing Places facility; water fountain; café or mobile food pitches (e.g. coffee van); bins.	LEAP/NEAP: Benches and bins.	No facilities provided.	
Integration with green open space and incorporation of trees and planting	Provision is integrated into a green open space type and supported by planting and landscaping.	Supported by planting and landscaping.	Neither located within a green open space nor supported by planting or landscaping.	
Tenure blind design	The play provision is equally accessible for children regardless of home tenure.		Play provision is more accessible for one tenure group.	
Delivery trigger threshold	By 50% of homes occupied.		Delivered after occupancy threshold is reached.	



Youth/Casual: Play provision for young people and adults (ages 11+)

- 2.311 Play provision designed for use by young people and adults ('young people', ages 11-16, and 'adults', ages 17+) is collectively known as 'Youth/Casual'. Young people need spaces that feel 'theirs' – where they are welcome and safe. Physical activity space and social space provision supports young people to engage in physical activities that help to build their self-esteem, strength, fitness and social relationships. Developing these abilities and having safe spaces to socially engage may help to reduce how often young people engage in harmful behaviours such as smoking, drinking alcohol, drug use, or engaging in forms of anti-social behaviour.
- 2.312 'Youth/Casual' provision is split into two main categories: 'physical activity space' and 'social space' provision. Some examples for each category include:
- **Physical activity space provision:** skate parks, BMX tracks, pump tracks, outdoor ping pong tables, larger-sized Multi-Use Games Areas (MUGAs – used for sports like basketball, netball, tennis, football, etc.), zip lines, climbing boulders/walls/netting, PLAYCEs®/Skills Gardens®, adult-sized trim trails, gamified public spaces, parkour or 'Ninja Warrior' style outdoor gyms, and other outdoor exercise equipment provision (see sub-section below).
 - **Social space provision:** youth shelters, group sitting areas, conversation benches, picnic tables, outdoor performance spaces, walking loops through open spaces, and (adult-sized) swings and multi-person swings.
- 2.313 Youth/Casual provision can be delivered within natural and semi-natural green space, amenity green space and parks and gardens green open space types. Co-designing Youth/Casual with young people is encouraged to support its use and enjoyment, and helps to ensure the provision is relevant, inclusive and attractive to women and girls and other groups with additional needs.
- 2.314 The Council expects a quantity rate of 0.25 hectares per 1,000 population inclusive of all play provision types – which age group(s)' play needs are to be addressed should depend on which type of provision would deliver the most community value. This should take into account the nature of the proposed development and the extent to which needs are currently met within easy walking distance of the development (the play environment).
- 2.315 Due to the wide age range being catered to when providing Youth/Casual play provision, rather than using child yield figures it is recommended that Youth/Casual requirements are calculated on the simple basis of 0.25 hectares per 1,000 population, using the dwelling occupation rate of 2.4 people per dwelling.
- 2.316 On-site Youth/Casual provision is expected to be delivered before 50% of the dwellings on site are occupied.

Designing Youth/Casual provision

- 2.317 The following design guidance should be applied to the design of Youth/Casual provision:
- **Combine the categories:** the social aspect of combined provision may help to encourage exercise in young people and adults who would not otherwise engage in exercise activity, particularly at higher intensities.



- **Integrate it into green open space or place next to centres/community facilities:** ideally, Youth/Casual provision is integrated into or provided adjacent to a green open space type, community facility like a leisure centre, or a high-footfall area, such as a district or local centre. This will help to ensure the provision is accessible, well overlooked and well used by the community. Youth shelters should be placed in locations where young people are likely to want to congregate, such as near schools, parks, retail centres and sport/leisure facilities.
- **Locate it away from children’s play provision, roads and hot food takeaways (where possible):** Youth/Casual provision should be located away from play provision for children (at least 30m) as this may discourage use of the Youth/Casual provision and encourage use by younger users than the equipment/space is intended for. Provision should be located away from heavily trafficked vehicle routes, where poorer air quality may undermine use. if possible, they should be located away from areas with hot food takeaways so as to discourage excessive use of them, particularly by young people.
- **Built to last:** Youth/Casual provision should be built to last, through using materials and construction techniques that will help the provision to be resilient to weathering, wear and tear and vandalism. However, care should be taken to balance an attractive appearance with durability, so as to avoid the provision looking ‘low cost’.
- **Provide accompanying facilities:** all Youth/Casual provision should be provided with bins, benches and cycle parking. Youth/Casual, particularly more social spaces, will likely be used by young people for an extended period of time, and would therefore benefit from being located close to centres (local, district or town centres), or next to community facilities that provide public toilets access.
- **Ensure they are accessible:** Youth/Casual provision should also be made inclusive wherever possible, such as through ensuring that youth shelters, social and performance spaces are wheelchair accessible.
- **Ensure they are inclusive:** Youth/Casual provision must be designed to be inclusive of all levels of ability and should take into account the additional needs some groups may have in order to feel safe and comfortable using the equipment/space. It is critical that Youth/Casual provision supports women and girls to feel safe, included, and enabled to engage in physical activity. Consideration should therefore be given to how play provision can be made more inclusive of women and girls. Make Space for Girls is a charity that campaigns for facilities and public spaces for teenage girls and provide useful information that can be used in the design process, such as the annual Research Report⁷².

Buffer landscaping around Youth/Casual provision

2.318 The use of landscaping to create visual and sound buffers between play provision and other uses is recommended, particularly on sites where minimal buffer zones are provided between homes and play provision (see [Youth/Casual Design Quality Matrix](#)) to screen and reduce the transfer of noise to surrounding homes. ‘Buffer landscaping’ can be created using plantings (e.g. native shrub mixes and retention/creation of woodlands) or bunding/site topography to act as a screen/barrier.

⁷² Available at: <https://www.makespaceforgirls.co.uk/resources-library>.



Youth/Casual: Multi-Use Games Areas

- 2.319 Multi-Use Games Areas (MUGAs) can be provided for children to support Neighbourhood Equipped Areas of Play (NEAPs) or can be provided for ages 11+ as Youth/Casual provision. MUGAs that accompany NEAPs are usually smaller and more simplistic in layout than those provided for Youth/Casual provision, as their primary purpose is to facilitate five-a-side football and equivalent games. MUGAs for ages 11+ are required to support multiple sports, usually in the format of an identified primary sport and secondary sport, in accordance with existing local provision and identified local need.
- 2.320 Youth Casual MUGAs have historically been organised into five types, though designs are not necessarily limited to these if local needs justify an alternative design solution. The below table, **Table 20**, provides a quick reference guide:

Table 20: Multi-Use Games Area (MUGA) types

MUGA type	Surfacing	Primary sport(s)	Secondary sport(s)	Additional details
Type 1	Open textured porous macadam	Tennis	Mini-tennis, netball and basketball	
Type 2	Open textured porous macadam	Netball	Tennis, mini-tennis and basketball	Higher surface friction than Type 1.
Type 3	Polymeric surface over macadam base	Netball	Tennis, mini-tennis and basketball	
Type 4	Polymeric surface over macadam base	Football, basketball and general sports and recreational training and play		Not recommended for tennis or netball due to higher shock absorbency and lower surface friction.
Type 5	Artificial grass – sand filled, sand dressed or needle-punch synthetic turf laid over a rubber shockpad layer. Artificial grass can also be short pile (better for hockey) or long pile (better for football and rugby).	Various, including football, rugby, hockey, athletics and lacrosse.		Contact forms of rugby must be supported by high shock absorbency surfacing.

- 2.321 Further design guidance and example layouts of different types of MUGAs (and larger artificial grass pitches) are available in Appendix 1 of Sport England’s Artificial Surfaces for Outdoor Sport Design Guidance Note (2013)⁷³.

⁷³ Available at: https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/artificial-surfaces-for-outdoor-sports-2013.pdf?VersionId=t.3rEH_hWpkMZ.am24nSILAAFdgQ4Lpz.



Youth/Casual: Outdoor exercise equipment

- 2.322 Outdoor exercise equipment, or ‘outdoor gyms’, are a sub-type of Youth/Casual provision for use by both young people and adults at all levels of ability, fitness and at all ages.
- 2.323 Outdoor gyms should provide for comprehensive body weight workouts by ensuring that the suite provides the opportunity to work all of the major muscle groups: chest, abdominals, legs, arms, back and shoulders.
- 2.324 To date, several outdoor gyms have been delivered in East Suffolk and they are generally being under used. This is likely due to a lack of body weight exercise equipment, such as horizontal (‘monkey’) bars, pull-up bars, parallel bars, gymnastic rings, climbing ropes, Swedish wall, etc., which are often delivered within compact calisthenics gyms, or in separate work out stations that can be grouped together.
- 2.325 In order to meet the diverse needs of the population, a mix of body weight equipment and machine based workout stations (e.g. stationary bikes, chest press, lat press, etc.), will generally be preferred. Exercise machines must be adjustable in terms of resistance and if relevant dimensions (e.g. leg press able to be adjusted according to leg length and weight resistance required) to ensure the needs of a wide range of potential users are met.
- 2.326 Accessible exercise equipment should be provided within all suites e.g. wheelchair accessible parallel bars or wheelchair-accessible hand bikes/ Outdoor exercise equipment should be accompanied with instructional signage on how to use the equipment safely, and to indicate how it can be used in a variety of ways to engage different muscle groups and/or train different types of movement. Accessible equipment should be clearly communicated as such through signage to support better awareness and inclusivity. Pull up bars should be provided in a variety of heights, with the highest bar set at an appropriate height for suspending user’s own kit, such as resistance bands, suspension trainers or gymnastic rings (if not provided) to them.
- 2.327 Though outdoor exercise equipment is principally for increasing strength and fitness, it is also intended to provide social and play opportunities for adults, and therefore consideration should be given to how outdoor gyms can integrate active forms of play and make exercise more enjoyable for all. Wherever possible equipment should be arranged socially, e.g. stations delivered in pairs.
- 2.328 The location of outdoor exercise equipment is also important for supporting higher levels of use. Outdoor exercise equipment is therefore recommended to be located:



Outdoor gym in Martlesham that includes pull up bars, parallel bars, inclined benches, and a captain’s chair.



- within or adjacent to other forms of open space, ‘town centre’ uses (e.g. cafés and shops) or community facilities (see [Healthy Centres and Community Facilities](#) chapter),
- near to available public facilities (water fountains, public toilets, etc.),
- in mixed use areas with good footfall and natural surveillance to help support use over the course of the day,
- away from heavily trafficked vehicle routes, where poorer air quality may undermine use of the facilities, and
- not ‘tucked away’ – minor screening can be used to support the privacy of users, though this should not be excessive.

2.329 Outdoor gyms should be accessible via active travel routes. Outdoor gyms should also ideally be located and designed so that more workout stations can be added to the suite over time to further expand the offer. All outdoor gyms should be supported with an open matted area for pre-exercise warm ups, equipment-free exercises and post-exercise stretching.

2.330 In order to encourage and support more girls and women to use outdoor exercise equipment, it is recommended that in addition to the requirements outlined above, the equipment is disaggregated and organised into smaller grouped areas rather than all provided in one central area (as this reduces the potential for the space to feel ‘territorialised’), and is served by basic screening (to reduce the feeling of being watched for those that are sensitive to this).

Youth/Casual Design Quality Matrix

2.331 The below assessment matrix provides an overview of all of the key design specification considerations for Youth/Casual provision. The table is organised into columns that show ideal ‘gold standard’ of provision, the ‘essential’ standard of provision, and what would be an unacceptable standard of provision. Where the ‘gold standard’ and ‘essential’ columns are merged, the contents can be read to be essential:

Table 21: Youth/Casual Design Quality Matrix

Youth/Casual design quality indicators	What good design quality looks like	Minimum acceptable design	What unacceptable quality looks like	Comments
Ages catered to	11+		Provision isn’t appropriate for use by the age group(s) it is intended for.	
Range of physical activity/social activity	General Youth/Casual: Spaces/equipment for both physical activity and social activity is combined in the design of the provision.	Physical activity <i>or</i> social space is provided, rather than both. Outdoor exercise equipment: six equipment stations are provided, including a mix of aerobic and	Provision is does not sufficiently meet needs.	



Youth/Casual design quality indicators	What good design quality looks like	Minimum acceptable design	What unacceptable quality looks like	Comments
	<p>Outdoor exercise equipment: more than six equipment stations are provided, including a mix of aerobic and anaerobic conditioning equipment that target:</p> <ul style="list-style-type: none"> • chest • abdominals • legs • arms • back, and • shoulders. 	<p>anaerobic conditioning equipment that target:</p> <ul style="list-style-type: none"> • chest • abdominals • legs • arms • back, and • shoulders. 		
<p>Walking catchment area, access to active travel routes and cycle parking</p>	<p>(MUGA) 700m / 9 minutes walk (All other Youth/Casual) 1km / 12 minutes walk. All provision should be connected to at least one accessible active travel route and should provide secure cycle parking.</p>		<p>Not connected to accessible active travel routes.</p>	
<p>Minimum quantity rate</p>	<p>Minimum provision: 0.25 hectares per 1,000 population.</p>		<p>Under provision.</p>	
<p>Recommended sizes</p>	<p>Multi-Use Games Area (MUGA): the minimum size is 0.1 hectares (40 x 20 metres/800sqm as specified in the FIT guide) and the maximum size is 3,000sqm. This size provides sufficient space for adults to play tennis or basketball.</p> <p>The provision of smaller MUGAs may limit useability by adults for some sports. Regard should be given to Sport England’s ‘Comparative Sizes & Sports Pitches & Courts (Outdoor)’ (2015) guidance in determining the appropriate of the provision⁷⁴.</p> <p>All other Youth/Casual provision is to be appropriately sized in accordance with function and quantity of space requirement (see minimum quantity rate).</p>		<p>Inappropriate sizing.</p>	

⁷⁴ Available for download from: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces>.



Youth/Casual design quality indicators	What good design quality looks like	Minimum acceptable design	What unacceptable quality looks like	Comments
Buffer zone and use of buffer landscaping	30 metres minimum separation between provision and the boundary of the nearest dwelling and buffer landscaping is used.	30 metres minimum separation between provision and the boundary of the nearest dwelling.	Insufficient buffer zone provided.	
Materials used	Metal coated in plastic coatings and reinforced rope. Natural materials (e.g. treated wood) will be supported for provision within SANG areas. Outdoor exercise equipment areas should be matted using durable rubber/PVC matting.		Inappropriate materials are proposed.	
Security	Youth/Casual provision is well overlooked, with good levels of natural surveillance (able to be viewed clearly from windows of active rooms of buildings and at least some footfall) and lighting.		Provision is not well overlooked.	
Inclusivity	Benches; located close to public toilets/community toilet access, including a Changes Places facility; inclusive physical activity and social spaces. Walking routes through larger provision is circular and offers multiple entry/exit points.		No benches; provision is not inclusive.	
Co-location with supporting facilities (Nearby access to)	Benches; located close to public toilets or community toilet agreement toilet access, including a Changing Places facility; water fountain; café or mobile food pitches (e.g. coffee van); bins.	Benches and bins.	No facilities provided.	
Incorporation of trees and planting into setting	Yes, and is located within or has a strong functional relationship with a green open space.	Yes.	No.	
Tenure blind design	Youth/Casual provision is equally accessible from dwellings of all tenures on site.		Provision is more accessible by one tenure group.	
Delivery trigger threshold	By 50% of homes occupied.		Delivered after occupancy threshold is reached.	



Maintenance agreements

- 2.332 Well-considered and planned green open space, play provision and wider landscaping management ensures that the various components of green infrastructure are not just aesthetically pleasing but also functional, sustainable, and support the health and wellbeing of communities.
- 2.333 A holistic approach to maintenance is crucial for the success of all green infrastructure. By integrating best practices and effective planning, development can ensure that green infrastructure remains valuable for communities, both today and long into the future. Key benefits and considerations in the quality of secured maintenance agreements are:
- **Integrate maintenance from the start:** maintenance agreements should be agreed at outline planning stage, or as early as possible within the process of full planning applications. Planning applications for major residential developments should include a detailed landscape maintenance strategy. This ensures that the long-term care of green infrastructure is considered from the outset;
 - **Timeframe:** Green Infrastructure should be supported by maintenance agreements that continue ‘in perpetuity’, which is generally recognised as meaning 80-125+ years;
 - **Produce a Landscape and Ecological Management Plan:** so as to direct maintenance works to create the most quality and value to the community for less resource (often through funds provided by development occupants); supporting pollinator species to have adequate access to plants in flower during the warmer months of the year should also be factored into maintenance agreements;
 - **Heritage assets:** Where relevant, consideration should also be given to the conservation activities required for the appropriate stewardship of any existing heritage assets on site;
 - **Employ qualified professionals:** utilise landscape architects and ecologists in both the planning and maintenance phases to ensure best practices are applied;
 - **Engage the community:** involving residents in landscape management (e.g., through community gardening initiatives) can foster a sense of ownership and ensure long-term upkeep;
 - **Monitor and review:** maintenance agreements should respond to how the managed space is likely to change over time. Establish regular review mechanisms (with a timeframe of every five years recommended) to assess the health and functionality of green infrastructure components. This will aid in identifying issues early on and ensuring that they are addressed promptly;
 - **Funding and resources:** suitable management structures should be agreed to ensure maintenance strategies are written to suit the responsible maintenance provider. Whether this is community focused or a management company. Clear and transparent methods of funding maintenance regimes should be established early to provide certainty on long term stewardship.



2.334 The Council will work closely with developers to ensure the successful implementation of approved landscape schemes and the delivery of high-quality green infrastructure. Site visits may be used to determine whether planting has been installed as approved, and whether establishment has been successful.

Healthy Environments: Design prompts

- Are the open space types on site well connected to each other and to homes/schools or other key locations?
- Has the proposal provided adequate opportunities for the community to grow food?
- Does the SuDS scheme provide amenity benefits and can therefore be considered to contribute towards the site's green open space requirement?
- Has the design of the green infrastructure (including tree plantings) adequately factored in resilience matters such as climate change adaptability, durability, ecological impacts and biosecurity?
- (If applicable) Is the SANG provision of a high enough overall quality to deter people away from recreational activities sensitive sites?
- (If applicable) Does the equipped play provision cater to the needs of the intended age groups and is inclusive of groups with reduced ability or other additional needs?
- (If applicable) Does the outdoor exercise equipment offer provide the opportunity for a comprehensive body weight and/or exercise machine-based workout, and can be used to provide an appropriate level of challenge at all levels of fitness and mobility?

3 Active Travel

Inclusive high quality cycling, walking and wheeling infrastructure for all



Active Travel: Key Messages

- **Active Travel** refers to journeys made in physically active ways, such as walking, wheeling (includes wheelchairs, skates, skateboards, push-scooters, etc.) or cycling. Active travel covers all journey types related to these modes of transport, including commuting, school runs, shopping trips, leisure cycling for fitness, etc. Active travel provides a wide range of health and wellbeing benefits when infrastructure is adequately designed to be safe, accessible, and secure.
- **Streets:** The design of streets and on-street active travel infrastructure (e.g. footways, segregated cycle lanes, etc.) should be directed by the Suffolk Design: Streets Guide (2022, and subsequent updates) and relevant national design guidance, such as the Department for Transport's Local Transport Note 1/20: Cycle Infrastructure Design (LTN 1/20) and Inclusive Mobility (2021).
- **Walkability and Cyclability** relates to the extent to which people are enabled and likely to walk and cycle due to factors such as trip purpose (utility or leisure), route length, convenient 'trip chaining', accessibility (including matters such as width, surface treatment, shelter, drainage, lighting, etc.), how safe they feel at the time of travel, and overall environmental quality (e.g. air quality, noise, attractiveness).
- **Core principles** refers to the 'design principles' chapter of the Suffolk Design: Streets Guide, which active travel infrastructure is expected to be design and delivered in accordance with, alongside LTN1/20 and Inclusive Mobility guidance. The core principles comprise of ensuring routes are direct and convenient; appropriate for context; healthy and safe; inclusive and accessible; and attractive. The core principles also set out the specifications of dementia-friendly design, green routes, cycle streets, and equestrian routes.
- The **infrastructure typologies guide** provides guidance on the design specifications for each of the key off-carriageway active travel infrastructure typologies.
- **Cycle parking provision and design** identifies the importance of secure cycle parking provision within appropriate locations and in sufficient quantity as an encouragement of active travel by making cycling a viable alternative mode of transport to key services and facilities. Secure cycle parking refers to when the cycle can be entirely locked away or secured to a suitable cycle stand. The guidance sets out, and illustrates, the secure parking types – comprising of bike lockers, cycle hangars, bike sheds, and cycle stands – and provides associated design guidance.



3 Active Travel

Introduction

- 3.1 Safe, convenient, accessible and enjoyable routes for travelling actively via walking or cycling are important for supporting the health, wellbeing, and local economy of the district. ‘Active travel’⁷⁵ includes the following modes of transport:
- **Walking** – pedestrians that are walking, including walking with non-wheeled mobility aids (e.g. walking sticks or frames), dog-walking, and running;
 - **Wheeling** – pedestrians that are using push or electric wheelchairs, electric mobility scooters, rollators, pedestrians with push chairs, skateboards, rollerblades/skates, or push and electric scooters⁷⁶, and;
 - **Cycling** – cyclists that are using all types of push bikes and e-bikes, including adapted cycles, bikes with trailers, tandems, passenger e-bikes (e.g. rickshaws, bicycle buses) and cargo e-bikes.
- 3.2 Active travel, whether undertaken on a utility basis for getting to work/school/local shops or on a leisure basis, provides a multitude of health, wellbeing and environmental benefits for individuals and the wider community. Engagement in active modes of travel can help to improve (but is not limited to):
- physical strength, flexibility and fitness, and maintain good levels of muscle strength and bone density,
 - mental health and wellbeing and cognitive performance (memory, alertness, etc.),
 - community interaction and group physical activities,
 - natural surveillance of streets and open spaces,
 - connection between people with local nature, and
 - local air quality.

⁷⁵ In this document the term ‘walking and cycling’ is used as an alternative term to ‘active travel’, and this should be read as being inclusive of ‘wheeling’. ‘Active travel’ can also include equestrians, though in most instances in this document reference will be being made to walking, wheeling and cycling only. The section [Specific considerations for equestrian users](#) of this chapter should be referred to for guidance on matters specific to equestrians.

⁷⁶ ‘Wheeling’ does not cover use of powered two-wheeled vehicles (motorbikes, scooters, and mopeds).



Background

3.3 Key active travel key statistics for East Suffolk are shown in the infographic, right.

3.4 According to Sustrans’ Walking and Cycling Index, active travel prevented the development and diagnoses of over 24,500 serious long-term health condition in UK cities in 2021, saving the NHS over £162 million. This is equivalent to the cost of over 5.4 million GP appointments⁷⁷.

3.5 Though there are likely to be a number of barriers that people experience making more short journeys by active modes of travel, the main contributing factors are likely to be the lack of availability and appropriateness of existing active travel infrastructure for facilitating safe, comfortable, convenient and direct cycling and walking journeys. This is likely due to:

- unacceptable risks to safety arising from a lack of segregation between active travel users and motorised transport users, increasing the risk of collision accidents and user conflict;
- poor design and poor surfacing increasing the risk of collision and slip accidents;
- inaccessibility (e.g. not wide or smooth-surfaced enough), making active travel infrastructure unable to be safely used by people with reduced mobility, including those with adapted cycles;
- inadequate secure cycle parking provision available for homes and at key destinations.

3.6 Residential areas in East Suffolk can often be a significant distance from centres. Town centres, district centres and local centres provide access to retail goods and services, and places of employment. This makes the provision of viable public transport services in the district challenging. The district’s population is ageing and has a slightly higher rate of disability than the national average (see [Introduction](#) chapter).

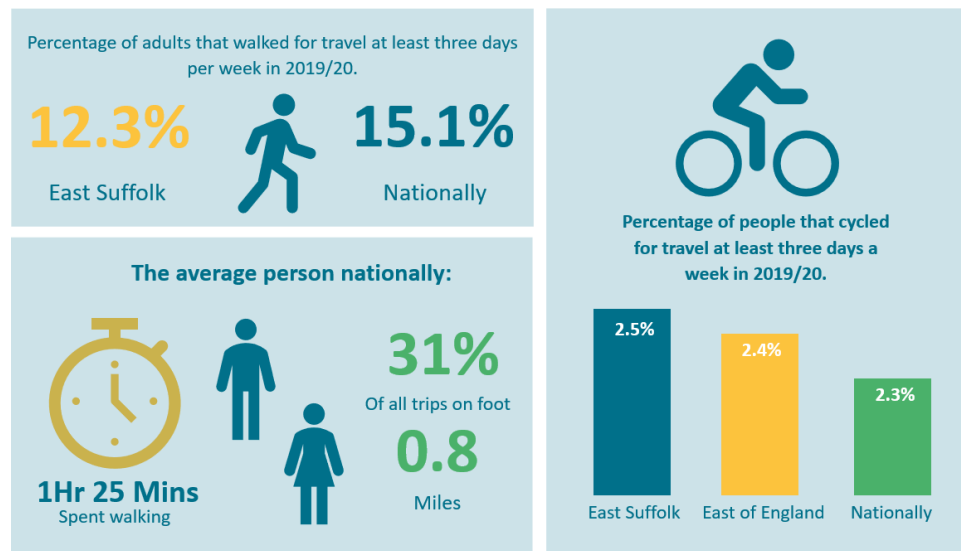


Figure 6: Key active travel statistics

⁷⁷ Sustrans (2021) Walking and Cycling Index. Available at: <https://www.sustrans.org.uk/the-walking-and-cycling-index/>



- 3.7 As with most areas of the UK, the delivery of adequate quality or quantity of active travel infrastructure has not historically been prioritised as an alternative to private motorised vehicle use for shorter journeys, meaning there is now a significant lack of active travel infrastructure in the district.
- 3.8 However, private motorised vehicle ownership/access is not a travel option available to all, and some households choose to be vehicle-free. The Census 2021 results showed that 84% of households in East Suffolk had at least one car or van, meaning 16% (almost one in six) of households had neither⁷⁸. These households could be at increased risk of being socially isolated, unable to access some employment opportunities, and of having reduced access to essential goods and services.
- 3.9 Cycling and walking is an important enabler for children and young people, providing more independence and flexibility to travel than if they are reliant on caregivers or infrequent public transport services. Safe and inclusively designed streets provide an important and accessible setting for children and young people to be socially active, explore, and develop their independence in a public setting.
- 3.10 Opportunities for safe walking, cycling, and wheeling are therefore important for widening inclusion in the local economy and social aspects of community life, for a range of groups. Inappropriately designed active travel infrastructure may exclude some users, such as wheelchair users or users of adapted cycles.
- 3.11 Alongside the other Suffolk Local Authorities, East Suffolk declared a Climate Emergency in 2019. East Suffolk also declared a biodiversity emergency in 2024. Together with health and wellbeing benefits, the provision of high quality active travel infrastructure is also key to reducing the district's use of fossil fuels and use of vehicles, and therefore positively contributes towards reducing climate change impacts and the reversal of biodiversity decline.



Walking in Carlton Colville

⁷⁸ ONS (2021) Census 2021: Cars or vans owned or available for use by a household. Available at: <https://www.ons.gov.uk/census/maps/choropleth/housing/number-of-cars-or-vans/number-of-cars-3a/no-cars-or-vans-in-household?lad=E07000244>.



Policy context for active travel

3.12 The below table provides a ‘quick reference’ guide to the key Local Plan policies that the guidance included in this chapter support. All policies should be read in full, including their supporting text, and should be considered in the context of the relevant Local Plan when read as a whole.

Table 22: A quick reference guide to the key Local Plan policies related to active travel

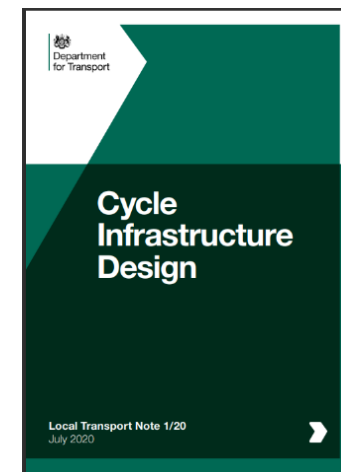
Key guidance areas	Local Plan policies	Key documents/ design guidance
<ul style="list-style-type: none"> Core principles General specifications Infrastructure typologies guide Cycle parking provision and design 	<p>Policy SCLP7.1 Sustainable Transport Policy SCLP7.2 Parking Proposals and Standards Policy SCLP8.2 Open Space Policy SCLP11.1 Design Quality</p> <p>Policy WLP8.21 Sustainable Transport Policy WLP8.29 Design Policy WLP8.30 Design of Open Spaces Policy WLP8.31 Lifetime Design</p>	<ul style="list-style-type: none"> Active Travel England (2023) Active Travel England Standing Advice Note: Active Travel and Sustainable Development Department for Transport (2020) Local Transport Note 1/20: Cycle Infrastructure Design Department for Transport (2021) Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure Sport England (2023) Active Design Guide British Standards Institution (2018): <ul style="list-style-type: none"> BS 8300-1:2018 Design of an Accessible and Inclusive Built Environment - External environment BS 8300-2:2018 Design of an Accessible and Inclusive Built Environment - Buildings Suffolk County Council (2022) Suffolk Design: Streets Guide Suffolk County Council (2023) Suffolk Guidance for Parking⁷⁹ Suffolk County Council (2023) Air Quality Strategy & Action Plan East Suffolk Cycling and Walking Strategy (2022)

⁷⁹ NB: As stated in Policy SCLP7.2: Parking Proposals and Standards, the design guidance covered under the ‘Residential Parking Design’ section of the Suffolk Guidance for Parking (including subsequent revisions) document does not apply to development in the former Suffolk Coastal area, unless other local planning considerations indicate otherwise.



National policy and guidance

- 3.13 The National Planning Policy Framework has consistently supported safe cycling and walking infrastructure; of particular significance is Chapter 9: Promoting sustainable transport. However, recognition of the need for higher quality, well-designed active travel infrastructure that provides substantive physical segregation between cyclists, pedestrians and motor vehicles was significantly boosted at national policy level by the nation’s experience of the COVID-19 pandemic of 2020-2021.
- This chapter’s guidance is also expected to be read in conjunction with:
 - The Department for Transport’s policy document ‘Gear Change: a bold vision for cycling and walking’ and the corresponding ‘Local Transport Note 1/20: Cycle Infrastructure Design’ (LTN 1/20) and ‘Inclusive Mobility: A guide to Best Practice on Access to Pedestrian and Transport Infrastructure’ guidance documents. These documents have nationally set a higher bar for designers, plan makers, and decision makers in determining the appropriateness, accessibility, safety, and design quality of active travel infrastructure.
 - The Highway Code (2022 updates), which includes a revised hierarchy of road users and pedestrian priority for crossing junctions.
 - The third edition Manual for Streets (anticipated in 2024), which is expected to continue the national policy direction on active travel infrastructure.
 - The National Design Guide and Building for a Healthy Life guidance (applicable in East Suffolk to major residential development only).



LTN 1/20, 2020

Suffolk Design: Streets Guide

- 3.14 Suffolk County Council is the Highways Authority in Suffolk. Through the adoption of this SPD, East Suffolk Council endorses Suffolk County Council’s guidance document, the Suffolk Design: Streets Guide (2022). It is therefore expected that streets and active travel infrastructure in East Suffolk will be designed in accordance with the Guide unless material considerations justify an alternative approach.
- 3.15 The Suffolk Design: Streets Guide should be referred to in the first instance for specific design guidance on active travel infrastructure and street design, with support from LTN 1/20. Where relevant, the guidance included in the Manual for Streets and the Design Manual for Roads and Bridges (DMRB) will guide the Highways Authority’s design requirements for active travel design on streets and roads.



Suffolk Design: Streets Guide, 2022



- 3.16 The Suffolk Design: Streets Guide focuses on the design of routes within settlements (mainly streets) and therefore does not cover detailed design matters related to Public Rights of Way (PROW) routes, which are typically routed between or outside of settlements over private land in the countryside, for leisure walking, cycling and horse riding purposes.
- 3.17 The design guidance in this chapter builds upon the Suffolk Design: Streets Guide’s guidance by providing further guidance on active travel design principles and the design expectations for Public Right of Way routes.

Suffolk County Council Air Quality Strategy & Action Plan

- 3.18 At Suffolk level, the key policy context is the Air Quality Strategy & Action Plan (2023), which identified eight objective areas and actions for improving air quality in Suffolk. This list included three main points of relevance for the design of active travel infrastructure, objectives two (sustainable and active travel) and three (traffic and congestion related emissions) and seven (Environmental and Green Space Management). This is because high quality active travel infrastructure can help to:
 - reduce emissions from internal-combustion engine vehicles;
 - enable people who will not choose to cycle without high levels of segregation from vehicles to do so, such as people cycling with small children;
 - make sustainable transport modes the most convenient and enjoyable modes of transport through design techniques employed for routes, streets and roads encourages more short journeys to be undertaken by cycle or on foot, and;
 - Increase the accessibility and attractiveness of green open space.

East Suffolk Cycling & Walking Strategy (2022)

- 3.19 The East Suffolk Cycling and Walking Strategy (‘C&WS’, herein) was adopted in 2022. The C&WS supersedes and updates the Waveney Cycle Strategy (2016). Policy WLP8.21 Sustainable Transport states that, “where possible, proposals are to include measures set out in the Waveney Cycle Strategy (2016 and subsequent updates)”. The C&WS includes a wide range of strategic recommendations for the delivery of new active travel infrastructure or improvements to existing active travel infrastructure. These recommendations include the creation of or improvements to:
 - commuting routes (between housing and employment and education setting destinations);
 - utility routes (housing and retail centres);
 - inter-settlement routes (‘Key Corridors’);
 - the creation of leisure routes (longer distance, rural/countryside routes principally for fitness and time in nature purposes), and;
 - Local Plan site allocation infrastructure recommendations.



- 3.20 The Council expects the C&WS recommendations for allocated sites to be delivered directly or to be financially contributed towards (whichever is most appropriate). The Council expects recommendations that run through, or that are well related to windfall sites, to be either directly delivered or financially contributed towards (whichever is most appropriate). Any design or routing adjustments from the C&WS recommendations are expected to be agreed with the Council and Highways Authority.

Enabling active travel: walkability and cyclability

- 3.21 The term ‘walkability’ relates to the extent to which people are enabled to walk or wheel between an origin and destination, such as between their home and local shops. It is separate to ‘cyclability’ because the time and distance people are able or willing to cycle is often longer/further.
- 3.22 What people will consider to be a ‘walkable’ distance will vary from person to person according to their ability and preferences, and the purpose of the walk, i.e. whether the walk is for day-to-day purposes or leisure purposes. If the walk is for ‘day to day’ purposes, their preference is likely for the walk to be as short, direct and to feel safe at the times of day that they need to travel. If the walk is for leisure purposes, their preference is likely to be that the route is of a sufficient length to provide adequate exercise, giving them time to ‘decompress’, think, converse with a companion, to feel they have had sufficient time in a natural setting, and so on.
- 3.23 Leisure walks should ideally be designed to be circular, though there may be circumstances where a more linear walk, or a linear connection out into the surrounding Public Rights of Way network from a site is appropriate.
- 3.24 An overview of the four main active travel journey types is provided below:

(1) Walking – utility walking trips

- 3.25 ‘Utility trips’ include the more ‘day to day’ trips on foot, such as school runs, commuting to work, shopping for essentials, or attending medical appointments. Utility trips may have a single destination or be part of a **trip chain**. Likely trip chains to, from and within sites should be considered in how active travel routes are designed.
- 3.26 A 20 minute / 1.6km round trip (i.e. 10 minutes/800m each way) is considered to be a ‘walkable’ journey time and distance for most people, and therefore is used as the walkability benchmark in Suffolk⁸⁰. This duration/distance should not be measured using a radius from a selected location. Instead, available routes to and from the access points of key origins and destinations, e.g. front doors to school gates should be used.

⁸⁰ The 800m/10 minute walk figure is used in the National Design Guide (2021, p.20) and the Suffolk Design: Streets Guide (2022, p.31).

3.27 Walkability for utility trips is best enabled by having key origins and destinations close enough together that walking is the natural choice for those that are able to. However, the genuine 'walkability' of a route isn't limited to its length, as other factors may reduce its accessibility and attractiveness to those that would otherwise choose to walk, such as topography. Walkability for utility trips is best supported through:

- planning mixed-use centres and neighbourhoods, helping to keep routes between homes and key destinations for utility trips as short and direct as possible, particularly routes to schools and to other destinations where children and/or people with reduced mobility may be travelling to;
- keeping centres' main areas (e.g. high streets) as pedestrianised as possible, using vehicle-free/limited areas, low traffic speed limits, traffic calming measures, and locating private vehicle parking outside of high activity central areas. Pedestrianisation must be balanced with the need for emergency vehicle access, close by public transport links, and the need for accessible parking provision;
- providing accessible benches (see BS 8300-1:2018⁸¹), as well as bins, cycle parking and trees (for shade, and for an attractive walking and cycling environment) at appropriate intervals, and;
- where a site's topography undulates, the routing of utility trip routes is prioritised for the flattest area(s) of the site, whilst balancing the merits of this with the merits of keeping the route direct/journey times shorter; alternatively, levelling measures may be appropriate to consider, particularly where this is the only means of ensuring an accessible route for utility trips is available.



Walking for leisure in a natural setting provides additional health and wellbeing benefits.

3.28 Information on how to create effective movement networks, including identifying the most appropriate routing for primary and secondary pedestrian routes can be found under the 'Movement Frameworks' chapter of the Suffolk Design: Streets Guide.

(2) Walking – leisure walking trips

3.29 Walking routes for leisure should be designed to provide users with the opportunity for walking, running and wheeling-based exercise in a leisure setting. Leisure walks are generally designed to be circular, and to provide sensory stimulation through landscaping, plantings and (if applicable) views from high points. Leisure routes tend to be routed through larger green open spaces, or through the countryside via Public Rights of Way (PROW) over private land.

⁸¹ BS 8300-1:2018 Design of an accessible and inclusive built environment. Available at: <https://www.thenbs.com/PublicationIndex/documents/details?Pub=BSI&DocID=320519>.



- 3.30 A circular 2.7km/30 minute walk, with the option to complete a shorter and more accessible circular walk of around 1.5km, is considered to be the appropriate for new leisure walking routes. Provision can be achieved through on-site delivery, or through a combination of on-site and connections out into the surrounding Public Rights of Way (PROW) network. Wherever possible PROW routes should be improved (widening, surfacing, etc.) to an accessibility standard appropriate for wheeling, particularly when creating a shorter leisure route (i.e. up to 1.5km).
- 3.31 Leisure routes should be supported by basic facilities, such as bins and benches at appropriate intervals, wherever possible.
- 3.32 Leisure walking (and cycling) routes that improve access to heritage assets will be supported where this improves the value and setting of the asset and is unlikely to cause unacceptable impacts to the asset.
- 3.33 Where some or all of the length is accommodated on site, the Council would encourage leisure walking routes to take the form of 'green routes' (see [Green Infrastructure](#) chapter for detailed guidance).

(3) Cycling – utility trips

- 3.34 A 5 miles/8 kilometres (15-30 minute) round trip is considered to be a reasonable maximum utility trip cycling distance for most people, particularly on an e-bike, which reduces the effort required.
- 3.35 The design and surfacing treatments used for utility trip routes must be safe for higher speed commuter (employment and education) cycling, and therefore the needs of those with road and hybrid cycle types. It should be noted that some people with reduced mobility have an easier time cycling (particularly when using a type of e-bike) than they do walking, and therefore the value of short distance utility cycling route options should not be underestimated.
- 3.36 As noted for walking utility trips, utility cycling trips can be single destination or part of a [trip chain](#). Likely trip chains to, from and within sites should be considered in how active travel infrastructure is designed.
- 3.37 Leisure and utility trip cycling routes do not need to be provided separately if they can be designed to accommodate bikes used for both trip types. As noted for walkability, where a site undulates, utility cycling routes should be prioritised for routing through the flattest areas of the site or, where this is not possible, levelling measures considered.



Active travel routes for leisure walking should meet the needs of all pedestrians.



Utility cycling trips require safe, direct, and convenient routes.



(4) Cycling – leisure cycling

- 3.38 The distance that most people are able or willing to cycle on a leisure basis is likely to be somewhere between around 5 miles/8 kilometres and 20 miles/32 kilometres roundtrips. For children, young people and those with reduced mobility, the maximum reasonable duration and distance is likely to be considerably less.
- 3.39 As noted above, some people with reduced mobility have an easier time cycling (particularly using a type of e-bike) than they do walking, and young children may not need to cycle particularly long distances to achieve a good level of exercise and enjoyment from cycling. The value of shorter leisure cycling route options (on site or via connectivity to bridleways in the surrounding PROW network) should therefore not be underestimated.
- 3.40 Due to their extended distance, the majority of the length of leisure cycling routes are expected to be provided through improvements to bridleways or byways within the local PROW network. Where some or all of the length is accommodated on site, the Council encourages leisure cycling routes to take the form of 'green routes' (see [Green Infrastructure](#) chapter for detailed guidance).
- 3.41 Leisure cycling (and walking) routes that improve access to heritage assets will be supported where this improves the value and setting of the asset and is unlikely to cause unacceptable impacts to the asset.
- 3.42 Where leisure cycling routes are provided on-site, surface treatments should be appropriate to the location and anticipated user types. Leisure routes do not necessarily need to be surfaced to utility trip route specifications unless they are reasonably likely to be used for both types of trips. All cycling and walking routes are expected to be provided with appropriate crossings over roads, designed as per their placement in the movement network hierarchy, and the design guidance included in the Suffolk Design: Streets Guide.



Source: Sport England Image Library
Accessible cycling route through an open space.

Designing active travel infrastructure to enable active travel for all: key principles

- 3.43 The design of active travel infrastructure is a key determinant of who, when, and how often people are likely to walk, wheel or cycle short journeys. Some groups are more sensitive to the design quality of active travel infrastructure than others, such as pedestrians travelling with young children (safety concerns and/or unable to securely park cargo/passenger bikes at key destinations) and people living with a disability (may need to cycle more slowly and carefully, and/or have adapted cycles that need suitable cycle parking space provision at destinations). It is expected that groups with enhanced needs for high quality active travel infrastructure design will be considered during the design process.





- 3.44 It should also be noted that latent cycling and walking potential within existing communities may not be easy to gauge. The poor quality of existing active travel infrastructure will be having a ‘nudge’ impact on how often they are currently being used, and therefore does not provide a reliable indication of demand if better quality infrastructure was delivered. Therefore, it is recommended that designers remain aspirational in the designing of active travel infrastructure, i.e. using the ‘build it and they will come’ principle.

Core principles

- 3.45 This section outlines each of the core principles for active travel infrastructure design that are provided in the ‘design principles’ chapter of the Suffolk Design: Streets Guide (2022).
- 3.46 As covered under the [Suffolk Design: Streets Guide](#) sub-section above, in East Suffolk, active travel infrastructure will be expected to be designed and delivered in accordance with the Guide, LTN 1/20 and Inclusive Mobility (and Manual for Streets 3, once published) unless material considerations justify the need for an alternative planning and design approach. Utility trip routes will be expected to be designed to be:
- **Direct and convenient** – The movement network to, from and within a development should serve main origins and destinations and take into account likely local trip chains. Routes for utility trips should be direct (shortening journey times) have good sight lines, logical routing and should be highly permeable, with multiple access points onto it. Active travel routes should be well connected to public transport stops (where provided) and supported with secure cycle parking (and push scooter parking, where applicable).
 - **Appropriate for context** – The design and layout of active travel routes will be expected to reflect pedestrian, cyclist, and equestrian flows.

Anticipated flows should determine whether routes are identified as ‘primary’ or ‘secondary’ in the local movement network and, as a general rule, where vehicle and/or active travel user flows are higher, the higher risk of user conflict, meaning a higher degree of segregation may be required.

Further guidance on the planning and design of primary and secondary pedestrian and cyclist routes is available in the ‘Movement Frameworks’ of the Suffolk Design: Streets Guide.

- **Healthy and safe** – risks to users’ safety should be reduced as much as possible through the infrastructure’s design, considering key matters such as potential conflict between users, accessibility of the route, and air quality. Vehicle and active user segregation should be considered to reduce conflict between users; inclusion of Dutch-style roundabouts/junctions, which allow pedestrians and cyclists to circumnavigate the roundabout/junction whilst segregated from vehicle users, will be considered where appropriate.



- **Inclusive and accessible** - users with non-standard cycles, wheelchairs, push chairs and wheeled mobility aids are supported and enabled to cycle when their needs are reflected in route and secure cycle parking design. Key accessibility features should be considered in the design of active travel routes. The key accessibility features that should be considered in the design of active travel routes are the provision of:

- surface treatments that are bound, smooth and non-slip (where appropriate to the location context) to aid the movement of wheelchair users and users of other wheeled mobility aids,
- routes are free of obstructive street clutter, or where they cannot be avoided, adjusting the width of the route accordingly,
- ramps are provided for level changes,
- tactile paving is provided at key points for those with visual disabilities,
- less acute bends where routes turn,
- free-draining to avoid risk of waterlogging and muddiness,
- route lighting (where appropriate to the location context),
- at-grade crossings are used in appropriate locations to avoid the need for dismounting and remounting pavements at junctions,
- deeper refuge areas for crossings where refuge areas are provided,
- basic facilities, including bins and benches at regular intervals along the route's length,
- longer and wider secure cycle parking options,
- push scooter parking, especially at locations likely to be frequented regularly by children such as schools and play area provision, and
- way-finding signage is provided that is well positioned for visibility and clear for users to understand, with both text and iconography used where appropriate, and digital information available via QR scanner technology.



*An accessible, segregated shared path supported by soft landscaped green buffer strips and tree plantings. The Lilacs, Trimley St Martin.
Source: Aspen Build Ltd (www.aspenbuildltd.co.uk)*

Attractive – tree plantings, landscaping and nature-led SuDS scheme features can support users' wellbeing by providing shade and creating an attractive walking and cycling environment, which encourages people to walk and cycle more often and for longer. It is recommended that the 10 indicators identified in the Healthy Streets⁸² model are also considered alongside the Suffolk Design: Streets Guide guidance. The historic environment should also be factored into the design of active

⁸² Available at: <https://www.healthystreets.com/what-is-healthy-streets>.



travel routes, with care taken to provide appropriate access and views of heritage assets, and to manage visual clutter and street clutter that may detract from the experience of them.

Dementia-friendly design for active travel routes and streets

- 3.47 The district has an ageing population. As per Policy SCLP11.1 Design Quality and Policy WLP8.31 Lifetime Design, dementia-friendly design principles are expected to be integral to the design of all spaces and publicly accessible buildings. Focus is particularly needed on the design of development that is intended to accommodate or intended to be used/visited often by older people. Use of dementia-friendly design principles increases accessibility and inclusivity for other groups with reduced ability as well, such as those that are neurodiverse or with reduced mental health.
- 3.48 In the context of designing active travel infrastructure, the following guidance is provided on implementing dementia friendly design principles:
- **Familiar:** active travel infrastructure typologies should be easily identifiable by their design and supporting signage, and where possible, as consistent with the design of the same infrastructure type in the area, unless this would mean reducing quality and safety. This is to ensure that it is clear to users how the infrastructure is intended to be used and by what user types, warns pedestrians that they may be passed by cyclists/equestrians, and how they are allowed to use the route. Where possible, active travel route design should be as consistent as possible throughout a neighbourhood.
 - **Legible:** street and active travel infrastructure design should make clear the expectations of different road users through providing visual indications of what space is intended for which users, and if for all users (e.g. shared surface street) that pedestrians and cyclists have priority. Keep streets relatively short (to allow clear views of the end and where they lead on to) and junctions into them fairly visible.
 - **Distinctive:** active travel routes can be made more distinctive through the use of landscaping, thematic design (e.g. nautical-themed wayfinding and cycle parking design along a seaside route), the integration of public and community art, or through its approach to routing. However, the value and opportunity to create distinction should be balanced with the value of familiarity and legibility. Though utility trip routes should prioritise being as direct as possible, there may be opportunities to create visual interest that warrant a slight deviation, e.g. to pass a footpath through a group of retained trees or to gain a view over a landscape, interesting building, or body of water that helps to make the route more distinctive.
 - **Accessible:** all active travel infrastructure types are expected to be accessible
 - **Comfortable:** Wayfinding signage is in an easily visible and logical location, positioned at a comfortable height to read, and uses a font or iconography at a size that makes it easy to interpret for all users (more accessible formats should also be considered). Supporting facilities such as public toilets, seating, dog waste bins and litter bins should be provided where appropriate for the context and scale of the development proposed.



- **Safe:** at-grade crossings are not recommended to be used in locations where there is likely to be a higher proportion of older and/or disabled users. Where they are used, they should be used sparingly and in contexts with the lowest potential for conflict.

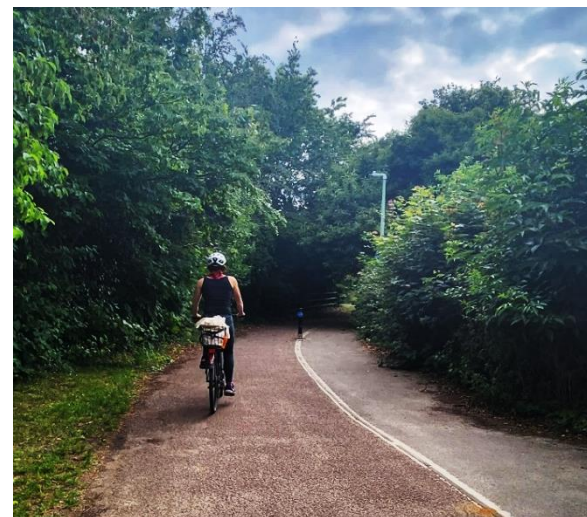
3.49 More information on dementia-friendly design is available in the Royal Town Planning Institute’s ‘Dementia and Town Planning’ guide⁸³.

Green routes

3.50 ‘Green routes’ are active travel routes set in a high quality natural setting. Green routes are typically lined with trees, shrubs and hedgerow, and are flanked by verges of wild, native plants.

3.51 Green routes can be created using any of the fully segregated active travel infrastructure typologies. However, green routes are normally expected to be delivered for both cycling and walking purposes. Where relevant, designs that are appropriate for also supporting equestrian use may be supported.

3.52 More detailed guidance on the creation of green routes is available in the [Green Infrastructure](#) chapter.



Green route (with internal segregation), Kesgrave.

Cycle Streets

3.53 Cycle Streets are streets that use design cues to prioritise cycle movement over vehicle movement along the carriageway, moving the cyclist onto a more primary position, and using textured surfacing and limited carriageway width to discourage vehicle drivers from attempting to overtake cyclists. The Taff Embankment in Cardiff is an example of a Cycle Street in the UK. The opportunity for the creation of Cycle Streets has been identified for a number of existing East Suffolk streets in the East Suffolk Cycling and Walking Strategy.

3.54 Proposals for new Cycle Streets will be supported where appropriately located within a movement network and logical for anticipated flow levels, such as to support primary cycling routes via access roads. Design guidance for Cycle Streets is available in the Suffolk Design: Streets Guide (see typology 9 in the Movement Frameworks chapter).

⁸³ Royal Town Planning Institute (2020) Dementia and Town Planning. Available at: <https://www.rtpi.org.uk/practice/2020/september/dementia-and-town-planning/>.



General specifications

- 3.55 **Height clearance:** a minimum clearance of 2.3m from any overhead or over-hanging obstruction must be maintained for footpaths and footways, and at least 3m for bridleways.
- 3.56 **Steps, cycle wheeling ramps, and grippable handrails:** the need to make steep level changes (i.e. that would require steps provision) along active travel routes should be designed out of proposals wherever possible. However, where not reasonably avoidable, a ramp should be provided instead of or in addition to steps. Cycle wheeling ramps are recommended for bridleway routes to accompany steps. Where there is insufficient space available to create a ramp at an appropriate gradient to be accessible for all users. This scenario would incur the expectation for highly accessible steps:
- low height increments per riser,
 - wide, deep, and anti-slip risers,
 - a grippable handrail on both sides (cycle wheeling ramp must be fitted to coincide well with the handrail placement), and
 - landing areas provided where needed (flights should not exceed around 20 risers, see Section 9.1.2 Design of steps and stairs of BS 8300 1:2018 for detailed guidance).



Cycle Street.

Source: Stantec/Suffolk County Council
(Suffolk Design: Streets Guide, 2022)

- 3.57 **Gradient of routes:** The gradient of routes should be between 1:60 (1.7%) and a maximum of 1:20 (5%). Wherever possible, gentler gradients within this range should be maintained, particularly over a longer distance. On longer routes and/or those with steeper gradients within this range, provision of flatter landing areas and seating to provide opportunities to rest between steeper sections is encouraged. Routes on a gradient will be expected to be accompanied with surfacing that provides a good level of grip in all weathers and a design that is well draining.
- 3.58 **Gradient of ramps:** guidance on the appropriate gradients of ramps, width of ramps, and use of landings can be found in BS 8300-1:2018 Design of an accessible and inclusive built environment Part 1: External environment – Code of practice (Section 9.2 Ramps)⁸⁴. The recommended specifications for gradients, steps, ramps and bridges intended for equestrian use can be found in The British Horse society’s advice note on bridges, gradients and steps⁸⁵. The British Horse Society can also be contacted directly for advice, if needed. A local example of a best practice bridleway bridge can be seen over the railway line to the west of Gun Lane, Trimley St

⁸⁴ Available at: <https://www.thenbs.com/PublicationIndex/documents/details?Pub=BSI&DocID=320519>.

⁸⁵ The British Horse Society (2019) Advice on: Bridges, gradients and steps in England and Wales. Available at: <https://www.bhs.org.uk/media/ijejorer/bridges-1019.pdf>.

Martin, which has a gentle gradient of 1:20, non-slip surfacing, a grippable high-contrast handrail, high parapets, and an appropriate overall colour scheme for the location.

3.59 **Seating:** the provision of seating along all route types, and in settlement or countryside locations will be supported at appropriate intervals. Seating is particularly relevant along higher flow pedestrian routes, such as routes between residential areas and town centres, and at key stopping locations, such as those that provide attractive landscape or at a circular route’s halfway point. Seating provision, and provision at shorter intervals, is also of enhanced relevance along routes that are likely to be used by an above average number of users that may benefit from stopping frequently due to reduced mobility. As per BS 8300-1:2018, in commonly used pedestrian areas, i.e. centres and along primary pedestrian routes, seating should be provided at intervals of 50m, though shorter or longer intervals may be supported depending on context.



Source: Suffolk County Council

Accessibly surfaced Public Rights of Way route

3.60 Routes with lower anticipated pedestrian flows, such as secondary pedestrian routes within settlements or footpaths within the Public Rights of Way network over countryside, should be provided with seating at reasonable intervals for the context (subject to agreement with the landowner if not the developer). Seating should ideally visually contrast with its surroundings so that it can be identified by those with visual impairment; a colour guidance document⁸⁶ was produced for the Suffolk Coast and Health Area of Outstanding Natural Beauty, which should be used to help inform the appearance of benches within this area. Seating should be designed so that rainwater does not collect on it, which may be achieved through how it is shaped or through providing sheltering.

3.61 Preferred materials for seating provision are metal and sustainably sourced wood. Recycled materials may be used if the developer is able to demonstrate that the material is durable, particularly in hot weather conditions. More natural style seating, such as seating created using logs can be used, though should be designed with accessibility in mind. Ideally a variety of seat heights, widths and depths should be provided, as per the accessible seating design guidance detailed in BS 8300-1:2018.

3.62 **Shared use paths and internal segregation:** Where cyclist flows are anticipated to be low, shared use paths may be appropriate. LTN 1/20 and the Suffolk Design: Streets Guide identify ‘low’ flow as being up to 300 cycles per hour at peak times. Physically separated pedestrian and cyclist infrastructure is generally preferred over shared use paths, as this is safer for pedestrians and allows cyclists to travel at higher speeds and stop/slow less often. Physically separated pedestrian and cyclist infrastructure is provided when the routes are separated from



Planted buffer that contributes towards an attractive environment, management of surface water run-off, cooling, and enhanced safety through physical segregation between the cycle track/footpath and the carriageway. Waterbeach, Cambridge.

⁸⁶ Suffolk Coast & Heaths Area of Outstanding Natural Beauty (2021) Guidance on the selection and use of colour in development. Available at Suffolk & Essex Coast & Heaths National Landscape: <https://www.coastandheaths-nl.org.uk/wp-content/uploads/2021/01/SCH-Use-of-Colour-Guidance-v7.pdf>.

each other using a form of physical barrier. This can be achieved using landscaping (e.g. a green buffer strip between the footpath/footway and cycle track/cycleway), demarcation kerbing, or by setting the two routes at different levels to each other.

- 3.63 'Light' internal segregation using painted lines, side-assigning signage, and tactile surfacing between users on shared use paths is generally discouraged as it is ineffective. For shared use paths with no internal segregation, signage should be used to indicate that the route is shared by both cyclists and pedestrians. See the [Infrastructure typologies guide](#) section for design guidance on shared use infrastructure.

Specific considerations for equestrian users

- 3.64 Equestrians (horses and their riders) are not included in the definition of active travel users set out at the beginning of this chapter as it is not a human-powered form of travel. However, equestrians use routes through local movement networks that are appropriate for them, which are principally rural bridleways, byways and roads, though they may occasionally also use more 'urban' routes, too. Routes that are also likely to be used by equestrians, must be designed and maintained to meet the needs of all intended user types equally, or for a separate alternative route to be provided for equestrian use.
- 3.65 Horses have specific needs for space, surfacing and for environments that reduce the risk of them becoming stressed and frightened. Horses need surfacing solutions that are non-slip (smooth surfaces like asphalt are not appropriate) and well-draining (avoiding the route becoming too muddy and sodden, which may lead to injury). More information can be found in The British Horse Society's advice note on surfaces for horses⁸⁷.
- 3.66 Horses are trained to be passed on their outside (their right) and need to be given plenty of space to reduce the risk of them being startled; rule 215 of the Highway Code instructs that they should be passed (by any type of road user) at a distance of at least 2 metres, and therefore shared route design should allow for this to be done safely.
- 3.67 Despite permission to do so, realistically not all bridleways will be used by equestrians. Many Public Rights of Way routes are historic and have since been severed by development and the network fragmented, or their general leisure value reduced, making them less attractive routes for riding. Where in doubt over whether a bridleway is being used or has the potential to be used by equestrians if reasonable improvements were made to the route and/or its connectivity to other routes, the East of England branch of the British Horse Society should be contacted for advice⁸⁸. Where bridleways are very unlikely to be used by equestrians, shared use



Sand is a recommended surface treatment for horse strips and bridleway routes that are likely to be used significantly by equestrians, though its accessibility limitations make it less appropriate for leisure walking/cycling routes and inappropriate for utility trip routes.

⁸⁷ The British Horse Society (2021) Advice on: Surfaces for horses. Available at: <https://www.bhs.org.uk/media/mr2b1udi/surfaces-0721.pdf>.

⁸⁸ Contact details are available at: <https://www.bhs.org.uk/bhs-in-your-area/east-of-england/>.


paths design and surfacing specifications will be expected to be adhered to. Bridleways that are likely to be used by equestrians have three key design and surfacing solution options (in order of preference):

- (1) the existing bridleway is kept unsurfaced, or a new unsurfaced bridleway is provided, and the movement needs of cyclists and pedestrians is met through provision of an alternative (surfaced) route;
- (2) the bridleway is surfaced but a separate adjacent horse strip(s) is provided, or;
- (3) an all-user track (see typology details below) is provided. Where it is unavoidable for an equestrian-use bridleway to cross roads or streets, a Pegasus style signalised crossing is likely to be required.

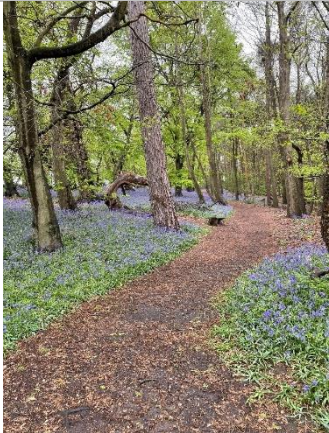
Infrastructure typologies guide



3.68 The below table provides design guidance for the key active travel infrastructure typologies in addition to that which are exclusively provided as part of streets, for which designers should refer directly to the Suffolk Design: Streets Guide, LTN 1/20 and Inclusive Mobility, together with any other relevant guidance for THE street design (e.g. The CIRIA SuDS Manual C753, if relevant). The references to typology types in the table refer to those outlined in section 3.4 Street Elements for Users of the Suffolk Design: Streets Guide (2022, pages 74-89).

Table 23: Key Infrastructure typologies



Infrastructure type	Appropriate use	Specifications	Example image
Footpaths	<p>Footpaths (typology 1 in the Suffolk Design: Streets Guide) are pedestrian-only routes that run through open spaces or developments. Footpaths differ from footways (or 'pavements') in that they are situated away from carriageways or are set back from carriageways using landscaping (e.g. green buffer strip).</p> <p>Footpaths within developments will generally be expected to be provided in combination with a cycle track unless the route is unsuitable for cycling (e.g. through a woodland environment).</p> <p>Where a combined pedestrian and cyclist route would be more appropriate than separate</p>	<p>Width: as stated in the Suffolk Design: Streets Guide, 2m is the desired minimum for new footpaths (1.5m is the absolute minimum at constraints), though wider footpaths will be supported, particularly in higher pedestrian flow areas. The minimum footpath widths should be maintained whilst accommodating street furniture e.g. seating, lamp columns, free standing post boxes, etc.</p> <p>Surface treatments: earth, bound stone or fine unbound stone (e.g. granite, limestone), asphalt or asphalt planings (in limited circumstances), sand, or rubber crumb (or similar) will be supported in appropriate contexts.</p>	 <p><i>Footpath (bound surfaced)</i> Source: Stantec/Suffolk County Council (Suffolk Design: Streets Guide, 2022)</p>




Infrastructure type	Appropriate use	Specifications	Example image
	<p>routes (e.g. along low flow routes) a shared use path is recommended.</p> <p>Existing footpaths can be upgraded to bridleways to also allow cyclist and equestrian use if there is sufficient width available for the upgrade, a suitable surface treatment for cyclists/equestrians is appropriate for use in the location, and the route is able to drain well.</p>	<p>Other non-slip, all-weather safe and durable surface treatments will be considered if accessibility requirements are met.</p> <p>Asphalt is likely to be the most accessible and durable surfacing treatment available for pedestrians as it is smooth, bound and durable. However, it may not be aesthetically appropriate in sensitive locations or natural contexts.</p> <p>Other considerations: Unsurfaced footpaths should not be used for utility walking trip routes – they should be used for leisure walking routes only (i.e. they should not be used for routes that form the only pedestrian link between a key origin and destination, as this would necessitate their use for utility trips). Where unsurfaced footpaths are provided for a leisure walking route, it is recommended (a requirement for SANG) that at least one alternative accessible, surfaced footpath is also provided.</p> <p>Sand is a less accessible surface treatment for people with reduced mobility to walk/wheel on, and therefore should only be used for leisure routes where an alternative, surfaced route is available.</p> <p>Footpath edging helps to reduce the ingress of vegetation on the sides of paths, which over time reduces their width and accessibility. Rubber crumb and similar shock absorbing materials are particularly valuable for routes that are likely to be used for running, such as parkrun© routes.</p>	 <p><i>Footpath (earth surfaced)</i></p>

Infrastructure type	Appropriate use	Specifications	Example image
<p>Shared use paths</p>	<p>Shared use paths can:</p> <ul style="list-style-type: none"> (Off-carriageway) be routed away from carriageways (typology 2 in the Suffolk Design: Streets Guide), or (Off-carriageway) run parallel but separate to carriageways using a physical barrier (typology 6 in the Suffolk Design: Streets Guide), or if neither of the above two options are possible, (Adjacent to carriageway) run immediately adjacent to the carriageway, in a format similar to a footway but at least 3m wide (see typology 5 in Suffolk Design: Streets Guide). <p>As per the Suffolk Design: Streets Guide, shared use paths are suitable for cyclist flows up to 300 cycles per hour at 3m wide, and up to 600 cycles per hour at 4m wide. Shared use paths must be identifiable with appropriate signage.</p>	<p>Width: 3m for cyclist flows of up to 300 cycles per hour. 4m for cyclist flows of up to 600 cycles per hour. Minimums must be achieved after space for potential obstacles (e.g. lamp posts, post boxes, etc.) has been factored in.</p> <p>Surface treatments: asphalt and paving solutions that provide a smooth, anti-slip and anti-trip finish. Rubber crumb and recycled materials may be suitable in some locations.</p> <p>Other considerations: Separate footpaths and cycle tracks are generally preferred over shared use paths, as they are safer for pedestrians and may help cyclists to progress more quickly. Rubber crumb and similar shock absorbing materials are particularly valuable for routes that are likely to be used for running, such as parkrun® routes.</p>	 <p><i>Shared use path.</i> Source: Stantec/Suffolk County Council (Suffolk Design: Streets Guide, 2022)</p>
<p>Cycle tracks / Footpath and cycle track combination</p>	<p>Cycle tracks are cycling-only routes that typically run through open spaces or developments</p> <p>Cycle tracks differ from cycle ways (immediate to carriageway) and cycle lanes (on carriageway) in that they are situated away from carriageways or are at least set back from carriageways using landscaping (e.g. planted strip).</p>	<p>Width: as stated in the Suffolk Design: Streets Guide, in lower cyclist flow locations (<600 cycles per hour), single direction cycle tracks should be at least 2m wide and bi-directional tracks at least 3m wide.</p> <p>Where cycle tracks are accompanied by a footpath, the footpath should be at least 2m wide. In higher cyclist flow locations (+600 cycles per hour), 3m is the minimum width for cycle tracks.</p>	 <p><i>Footpath and single-direction cycle track combination</i> Source: Stantec/</p>




Infrastructure type	Appropriate use	Specifications	Example image
	<p>Cycle tracks are generally provided in combination with a parallel footpath, which is separated from the cycle track using a physical barrier such as a Cambridge kerb or green buffer (see typologies 3 and 4 in the Suffolk Design: Streets Guide).</p> <p>The minimum width of cycle tracks depend on anticipated cyclist flows.</p>	<p>Surface treatments: asphalt, road planings, bound stone (where likely to be durable and not crumble), rubber crumb or similar hardwearing recycled materials, provided they can be demonstrated to be durable.</p> <p>Other considerations: Where combined with footpaths, design indicators and a form of physical barrier (such as a demarcation kerb or a planted SuDS scheme between them) should be used to communicate which side is the footpath and which side is the cycle track.</p>	<p><i>Suffolk County Council (Suffolk Design: Streets Guide)</i></p>  <p><i>Footpath and bi-directional cycle track combination Source: Stantec/ Suffolk County Council (Suffolk Design: Streets Guide).</i></p>
<p>Unsurfaced bridleways</p>	<p>Unsurfaced bridleways are appropriate for leisure pedestrian and equestrian routes. If the surfacing conditions are appropriate (e.g. free of obstructions and free draining), they may also be suitable for leisure cycling.</p> <p>They are not suitable provision for utility walking or cycling trips and therefore an alternative typology must be provided to meet needs for these trips.</p> <p>Unsurfaced bridleways may not meet the leisure walking needs of people with reduced mobility. Where unsurfaced bridleways are used, consideration should be given to ensuring there are suitable alternative leisure routes for people with reduced mobility to enjoy.</p>	<p>Width: a minimum of 3m.</p> <p>Surface treatments: earth, grass or sand.</p> <p>Other considerations: Unsurfaced bridleways are not suitable for utility trips, and therefore should only be considered for leisure routes. They are of particular value to equestrians and should normally be the first choice for routes that are likely to be used significantly by equestrians.</p> <p>Where unsurfaced bridleways are provided for leisure walking/cycling/horse riding, it is recommended (a requirement for SANG) that at least one more accessible, surfaced leisure route is provided for pedestrians with reduced mobility and cyclists without suitable cycles for unsurfaced routes.</p> <p>Unsurfaced bridleways should be supported by seating and bins, where possible.</p>	 <p><i>Quintons Lane, Felixstowe, an example of a typical unsurfaced bridleway.</i></p>



Infrastructure type	Appropriate use	Specifications	Example image
<p>Surfaced bridleways with or without horse strip(s)</p>	<p>Surfaced bridleways are bridleways within the Public Rights of Way network that are surfaced to make cycling and walking more accessible; however, in doing so the surfaced section makes equestrian use less accessible due to increased slip risk from the smooth, bound surface treatments used.</p> <p>Therefore, where equestrian use of the route is likely, surfaced bridleways will be expected to be accompanied with a grass, earth or sand surfaced ‘horse strip’, as these surfaces are safer for equestrian use.</p> <p>Where the value of a new or existing route to equestrians is unclear, it is recommended that the British Horse Society are contacted for advice.</p> <p>Surfaced bridleways with horse strips are preferred over all user tracks as natural surfacing is the most suitable option for horses, however the ‘gold standard’ for routes with likely equestrian use is for alternative, separate infrastructure provision for cyclists and pedestrians, so the bridleway can be left unsurfaced for equestrians.</p>	<p>Width: the surfaced section of the bridleway (intended for pedestrian and cyclist use) should be at least 3m wide for normal flows, or at least 4m where pedestrian and cyclist flows are anticipated to be higher.</p> <p>Surfaced bridleways with a bi-directional horse strip should be a minimum of 5m in total width, with at least 2m provided for the horse strip section. Horse strips are generally provided as a bi-directional strip along one side of the surfaced shared path, although single-direction strips on either side may be supported if each strip is proposed to be at least 1.5m wide (and therefore a minimum total width of 6m).</p> <p>Surface treatments: the surfaced section of the shared use path can be surfaced using asphalt, road planings, bound stone (where likely to be durable and not crumble), rubber crumb or similar hardwearing recycled materials, provided they can be demonstrated to be durable. Earth, grass (maintained at a reasonable length) or sand is required for the horse strip(s).</p> <p>Other considerations: Horse strips must be as well-draining as possible, as mud poses injury risks to horses.</p> <p>If possible, bi-directional horse strips should be positioned on the side of the shared path that is likely to be the least disturbing for horses, such as the furthest side from the nearest carriageway or other source of visual or noise disturbance.</p> <p>Rubber crumb and similar shock absorbing materials are particularly valuable for routes that are likely to be used for running, such as parkrun© routes.</p>	 <p><i>A surfaced bridleway with a 2.5m wide surfaced section and 2m wide horse strip in Mildenhall, Suffolk. The smooth, bound surfacing used for the surfaced section is asphalt, whilst the horse strip is maintained as short grass (pictured here before maintenance works).</i></p> <p><i>Source: Suffolk County Council</i></p>



Infrastructure type	Appropriate use	Specifications	Example image
<p>All-user tracks (standard bridleways)</p>	<p>All-user tracks are bridleways that are surfaced using a surface treatment that is accessible and equally safe for pedestrians, cyclists and equestrians to use.</p> <p>As all-user tracks are not ideal for equestrians (where the preference is for unsurfaced routes – earth, grass or sand), it is advised that they are only used over short distances, and on routes with low equestrian use.</p>	<p>Width: all-user tracks should be at least 4m wide, though 5m (comparable to surfaced bridleways with a horse strip) would be preferred.</p> <p>Surface treatments: Rubber crumb, recycled materials, or a fine bound stone (or similar) are preferred. Recycled materials can be vulnerable to melting in sun light. It must be demonstrated that materials proposed to be used are non-slip and durable.</p> <p>Other considerations: Rubber crumb and similar shock absorbing materials are particularly valuable for routes that are likely to be used for running, such as parkrun routes.</p>	 <p><i>Rubber crumb towpath in Stoke Bruerne, near Northampton. Source: Suffolk County Council</i></p>

Cycle parking provision and design

3.69 The availability and quality of active travel infrastructure is an important determinant of car dependency and incidental day to day activity. The provision of secure cycle parking in appropriate locations and in sufficient quantity is vital to enabling people to cycle more of their journeys, particularly shorter utility trip journeys. This section covers general design principles for appropriate cycle parking provision, followed by an overview of the pros and cons of the different key secure cycle parking typologies.

What is ‘secure’ cycle parking?

3.70 Cycle parking is only considered ‘secure’ when the cycle is able to be either entirely locked away with a reliable lock-operated storage unit, such as a cycle hangar or locker, or can be secured to a suitable cycle stand. Secure cycle parking provided for homes is expected to be lockable and sheltered, and for at least the minimum storage space requirements to be met. Ideally, all public realm cycle parking would be sheltered from weather impacts, however as this is likely to incur extra costs, sheltering should be prioritised for ‘long-stay’ locations (e.g. to serve employees at places of employment, train stations, visitor attractions, etc.) over ‘short stay’ locations (e.g. high streets, GP practices, supermarkets, etc.). Section 11.2 Cycle parking – general principles of LTN 1/20 is recommended for reference when determining the level of security appropriate for cycle parking solutions in the public realm. Sheltered cycle parking designs should enable good visibility of the parked cycles to dissuade thieves, and therefore may benefit from being transparent or provided without sides.



- 3.71 The inclusion of push scooter parking, particularly for locations frequented by children such as schools and play provision sites should also be considered.

Quantity

- 3.72 The quantity of cycle parking to be provided should meet at least the minimum provision outlined in the Suffolk Guidance for Parking (2023 and any subsequent updates) for all of the uses and quantities proposed for the development. This information is available under Section 7 – Parking Guidance for Use Classes. As stated in Policy SCLP7.2 Parking Proposals and Standards, the design guidance covered under the ‘Residential Parking Design’ section of the Suffolk Guidance for Parking (including subsequent revisions) document does not apply to the former Suffolk Coastal area; the guidance does however apply to the former Waveney area, as per Policy WLP8.21 Sustainable Transport. As per LTN 1/20, at least 5% of cycle parking provision should meet the needs of users with non-standard cycles.

Charging

- 3.73 E-bikes are provided with either a detachable or integrated rechargeable battery. Integrated battery bikes need to be able to be charged in situ, and therefore the provision of external power points for charging should be considered for sheltered forms of cycle parking.

Location: residential

- 3.74 Residential cycle parking provision should be secure and convenient, with access to the highway designed to be as direct as possible, and at least as easy as accessing a vehicle. The most secure cycle parking solution is likely to be provided with integrated or attached garages or with bike lockers to the frontage or side of the property. For flatted development, this is likely to be through an integrated vehicle and/or cycle parking solution on the ground floor or underneath the building such as under-croft, semi-basement or underground parking. Alternatively, on-street solutions such as a cycle hangar should be considered.
- 3.75 However, it should be noted that the Building for a Healthy Life guide identifies providing all cycle storage in garages and sheds as a ‘red light’ (negative) design quality indicator. The storage of cycles in rear garden sheds, especially for terraced properties, where the only option is for the occupant is to wheel or carry the cycle through the home will not be supported. To avoid the need to carry cycles up and down stairs in flatted developments, the provision of under-croft, semi-basement or underground cycle parking or external secure cycle parking provision (e.g. cycle hangars) will be expected. The exception to this would be if accessible lifts were provided and appropriate cycle storage space for the intended occupancy rate is provided within homes. Access between cycle storage and the highway should be able to be made step-free.
- 3.76 Detached garages are potentially less secure than integrated and attached garages as they are easier to break into without occupants being made aware. Detached garages are also less convenient for occupiers to access than integrated or attached garages. This inconvenience may discourage frequent use of them, making them more likely to be used for the storage of household items than for vehicles/cycles as intended. Provision of detached garages to the rear of properties (where natural surveillance is lower) is not encouraged.






Location: non-residential




- 3.77 Non-residential parking provision should be consistent with Suffolk County Council’s Suffolk Guidance for Parking guide (2023, and any subsequent updates)⁸⁹. Non-residential cycle parking provision should be provided at key utility and leisure trip destinations and should provide cycle parking closer to access points than vehicle parking.
- 3.78 As sheltered cycle parking provision is likely to be more expensive than unsheltered, it should be prioritised for longer-stay cycle parking, such as for employees at a place of employment, visitor attractions or train stations. However, sheltered provision will be supported for both long and short stay cycle parking if indicated in proposals.
- 3.79 Cycle parking in the public realm, particularly in town centre or tourism locations, can be creatively designed, particularly where the design reflects the local context (e.g. design reflects seaside location or a local history reference); designs will be supported where it is appropriate to the context and accommodates both standard and non-standard cycles securely.


Table 24: Key secure cycle parking typologies

Secure cycle parking types	Design guidance
<p>Integrated or attached garages provide the most secure and convenient form of cycle parking by ensuring that stored cycles benefit from high levels of natural surveillance from occupants and neighbours. The proximity of the storage space to the rest of the home, and the higher likelihood of forced access being seen or heard, acts as a deterrent from theft.</p>	
 <p><i>Bike lockers. Source: Cyclehoop</i></p>	<p>Bike lockers come in many different shapes and sizes, from small lockers for single fold-up cycles to lockers for multiple cycles and cargo/adapted cycles. Bike lockers may be provided for indoor (e.g. for employment premises) or outdoor use.</p> <p>Lockers should be placed in locations that give them convenient, continuous and step free access to the highway (to the frontage, side or rear). They can be provided for individual homes/workplaces or can be grouped in a communal area to serve multiple homes/workplaces.</p> <p>Outdoor bike lockers that are sheltered are likely to last longer, though this benefit should be balanced with the need for them to be well overlooked. Unlike the other cycle storage types listed as examples in this section, bike lockers have the added benefit of providing outdoor storage space for other items if not all of their storage capacity is used up for storing cycles, meaning occupants can choose to use them as ‘mini-sheds’ too, making them a more versatile secure storage solution.</p>

⁸⁹ Available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>.



Secure cycle parking types	Design guidance	
 <p data-bbox="192 587 741 619"><i>A standard cycle hangar Source: Cyclehoop</i></p>	<p data-bbox="741 228 2047 391">Cycle hangar or equivalent on-street cycle parking is most appropriate for residential streets with flatted or terraced development. This style of lockable cycle storage provides residents with immediate access to the highway when placed on-street or as part of a parking area. This means occupants do not need to carry their cycles through or up and down steps in their building and avoids the need for lift provision. One cycle hangar unit can use the same space required for a single car to park multiple bikes.</p> <p data-bbox="741 391 2047 619">The cycle hangar is available in different dimensions according to how many and which cycle types need accommodating.</p>	
 <p data-bbox="192 1026 741 1093"><i>Bike shed with lockable doors. Source: Cyclehoop</i></p>	 <p data-bbox="741 983 1391 1093"><i>Two-tier bike cage showing both free-standing cycle parking stands and elevated racks.</i></p>	<p data-bbox="1391 619 2047 850">Bike sheds and cages are useful options for providing a more substantial amount of secure cycle parking space, such as for work places or higher density flatted residential developments. Similar to cycle hangars, they would typically be provided on-street or within a surfaced parking area, meaning users would have immediate highway access.</p> <p data-bbox="1391 850 2047 1093">Bike cages provide a similar level of security and shelter as bike sheds, and may be able to provide two-tier cycle parking, as depicted (left) where elevated racks are provided as well as stands. Elevated racks are less accessible than stands and therefore should not be provided exclusively.</p>

Secure cycle parking types	Design guidance
 <p data-bbox="203 592 728 651"><i>Free standing cycle stands with planters. Source: Cyclehoop</i></p>	<p data-bbox="757 236 2033 395">Free standing cycle parking stands with planters – cycle parking stands provide less security than key-lockable cycle storage solutions as cycles are more easily accessed and are therefore more vulnerable to being vandalised or stolen. However, well designed stands can help to offset this vulnerability by providing the opportunity for a wide range of different cycle types to be double locked. Where there is an opportunity to secure further green infrastructure and BNG through the provision of cycle parking teamed with planters, this is encouraged.</p> <p data-bbox="757 400 2033 657">Free standing cycle stands Free-standing cycle stands (often seen in ‘Sheffield’ stand style) represent the minimum acceptable standard of cycle parking in the public realm; they are not appropriate for use as residential parking provision. Where provided there should be plenty of space around them for cycles of all types and dimensions to be able to fit against them in a way that means they can be appropriately secured (double locked). Unsheltered free standing cycle stands should only be used in ‘short stay’ contexts and should receive good levels of natural surveillance and footfall past them, making them most appropriate for town centre locations and primary pedestrian and cyclist routes. LTN 1/20 recommends that all free-standing cycle parking stands are spaced 1.2m apart, with the minimum being 1m.</p>

Healthy Environments: Design prompts

How does the design and layout of the active travel infrastructure for the proposed development...

- ...support safe, accessible and inclusive active travel for pedestrians and cyclists?
- ...facilitate all four key journey types?
- ...(if applicable) meet the needs of equestrians?
- ...reflect the projected movement needs of the new and existing community to/from and through the site?

4 Healthy Homes, Schools & Workplaces



Healthy Homes & Workplaces: Key Messages

- **Environmental quality** in a residential context is determined by the level of **environmental protection** from potential sources of harm to health, **residential amenity** (ability to enjoy one's living environment without undue disturbance and stress) and the overall wider context for enabling people to engage in healthy behaviours and avoid harm.
- **Healthy homes** are appropriately warm, ventilated, resource efficient, accessible, tenure-blind, safe and secure, private, have good air quality, have good levels of natural light, have access to private/semi-private external space, provide adequate space to prepare healthy meals and for households to eat together, support productive working/studying from home, and provide an environment with good overall levels of amenity in which occupants can relax.
- **Healthy homes for older people** are more accessible, support independence and support social interaction with other members of the community. Where relevant, healthy homes for people with dementia are designed to be dementia-friendly, responding effectively to the identified challenges of the disease.
- **Healthy schools** are appropriately located and provided with active travel infrastructure that enables families with children to walk and cycle to and from school. Healthy schools provide children with adequate recreational spaces/facilities to engage in physical activity, social forms of play and to connect with nature (e.g. through provision of 'forest school' woodland areas, and/or a school food garden). Healthy schools are also appropriately located and landscaped to ensure adequate environmental protection and productive learning environments.
- **Healthy workplaces** are safe in health and safety terms, provide healthy and productive working environments (where possible also for different personality types), and provide adequate active travel infrastructure (including facilities such as showers and lockers) to enable people that live within active travel distance of their main workplace to walk and cycle to and from work.



4 Healthy Homes, Schools and Workplaces

Introduction

- 4.1 The planning and design approaches used for homes, schools and workplaces is important as these environments are key determinants of health and wellbeing; some planning and design choices may increase the potential for harm and behaviours that do not support good health, whilst other choices may support and encourage positive behaviours for health.
- 4.2 The impacts of planning and design choices may be direct, i.e. without action needed from occupants to experience them, such as impacts arising from poor air quality, or indirect, i.e. by enabling or discouraging behaviours and lifestyles choices that have health and wellbeing effects (e.g. provision of secure cycle parking supporting cycling to work/school).
- 4.3 The guidance included in this chapter is intended to cover general principles for the planning and design of healthy buildings, and to support the assessment of the potential for impacts arising from proposed development designs. This chapter will not reproduce national legislation. This document will also not include prescriptive guidance on technical matters.

Policy context for healthy homes, schools & workplaces

- 4.4 The National Planning Policy Framework (NPPF) requires that direct and indirect health impacts are considered in the planning and design of development. The planning and design of all dwellings is expected to meet at least the minimum Building Regulations and the Local Plan policy requirements, though designers are encouraged to exceed design quality minimums and consider how homes can be better designed to protect and improve occupant's health and wellbeing.



*A self-build home that provides good levels of natural light into key living spaces within the home. This supports occupants' energy levels and feelings of wellbeing during the day, and the overall healthy regulation of body clocks.
Graven Hill, Bicester.*



4.5 The below table provides a ‘quick reference’ guide to the key policies for the guidance contained in this chapter. All policies should be read in full, including their supporting text, and should be considered in the context of the full relevant Local Plan when read as a whole.

Table 25: A quick reference guide to the key Local Plan policies related to healthy homes, schools and workplaces

Design guidance areas	Key Local Plan policies	Key guidance documents
<ul style="list-style-type: none"> Environmental quality: environmental protection and residential amenity Healthy homes: design guidance Healthy homes for older people Healthy schools Healthy workplaces 	<p>Policy SCLP5.7 Infill and Garden Development Policy SCLP5.8 Housing Mix Policy SCLP7.1 Sustainable Transport Policy SCLP9.2 Sustainable Construction Policy SCLP10.3 Environmental Quality Policy SCLP11.1 Design Quality Policy SCLP11.2 Residential Amenity</p> <p>Policy WLP8.2 Affordable Housing Policy SCLP8.21 Sustainable Transport Policy WLP8.28 Sustainable Construction Policy WLP8.29 Design Policy WLP8.31 Lifetime Design Policy WLP8.33 Residential Gardens and Urban Infilling</p>	<ul style="list-style-type: none"> Royal Town Planning Institute (2020) Dementia and Town Planning Royal Town Planning Institute (2022) Housing for Older People Town and Country Planning Association (2023) Healthy Homes Principles Building for a Healthy Life (2020 and subsequent updates) Secured by Design – Homes (2023), Commercial (2015) and New Schools (2014) British Standards: <ul style="list-style-type: none"> BS 8233:2014: Guidance on Sound Insulation and Noise Reduction for Buildings BS 5489 – 1:2020: Design of Road Lighting – Lighting of Roads and Public Amenity Areas: Code of Practice (2020 and subsequent updates) BS EN 12193: 2018: Light and lighting – Sports lighting (2019, and subsequent updates) BS EN 12464 – 2:2014: Light and lighting – Lighting of work places – Part 2: Outdoor work places (2014, and subsequent updates) Sport England (2015) Artificial Grass Pitch (AGP) Acoustics – Planning Implications The Institute of Lighting Professionals (2023) The Brightness of Illuminated Advertisements including digital displays: Professional Lighting Guide 05/22 (and subsequent updates) The Institute of Lighting Professionals (2019) Domestic exterior lighting: getting it right: Guidance Note 9/19 Chartered Institute of Environmental Health: Professional Practice Guidance on Planning & Noise – New residential development (May 2017) Acoustics, Ventilation and Overheating (AVOG) Residential Design Guide, Version 1.1 (January 2020) BRE: BREEAM UK New Construction Technical Manual Suffolk County Council Air Quality Strategy & Action Plan (2023) East Suffolk Sustainable Construction Supplementary Planning Document (2022) East Suffolk Affordable Housing Supplementary Planning Document (2022) East Suffolk M4(2) Checklist - Accessible and adaptable dwellings (2023)



Environmental quality: environmental protection and residential amenity

- 4.6 Residential development of high ‘environmental quality’ for human health and wellbeing is achieved when the proposal’s design combines adequate environmental protection, high levels of residential amenity (ability to enjoy one’s living environment without undue disturbance and stress), and a wider overall health-supporting environmental context that enables people to engage in healthy behaviours and avoid harm. The term ‘environmental quality’ is used in this SPD to cover both environmental protection and residential amenity matters.

Environmental protection

- 4.7 ‘Environmental protection’ and ‘residential amenity’ have slightly different meanings but overlap. ‘Environmental protection’ relates mostly to direct impacts on physical and mental health, rather than matters of wellbeing. Environmental protection is achieved when designers have avoided, reduced, or adequately mitigated the potential for people to be exposed to forms of pollution to an acceptable, safe level.
- 4.8 Types of pollution include air (outdoor or indoor), water, noise, artificial light, odour, and land (contamination). The impacts of vibration and other sources of disturbance are also environmental protection matters. Typical pollution source types include commercial and industrial (noise, light, odour), construction and transportation (noise and air), and agriculture (water and odour).
- 4.9 Environmental protection matters also apply to non-residential development, whilst residential amenity matters do not apply to non-residential uses unless the development is likely to impact nearby residential buildings.

Residential amenity

- 4.10 Policy SCLP11.2 Residential Amenity of the East Suffolk Council – Suffolk Coastal Local Plan states that development will be expected to provide adequate living conditions for future occupants and will not cause an unacceptable loss of amenity for existing or future occupants of development in the vicinity. ‘Residential amenity’ includes all environmental protection matters for human health (as adequate environmental protection is a prerequisite for high levels of residential amenity) plus the specific form of wellbeing arising from the enjoyment of one’s home (see [Table 26](#) below for more detail).
- 4.11 The enjoyment of one’s home essentially rests on feeling safe, secure, and comfortable there. A home that provides high levels of residential amenity will be able to support occupants to relax and sleep undisturbed by normal activity. To ensure high levels of residential amenity are achieved for all homes on a development, a by-unit approach is best taken to ensure any necessary adjustments or mitigation required is identified and provided. For example, a home vulnerable to noise and air pollution from a busy road may benefit from design alterations such as:
- adjustments to plot positioning (moving it further back on the plot),
 - adjustments to its orientation,
 - not having residential use at ground floor level where air quality is poorer (e.g. having commercial units at ground floor only),
 - using mechanical ventilation that draws in air from a cleaner source (usually from higher up, or to rear of the property),



- a higher standard of sound insulation (denser glazing, walls and floors), or
- external mitigation measures, such as the use of bunds to create landscape barriers⁹⁰.

4.12 Any adjustments made to the home would also need to consider the potential for unintended impacts on matters such as solar gain/shade and overheating, privacy, and flexibility for later extensions.

4.13 The below table, **Table 26**, provides an overview of the potential health and wellbeing impacts arising from designs that do not prioritise or adequately mitigate for residential amenity impacts:

Table 26: Residential amenity considerations and their associated health and wellbeing impacts

Residential amenity considerations	Key potential health and wellbeing impacts
<ul style="list-style-type: none"> • Privacy (visual and sound) • Noise • Vibration • Poor physical relationships with surrounding buildings • Overbearing in scale 	<p>Stress, discomfort and/or sleep disturbance from reduced privacy (being seen or heard in a private context, e.g. views into bedrooms, conversations are audible through walls), noise arising from neighbouring/nearby building occupant’s activity or from nearby transport systems (roads, trains, etc.). Disturbance may also reduce occupants of the home’s ability to concentrate, impacting on home working, study and leisure activities. Loss of privacy from overlooking may reduce occupant’s use of private external space, such as rear gardens or balconies, and therefore reduce the benefits to their health and wellbeing of having access to these amenities.</p> <p>Background noise from transportation sources (road, rail, air, etc.) has been linked to poorer mental health (particularly depression and anxiety, and dementia), behavioural problems (e.g. hyperactivity/ inattention) in children and young people, sleeping issues, increased day time sleepiness, and cardiovascular, metabolic and respiratory issues.</p>
Outlook	Attractive outlooks are highly subjective. Views over green open spaces, street trees, or vibrant townscapes may help to improve mood, creativity and support relaxation for occupants. The reverse may be true for less natural outlooks, views of ‘blank’ elevations, outlooks with a very limited range, and outlooks with limited visual variety or interest (e.g. higher activity spaces).
Access to daylight and sunlight	Access to daylight through windows and other glazed surfaces is important for mood, energy levels, maintaining a healthy body clock (important for sleep quality and overall wellness), increasing indoor temperature (solar gain) and light (therefore reducing household bills), reducing humidity/moisture (and therefore reducing the risk of mould development), and the keeping of indoor plants (for ornamental, food and/or indoor air quality purposes).

⁹⁰ Further information on noise mitigation available via the Institute of Acoustics’ Acoustics, Ventilation and Overheating (AVOG) Residential Design Guide, Version 1.1 (2020), available at: <https://www.association-of-noise-consultants.co.uk/wp-content/uploads/2019/12/ANC-AVO-Residential-Design-Guide-January-2020-v1.1-1-1.pdf> and the Chartered Institute of Environmental Health: Professional Practice Guidance on Planning & Noise – New residential development (2017), available at: <https://www.cieh.org/media/1255/propg-planning-noise.pdf>.



Residential amenity considerations	Key potential health and wellbeing impacts
	<p>Access to direct sunlight in external private and semi-private space(s) (gardens and balconies) impacts opportunities for sunbathing, clothes drying and the cultivation of plants for ornamental or food production purposes.</p>
<p>Light spillage (artificial light pollution – constant or phasic)</p>	<p>Impacts on sleep and sleep quality, with the latter particularly affected by bright and ‘blue’ and ‘green’ sources of light. Light disturbance may also cause more stress and discomfort when phasic rather than constant, such as:</p> <ul style="list-style-type: none"> • the occasional flash of vehicle headlights into the home, • a motion-activated security light, or • a source of intermittent, flickering light such as from a nearby shop front. <p>Key considerations are in the relative placement of vehicle turning heads, street lights, wall-mounted lights, and the potential for light from buildings to significantly spill into the private spaces of homes due to poor placement of windows/light fittings, etc.</p> <p>Light spillage may contribute to headaches, eye strain, and discomfort from glare exposure. Artificial light may also have an uplighting effect that reduces the quality of experience of dark skies for humans and has a direct negative impact on wildlife.</p>
<p>Poor outdoor air quality and other forms of outdoor environmental pollution</p>	<p>Poor air quality (e.g. nitrogen dioxide, PM2.5 and PM10) has been linked with a wide range of negative physical health and mental health impacts, including respiratory irritation and respiratory conditions such as chronic obstructive pulmonary disease (COPD) and asthma.</p> <p>One important means of reducing air pollution is to reduce the need to travel via private vehicle (as most still have an internal combustion engine), through making more sustainable, emission-free modes of transport easier and more attractive (e.g. walking) or accessible (e.g. electric cars made available through a community car-share scheme).</p>
<p>Indoor air quality – gas appliances, poor ventilation, air filtration, moisture levels and mould</p>	<p>Poor indoor air quality is linked to a range of negative physical health and mental health impacts, though particularly respiratory irritation and respiratory conditions (e.g. nitric oxide and nitrogen dioxide from gas appliance use has been linked to childhood asthma and being on par with living with an indoor smoker), and autoimmune conditions arising from exposure to mould. Mould is most likely to arise in buildings that are consistently made moist through poor ventilation in higher humidity areas (usually kitchens and bathrooms), are cold, and in areas with minimal or no sunlight exposure.</p> <p>In more extreme cases, such those arising from acute carbon monoxide poisoning, indoor air conditions may cause serious tissue damage or even death. The use of open fires and wood burning stoves is also linked to poor indoor air quality.</p>



Residential amenity considerations	Key potential health and wellbeing impacts
Odour and fumes	Exposure to odour (e.g. smell and fumes arising from poorly ventilated operations in adjoining commercial premises) may cause nausea, headaches and discomfort.
Safety and security	Homes that are insecure due to low quality materials and standards of external doors and windows fitted are likely to cause stress for occupants. Occupants that are renting the home, and therefore have no means of controlling the upgrading of its security, and those on low incomes, are most vulnerable to designs that offer poor security. Poor layout, poor lighting, and poor relationships between buildings, spaces and movement routes can also generate safety and security issues. The use of open fires and wood burning stoves increases the risk of fire.

Healthy homes: design guidance

- 4.14 The design of homes has the potential to enable and encourage occupants to engage in health-protecting behaviours, such as exercising more often, preparing meals from scratch, and building relationships with their neighbours and wider community.
- 4.15 The design guidance in this section is intended to support the designer by highlighting opportunities to meet or exceed the planning policy or Building Regulation minimums in the interests of creating high quality, healthy environments. Developments may be able to secure health net gain for the new and existing neighbouring communities.
- 4.16 Where design recommendations refer to matters outside of direct planning control, it should be noted that whilst their incorporation into designs cannot be required, this may weigh positively in the assessment of the proposal’s overall design quality.
- 4.17 The Town and County Planning Association’s Healthy Homes Principles⁹¹ provide the overall framework for this section and are recommended to be reviewed before considering the more detailed recommendations included in this section. Healthy homes are likely to include all or most of the following qualities:
- 4.18 **Healthy homes provide high levels of residential amenity** – all relevant residential amenity matters are expected to be considered in the placement of residential buildings on site in relation to potential sources of environmental pollution (noise, odour, poor air quality, vibration, etc.), and their orientation on plot, design, and build quality. In some cases, it may also be necessary to include an external means of environmental protection to ensure adequate mitigation from a pollution source, such as the installation of acoustic bunding or other forms of sound barrier to reduce the transfer of noise from a pollution source, such as a busy road.

⁹¹ Available at: <https://www.tcpa.org.uk/resources/healthy-homes-principles/>.



- 4.19 The residential amenity of the development’s occupants and that of neighbouring existing homes is of equal relevance and importance. Therefore, where acting as the ‘Agent of Change’ in an existing residential environment, the design of new residential development will be expected to equally consider and minimise adverse residential amenity impacts on existing nearby homes as it does the new homes.
- 4.20 As a minimum, healthy homes are expected to enjoy:
- good levels of visual privacy (i.e. from overlooking views into private areas of the home and rear garden),
 - good levels of sound privacy (covered in more detail below),
 - freedom from unacceptable artificial light pollution (covered in more detail below),
 - good levels of access to daylight and sunlight,
 - good levels of ventilation and good outdoor and indoor air quality (covered in more detail below), and
 - freedom from odour.
- 4.21 **Sound privacy** – The minimum requirements for resistance to sound performance is detailed in Approved Document E Resistance to Sound of the Building Regulations 2010 (as amended). However, these are minimum standards, and it is recommended that where possible minimum standards are exceeded, in the interests of providing better home environments. The level of sound insulation provided in the building between walls and floors is therefore recommended to be provided at a level of quality that ensures that occupants of the home’s normal day-to-day activities, movements and conversations (or their neighbour’s) are not audible between rooms or floors.
- 4.22 Higher resistance to sound is most easily achieved through creating mass that stops sound transfer from exceeding maximum acceptable levels. Mineral wool or similar specialist sound insulation products may be effective in increasing resistance to sound and therefore privacy, and reduced discomfort and distractions from internal and external sources of noise.
- 4.23 Bedrooms and home office spaces are the most sensitive spaces to noise disturbance, and therefore should be prioritised in any design decisions relating to increasing resistance to sound and protection from external sources of noise, such as their placement within home layouts or which rooms are prioritised for use of materials that increase sound resistance in the walls and/or floor. Attached homes may benefit from floorplans that mirror each other by putting more active and noise generating areas of the homes together, vice versa with the quieter areas of homes. The floorplan placement of bathrooms and/or storage areas (e.g. built-in wardrobes) between bedrooms can help to further reduce sound transfer between bedrooms.
- 4.24 Sound privacy is particularly important for denser housing types and Houses in Multiple Occupation (HMOs). Increasing sound insulation may also have the added benefit of providing greater thermal insulation benefits as well.
- 4.25 In terms of the design of the overall development – other homes and the wider public realm (where external sources of noise pollution would be generated) – it is expected that external sources of noise are avoided or kept to an acceptable minimum where possible (through location, orientation, etc.) or otherwise adequately mitigated (e.g. use of acoustic bunds between source of noise and home).



- 4.26 **Artificial light pollution** – the windows to all habitable rooms should be free from unacceptable levels of artificial light incursion, which is most harmful during the hours of darkness. This may arise from inappropriate street lighting design, shop fronts, illuminated signage, poor relationships with other buildings (e.g. alignment of windows on neighbouring facades), security lighting of car parking areas, sports pitch floodlighting, and so on. Where external lighting is proposed, it should first be considered as a potential harm, and then the mitigation hierarchy applied. The designer should therefore consider how it can be (in order of general preference):
- **Avoided:** is the artificial lighting absolutely necessary? Can the need for it be designed out? Regard should also be given to potential locations for crime, such as any areas of the current design that do not have adequate natural surveillance, so that these potential ‘dark corner’ hiding places can be designed out, rather than illuminated.
 - **Reduce to a minimum and keep ‘task focused’:** if lighting is indeed necessary, the absolute minimum required for the task (e.g. lighting a footpath for walking during the hours of darkness) to be safely completed should be provided. The lighting should be tilted downwards as much as possible, should be entirely task-focused (e.g. illuminating the surface of the footpath only), lighting the minimum total area required for safe visibility, and should minimise how much uplighting of the sky and surrounding tree canopy is produced. The lighting should be continuous, and not flickering on and off. Motion activated lighting is discouraged in residential areas. Lighting should be provided for the minimum time it is required (e.g. only the hours of darkness that a locked open space is accessible to the public for). The lighting should also be as ‘warm’ as possible without undermining the ability for the task to be completed safely, as warmer lighting limits the negative impacts on human and wildlife body clocks.
 - **Mitigated:** where lighting cannot be minimised to being single task focused due to a large task area needing to be illuminated (e.g. as may be the case on a logistics and distribution site), it should be as ‘warm’ as possible, and uplighting reduced as much as possible.
- 4.27 Recommended guidance on avoiding unacceptable residential amenity impacts arising from sources of artificial lighting include are listed in the quick reference table’s list of key external guidance documents in the [Policy Context](#) section of this chapter.
- 4.28 Where relevant (i.e. outside of already urbanised areas), consideration should be given to the additional wellbeing benefits of preserving darker skies for residents to enjoy through taking a minimalist approach to the lighting of the public realm around homes, and the level of external lighting that completed dwellings are provided with.
- 4.29 Extra consideration should be given to the potential for light pollution impacts of residential development (and non-residential development) in the Suffolk & Essex Coast & Heaths Area National Landscape, where the maintenance of ‘Dark Skies’ is of enhanced relevance to landscape character and welfare of wildlife. Guidance on the design of lighting in the National Landscape is available in the Dedham Vale National Landscape and Coast & Heaths National Landscape ‘Lighting Design Guide’ (2023)⁹².

⁹² Available at: available at: <https://coastandheaths-nl.org.uk/wp-content/uploads/2023/08/Lighting-Guidance-in-National-Landscapes.pdf>.



- 4.30 **Healthy homes provide multiple aspects, natural light and good ventilation** – the design approach to the home’s glazing and ventilation should provide multiple benefits. It should balance:
- adequate natural light,
 - cross-ventilation,
 - a good internal acoustic environment,
 - views of nature,
 - views of street activity,
 - the need for visual privacy,
 - solar gain and solar shade opportunities,
 - reducing the potential for artificial light impacts on neighbouring homes, and
 - the blocking of natural light on neighbouring homes.
- 4.31 A healthy home remains dry inside and maintains good indoor air quality. This means that adequate ventilation throughout the home is maintained, and the installation of appliances that are known to cause pollution (e.g. gas appliances, open fires/wood burning stoves, etc.) are avoided. The use of materials which support drier/less humid internal environments (e.g. hemp) will be supported.
- 4.32 In areas with poor air quality or peaks of externally generated air or noise pollution, mechanical ventilation may be necessary for adequate mitigation, if demonstrated to be effective enough. Where used as mitigation for poor air quality, mechanical ventilation should draw cleaner air into the home by sourcing it from elsewhere, such as from a higher point on the building (as some particulate matter does not rise much higher than ground floor level) or from the rear of the building. In other cases, it may be more appropriate to re-position homes on their plot, or to have residential use only at first floor and above level in this higher risk area. Re-positioning homes for air quality purposes should also consider any impacts this may consequently have on residential amenity and matters such as privacy and solar gain/solar shade.
- 4.33 Mechanical ventilation with heat recovery (MVHR) systems provide further health and wellbeing benefits over more standard mechanical ventilation systems by filtering the incoming air and reducing energy use and heating costs by recovering heat from extracted and incoming air.
- 4.34 Main living spaces should be located on elevations facing south, with rooms such as bathrooms, cloakrooms and utility rooms on northern elevations as these spaces normally require less heating. However, consideration must also be given to the potential for the home to overheat as a result of the solar gain, and therefore whether solar shading features are required (e.g. brise soleil, tree plantings, overhangs, vertical fins, etc) to manage this and any impact this may have on natural light into the home. Consideration should also be given to how higher levels of insulation helps to provide a more constant temperature in the home.



- 4.35 **Healthy homes provide appropriate internal space and have logical layouts** – though the Local Plans do not set minimum internal floor space requirements for new dwellings, regard to the Nationally Described Space Standards is recommended for reference to ensure an adequate amount of floorspace for occupants at the intended occupancy level. The internal sizing of homes are important determinants of matters such as whether or not:
- occupants have room to prepare healthy meals from scratch,
 - the living room is of adequate size that it can be used for home exercise and/or as a social space,
 - families can eat together at a dining table,
 - children’s bedrooms can fit a workstation for doing homework undisturbed,
 - provision of an enclosable home office space, and so on.
- 4.36 However, the benefits of providing more internal space should be weighed against the affordability implications of internally larger homes, which is of increased relevance to homes intended for affordable tenures. It is therefore advised that, particularly for smaller homes and affordable homes, designers focus on making limited spaces ‘work harder’ for their future occupants. The priority should therefore be to make them as flexible and ergonomic as possible.
- 4.37 Layouts should prioritise how its occupants are likely to need to use the space, and how this might change over the building’s lifetime with different occupants’ lifestyles and differing levels of mobility. The approach to on-plot positioning and the design of layouts should also aim to provide occupants with the flexibility for internal spaces to later be subdivided or merged, and/or for the building to be extended, as appropriate.
- 4.38 Wherever possible, floorplans should make clear which room(s) of the home are intended to be home offices or working from home spaces (where integrated into another room, such as a bedroom). If able to be accommodated, home offices/working from home spaces should be provided at ground floor level, so as to increase useability of the space for those with reduced mobility.
- 4.39 Consideration should be given to home office spaces for all types of housing, including housing intended for older people (i.e. post-retirement). The incorporation of a home office space is beneficial to include for reasons besides enabling home-based work, such as: space for taking care of household administration matters (e.g. paying bills), supporting intergenerational households, accommodating the needs of friends and family staying on a temporary basis, or engagement with online services such as NHS video conferencing appointments and other virtual meetings.
- 4.40 For extra care housing, attention should be given to clearly defining and ensuring the functionality and residential amenity of the self-contained homes and any private external space, and the conviviality of shared spaces, such as common rooms, shared kitchen areas, terraces and walkways (as applicable).
- 4.41 **Healthy homes support healthy diets** – Overweight, obesity and other forms of malnutrition are major drivers of poor health, wellbeing and reduced quality of life for adults and children in East Suffolk. Homes that support healthy diets firstly include kitchen facilities for preparing meals from scratch in dwellings of all types and sizes. Kitchen space should be large enough to accommodate sufficient kitchen counter space, storage space (pots, pans, utensils, cutlery, etc.), sink area space, and at least enough space for the key kitchen appliances (fridge, oven, hob, microwave). This is intended to enable occupants to cook nutritious meals from scratch and



to efficiently clean up after. This is of enhanced importance for homes intended for affordable tenures or Buy to Let, as occupants on reduced incomes or that are renting the property may not be able to change/extend the kitchen space.

- 4.42 Homes are recommended to include at least some potential food growing space and space for drying clothes outside, particularly where limited in internal space. In homes at ground floor level this would usually be expected to be the rear garden, and in homes above ground floor this would be expected to be provided via a balcony, terrace, or rooftop garden space. Access to sunlight and the potential for buildings or boundary treatments to overshadow the space should be considered. To support households with limited food growing space (e.g. balconies or smaller gardens), the provision of allotment plots should be considered (as appropriate to scale of the development). It should be noted that demand (or lack of demand) within the existing community in the location of the site may not necessarily reflect demand levels post-occupation, particularly as many households may not consider taking on an allotment until an opportunity is presented for one close to home.
- 4.43 Lastly, a space appropriate for a dining table is recommended in homes with multiple occupants, as social eating provides health and wellbeing benefits, and has been linked to lower calorific intake from meals when compared with solitary or ‘distracted eating’ (screen accompanied – gaming, TV, mobile phone, etc.)⁹³.
- 4.44 **Healthy homes are adaptable to changes in mobility and household composition over the building’s lifetime** – the Building for a Healthy Life guidance states that to receive a ‘green’ assessment score, homes should be designed to be flexible for occupants’ changing needs. This can be achieved in different ways. This includes ensuring that occupant’s mobility needs can be adapted to via building to accessible and adaptable (M4(2)) or wheelchair user (M4(3)) homes standards, as appropriate. By building to M4(2) standards, this ensures more circulation space, better access to the home’s facilities, and space for later adaptation (e.g. to install a lift) if needed. M4(3) standard ensure that the home is ready for a wheelchair user from the outset.
- 4.45 The Local Plans set a minimum proportion of M4(2) homes on major residential sites. However, this is a minimum, and therefore proposals to build a higher quantum of M4(2) standard homes will also be supported in principle. The Local Plans do not set a minimum requirement for M4(3) standard homes, though their provision will be supported where the need for a wheelchair user home is demonstrated.
- 4.46 Though M4(2) homes are principally intended to support occupants with the impacts of reducing mobility over time, the extra turning space, circulation spaces, and a more accessible entrance also supports occupants with young children using push chairs, and with loading/unloading to and from the home. The Council has produced a separate M4(2) Checklist – Accessible and Adaptable Dwellings document (2023) which can be used to help ensure that M4(2) homes meet all of the standard’s requirements⁹⁴.

⁹³ Renata Fiche da Mata Gonçalves, Danyela de Almeida Barreto, Pâmela Ione Monteiro, Márcio Gilberto Zangeronimo, Paula Midori Castelo, Andries van der Bilt, Luciano José Pereira (2019) Smartphone use while eating increases caloric ingestion, *Physiology & Behavior*, Volume 204, 2019, Pages 93-99. Available at: <https://www.sciencedirect.com/science/article/pii/S0031938418309697>.

⁹⁴ Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/M4-2-Checklist.pdf>.



4.47 Over the building’s lifetime, family-sized homes are likely to go through periods of occupation by multiple adults (e.g. sharers in a House in Multiple Occupation, HMO), due to the unaffordability of housing, particularly for young adults. To protect the health, wellbeing and residential amenity for the occupants of the home and neighbouring homes, HMOs have an enhanced need for:

- enhanced sound insulation between walls and floors,
- bedrooms large enough to accommodate a home office/study space,
- more general storage space,
- larger kitchens and more kitchen storage space, and
- more parking spaces than the equivalent sized family home.

4.48 **Healthy homes are sustainably constructed and resource efficient:** Policy SCLP9.2 Sustainable Construction and Policy WLP8.28 Sustainable Construction require all major residential development of ten houses (WLP) or more than ten dwellings (SCLP) to be built to high resource efficiency and carbon emission standards (see policies for details). Warmer (but not overheated), drier, naturally lighter, and overall more resource efficient homes benefit physical and mental health and wellbeing both directly and indirectly; directly by reducing the risk of health conditions linked with cold and damp, and indirectly by reducing household bills, therefore increasing households’ disposable incomes, meaning funds can be re-allocated to purposes that increase health and wellbeing (e.g. socialising, better quality food, fitness/leisure activities, etc.).

4.49 Although the Sustainable Construction policies do not require it, there are significant health and wellbeing benefits to be gained from building to Passivhaus or equivalent higher standards. Solar gain brings natural light and heat into the home, whilst solar shade may also have the added residential amenity benefit of providing more privacy; balancing solar gain and shade is an important factor in ensuring homes do not overheat.

4.50 A resource efficient and low carbon home may also reduce the occupant’s eco-anxiety, particularly if also teamed with renewable energy generation technologies (e.g. PV panels). The provision of appropriate space for growing food and pollinator plants, and the inclusion of wildlife protection features such as swift bricks/boxes, may also help to reduce eco-anxiety. A resource efficient home should also include suitable external space for clothes drying.

4.51 Where air source heat pumps are to be installed, consideration should be given to the potential for noise pollution arising from the units in the selection of unit types to install. Potential impacts can usually be mitigated through the location and orientation of the unit, screening, or enclosure. Installation near the window of a habitable room should be avoided. If there is considered to be potential for noise pollution impacts on a new or existing sensitive receptor (e.g. homes), a noise



The Passivhaus homes in the Goldsmith Street development in Norwich are lower cost to heat, provide more consistent internal temperatures, are better ventilated, and are better sound insulated than homes built to Building Regulations minimums. Co-locating front doors also promotes neighbourly interactions.



assessment may be required depending on the scale of the system, the number of units, and the location of external units relative to neighbours. Assessments will be undertaken using the [BS 4142:2014+A1:2019](#) standard (or superseding guidance) and the Council’s noise assessment criteria.

- 4.52 Further guidance on this topic area is available in the East Suffolk Sustainable Construction Supplementary Planning Document (2022)⁹⁵.
- 4.53 **Healthy homes include at least one suitable space that can be used for work or study** – as a minimum this should include sufficient space for a desk, space for basic storage provision, and be well served by power points, in an enclosable space (e.g. a bedroom or a for-purpose home office room). Wherever possible, it should provide a window view of a green space (back garden, open space, a street tree, etc.) to support creativity, productivity and reduce anxiety. Consideration should also be given to the relationship between sunlight being received through the window and the likely positioning of any display screen equipment in the room so as to reduce glare and eyestrain. Provision of at least one suitable space will help to support widening opportunities for home-based or hybrid employment and for higher educational attainment.
- 4.54 **Healthy homes provide adequate storage space** – sufficient space is provided in the right locations within the home. This has enhanced relevance in HMOs, specialist housing for older and/or disabled people, and for general housing that is intended to be adaptable to the needs of older people or disabled people. Extra storage, together with being more accessible and adaptable, help to ensure homes are ‘care ready’. All homes are expected to provide secure cycle parking (see **Active Travel** chapter).
- 4.55 **Healthy homes are safe and secure** – Policy SCLP11.1 Design Quality and Policy WLP8.29 Design require the design of proposals to promote public safety and use design approaches to help deter crime. Development is therefore expected to be designed to protect the safety and security of occupants, through providing securable buildings, cycle storage and private external space (where separate from the building, i.e. ground floor gardens), and by designing street and open space environments that deter crime (an approach known as ‘designing out crime’).
- 4.56 The Police have developed Secured by Design guidance to support this. The guidance is made up of separate documents, which of most relevance to this chapter are the Homes (2023), Commercial (2015) and New Schools (2014) guides. The design recommendations made in the Secured by Design guidance may need to be balanced with other important design considerations to ensure well-connected and functioning places. Some key examples of design approaches that are consistent with the Secured by Design guidance include:
- the creation and maintenance of active frontages and natural surveillance onto/over streets, active travel routes and open spaces;
 - avoiding exposed rear garden boundaries;
 - the use of materials and door/window specifications that offer a high level of security for occupants;
 - avoiding ‘left over’ green spaces and street space that doesn’t receive good natural surveillance from buildings, and;

⁹⁵ Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf>.



- avoiding the provision of garages that are detached, particularly when these are placed out of view from the active rooms of the home (e.g. kitchen, home office).
- 4.57 **Healthy homes are dementia friendly, where relevant** – dementia-friendly homes should be familiar, legible, distinctive, safe and accessible. It is recommended that designers of dementia-friendly homes have regard to the joint British Research Establishment (BRE) and Loughborough University’s highly comprehensive dementia-friendly demonstration Home, ‘Chris and Sally’s house’, which was created by retrofitting an existing home that required improvement⁹⁶.
- 4.58 **Healthy homes include a bath** – All M4(2) dwellings are required to provide a bath on the same floor as the master bedroom of the home, together with a W/C and basin, and provision for a level access shower if not provided elsewhere within the dwelling. For M4(1) homes, a bath is not required (a shower is sufficient) but is recommended to be provided in addition to a shower, as baths are more suitable for bathing young children and pets, help with relief from physical pain and muscle fatigue more than showers, and provide people with a preference for baths with general wellbeing benefits. However, care should be exercised in the capacity of the fitting, due to the Sustainable Construction policies’ requirements for all new homes to achieve the water efficiency standard of 110 litres per day (or less). Purpose built HMOs are recommended to include ensuite bathrooms to each bedroom (at least a W/C and basin), where possible. Homes for multi-person households may benefit from an additional W/C and basin rather than a single bathroom.
- 4.59 **Healthy homes provide private or semi-private external space:** The provision of private external space, such as rear gardens, terraces, rooftop gardens or balconies, is encouraged and will be supported where the location and context is appropriate, e.g. where balconies will not create unacceptable residential amenity impacts. The Building for a Healthy Life guidance identifies the provision of access to outdoor space suitable for drying clothes for apartments and maisonettes as contributing towards a ‘green’ assessment score. Ideally, balconies should be large enough to accommodate at least the equivalent space for a small table and two chairs, though its size should be reasonably proportionate to the size of the household and take into account any other considerations that may necessitate limitations to its size.
- 4.60 The positioning of balconies should be considered carefully so that residential amenity for occupants of nearby homes is not unacceptably harmed (e.g. through overlooking of private amenity space and internal spaces). Care should be taken to ensure that unacceptable loss of natural light onto other balconies or into homes caused by shadows from the balconies is minimised.
- 4.61 Specialist housing for older people, particularly where a low to moderate level of care is provided, may benefit more from the provision of smaller, more manageable gardens than larger gardens, or from balconies designed to support and provide adequate space for the keeping of outdoor plants due to occupants’ reduced mobility. Specialist housing for older people with higher levels of care provided may benefit more from a managed semi-private green open space, due to the demands of maintaining private gardens or plants on balconies.

⁹⁶ Further information is available at: <https://bregroup.com/about/science-park/dementia-friendly-house>.

- 4.62 The provision of sheltered outdoor spaces, such as porches, are helpful for enabling people that are vulnerable to direct sunlight, such as the elderly and the very young, to spend time outside more safely. The positioning and dimensions of ground floor gardens should enable at least some of the garden to receive direct sunlight over the course of the day, year round. Gardens that will be entirely overshadowed by buildings or boundary treatments are unlikely to be supported.
- 4.63 The provision of small front gardens with low, soft boundary treatments and the placement of attached homes' front doors next to each other is encouraged where appropriate, as this may help to encourage neighbourly interactions.
- 4.64 **Healthy homes are tenure blind** – as per the requirements of Policy SCLP11.1 Design Quality (via the Building for a Healthy Life guidance) and Policy WLP8.2 Affordable Housing, all mixed-tenure developments are expected to be tenure-blind at dwelling, plot and neighbourhood level. At dwelling and plot level, this means that affordable tenure dwellings are expected to be indistinguishable from the equivalent market tenure dwelling in terms of:
- external appearance,
 - overall build quality when compared to the equivalent capacity market tenure dwelling (internal space, materials, finishing, etc.) and,
 - external space provision (garden and parking).
- 4.65 As identified in the Building for a Healthy Life guidance, apartment buildings might separate tenure by core, but each core must look exactly the same.
- 4.66 Alternatively, developments can ensure that no two buildings look alike, and therefore there is no external indication of tenure due to each building being unique and distinct from all others.
- 4.67 Tenure-blind design also requires that:
- affordable tenure homes be delivered individually or in clusters of no more than 10 homes,
 - clusters must not be planned contiguously,
 - affordable tenure homes must not be disproportionately burdened with potential environmental sources of disturbance (e.g. a busy road or railway line) even with adequate mitigation,
 - nor should they be disproportionately located further away from a site's amenities (e.g. open space provision) than the market dwellings on site.
- 4.68 Tenure-blind design should not be stated as a reason to avoid providing varied morphologies across the site, as highly distinctive and character area structured layouts will be supported where the design proposal is appropriate to the location and meets housing needs. Tenure blind design at building/plot level should therefore be understood as that a two bedroom market dwelling and two bedroom affordable dwelling within the same character area should be built to the same



Each home in this self-build development in Graven Hill, Bicester is unique and distinctive. Tenure-blind design can equally be achieved by ensuring no two homes look the same, as it can through ensuring all equivalent homes of different tenures look the same.



specifications (and vice versa at other sizes). More detailed guidance on tenure blind design can be found in the East Suffolk Affordable Housing Supplementary Planning Document (2022).

Healthy homes for older people

- 4.69 Housing for older people is best located in a highly sustainable location, at easy walking/wheeling distance to shops and services, public transport, healthcare services and key community buildings and spaces. This may mean an edge of centre or an integrated (mixed-use) location. Being close enough to walk/wheel to a centre or other key locations of community activity (e.g., allotments, community centre, library) supports more regular social interaction and community participation opportunities in day to day life. This is particularly important for older households that cannot or do not want to rely on access to a private vehicle, freeing them of the costs of fuel, insurance and maintenance. Car-share schemes in denser areas or larger scale developments are encouraged to support occasional use.
- 4.70 The below list provides an overview of the key housing typologies that are recommended for meeting the typical needs of older people:
- **Extra-care housing:** These dwellings are typically delivered as self-contained single-level dwellings, usually flats, with significant shared amenities (gardens, allotment plots, on-site services such as a shop or hairdressers, depending on scale) and communal areas (common rooms, meeting rooms, events spaces, may have a shared ‘guest house’), together with on-site personal care and assistance available for up to a moderate level of personal care. All dwellings would be expected to be built to accessible and adaptable dwelling (per Part M4(2)) or wheelchair user dwelling (Part M4(3)) standard of the Building Regulation (2010), as appropriate. Extra care housing will be supported where the scheme incorporates a mix of tenures and sizes to meet an identified need. Cohousing may be delivered specifically for older people or may be mixed in with housing for other age groups with care needs.
 - **Cohousing for older people:** These dwellings are typically delivered as self-contained flats with significant shared amenities (gardens, allotment plots, relevant on-site services, depending on scale) and communal areas and facilities (shared kitchen, meeting rooms/events spaces, may have a shared ‘guest house’ and/or facilities like a shared laundry room or tool shed). Co-housing for older people does not have on-site or on-call/off-site care services. Co-housing schemes are bespoke to the needs of the community being housed so rely on meaningful engagement and co-design. All dwellings would be expected to be built to accessible and adaptable dwelling (per Part M4(2)) or wheelchair user dwelling (Part M4(3)) standard of the Building Regulations (2010), as appropriate. Cohousing may be delivered specifically for older people or may be mixed in with housing for other age groups.
 - **Sheltered housing:** sheltered housing is self-contained dwellings, usually bungalows but can also be flats, either on-site or on-call/off-site low level of care is available, may have shared green open space but not usually shared facilities. All dwellings would be expected to be built to accessible and adaptable dwelling (per Part M4(2)) or wheelchair user dwelling (Part M4(3)) standard of the Building Regulations (2010), as appropriate. Sheltered housing will be supported where the scheme incorporates a mix of tenures and sizes to meet an identified need.
 - **Intergenerational housing:** provided through larger dwellings, residential annexes or linked self-contained units. This model may be particularly workable if provided as custom and self-build housing, so this would allow the dwelling to be bespoke to the specific needs of the household.



- **Accessible and adaptable general housing:** general housing that has been built to Part M4(2) accessible and adaptable dwelling or M4(3) wheelchair user dwelling standard of the Building Regulation (2010); the Local Plans specify that all general housing on schemes of 10 or more dwellings must include 50% (SCLP) or 40% (WLP) M4(2) housing, which M4(3) provision may contribute towards, where appropriate. This type is mixed in with housing intended for other age groups.
- **General housing:** housing built to M4(1) visitable dwellings standards may be suitable for older people without any current mobility impairments, though may not be suitable in the longer term.
- **Almshouses:** housing provided by charities at a low rent, usually for older people.
- **Nursing and residential care homes:** secure residential accommodation with a significant element of personal and medical care; care homes may be intended for all ages, or for a younger people only (under 65s), or for older people only (over 65s).

4.71 As well as being delivered to M4(2) or M4(3) standards, dwellings intended for older people should ideally also include more ample storage space than general housing to support older households' changing mobility and care needs. Some C3 dwellings intended for older people should be provided with a smaller garden area, or if flatted, only a balcony area and access to a shared green open space. This is to meet the needs of those with limited capacity to or preference not to maintain a private garden space.

4.72 Housing for older people should be accessible via step-free, level access. Ground floor access to residential buildings should be available via doors that are wide and have a level threshold. Flatted developments should be provided with an accessible lift to all floors including M4(2) or M4(3) standard dwellings. Housing for older people should be tenure blind.

Healthy schools

4.73 Healthy schools cultivate an environment that supports children's physical, mental and social health and is therefore conducive to productive learning, socialising and play. As a minimum, schools require a good acoustic environment with minimal external noise exposure and noise transfer between internal spaces. Schools also require a good air quality environment. These qualities are particularly supported by:

- situating schools away from busy roads and streets;
- locating vehicle drop off points for schools well away from school buildings (in effect creating vehicle-free zones around schools) or at least classroom spaces;
- providing schools with fully-segregated (off-carriageway, away from motorised vehicles) active travel routes between local homes and the schools site, and adequate cycle and push scooter parking at the school site;
- providing appropriate school sports facilities for children to engage in physical activity and engage in social forms of more structured play;



- providing schools with a natural, landscaped setting that includes tree plantings; and
 - providing schools with natural and functional green space access, such as a school playing field, ‘forest school’ woodland area, and/or school food garden.
- 4.74 Schools should be appropriately located for the community it serves to reach it principally via sustainable transport modes. Fully segregated active travel routes are of enhanced relevance to vulnerable groups, such as school children, and are particularly encouraged for the key school commuting routes. There is evidence to suggest that walking or cycling to school, particularly in a social setting, may be more beneficial for children’s alertness, academic performance, mood and mental health than being driven to school⁹⁷. School sites must provide adequate secure cycle parking as per the Suffolk Guidance for Parking (2023, and subsequent updates)⁹⁸. Lighting along key active travel routes for school commuting will be supported where this would not have unacceptable residential amenity or wildlife impacts. See the [Active Travel](#) chapter for further guidance on the design of active travel infrastructure, including cycle parking.
- 4.75 Where schools are supported by artificially lit outdoor sport facilities (e.g. lit playing fields, pitches and/or Multi-Use Games Areas), that are intended to be used during the hours of darkness by the school or wider community (i.e. via Community Use Agreement), it is recommended that regard is had to relevant environmental protection guidance on artificial lighting⁹⁹ and noise¹⁰⁰ to help ensure the avoidance of unacceptable residential amenity impacts.

Healthy workplaces

- 4.76 The planning and design of non-residential development also has the potential to have health and wellbeing impacts for users and visitors, due to the amount of time the average working age person spends in a place of work. As with residential development, the design of workplaces may have direct or indirect impacts, and impacts may be positive or negative. Together with considerations for the workplace building itself are the health and wellbeing impacts of the wider site, and whether the workplace is accessible by walking, cycling and public modes of transport.
- 4.77 Some workplaces will have an enhanced need for environmental protection, due to activities requiring quiet and/or privacy, such as schools, libraries or medical facilities. More generally workplaces benefit from areas that are sheltered from external noise sources, weather, poor air quality areas, for the comfort and wellbeing of employees during break periods. The minimum legal health and safety requirements for non-residential buildings are covered by the Approved Documents of the Building Regulations 2010 (as amended). The minimum requirements for general welfare facilities are covered by the Health and Safety Executive’s guidance ‘Welfare at Work: Guidance for employers on welfare provisions’ (2007).

⁹⁷ Westman, J., Olsson, L.E., Gärling, T. and Friman, M. (2017) Children’s travel to school: satisfaction, current mood, and cognitive performance. *Transportation* 44, 1365–1382. <https://doi.org/10.1007/s11116-016-9705-7>.

⁹⁸ Available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>

⁹⁹ See British Standards Institute (2019, or subsequent updates) BS EN 12193:2018 Light and lighting: Sports lighting. Available for download via: <https://knowledge.bsigroup.com/products/light-and-lighting-sports-lighting-1>. Where the content of the two guidance documents differs, the British Standard guidance should be considered to supersede the now out of date guidance included in SPG11 Recreational Floodlighting (1995) that applies to the former Suffolk Coastal area only.

¹⁰⁰ Recommended source is Sport England (2015) Artificial Grass Pitch (AGP) Acoustics – Planning Implications guidance. Available for download from: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces>.



- 4.78 Policy SCLP9.2 Sustainable Construction sets the policy minimum for all new non-residential developments in the former Suffolk Coastal area of equal or greater than 1,000sqm gross floorspace to achieve the British Research Establishment Environmental Assessment Method (BREEAM) 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so.
- 4.79 Similarly, Policy WLP8.28 Sustainable Construction sets the policy minimum for all new office and school developments in the former Waveney area of equal or greater than 1,000sqm gross floorspace to achieve the BREEAM 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so. The BREEAM UK New Construction Technical Manual – SD5079 (Version 6)¹⁰¹, 14% of the assessment weighting relates to health and wellbeing criteria, which are listed under 'Health and Wellbeing' and 'Sustainable transport'. This document covers a wide range of buildings, including education buildings, healthcare buildings, multi-residential buildings, retail buildings, prisons, offices, creches, courts, industrial and other building types. Though not all non-residential development is required by these policies to achieve against the BREEAM assessment criteria, it is nonetheless recommended that designers of non-residential development proposals consider the guidance.
- 4.80 In addition to the criteria identified through the BREEAM assessment guide, the following considerations are also recommended for developments (above or below the policy threshold):
- **Kitchens** – where provided, staff kitchens are recommended to ensure sufficient refrigeration capacity for most employees to have the choice to bring in and store fresh food for consumption during meal breaks to help support healthy diets and to reduce food costs. Similarly, kitchens are recommended to provide a means of heating food (e.g. microwave) as well as heating water (ideally a communal boiler rather than a kettle, to reduce energy use), so that a wider variety of healthy meals can be consumed.
 - **Inclusion of staff rooms** – this is particularly recommended in buildings where visitors/customers circulate, to ensure staff can have restful breaks, and a suitable space to take private calls when needed. Larger staff rooms are recommended to be split into a more social area and a quieter area for people to spend time by themselves.
 - **Floorplate design** – it is recommended that the design of floorplates considers the needs of different types of work tasks, as well as the needs of different personalities. It may therefore be helpful to provide seating areas suited to group/social work, and areas that support people to 'deep work' by themselves and maintain concentration and without disturbance. Similarly, the positioning of seating is recommended to take into account preferences for sociality (extroversion and introversion), ability to be disturbed (some people struggle to maintain concentration more than others) and the general preference for people to not have their backs to activity areas of the room or entry/exit points.
 - **Co-location of employment uses with leisure facilities and open space** – this is recommended where the opportunity exists, on the basis that the close proximity of amenities will help to support employees to engage in healthy behaviours.

¹⁰¹ Available at: <https://files.bregroup.com/breeam/technicalmanuals/sd/uk-new-construction-version-6/content/resources/output/pdf/sd5079-breeam-uk-new-construction-version-6.pdf>.



- **Higher ceilings and higher window and door heads** – higher ceilings have been linked to more creative and flexible thinking and are generally preferred by people to lower ceilings in a work environment setting.

Healthy Environments: Design prompts

- (For residential development) have the qualities listed in the healthy homes design guidance been considered and, where appropriate, are able to be observed in the proposal's design?
- (For school development) has active travel infrastructure between schools and surrounding residential areas been provided to an appropriate standard?
- (For school development) has the provision of green infrastructure been used to help provide an active, natural and good air quality environment around the school?
- (For workplaces) has the design considered employee and visitor health and wellbeing through delivery of supporting amenities such as showers, staff rooms, or a staff garden area?

5 Healthy Centres & Community Facilities



Healthy Centres and Community Facilities: Key Messages

- **Healthy centres** refer to town centres, district centres, or local centres which provide communities with access to a variety of services and facilities that help meet physical, mental, and social health and well-being needs. In order to create and maintain a thriving healthy centre, they need to be viable, vital, and supportive of health and wellbeing.
- **Design guidance for creating healthy centres** identifies the features and qualities that determine whether centres have a negative or positive impact on health and wellbeing. Key indicators of healthy centres comprise of ensuring that the centre is compact, connected, and complete. Other indicators include ensuring that centres support good nutrition; make space for the community; are safe and secure; and conserve and integrate the historic environment.
- **Inclusive and dementia-friendly design** should be a crucial consideration in the design of centres and community facilities. The use of dementia-friendly design principles also supports those that are neurodiverse, have learning difficulties, or experience challenges with their mental health. Key considerations include creating familiar centres that are easily identifiable and distinctive through features such as landmarks, legible via ensuring clear routes and purposes, and accessible.
- **Community facilities** provide valuable services and spaces for communities to interact and socialise, exercise, and spaces for education and skill building activities. Examples include: community shops/cafés, Post Offices, pubs, community centres, co-working spaces, outdoor/indoor sport and recreational facilities, healthcare facilities, and cultural buildings (e.g. performing arts centres, libraries, etc.).
- **Community Hubs** provide a mix of community facilities under one roof or otherwise closely related on site. Community Hubs support walking and cycling and support the community to collaborate and share resources.
- **Wellbeing Hubs** are Community Hubs with a mix of uses that focus on supporting health and wellbeing, and incorporate a form of face-to-face healthcare services (e.g. a GP surgery).

5 Healthy Centres and Community Facilities

Introduction: creating healthy centres

- 5.1 Centres provide communities with access to a variety of goods, services, social spaces, leisure/fitness opportunities and entertainment experiences which help to meet their physical, mental, and social health and wellbeing needs. In East Suffolk, centres are categorised by their size, completeness, and their role (retail hierarchy); from largest to smallest, they are categorised by size as ‘town centres’, ‘district centres’ or ‘local centres’. In this guidance, where the document refers to ‘centres’ without making a distinction between the different sizes, the guidance can be read as being equally applicable to all types of centre.
- 5.2 The role of centres is evolving. Centres have historically been spaces primarily for face-to-face trade of goods and services, though as more trade and services move online, centres are being forced to adapt in order to continue to thrive and be relevant to the communities they serve. The three basic requirements for creating and maintaining thriving, healthy centres are:
1. **Viable:** centres must be economically sustainable, meaning businesses must be enabled to make a profit and not-for profit organisations and spaces must be able to be sustained through adequate funding and access to free local volunteer labour. Costs must be kept low, goods and services must be attractive, available, accessible and affordable, and footfall in centres kept high for walk-in business and business visibility. The relevance of the offer of goods, services and spaces will be influenced by socio-economic and cultural factors such as demographics and incomes.
 2. **Vital:** centres must be attractive, relevant, and interesting to the community to generate enough visits and activity. Generally, trends in centre adaptation show that the centres that are thriving are those that can evolve into a “destination” and provide a holistic leisure and social experience for visitors. These centres focus on encouraging and enabling visitors to stay for longer (and therefore spend more money) by ensuring their physical, mental, and social needs and wants are being met whilst in the centre over an extended period. This is further supported by centres having both a day time and evening economy, and by having multiple uses operating in one premises either simultaneously or at different times of the day/evening. A few possible examples of this are:
 - an early years setting by day and then a space for yoga classes in the evening,
 - a cafe by day and then a wine bar in the evening, or
 - a co-working office space teamed with a hireable community use space (hireable for activities such as book clubs, knitting clubs, and so on) that is operable during both the day and evening.



Beach Street in Felixstowe provides goods and services to the community via independent shops, a yoga studio, barbershop, dog groomers, restaurants, and spaces to meet and interact. This diversity and flexibility strongly contributes to vitality.



- 3. **Supportive of health and wellbeing:** a healthy centre provides a healthy environment for visitors, supporting their physical, mental, and social health and wellbeing. Healthy centres provide access to healthier choices and behaviours for meeting needs whilst using the centre.
- 5.3 Centres must be highly accessible via walking, cycling, public transport and accessible parking, and reasonably accessible via private vehicle, in order to maintain vitality and ensure inclusivity for all. The presence of motorised vehicles can make environments less pleasant, attractive, social and less healthy (through reducing air quality, creating noise, and reducing safety); this discourages people from walking, cycling or using public transport to reach the centre. Therefore, centres that provide at least some fully pedestrianised areas/streets are more likely to thrive. However, this must be supported by having public transport stops and parking (particularly accessible parking) within a reasonable walking/wheeling distance of high activity areas. This is recommended to be no more than a few minutes of walking/wheeling, based on a slower walking/wheeling pace. Guidance on the design and delivery of active travel infrastructure is available in the [Active Travel](#) chapter.

Policy context for healthy centres and community facilities

The below table provides a ‘quick reference’ guide to the key policies for the guidance contained in this chapter. All policies should be read in full, including their supporting text, and should be considered in the context of the relevant Local Plan when read as a whole.

Table 27: A quick reference guide to the key Local Plan policies related to healthy centres and community facilities

Guidance areas	Key Local Plan policies	Key documents/design guidance
Healthy centres Community facilities that meet community needs	Policy SCLP3.5: Infrastructure Provision Policy SCLP4.8 New Retail and Commercial Leisure Development Policy SCLP4.9 Development in Town Centres Policy SCLP4.10 Town Centre Environments Policy SCLP4.12 District and Local Centres and Local Shops Policy SCLP7.1 Sustainable Transport Policy SCLP8.1 Community Facilities and Assets Policy SCLP11.1 Design Quality Policy WLP1.3- Infrastructure Policy WLP8.18 New Town Centre Use Development Policy WLP8.19 Vitality and Viability of Town Centres Policy WLP8.20 Local Shopping Centres Policy WLP8.21 Sustainable Transport	<ul style="list-style-type: none"> • The National Design Guide (2021) • Fields in Trust (2015) Guidance for Outdoor Sport and Play Beyond the Six Acre Standard (England) • Town and County Planning Association (2021) The 20-Minute Neighbourhood Guide • NHS Suffolk and North East Essex ICS (2022) Green Plan • NHS Waveney & Norfolk ICS (2022) Green Plan • NHS Waveney & Norfolk ICS (2022) Estates Strategy • Suffolk County Council (2022) Suffolk Design: Streets Guide • East Suffolk Council (2021) East Suffolk Playing Pitch and Outdoor Sports Strategy • East Suffolk Council (2022) East Suffolk Cycling and Walking Strategy



[Policy WLP8.22 Built Community Services and Facilities](#)

[Policy WLP8.29 Design](#)

National policy and guidance

- 5.4 The National Planning Policy Framework (NPPF) currently defines ‘town centres’ in the Glossary (Annex 2) as the areas defined on the local authority’s policies map, including the Primary Shopping Area (where retail development is concentrated), and areas predominantly occupied by main town centre uses within or adjacent to the Primary Shopping Area (i.e. Secondary Shopping Area). The NPPF currently defines ‘main town centre uses’ as per the Use Classes Order 1987 (as amended) as:
- retail development;
 - leisure, entertainment and more intensive sport and recreation uses including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls;
 - offices, and;
 - arts, culture, and tourism development (including theatres, museums, galleries and concert halls, hotels, and conference facilities).
- 5.5 The NPPF definition covers a wider range of uses than those which are included in the list of uses that will be permitted in town centres under the respective Local Plan policies SCLP4.8 New Retail and Commercial Leisure Development and WLP8.18 New Town Centre Use Development. The NPPF also supports the inclusion of residential development within the mix of appropriate uses in centres. Paragraph 90 identifies residential use as suitable for mixing in with town centre uses in centres on appropriate sites to support their vitality.
- 5.6 Chapter 8 of the NPPF (promoting healthy and safe communities) encourages planning policies that support the creation of places that promote social interaction, that are safe and accessible, that have layouts which encourage walking and cycling, and that enable and support healthy lifestyles by providing open space and recreational facilities, local shops, and access to healthier food.
- 5.7 In 2020, there were some significant changes to the Use Classes Order 1987 (as amended). In terms of centres, one of the most notable changes has been the creation of the Class E (Commercial, Business and Service) Use Class. Class E is wide ranging, covering uses such as shops, cafes and restaurants, professional services, gyms and indoor sport and recreation, healthcare services, creches/nurseries, and offices – and therefore many of the key town centre uses. The impacts and opportunities arising from this change come from permission not being required for changes of use within this new and wide ranging Use Class. The exception to this is that permission may still be required for matters such as the development works necessary to implement the use, such as changes to the façade, or for appropriate licencing.
- 5.8 Most of the uses specified in policies SCLP4.8 New Retail and Commercial Leisure Development and WLP8.18 New Town Centre Use Development have been re-classified since the adoption of the Local Plans. However, the respective lists of uses that will be permitted within Town Centre Boundaries (as per the Policy Maps)



still stand where these policies continue to be considered up to date, unless material considerations indicate otherwise¹⁰². For the purposes of interpreting these policies, the former use class references should be directly converted to their new use classes (e.g. ‘A1 Shops’ should be interpreted as ‘E(a) Display or retail sale of goods, other than hot food’), where relevant.

- 5.9 This liberalisation of uses previously in different Use Classes means that the ability to plan for and permit specific uses and exclude others, and to protect existing uses, is now reduced. Nonetheless, planning conditions can still be used to restrict developments to a certain use class or sub-use class where this is justified by planning policy. The main opportunity to specify uses and limit changes away from specific uses is now therefore for the most part limited to adopted development plan policies (i.e. the Local Plans and neighbourhood plans).
- 5.10 However, this liberalisation of town centre uses has the benefit of allowing centres to be more dynamic in responding to changes in the economic and social demands of the communities it serves; it is also more straightforward for premises to have multiple simultaneous uses. Though the 2020 changes to the Use Classes Order 1987 (as amended) did liberalise most town centre uses, some uses that have potential health and wellbeing impacts (such as hot food takeaways) were re-classed as Sui Generis, and were not given permitted development rights for use switches to them, only to switch use away from them.
- 5.11 This liberalisation of centre’s uses ultimately necessitates a stronger emphasis on all of the other key elements and the design quality of centre environments to be supportive of the community’s physical, mental and social health and wellbeing.

Suffolk policy and guidance

- 5.12 The Suffolk Design: Streets Guide (Suffolk County Council, 2022) supports the creation of pedestrianised streets in appropriate locations, such as in centres; on page 55 it states:

“Pedestrianisation can be used to transform previously uncared for urban areas into bustling multi-functional spaces that are more likely to be consistently occupied throughout the day and can be used to host a variety of community events, which helps to achieve natural surveillance. pedestrianising certain areas through attractive hard and soft design features creates spaces that are clearly intended for public use, helping to create a sense of ownership of the area among the local community”.

- 5.13 Technical information on the creation of vehicle restricted areas – i.e. pedestrianised areas that still permit cycling – is available in Local Transport Note 1/20: Cycle Infrastructure Design¹⁰³, section 7.4 Cycling in vehicle restricted areas (VRAs).

¹⁰² As per Section 70(2) of the Town and Country planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004.



East Suffolk Council policy and guidance

5.14 In addition to the policies included in the table above, other key documents to consider are:

- The **East Suffolk Cycling and Walking Strategy¹⁰⁴ (2022)** includes many recommendations relating to active travel infrastructure improvements for walking and cycling within centres and to and from them (the key corridors). The strategic recommendations related mainly to Lowestoft, Felixstowe and the Trimley Villages, Beccles and Worlingham, Bungay, the East of Ipswich area and Woodbridge and Melton. The Strategy also included recommendations for centres via recommendations specific to site allocations in central locations.
- The **Historic Environment SPD (2021)¹⁰⁵**. The conservation of cultural heritage in the built environment through the retention and enhancement of heritage assets and other visual indicators of the layers of time inherent in the organic growth of long-standing centres is an important principle in placemaking. The Historic Environment SPD (2021) includes guidance relevant to the conservation and appropriate integration of heritage assets into centre environments, including listed buildings, building in Conservation Areas, non-designated heritage assets and scheduled monuments.
- The **Sustainable Construction SPD (2022)**. High levels of resource efficiency through building performance and the generation of renewable or low carbon energy are important for future-proofing development in centres. The Sustainable Construction SPD (2022) includes design guidance on the development of more environmentally sustainable buildings.

The retail hierarchy: town centres

- 5.15 Town centres are typically large built-up areas with a mix of ‘town centre’ uses. Existing town centres generally have an identifiable linear ‘high street’ that is made up of one or several key streets that are predominantly in retail use at ground floor level. All town centres in East Suffolk are identified in the relevant Local Plan’s Policy Map. The Policy Map identifies each town centres’ ‘Primary Shopping Area’, and the specific streets within the Primary Shopping Area as the ‘Primary Shopping Frontage’.
- 5.16 Town centres will often be supported by secondary streets and spaces that tend to be more of a mix of typical ‘town centre’ uses (See list below), and therefore not predominantly retail. These secondary streets and spaces are identified in the Policy Map as the centre’s ‘Secondary Shopping Frontage’. Centres have identifiable ‘edges’, where the density of town centre uses becomes much reduced. Town centres are protected through policy that concentrates town centre uses in centres, using ‘Town Centre Boundaries’ in the Policy Map and using policy to limit key town centre uses and unit sizes outside of Town Centre Boundaries.

¹⁰⁴ The East Suffolk Cycling and Walking Strategy (2022) is accessible via: <https://storymaps.arcgis.com/collections/4bd40e1d6e6c4637a7fceb840827c843>.

¹⁰⁵ The Council’s other supplementary planning documents are accessible via: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/>.



5.17 Typical centre uses fall under Use Classes C, E and F and some are Sui Generis, as per the Use Classes Order 1987 (as amended). In East Suffolk the uses that will be permitted within Town Centre Boundaries are more limited to those indicated in the following table, **Table 28**, using asterisks¹⁰⁶. Typical centre uses include:

Table 28: *uses specified in Policy WLP8.18 - New Town Centre Use Development and Policy SCLP4.8: New Retail and Commercial Leisure Development as permissible within Town Centre Boundaries*

Use Type	Use Class
*Shops	Class E(a) (formerly A1)
*Professional services (other than healthcare services) – e.g. banks, post offices, estate agents	Class E(c) (formerly A2)
*Cafés and restaurants	Class E(b) (formerly A3)
*Pubs and wine bars	Sui Generis (formerly A4)
*Hot food takeaways	Sui Generis (formerly A5)
*Hotels and guest accommodation	Class C1
*Swimming pools	Class F2(d) (formerly D2)
*Gyms and some indoor sport, recreation or fitness uses	Class E(d) (formerly D2)
*Community centres/halls or meeting places for the principal use of the local community	Class F2(b) (formerly D2)
*Cinema, concert/bingo/dance halls and live music venues	Sui Generis (formerly D2(a-d))
**Offices	Class E(g)(i) (formerly B1a)
Healthcare services – GP surgery, pharmacy, opticians, dentist, osteopathy clinic	Class E(e) (formerly D1)
Art galleries, museums, libraries, public halls, places of worship and law courts	Class F1(b-g) (formerly D1)
Creches, day nursery or day centre	Class E(f) (formerly D1)
Nightclubs, casinos, theatres, betting shops, taxi businesses	Sui Generis (formerly various)
Homes	Class C3

5.18 Together with typical centre uses, centres may also include, or be closely related to, some of the following spaces and features, with mutual benefit:

- Heritage assets and tourist attractions
- Open space – e.g. green open space, such as parks and gardens, and play provision)
- Public spaces (e.g. town squares)
- Public facilities – e.g. public toilets, bins, benches and cycle and vehicle parking.

¹⁰⁶ *Uses specified as permissible in both Policy WLP8.18 - New Town Centre Use Development and Policy SCLP4.8: New Retail and Commercial Leisure Development.

**Uses specified as permissible in Policy WLP8.18 - New Town Centre Use Development only. Uses without an asterisk were not specified as acceptable uses within Town Centre Boundaries in either of these policies.



The retail hierarchy: district centres & local centres

- 5.19 ‘District centres’ are smaller than town centres, and typically have a less diverse offer of centre uses. District centres are described in the East Suffolk Council – Suffolk Coastal Local Plan (SCLP) as being typically a large group of shops anchored by a small supermarket, together with facilities, which collectively form a coherent area. The definition used in the East Suffolk Council – Waveney Local Plan (WLP) adds that the facilities may include banks/building societies, restaurants/cafes, and community facilities such as a library.
- 5.20 ‘Local centres’ are smaller than district centres, and typically have much less of a diverse offer of centre uses than town centres or district centres. Local centres will normally have a catchment of no more than walking distance (10 minutes of walking/800m) from the centre, where walking routes are accessible enough to enable travel on foot. The SCLP describes local centres as typically featuring a newsagent and/or small convenience store (e.g. small supermarket), along with various other small shops. The WLP adds that they may also include facilities such as a post office, pharmacy or cafes.
- 5.21 Individual and groups of local shops, services and community facilities that are not considered to be ‘centres’ in the relevant Local Plan but which that are important for meeting the day-to-day needs of local communities will be protected. Where possible, cycling and walking access to them should be enhanced.

Existing centres

- 5.22 To put this information into the East Suffolk context, **Table 29** below provides an overview of East Suffolk’s existing centres:

Table 29: Existing centres in East Suffolk

Waveney town centres	Waveney district centres	Waveney local centres
<ul style="list-style-type: none"> • Lowestoft (largest town) • Beccles • Halesworth • Bungay • Southwold (resort town) 	<ul style="list-style-type: none"> • Oulton Broad District Shopping Centre • Kirkley District Shopping Centre 	<ul style="list-style-type: none"> • Lowestoft – Carlton Road, Hollingsworth Road, High Street, London Road (Pakefield), Oulton Road, Snape Drive, The Green, Village Rise, and Westwood Avenue • Carlton Colville – Ashburnham Way and Famona Road • Kessingland – High Street and Field Lane • Worlingham – Hillside Avenue • Wrentham – High Street

Suffolk Coastal town centres	Suffolk Coastal district centres	Suffolk Coastal local centres
<ul style="list-style-type: none"> • Felixstowe (resort town) • Aldeburgh • Framlingham • Leiston • Saxmundham • Woodbridge 	<ul style="list-style-type: none"> • Cavendish Park, Felixstowe • High Road East, Felixstowe • Undercliff Road West, Felixstowe • Walton High Street, Felixstowe • Ropes Drive West, Kesgrave • The Square, Martlesham Heath • Sycamore Drive, Rendlesham • The Hill, Wickham Market 	<ul style="list-style-type: none"> • Bixley Farm, Rushmere St Andrew • Saxmundham Road, Aldeburgh

Design guidance: creating healthy centres

5.23 The quality, availability, accessibility and diversity of the goods, services, uses, facilities, and public realm spaces a centre has to offer will largely determine whether it has positive or negative health and wellbeing impacts. Other key factors such as noise, air quality, odour, pedestrian and cyclist safety and convenience, and the extent to which green infrastructure is integrated will also contribute to how supportive of health and wellbeing a centre is. Some of the key indicators of healthy centres are:

5.24 **The centre is compact, connected, and complete**¹⁰⁷. In more detail:

- **Compact:** compact centres are dense with centre uses within a relatively small geographic area, supporting good walkability and cyclability. Long, linear streets of shops are avoided, in favour of more easily circulatable centres. Compact centres have discernible edges (i.e. there is a clear sense of when one has entered or left ‘the centre’), and particularly when larger, may have discernible ‘districts’ which have been created by small concentrations of a single or a few well-related uses (e.g. ‘entertainment’, ‘shopping’, ‘restaurants’ or ‘tourist’ areas).



An example of a pocket park with integrated cycle parking facilities in a centre.

¹⁰⁷ The Town and County Planning Association’s The 20-Minute Neighbourhood Guide (2021) is recommended for further guidance on creating compact, connect and complete centres. It should also be noted that the ‘compact, connected and complete’ concepts must be appropriately interpreted and adapted for a rural district where population densities are lower and there are rural communities with high levels of dependency on the use of private vehicles to meet their day to day needs.



- **Connected:** Connected centres are well connected to key origins such as homes, schools and workplaces within walking distance of the centre (10 minutes walk/800m). All centres should support safe, accessible, and efficient active travel routes to, from and within them that are inclusive of all levels of mobility. The routes and relationships between different buildings, spaces, and access points into them should follow likely movement patterns and **trip chains**. New centre layouts should be highly permeable, providing multiple access routes from different origins and between different districts of the centre (if applicable).
- New district centres should be accessible via safe, accessible, and efficient continuous walking routes between the centre and residential areas within a range of at most 10 minutes walking time (800m) from the centre.
- New local centres should be accessible via safe, accessible, and efficient continuous walking routes between the centre and residential areas within a range of at most 5 minutes walk (400m) of residential areas. Design guidance on active travel infrastructure design can be found in the [Active Travel](#) chapter. Where public transport is provided, routes should be designed to pick up and drop off at relevant and high-activity areas of the centre, rather than at peripheral locations. East Suffolk has many rural communities that depend on private vehicle access to centres, and therefore private vehicle parking is still required for access to all types of centres. Accessible parking and loading/unloading spaces should be provided in key locations to reduce walking distances. General vehicle parking should ideally be in edge-of-centre locations, though no more than few minutes of walking/wheeling away from the Primary Shopping Area, based on a slower walking/wheeling pace.
- **Complete:** Healthy centres provide a diverse mix of appropriate uses, in accordance with the scale of the centre and density of the population it serves. Complete centres are supported by at least a minor element of location appropriate housing, in order to support the viability and vitality of centres, make centres more accessible to those with reduced mobility, and to reduce the number of trips to the centre made by private vehicles. A diversity of goods, services and uses ensures that a wider range of the needs and preferences of the groups within the community are met.

5.25 **The centre is inclusive and dementia-friendly:** healthy centres meet the diverse needs of the community by providing a mixture of town centre uses and therefore a varied offer of goods, services, and experiences. All centres should provide at least some vehicle parking, preferably well away from key activity areas, allowing these key spaces to be pedestrianised. Where available space for parking provision is limited, priority should be given to providing accessible parking and serving community uses. Cycle parking suitable for non-standard cycles should be provided in centres.

5.26 Dementia-friendly design principles should be used in the design of centres, throughout or in designated **dementia friendly areas** (as appropriate). Use of dementia-friendly design principles also support people that are neurodiverse, having learning difficulties, or that otherwise experience challenges with their mental health. The following list puts the principles of dementia friendly design into the context of centres:

- **Legible:** legible centres have a clear purpose and clear routes in, out and through them, supported by accessible wayfinding signage. The clear purpose of the centre is supported by having a diverse mix of town centre uses, and a predominantly retail offer in the Primary Shopping Area.



- Centres with discernible edges and districts within them (e.g. a restaurant quarter) also support legibility, by supporting visitors to develop more clearly defined mental maps of which spaces are used for what purpose. Wayfinding signage in centres, particularly larger centres, is recommended to take a similar format to the ‘Legible London’¹⁰⁸ walking maps, which provide a ‘you are here’ style map, direction markers to key locations, together with written information on walking distances and estimated times.
- **Distinctive:** distinctive centres use tools such as districts, landmarks, and design coding (such as creating character area material, shape and/or colour palettes) to help visitors identify where they are in the centre and build mental maps of how different spaces relate to each other. Other features such as public art, memorials, distinctive landscaping, space branding (e.g. the Barbican’s use of the ‘B’ and docklands references), and the integration of unique public and open spaces (though without undermining walkability significantly) also help to add distinctiveness to centres.
- **Accessible, comfortable, and safe:** accessible centres are easily accessed and used by all, regardless of age and ability. This is supported by delivering high quality active travel infrastructure (see [Active Travel](#) chapter) and using pedestrianisation or shared space principles in the design of centres wherever possible, and keeping buildings and spaces at human scale and designed to prioritise human movement (rather than vehicles). Town and district centres with high levels of permeability and a close-knit layout help to support people to walk and cycle to, from and within them, providing an opportunity for incidental activity in day to day life. As mentioned above, cycle parking for non-standard cycles should be provided to improve accessibility.
- Comfortable centres are inclusive and provide access to public facilities such as public toilets, benches at appropriate intervals, bins and, if possible, quiet areas. Quiet areas are normally created out of ‘nooks’ in public space or open space provision, are supported by planting, seating and shade, and most importantly are away from the higher activity spaces (e.g. Primary Shopping Area), or sources of noise, that may produce too much sensory stimulation for some. Ideally, comfortable centres provide an active travel route around them, allowing those that would prefer or need to avoid the high activity spaces within the Primary Shopping Area with a feasible, less stimulating alternative route.
- Comfortable and safe centres reduce exposure to environmental stressors such as air and noise pollution, and are pedestrianised where possible and appropriate, or are otherwise designed to reduce the potential for conflict between pedestrians and other users of the movement network.
- **Familiar:** familiar centres are clearly identifiable as centres through their form, functionality and density of town centre uses, including a Primary Shopping Area that is predominantly in retail use. To further support familiarity, familiar centres feature units that clearly demonstrate their intended use, and when units are in mixed use or are multi-functional (such as a community centre), their mix of uses or multi-functionality is communicated through the design of the frontage and/or clear signage, where this can reasonably be accommodated.
- The retention of historic shopfronts may be helpful in supporting those with dementia or other mental health challenges that impact memory. More information can be found in the Historic Environment Supplementary Planning Document’s ‘Shopfront and Signage’ section.

¹⁰⁸ For more information on the Legible London map product range see: <https://tfl.gov.uk/info-for/boroughs-and-communities/maps-and-signs>.



- 5.27 The inclusivity of centres is further supported by the integration of open space, public spaces, picnic areas (particularly where indoor or sheltered) and free-to-use public services such as libraries and museums also help to provide inclusivity for those on low incomes and/or young people, who may otherwise be excluded from commercial (where admission and engagement in activity must be paid for, e.g. a cinema or restaurant) or age-restricted spaces (e.g. pubs/bars that do not admit under 18s), and quiet low-stimulation spaces for those that need alternative spaces to or periods of respite from high activity areas.
- 5.28 **The centre supports good nutrition:** healthy centres provide access to fresh, whole foods and minimally processed foods that are nutrient-dense and support the maintenance of healthy weight. This is supported by:
- The presence of food retailers such as greengrocers, supermarkets, butchers, fishmongers, bakers, etc.
 - Allotment/community garden space and/or suitable private external space (e.g. in a centre this is likely to be limited to balconies or rooftop gardens) is made available to support residents to grow some of their own food if they want to, and;
 - Large public open spaces (e.g. town square) and/ or indoor spaces for food markets/relevant community events such as seed swaps and compost giveaways.
- 5.29 Over concentration of hot food takeaways, particularly those that serve food which is low in fibre, vitamins, and minerals, and is high in salt, sugar/sweeteners and additives, may therefore negatively impact the maintenance of healthy weight.
- 5.30 **The centre supports the community to be playful and active:** playful centres provide opportunities for people of all ages and levels of mobility to engage in play, ideally in an active and social way. This can be achieved through providing:
- Integrate gyms, swimming pools and recreational facilities.
 - Active travel infrastructure – allowing people to walk, wheel and cycle to, through and from centres and their homes, and are pedestrianised (or use shared space principles, if this is more appropriate) in high activity areas.
 - Access to play provision – play and exercise equipment for children, young people, and adults to exercise and socialise in an active context.
 - Access to green open space – from tiny parklets up to full parks and gardens.
 - Access to public spaces and the inclusion of ‘play on the way’ features – standalone play features such as water jets, stepping stones, permanent hopscotch, etc.
 - Planters – community-managed planters provide a sociable, low intensity exercise opportunity and a more attractive environment, in turn promoting more walking and cycling to/from and through the centre.
- 5.31 Further design guidance on creating attractive and functional open spaces and public spaces is available in the National Design Guide¹⁰⁹.
- 5.32 **The centre has high environmental quality:** see [Healthy Homes, Schools & Workplaces](#) chapter.

¹⁰⁹ See P1. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf.



- 5.33 Healthy centres are designed to manage and reduce the transfer of noise and odour, maintain good levels of air quality, and maintain an attractive appearance. This can be achieved through careful management of uses and planning permission conditions on build and use, the integration of tree planting and landscaping (and/or community-managed planters), and pedestrianising. Bins are expected to be provided at regular intervals to help reduce the production of litter.
- 5.34 Together with improving air quality and capturing pollution, tree planting in centres also provides shelter and shade, and improves the attractiveness of public spaces. Pedestrianising high activity areas help to significantly increase environmental quality, as it reduces pollution, the potential for conflict with vehicles, and allows more street furniture and features (such as planters, landscaping and public art) into central spaces.
- 5.35 The East Suffolk Council – Suffolk Coastal Local Plan identifies in para 4.66 several specific opportunities to increase pedestrian connectivity and legibility through development within existing centres in the district, which could include full pedestrianisation, the use of shared space principles, or improvements to active travel routes. Those identified in the Local Plan were:
- Felixstowe – between the town centre and seafront;
 - Woodbridge – between the town centre and riverside;
 - Aldeburgh – between car parks and the town centre;
 - Framlingham – highway junctions (identified in the Neighbourhood Plan);
 - Leiston – mixed use town centre opportunity site (identified in the Neighbourhood Plan);
 - Saxmundham – between the railway station and town centre;
 - Martlesham – between retail units and employment areas.
- 5.36 Regard should also be given to the recommendations included in the East Suffolk Cycling and Walking Strategy¹¹⁰ (2022 and subsequent updates).
- 5.37 **The centre’s public transport provision follows activity:** where possible, stops for public transport should be located close to high activity areas to support walkability and accessibility for those with reduced mobility. Where there is an option to appropriately extend existing public transport routes into centres (excluding any intended pedestrianised areas) to aid useability and accessibility, this will be supported.
- 5.38 **The centre makes space for the community:** Healthy centres are vibrant with activity and interactivity. Walkability, relevance of the goods and services on offer to the community, a high quality environment and the integration of community uses help to ensure centres are well frequented by the community.
- 5.39 The integration of community uses, and open space encourage and enable communities to interact with each other and build relationships, networks, and share social capital. These spaces also help to sustain voluntary, community and social enterprises by giving them spaces to operate. Healthy centres are not overly commercialised, providing a mixture of uses and spaces that are for-profit (e.g. shops, restaurants, cinema, etc.) and those that are free of charge to use by the

¹¹⁰ The East Suffolk Cycling and Walking Strategy (2022) is accessible via: <https://storymaps.arcgis.com/collections/4bd40e1d6e6c4637a7fceb840827c843>.



community or wider public (e.g. picnic areas, open space, public toilets, community centre, etc.). Healthy centres should also include public art and opportunities for the community to engage in and display art and creativity.

5.40 **The centre is stable but flexible:** Healthy centres are relatively stable, with few vacant units and an appropriate turnover of leases and changes of use that balances the benefits of being dynamic and responsive to changing markets, with the value of continuity for the community.

5.41 The relationships between businesses and organisations and the communities that support them through their patronage and volunteering activities helps centres to stay viable and vital and supports the mental and social health and wellbeing of the community.

5.42 The stability of long standing shops and services help to build longer term community and organisation connections, supports the development of place identity and this in turn may support the protection and stewardship of heritage assets and valuable spaces over time.

5.43 **The centre is safe and secure:** Healthy centres help to keep users safe through design. The following design approaches may support safer centres:

- The provision of appropriate, task-focused lighting – balancing the need for visibility with residential amenity, sky lighting and wildlife impacts;
- Designing out hiding places – ensuring ‘dark corners’ are not created;
- Permeability – ensuring that there are multiple access points into and out of key centre areas, and that ‘dead ends’ are not created;
- Sight lines – good sight lines throughout key centre areas help visitors see and assess activity within these spaces;
- Natural surveillance – central areas that are well overlooked by upper-storey residential uses and night time economy uses (e.g. restaurants and bars) helps to ensure spaces receive good around the clock natural surveillance;
- Secure cycle parking – secure cycle parking helps to reduce the likelihood of cycles being stolen;
- High quality active travel infrastructure – well designed active travel routes should reduce the likelihood of slips, trips, falls, the build up of mud or puddles and the potential for conflict with other users of the movement network, as per Policy SCLP7.1 Sustainable Transport and Policy WLP8.21 Sustainable Transport.

5.44 **The centre conserves and integrates the historic environment:** healthy centres are designed and maintained to make reference to their environmental, socio-cultural and historic context. Where relevant this will be supported by the retention of any heritage assets such as listed buildings, scheduled monuments and any non-designated heritage assets that have been identified by the Council’s Local List or the community through Neighbourhood Plan policies. More information can be found in the Historic Environment Supplementary Planning Document’s ‘Shopfront and Signage’ section.



Source: Centre for Ageing Better Image Library

Community facilities provide important spaces for communities to interact, build relationships, and engage in personal development activities.

Community facilities that meet community needs

- 5.45 Para 8.1 of the East Suffolk Council – Suffolk Coastal Local Plan (SCLP) identifies community facilities as places which promote social interaction and provide opportunities for meetings between people who might not otherwise come into contact with each other. Community facilities provide valuable services and spaces for regular social meetings, regular group exercise classes, as well as spaces for education and skills building.
- 5.46 The term ‘community facilities’ is deliberately ambiguous, as the local buildings and spaces that are available and valued by communities for facilitating social and exercise activities will vary from one community to another. New built community facilities that may be supported can include one or a mix of the following uses:

- Community shops/cafés;
- Post Offices;
- Pubs;
- Community centres/village halls and other hireable spaces for social, education and/or physical exercise activities;
- Co-working, hot-desking or other office spaces for meetings;
- Outdoor sport and recreational facilities (natural playing fields, artificially surfaced playing pitches, and recreational facilities such as bowls lawns);
- Indoor sports/leisure facilities (e.g. leisure centres);
- Healthcare facilities;
- Police facilities, and;
- Cultural buildings (e.g. performing arts centres, libraries, etc.) and spaces for voluntary organisations for the local community (e.g. a ‘library of things’).

- 5.47 Policy SCLP8.1 Community Facilities and Assets and Policy WLP8.22 Built Community Services and Facilities state that proposals for new community facilities and assets will be supported if the proposal meets the needs of the local community, is of a proportionate scale, well related to the settlement which it serves and would not adversely affect existing facilities that are easily accessible and available to the local community. The ability to successfully meet the needs of the local community and provide an offer that is valuable and relevant rests on understanding what those needs and preferences are. Where the type of community facilities required has not been specified in a site allocation policy in the relevant Local Plan, it is recommended that community facilities are designed and delivered based on a combination of desktop research on the existing community facilities offer within walking distance of homes (what already exists/new facilities have the potential to cause harm to, and what does not currently exist that may be of benefit) and direct community consultation.



The Old Hospital in Southwold, which includes a library, pre-school and community café.



- 5.48 Ideally, community facilities would be designed through co-design events, which may also help to engage a wider audience than the more typical approach of distributing questionnaires. In some circumstances the Council may request evidence of community engagement and support for the design of the proposed community facilities.
- 5.49 Where sport facilities are provided through schools, it is encouraged for these facilities to benefit from a Community Use Agreement (or equivalent agreement) to provide access to the wider community outside of school hours.
- 5.50 The East Suffolk Council Indoor and Built Facilities Assessment (2021) found that the district’s needs in terms of core swimming pool, sports hall and health/fitness provision will generally be adequately catered for over the period of the Local Plans (2018-2036) and therefore additional facilities are unlikely to need to be provided during this period. The exception to this is for new indoor tennis provision, which was identified as being particularly needed in Lowestoft and Felixstowe.

Key policies and guidance for community facilities

National policy and guidance

- 5.51 The National Planning Policy Framework states under paragraphs 92 and 93 that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other (e.g. through mixed-use developments and strong neighbourhood centres);
 - enable and support healthy lifestyles, especially where this would address identified local health and well-being needs (e.g. through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling);
 - provide shared spaces and community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship), and;
 - ensure that established shops, facilities and services are enabled to develop and modernise, and are retained for the benefit of the community, and are safeguarded against unnecessary loss, particularly where this would reduce the community’s ability to meet its day to day needs (e.g. food, healthcare, employment).

5.52 Paragraph 93 also states that to provide the social, recreational, and cultural facilities and services the community needs, planning policies and decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. Community Hubs, including Wellbeing Hubs, offer an opportunity to integrate different key community facilities and open space into a holistic community use space.

5.53 As covered above, the recent creation of the Class E Use Class presents an opportunity for Hubs to be created and managed more easily.

Suffolk policy and guidance

5.54 Strategic objectives outlined in the NHS Suffolk and North East Essex Integrated Care System’s (SNEE ICS) Green Plan (2022) under the ‘estates and facilities’, ‘green spaces and biodiversity’ and ‘food and nutrition’ themes include:

- to transition to 100% renewable energy use,
- reduce overall energy use,
- provide more and better green space,
- incorporate biophilic design into buildings and
- identify NHS land that can be used for food production.

5.55 The NHS SNEE ICS Green Plan details that some of the key actions to achieve this are sharing spaces through estates collaboration, building active travel infrastructure (including food growing opportunities), installing on-site renewable energy generation technology, and incorporating biophilic design into estates design to improve patient recovery and wellbeing and enable green social prescribing activities.

5.56 The NHS Norfolk and Waveney Integrated Care System Green Plan (2022) identifies similar strategic objectives, including the need to:

- reduce back-office estate, underused space and rationalise surplus estates and facilities,
- increase energy efficiency, and
- increase on-site renewable energy generation to reduce their carbon footprint and move away from the use of fossil fuels.

5.57 The NHS Norfolk and Waveney Integrated Care System Estate Strategy (2022-2027) includes a commitment to rationalise surplus estates and facilities and improve space efficiency and service integration through a ‘One Public Estates’ approach to the co-location of NHS services with appropriate local services and spaces.



Castle Community Rooms, Framlingham – winner of the Design award of the East Suffolk Quality of Place Awards 2023.

Source: James Gorst Architects

East Suffolk Local Plan policy and guidance

5.58 The key Local Plan policies relating to community facilities comprise of:

- Policy SCLP3.5: Infrastructure Provision
- Policy SCLP8.1: Community Facilities and Assets
- Policy WLP1.3 - Infrastructure
- Policy WLP8.22: Built Community Services and Facilities

Community Facilities: new outdoor sports and recreational facilities

5.59 The term ‘outdoor sports and recreational facilities’ includes natural grass playing fields and pitches, artificially surfaced playing pitches, Multi-Use Games Areas (MUGAs), and outdoor recreational facilities such as bowls lawns.

5.60 The East Suffolk Council – Waveney Local Plan (adopted 2019) recognises outdoor sports and recreational facilities as ‘community facilities and services’, and therefore new provision is managed under Policy WLP8.22 Built Community Services and Facilities. The East Suffolk Council – Suffolk Coastal Local Plan (adopted 2020) recognises outdoor sports and recreational facilities as ‘open space’ and therefore new provision is managed under Policy SCLP8.2 Open Space.

5.61 The East Suffolk Council – Waveney Local Plan identifies which development site allocations require new outdoor sports and recreational facilities to support planned growth in those locations over the plan period to 2036. It is possible that additional new outdoor sports and recreational facilities to those indicated in the site allocation policies will be required over this period to support any additional growth.

5.62 The East Suffolk Council – Suffolk Coastal Local Plan requires open space to be delivered on allocated sites where specified as a requirement in the policy criteria so as to support planned growth in the former district area over the plan period to 2036. The East Suffolk Council – Suffolk Coastal Local Plan is not prescriptive of what type or quantity of open space is required for each site; appropriate provision will be considered on a site by site basis.

5.63 The evidence bases for the Local Plans on need for outdoor sports and recreational facilities was updated by the findings of the assessment work undertaken for the East Suffolk Council Playing Pitch and Outdoor Sports Strategy (2021, to support the Leisure Strategy). The Playing Pitch and Outdoor Sports Strategy covered the district’s need for improvements to existing, and need for new outdoor sports and recreational facilities, but excluded Multi-Use Games Areas ¹¹¹. The majority of the



Tennis courts, Woodbridge

¹¹¹ Multi-Use Games Areas (MUGAs) were not covered in the Strategy as they are considered to be play provision so were instead assessed through the subsequent East Suffolk Council Play Area Strategy 2022-27 (2023) work. Further guidance on MUGAs is available in the [Green Infrastructure](#) chapter.



recommendations of the East Suffolk Council Playing Pitch and Outdoor Sports Strategy (2021) recommend improvements to existing provision to increase quality, capacity, ancillary facilities (e.g. changing rooms) or to increase multi-functionality, rather than for new additional provision.

- 5.64 The recommendation to focus on improvements to existing outdoor sports and recreational facilities provision rather than the delivery of new provision (in addition to what has been planned for the East Suffolk Council – Waveney Local Plan) was taken forward into the Leisure Strategy (2021). However, there remains the possibility that new provision may be required to support some residential developments located in the former Suffolk Coastal area, and on windfall sites throughout the East Suffolk district.
- 5.65 New housing development will contribute towards improvements via Community Infrastructure Levy (CIL) payments, and where direct on-site delivery is required, new provision will be secured through a Section 106 Agreement.
- 5.66 In terms of the design of new outdoor sports and recreational facilities, Sport England provides design guidance via a suite of design documents on the sizes, layouts, suitable surfaces and suitability by sport, all available for download from their website¹¹². ‘Artificially surfaced outdoor playing pitches’ are most suitable for sports such as tennis, netball, basketball, and hockey, though are also suitable for all sports played on playing fields. Artificial grass pitches are created using long pile artificial grass (best for rugby and football but unsuitable for hockey) or short pile artificial grass, and are based with rubber crumb, sand or water (through pitch irrigation; best for hockey). The irrigation required for artificial pitches is a worthwhile consideration, given that East Anglia is an area of serious water stress.
- 5.67 All outdoor sports and recreational facilities should be well linked to active travel routes, though consideration will also need to be given to ensuring adequate car parking; this is especially the case when recreational facilities are likely to provide a facility for local sports clubs where those attending may come from further distances and ‘away clubs’ will use the site. Ideally, this should not be a dedicated car park but instead opportunities for wider shared car parking should be considered, such as within a local centre or shared with a new school (allowing evening and weekend use). Failure to consider car parking of visitors unable to walk and cycle to facilities may cause parking issues on the surrounding streets.

Community facilities: Community Hubs

- 5.68 Community facilities can be delivered individually or as part of a holistic multi-use ‘Community Hub’. Every Hub is unique in terms of its size and offer, though are usually created as a single building, or a group of multiple closely related buildings, that accommodates a range of synergistic public services and community facilities. Hubs will be expected to be closely related to residential areas and well connected to centres via sustainable transport modes.
- 5.69 If healthcare-led, Community Hubs can take the form and function of a ‘Wellbeing Hub’, a sub-category of Community Hubs.

¹¹² <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces>.



Wellbeing Hubs:

5.70 Wellbeing hubs are healthcare-led Community Hubs, providing a particular focus on creating and supporting the mental, physical and social health and wellbeing of the community it serves. In order to be able to be identified as a ‘Wellbeing Hub’, the Hub must include the following uses:

- at least one patient-facing healthcare service (e.g. GP surgery, dentist, pharmacy, counselling, optometrist, Family Hub/children’s centre, physiotherapy clinic – not only administrative office space);
- at least one hireable space for social and group exercise activities (e.g. club meetings, weekly exercise classes, local wildlife lectures, etc.), and;
- a form of food service (e.g. a community café or restaurant).

5.71 The diagram on the right depicts a larger example of how uses can be mixed to create a Wellbeing Hub. This example includes all of the essential, plus some of the ‘desirable’ and ‘gold standard’ elements that are outlined in the [Wellbeing Hubs Design Quality Matrix](#) later in this chapter.

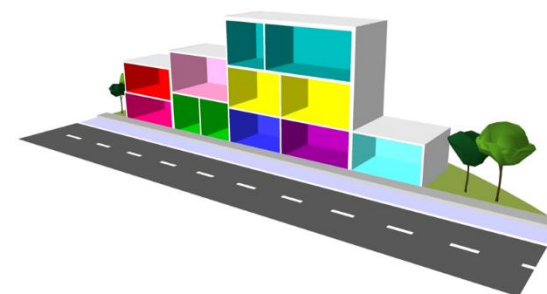
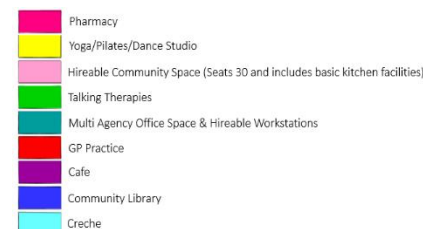


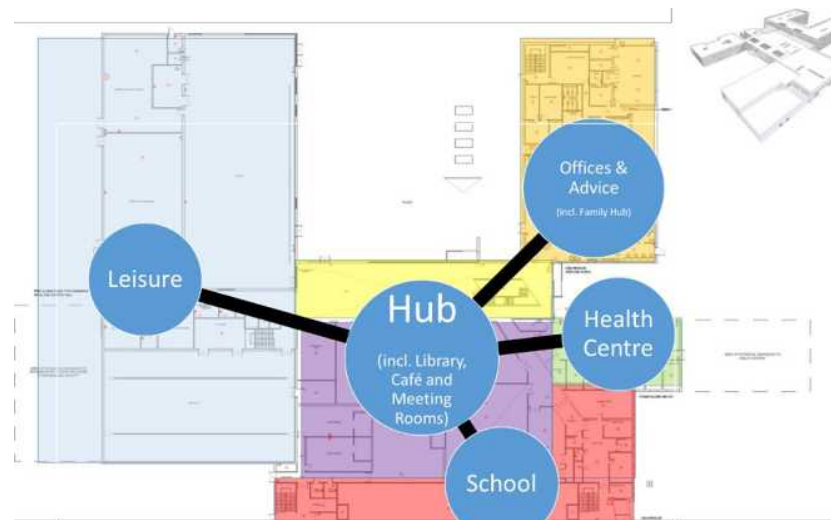
Figure 7: Example of a Wellbeing Hub spaces. This diagram indicates how a large and more complex Wellbeing Hub’s spaces might be used, incorporating all of the essential criteria and some desirable criteria, as outlined in the Wellbeing Hubs Design Quality Matrix.

The Mildenhall Hub case study

5.72 Wellbeing Hubs can be small, including just these essential uses, or can be large, incorporating a number of other uses. An example of a large Wellbeing Hub is the Mildenhall Hub in West Suffolk, which opened in 2021. The Mildenhall Hub currently includes:

- a healthcare centre,
- a café,
- a Family Hub (an expanded children’s centre, providing multi-disciplinary specialist advice and support for families with children 0-19 years, or up to 25 years for those with special educational needs and disabilities),
- a leisure centre, including gym, swimming pool, outdoor sports facilities (sports pitches)
- meeting rooms (for community use)
- a secondary school (Mildenhall College Academy) including a sports hall,
- a central library,
- Job Centre Plus,
- Multi-agency offices, including organisations such as: the Citizens Advice Bureau, the NHS, Suffolk Constabulary and the Department for Work and Pensions.

- 5.73 The Mildenhall Hub is around 10 minutes' walk from the centre of Mildenhall and surrounding residential areas. The aims of this project were to provide public and voluntary services in one location to cut costs (e.g. land and energy), transform delivery and provide flexibility. The Mildenhall Hub is powered using renewable energy via solar panels, a ground source heat pump (GSHP) which is used to heat the pools, and a combined heat and power (CHP) unit which combines a boiler and electricity generator into one. The Hub also uses heat recovery technology to heat the building's water and environment.
- 5.74 The post implementation scrutiny review identified that the Hub had met all high-level targets, that the quality of new facilities was higher than previously provided and that educational attainment is higher. Floorspace has been reduced and it is believed that running costs will be reduced. There is room for expansion and existing public sector sites have been released for development.



Left: The Mildenhall Hub, West Suffolk.

Right: Floorplan extract of most of the Mildenhall Hub's ground floor, which shows the concept of different community uses co-located within the Hub. Sources: RG Carter, Schoolhouse Digital, Hexcam and West Suffolk Council.

The benefits of Hubs

- 5.75 By co-locating, some of the key potential benefits are:



- **High benefit to cost ratio for active travel infrastructure:** larger, multi-stakeholder projects are more likely to deliver high quality, joined-up active travel infrastructure between key origins and the Hub than more piecemeal development;
- **The site and buildings are accessible and inclusive for all:** a new for-purpose building can ensure high levels of inclusivity and accessibility throughout the building and site, ensuring all of the community can enjoy the benefits of the Hub;
- **Enhanced convenience for visitors:** having different uses close by reduces the time and energy required to travel between them when compared to how services may be spread out across a typical town centre. Some examples of potential space synergies could include a pharmacy located next to a GP surgery (for prescriptions), a creche located next to leisure facilities (for adults to use the facilities), or the children’s library has an integrated café (to allow adults to socialise and supervise children at the same time whilst in an environment that is engaging for them);
- **Reduce psycho-social barriers to engaging in services:** by providing services that may have social stigma attached to their use within a mix of uses that are readily accessible within the Hub, it reduced the fear of being seen accessing these services. The enhanced and repeated visibility of services that do not require the crossing of a threshold may also make them feel more approachable, and prompt people that may otherwise have been hesitant to seek out and engage with these services to do so.
- **Bespoke to the needs of the community:** through a combination of evidence on need (e.g. the shortfall in clinical floorspace in the area) and consultation and (if possible) co-design workshops with the community, Hubs can be unique and bespoke to the needs and wants of the community it serves. Capital receipts from the non-healthcare uses may be able to support higher quality amenities and community facilities on site, meaning communities can be more creative and ambitious in their responses when engaging in consultation and co-design events.
- **Working together for the patient/visitor:** co-location helps to promote different services with different areas of expertise to share knowledge, creating efficiencies, patient-focused care and reducing siloed working;
- **‘Nudge’:** the co-location of easily accessible services increases the likelihood of visitors noticing, gaining awareness, and engaging in public services, activities and/or accessing useful information for their health and wellbeing than they may not otherwise have been enabled to. An example of this is seen in the Mildenhall Hub at Mildenhall in West Suffolk, where the combination of co-locating the library and café, and the layout requiring people to walk through the library to access the leisure facilities significantly increased engagement with library services compared with the pre-Hub baseline;
- **Efficient use of land:** The NPPF supports development that makes efficient use of land. Wellbeing Hubs may significantly reduce land take required for the equivalent development on separate sites. Including at least one well-designed and adequately sized flexible community use space ensures that it can be used for a multitude of different community activities;
- **Sustainable construction:** the financial savings from being efficient with land and building at scale may enable the delivery of higher performing buildings in terms of energy and water efficiency, rainwater harvesting, green roof or walls, renewable energy generation (e.g. PV panels on the roof), minimised noise



transfer between spaces, increased tree planting and landscaping, and for delivering open space (such as outdoor sports facilities, play provision, patient and staff gardens or kitchen gardens for food service on site).

In some circumstances it may also be possible to retain/regenerate or extend an existing building for the Hub rather than build entirely new, particularly where the scale of the Hub has ‘unlocked’ a large site that primary healthcare services would not have been able to access without co-locating with other services. By retaining/regenerating/extending an existing building, significant carbon emission savings are made versus an entirely new build, though there may be cost or practical barriers to retrofitting an existing building to perform at high levels of resource efficiency;

- **Capital receipts:** capital generated from the lease of spaces within the Hub may be able to help fund further improvements/extensions to the Hub;
- **Culture of prevention:** A health and wellbeing focused environment helps to promote a local culture of being more active in creating and maintaining health and wellbeing, and therefore helping to prevent the development of ill health, reducing the quality of life and healthcare costs of developing and treating ill-health.

Wellbeing Hubs Design Quality Matrix

- 5.76 Each Wellbeing Hub will be unique and will be expected to be tailored to the needs of the existing and planned communities local to the site. The design guidance in this section is therefore highly flexible, with the list of essential criteria kept concise. However, there is a short list of elements (uses and design qualities) that are essential and therefore should be included and common to all Wellbeing Hubs in East Suffolk.
- 5.77 The below table provides the list of essential elements that must be included, as well as ‘desirable’ and ‘Gold standard’ elements, which are encouraged and will be supported where appropriate for the site and communities the Wellbeing Hub will serve. It should be noted that the ‘desirable’ and ‘Gold standard’ lists are non-exhaustive, and therefore alternative elements will also be considered where they are considered to be appropriate and relevant for a Wellbeing Hub to include.

Table 30: Wellbeing Hub Design Quality Matrix

Essential uses (Use Classes E and F)	Desirable uses (Use Classes E and F)	‘Gold standard’ uses (Use Classes E and F and Sui Generis)
<ul style="list-style-type: none"> • At least one patient-facing healthcare service • At least one flexible community space for hire that could seat 30+ people and has access to at least basic supporting facilities • At least one café or restaurant 	<ul style="list-style-type: none"> • Multiple healthcare services • Multiple community spaces for hire in a range of sizes for different activities with access to at least basic supporting facilities (bathrooms and basic kitchen) 	<ul style="list-style-type: none"> • Multiple community spaces for hire in a range of sizes and a range of different facilities that are bespoke for different intended uses (e.g. a multi-station kitchen for community cooking classes, an art studio space for art classes, etc.) • Multi-agency/Public services offices – e.g. Police, Fire & Rescue, Council offices, etc.



Essential uses (Use Classes E and F)	Desirable uses (Use Classes E and F)	'Gold standard' uses (Use Classes E and F and Sui Generis)
	<ul style="list-style-type: none"> • Fitness leisure spaces – gym, indoor or outdoor sport/recreation facilities¹¹³, swimming pool, health studio spaces (e.g. yoga, dance, circuit training) • Inclusion of a Family Hub area, with services targeted at meeting the needs of families with dependent babies, children and young people • Library (full or specialised, e.g. children's library) • Community art gallery space • Retail (limited) 	<ul style="list-style-type: none"> • Inclusion of the Citizens Advice Bureau or equivalent services for advice on matters such as housing, managing debt, legal aid, etc. • Inclusion of Job Centre Plus or equivalent services • Creche, early years setting and/or school • A large flexible space for community events (e.g. markets, fayres, performances, pop up cinema, etc.) • Multiple cafes/restaurants (if appropriate to scale)
Essential design qualities	Desirable design qualities	'Gold standard' design qualities
<ul style="list-style-type: none"> • The Hub is well connected to active travel routes to and from nearest residential areas and centre(s) • The Hub is accessible to those using wheelchairs, mobility aids and pushchairs throughout the site and building(s) • Public facilities – access to public toilets, seating, bins, push chair park(s), cycle and push scooter parking • Effective ventilation and indoor air quality • The Hub site and building(s) should not be excessively large, as this undermines the feeling of 'community ownership' and may otherwise make the Hub feel more like a hospital 	<ul style="list-style-type: none"> • The Hub design was informed by consultation with the community • Community facilities includes Changing Places toilet, water fountains, and lockers (in addition to the leisure fitness spaces' facilities) • Incorporation of renewable energy generation technology (e.g. PV panels, ground source heat pump, heat recovery systems, etc.) • Rainwater harvesting and greywater recycling systems • High levels of natural light • Includes a visitor and staff garden area • Biosecurity¹¹⁴: the building is fully compatible with adaptation for social distancing measures 	<ul style="list-style-type: none"> • The Wellbeing Hub was co-designed with the community using interactive workshops and multiple points of consultation throughout the project's delivery • The Wellbeing Hub is well connected to active travel routes to and from nearest residential areas and centre(s) – active travel routes provide continuous segregated cycling and walking between origin and key destinations • Design is focused on reducing user's anxiety – reducing sources of discomfort (e.g. noise, poor ventilation, lack of

¹¹³ Where provided, the dimensions of recreation facilities for formal sport with set dimensions (e.g. tennis courts) should adhere to the Fields in Trust Guidance for Outdoor Sport and Play Beyond the Six Acre Standard (England) guide's standards (2015, and subsequent updates). Available at: <https://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England.pdf>.

¹¹⁴ Biosecurity is of enhanced relevance to Wellbeing Hubs, though should be a consideration in the building of all non-domestic buildings. Factors to consider include: effective ventilation (natural or mechanical), spacing in rooms and corridors, materials used and how easily they can be cleaned (e.g. designing integrated blinds reduces the need for curtains, and provides a glass surface rather than a fabric surface), making stairs



Essential uses (Use Classes E and F)	Desirable uses (Use Classes E and F)	'Gold standard' uses (Use Classes E and F and Sui Generis)
<p>(particularly where healthcare element is dominant) or shopping mall (particularly where the community element is subordinate to supporting uses, such as shops, cafes and restaurants)</p> <ul style="list-style-type: none"> The mix of uses, internal division of space to different uses, and the overall scale of the Hub should be balanced with the services and spaces the community needs and the necessity to ensure the Hub is viable and receives sufficient footfall 	<ul style="list-style-type: none"> Biophilic design: integration of plants (e.g. green walls), green/brown/blue roof, natural building materials, and use of patterns and form found in nature (If applicable) on-site SuDS components are attractive and safely accessible to visitors, e.g. use of rain gardens along active travel routes 	<p>greenery, 'clinical' feel) and increasing comfort – and is responsive to the needs of people that are neurodivergent (e.g. managing overstimulation from light, noise and space), have mental health challenges (e.g. using dementia-friendly design principles) or sensory disabilities (e.g. easily navigable, use of induction loops throughout, etc.)</p>

Healthy Environments: Design prompts

- Has the centre been planned to include an appropriate mix of town centre uses?
- Has the centre been designed to be compact, connected and complete, as per the policy context and definitions given?
- Has the centre been designed using dementia-friendly design principles?
- Has the potential for high activity areas in the centre to be fully pedestrianised been considered?
- Have appropriate measures to increase the safety and security of people using the centre been used?
- Has an adequate and relevant range of community facilities been proposed to support the development?
- Where a Community Hub/Wellbeing Hub is proposed, does the design accord with the general design criteria included in this chapter?

as accessible as possible so that as few people as possible must take lifts (enclosed shared spaces), providing multiple access points, and designing so that one way systems through the building are easily implementable if needed.

6 Lifetime Neighbourhoods



Lifetime Neighbourhoods: Key Messages

- **Lifetime neighbourhoods** are major residential developments, or major mixed-use (including residential) developments that provide a healthy, holistic, high quality built environment for its community. Lifetime neighbourhoods ensure that each of the essential elements of built environments (green infrastructure, active travel infrastructure and healthy streets, healthy buildings, centres and community facilities) are each high quality, meet needs by being accessible and inclusive of all ages and abilities and have good functional relationships with the other essential elements. This enhanced focus on supporting health, wellbeing and healthy lifestyles is intended to support positive health outcomes, and ideally 'health net gain'.
- **Designing for life stage** means designing for the different needs that people have at different ages, including children, young people, adults and older adults.
- **Designing for all levels of ability** means designing with different forms of reduced ability – whether due to physical mobility/ability/health, functionality, or mental ability/health in origin.
- **Dementia-friendly design at neighbourhood scale** means ensuring streets, active travel routes, open spaces, landscaping, homes, workplaces, schools, community facilities and centres are designed to be familiar, distinctive, safe, comfortable, accessible and legible. This is as both individual elements and functioning together as a holistic neighbourhood.
- **Designing for groups with additional needs** means considering how some specific groups, such as people on lower incomes, may be disproportionately affected or more strongly benefit from design choices, and therefore may be excluded or included by them. Key examples include use of tenure-blind design principles and enhanced play provision (as free to use recreational facilities).

6 Lifetime Neighbourhoods

Introduction

- 6.1 Lifetime neighbourhoods are major residential developments, or major mixed-use (including residential) developments that provide a healthy, holistic, high quality built environment for its community.
- 6.2 Lifetime neighbourhoods ensure that each of the essential elements of built environments (green infrastructure, active travel infrastructure and healthy streets, healthy buildings, centres and community facilities) are each high quality, meet needs by being accessible inclusive of all ages, abilities and additional needs, and have good functional relationships with the other essential elements. Overall, this supports direct, safe and convenient movement between them and the overall legibility and functionality of the development.
- 6.3 Lifetime neighbourhoods therefore provide high environmental quality (see [Healthy Homes, Schools & Workplaces](#) chapter), a range of spaces for recreation and socialising within the community, and overall high levels of accessibility, inclusivity, safety, and convenience. These placemaking tools help to ensure that the neighbourhood is functional, convivial, and able to be enjoyed and benefited from by all.
- 6.4 The design focus of creating lifetime neighbourhoods should be on supporting positive health outcomes, and ideally 'health-net gain'. The highest quality lifetime neighbourhoods are informed by identified health and wellbeing challenges in the district and/or within the local area and have used planning and design approaches to help address them. 'Lifetime neighbourhoods' should therefore be seen as a status of design quality for major residential/mixed use developments to aspire to achieve.
- 6.5 This chapter provides guidance to help bring together each of the essential elements (green infrastructure, active travel infrastructure and streets, healthy buildings, centres, and community facilities) into functional, highly inclusive developments that deliver positive and holistic outcomes for health and wellbeing at neighbourhood scale. The chapters of this SPD are ordered according to the recommended order of initial planning and design. Each of the essential chapters are recommended to be read in full before reading this chapter.



Lifetime neighbourhoods enable people of all ages and abilities to live healthy lifestyles.



The essential elements for lifetime neighbourhoods

6.6 The essential elements for lifetime neighbourhoods, and the order that they are generally recommended to be designed and ‘layered into’ development layouts, are (from first to last):

- [Green Infrastructure \(Chapter 2\)](#) – including green open space, play provision, trees, landscaping, sustainable drainage systems (SuDS), green routes, and Suitable Alternative Natural Greenspace (SANG, where required) to support recreation through relaxation, socialising, physical activity, and spaces to grow food.
- [Active Travel \(Chapter 3\)](#) – active travel routes that provide safe and convenient connectivity between key origins and destinations for pedestrians and cyclists (and equestrians, if relevant) and create an attractive public realm. Where appropriate to the scale and location of the development, increasing access to other sustainable transport modes should also be considered, such as public transport and spaces for car share clubs.
- [Healthy Homes, Schools and Workspaces \(Chapter 4\)](#) – key buildings that support the health, wellbeing and overall standard of living for residents and users regardless of age and level of ability.
- [Healthy Centres and Community Facilities \(Chapter 5\)](#) – centres that are compact, complete and connected and therefore accessible, relevant, social, legible and support healthy behaviours and lifestyles; community facilities that support people to access enjoyable leisure experiences, opportunities to exercise and socialise.

6.7 To further assist with the planning and refinement of layouts and relationships between buildings and spaces, it is recommended that the Jan Gehl principle is used. With Jan Gehl’s fundamental principle of ‘first life, then spaces, then buildings’ used to direct this. Once a working layout has been created for a development site, the layout and design details should be refined to further increase accessibility, inclusivity, safety and convenience for the resident community.

6.8 The below table, [Table 31](#), provides further guidance on use of the principle:

Table 31: Guidance on implementation of the Jan Gehl principle of ‘first life, then spaces, then buildings’ in the design of lifetime neighbourhoods

Jan Gehl principles		
First life...	...then spaces...	...then buildings
<ul style="list-style-type: none"> • Consider the needs of people – their physical and mental needs, their movement, and variations in abilities and health status within the population. Designing for the most 	<ul style="list-style-type: none"> • ‘Spaces’ includes streets, active travel routes, green open spaces, play provision, public spaces (e.g. town squares), and other outdoor spaces for street events, performance and spaces for markets. Centres should be designed to ensure there are 	<ul style="list-style-type: none"> • Consider how homes, schools, workplaces and other key buildings can increase accessibility, inclusivity, safety and convenience for users. Seemingly small tweaks to the design of buildings may be the difference between some groups



Jan Gehl principles		
vulnerable user means designing for everyone.	<p>spaces that are accessible and free to use for all, integrate community uses, and where possible, provide areas that are enabled to be higher quality environments by being vehicle-free or reduced vehicle access.</p> <ul style="list-style-type: none"> • Consider how design detail can help to foster social interaction, play, enjoyment, relaxation, the expression of creativity, and education. • Consider how spaces can meet a multitude of needs through being designed to be flexible, multi-functional, or multi-use. • Consider how the design of built environments can create physical and/or mental stress and inaccessibility, can exclude or disadvantage some groups, may reduce residential amenity, safety and/or convenience. Seemingly small tweaks to the design of spaces may be the difference between some groups being enabled to use them comfortably, independently, or possibly at all. 	<p>being enabled to live, study, work or visit them comfortably, independently, or possibly at all.</p> <ul style="list-style-type: none"> • Homes should be designed to be flexible for different activities (including working from home), enjoy high environmental quality, able to facilitate socialising, and provide sufficient space for the preparation of meals. • The design of more communal models of housing (student halls, retirement homes, extra care, co-housing, etc.) should take extra care to ensure shared facilities and social spaces are attractive, functional and are accessible and inclusive for all residents and visitors.

Policy context: Lifetime neighbourhoods

6.9 The term ‘lifetime neighbourhoods’ is not used in the East Suffolk Local Plans, but is used in this document to refer to major residential and mixed-use developments that:

- perform positively when considered against this SPD’s design guidance for each of the essential element chapters (inclusive of the ‘design prompts’ listed at the end of each chapter and collated in [Appendix 2: Healthy Environments: Design prompts](#);
- are holistically functional, accessible and inclusive, and;



- perform positively when assessed against the ‘green’ criteria included in the Building for a Healthy Life (2020) guide¹¹⁵.

6.10 The below table provides a list of the key Local Plan policies for creating lifetime neighbourhoods, which has been organised by the chapters of the SPD and the 10 key design principles for lifetime neighbourhoods (see [Lifetime neighbourhoods design principles by essential element matrix](#) section). All policies should be read in full, including their supporting text, and should be considered in the context of the relevant Local Plan when read as a whole.

Table 32: A quick reference guide to the key Local Plan policies related to lifetime neighbourhoods

SPD chapter	(2) Green infrastructure		(3) Active travel	(4) Healthy Homes, Schools & Workplaces				(5) Healthy Homes & Community Facilities		(6) Lifetime neighbourhoods
Key design principles	High quality green infrastructure	Nature-led SuDS	Sustainable transport infrastructure	Tenure blind design	Resource efficient buildings	Accessible buildings	High environmental quality	Healthy centres	Community facilities	High overall design quality
Key Local Plan policies	SCLP8.2 Open Space	SCLP9.2 & WLP8.28 Sustainable Construction	SCLP7.1 & WLP8.21 Sustainable Transport	SCLP11.1 Design Quality (via BfHL, 2020)	SCLP9.2 & WLP8.28 Sustainable Construction	WLP8.31 Lifetime Design	SCLP5.7 Infill & Garden Development	SCLP4.8 New Retail & Commercial Leisure Development	SCLP8.1 Community Facilities & Assets	SCLP11.1 Design Quality WLP8.29 Design
	WLP8.30 Design of Open Spaces									
	SCLP10.1 & WLP8.34 Biodiversity & Geodiversity					SCLP11.1 Design Quality	SCLP11.2 Residential Amenity	SCLP4.10 Town Centre Environments	WLP8.18 New Town Centre Use Development WLP8.19 Vitality & Viability of Town Centres	



Lifetime neighbourhoods design principles by essential element matrix

6.11 Each of the essential element chapters feed into the production of the 10 Lifetime Neighbourhoods Design Principles, which are to include the following:

1. High quality green infrastructure
2. Nature-led sustainable drainage systems (SuDS)
3. Sustainable transport infrastructure (including accessible, well planned active travel infrastructure and routes)
4. Tenure blind design across all essential elements
5. Accessible buildings
6. Resource efficient buildings
7. High environmental quality – inclusive of environmental protection and residential amenity matters
8. Community facilities that meet community needs
9. Healthy centres
10. High overall design quality – high inclusivity and good functional relationships between all essential elements at neighbourhood scale.

6.12 The below table, **Table 33**, provides an overview of how each of the 10 Lifetime Neighbourhoods Design Principles can be applied to each of the essential elements.

Table 33: Implementation of the 10 lifetime neighbourhoods design principles by essential element matrix



SPD chapter/ Essential element	1. High quality green infrastructure	2. Nature-led SuDS	3. Sustainable transport infrastructure	4. Tenure blind design	5. Accessible buildings	6. Resource efficient buildings	7. Environmen tal quality	8. Community facilities	9. Healthy centres	10. High overall design quality
2. Green infrastructure	Green infrastructure provision design ensures an appropriate location, layout, functionality, accessibility, inclusivity, and attractive appearance.	Development incorporates an accessible nature-led SuDS scheme which adds amenity value for the community.	Active travel routes to, from and through open spaces are provided, as appropriate.	Open space provision should be equally accessible for all home tenures on site, with no one tenure type given better access.	Open spaces are designed to be accessible and combine with built elements to provide a holistic inclusive, dementia-friendly environment.	Green roofs and walls can be used to provide insulation and therefore a cooler, more constant internal temperature in buildings that use less energy.	Green infrastructure may improve air quality, reduce noise, provide visual screening and generally provide a more attractive environment.	Community facilities may be situated within open spaces (e.g. tennis courts within a park), which can have the mutual benefit of encouraging higher use.	Green infrastructure integration into centres may help to improve environmental quality, provide social spaces, and provide lower stimulation spaces for relaxation.	Green infrastructure is designed according to need and context, retains and enhances the existing landscaping and natural features on site.
3. Active travel	Active travel routes to, from and through open spaces are provided, as appropriate. Active travel routes are delivered to 'green routes' standards.	SuDS features along active travel routes and streets can include 'rain garden' or other linear nature-led features.	All available opportunities to enable and support travel by sustainable transport modes have been taken. The potential for conflict between users of the transport network has	Active travel routes should serve all tenures on site equally. Secure cycle parking should be provided for all tenures.	Accessible active travel infrastructure design combines with built elements to provide a holistic inclusive, dementia-friendly environment.	The roof area over some secure cycle parking structures may be suitable for the mounting of solar panels or green roofs. External lighting	Active travel infrastructure and access to low or zero direct emissions forms of transport may help to improve air quality and reduce noise.	Community facilities should be accessible via active modes of transport, and be supported by secure cycle and push scooter parking.	Active travel routes should be provided to, from and through centres. Centres should be supported with secure cycle parking. New District and Local Centres should be located	Active travel routes are designed to be safe, direct, comfortable, convenient, intuitive, and accessible. Active travel is consequently enabled to be an easy, if not the easiest, mode of



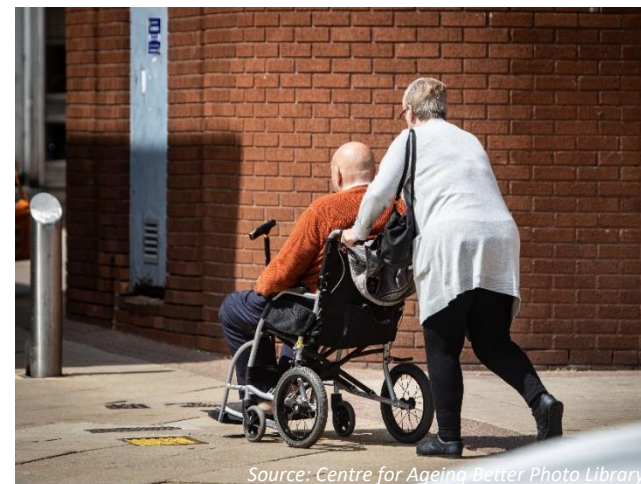
SPD chapter/ Essential element	1. High quality green infrastructure	2. Nature-led SuDS	3. Sustainable transport infrastructure	4. Tenure blind design	5. Accessible buildings	6. Resource efficient buildings	7. Environmen tal quality	8. Community facilities	9. Healthy centres	10. High overall design quality
			been minimised.			fittings along active travel routes may be able to be solar powered.			within walking distance of homes.	transport for short journeys.
4. Homes, schools and workplaces	Homes are provided with adequate access to external private/semi- private space, appropriate open space, and supporting landscaping.	The development incorporates a nature-led SuDS scheme, adding amenity value for the community. Adding SuDS features throughout the landscaping/a ctive travel routes of the development increases the functionality and attractiveness of homes,	The provision of forms of off-street parking of an appropriate size and quantity supports EV charging. The provision of secure storage solutions for cycles and push scooters supports walking, wheeling and cycling between homes, schools, workplaces	Affordable housing should be unable to be distinguished from market housing, and should meet all requirements of the design policies.	Inclusive design, including minimum of 50% (SCLP) /40% (WLP) should be M4(2). M4(3) should be provided where need is evident.	Minimum resource efficiency requirement s apply to proposals above the specified scale thresholds.	The development has benefitted from a clear design focus on providing high levels of residential amenity and ensuring environmenta l protection matters are addressed and where necessary potential impacts appropriately mitigated.	Community facilities that meet the needs of new and existing communities are provided, having been informed by community consultation.	Key origins are well connected to centres via sustainable transport infrastructure.	Homes, schools and workplaces enjoy high environmental quality, good sustainable transport mode connectivity, appropriate provision of green infrastructure and have good functional relationships with each of the essential elements on site.



SPD chapter/ Essential element	1. High quality green infrastructure	2. Nature-led SuDS	3. Sustainable transport infrastructure	4. Tenure blind design	5. Accessible buildings	6. Resource efficient buildings	7. Environmen tal quality	8. Community facilities	9. Healthy centres	10. High overall design quality
		schools and workplaces.	and other key destinations.							
5. Centres and community facilities	Open space and landscaping integration into centres may help to improve overall environmental quality as well as providing social spaces and lower stimulation spaces.	SuDS features may be able to be incorporated into the public realm areas of centres, adding to the overall environmental quality and useability of the centre.	Centres should be compact, complete and connected. Centres and community facilities should be accessible via sustainable modes of transport, with focus given to likely trip chains and nodes of activity.	The placement of community facilities within developments should ensure equal access for all tenures.	Centres and community facilities should be accessible for people with reduced ability, and should provide an inclusive environment for all users.	Minimum resource efficiency requirements apply to all developments that meet the specified thresholds in the Sustainable Construction policies. Proposals that include designs for community facilities that exceed minimum sustainable construction policy criteria may be supported.	Centres with high levels of environmental quality are likely to be more vital and viable.	Community facilities that meet the needs of new and existing communities are provided, informed by consultation.	Centres provide environments that support health and wellbeing through access to better diets, incidental activity, and a relevant mix of uses, supported by an inclusive environment.	Active travel routes are designed to be safe, direct, comfortable, convenient, intuitive and accessible. Active travel infrastructure joins up with other public transport modes, allowing for easy transitions between them, supporting the vitality on centres and use of community facilities.

Lifetime neighbourhoods: enabling greater inclusion and independence

- 6.13 Designing lifetime neighbourhoods means minimising as many of the potential disabling barriers in the physical environment as possible. Through appropriate refinements to neighbourhood designs, people who may otherwise have been excluded or negatively impacted by more typical approaches to building and public realm design are enabled to enjoy greater independence, a wider range of activities, and experience less stress and discomfort in day to day life.
- 6.14 The lifetime neighbourhoods approach is ultimately intended to help to provide residents and visitors with a better quality of life; lifetime neighbourhoods may also support improvements to local health outcomes due to enabling healthy behaviours and lifestyles that would otherwise have been less accessible and sustainable.
- 6.15 Lifetime neighbourhoods should therefore support people of different ages, abilities and with additional factors or needs for inclusion to feel:
- healthy and well – enabled to build and maintain health and wellbeing due to a high quality, healthy environment; potential environmental sources of harm are minimised;
 - safe, secure, free, independent and in control – enabled to safely and comfortably use the buildings and spaces in the public realm, and travel using more sustainable modes of transport such as walking, wheeling and cycling;
 - enabled to participate and socialise with their neighbours and community;
 - a sense of **place attachment** and **pride of place**, and;
 - enabled to engage in personal development activities that are relevant and accessible to them, through the provision of appropriate, accessible open spaces, community facilities, and well-designed homes, schools and workplaces.
- 6.16 To understand how the design of built environments can help to meet different groups' needs, it is useful to consider how these needs may typically change over life stages, and with any existing or changes to the status of people's health, level of ability, or any additional needs that can be met or improved through effective built environment design. Relevant matters to consider include:
- **Life stage:** the specific needs of and barriers in the built environment that are typically experienced by different age groups ('children' (up to age 10), 'young people' (up to age 17), 'adults' (18-64) and 'older adults' (65+)), such as young people not having a safe and appropriate space to socialise and exercise with friends, particularly outside of formal sports facilities;



Source: Centre for Ageing Better Photo Library.

Physical barriers in built environments such as bollards, inaccessible level changes and poor surfacing, crossings and signage can significantly impact freedom, independence, safety and comfort in the public realm.



- **Ability:** the extent to which people’s level of ability to travel through, access and use built environment elements varies from person to person;
- **Additional factors or needs for inclusion:** any other key characteristics that might make a person vulnerable to disabling barriers in how built environments are designed, or barriers that lower their capacity to engage. Example of this may include the exclusion of (but not limited to):
 - Young people from age-restricted spaces (e.g. bars), commercial spaces (e.g. cost of activities) or general public spaces (seen as a nuisance);
 - Lower income households from commercial spaces;
 - Households that work non-standard hours (limited access to community facilities);
 - Households without private vehicle access (limited ability to travel to access amenities and vital goods and services if more than an active travel journey distance away and sustainable transport options are limited), and;
 - People with an enhanced need to feel safe in the public realm.

Designing for life stage

- 6.17 Supporting the maintenance of health, wellbeing and healthy weight status starts with facilitating the development of healthy habitual behaviours and lifestyles (e.g. regular physical activity, healthy eating, etc.) early in life. Children and young people that are obese are around five times more likely to be obese in adulthood than those who are not obese¹¹⁶, meaning the maintenance of healthy weight in childhood and adolescence is a key preventative measure supporting health and ability in adulthood, and preventing the development of non-communicable diseases associated with overweight and obesity. Evidence shows that children and young people who are more active have more confidence, higher self-esteem, less anxiety and stress and better social skills¹¹⁷ – attributes that help people manage life’s challenges for mental and social health at all ages. Further information on the key health challenges for East Suffolk’s population can be found in the [Introduction](#) chapter.
- 6.18 The below table, [Table 34](#), provides an overview of some of the key ways that the design of built environments can support people over the key life stages, from start of life to end of life needs. The guidance is organised by the six domains of the NHS Suffolk and North East Essex Integrated Care Board (SNEE ICB)’s Live Well¹¹⁸ framework:

¹¹⁶ Simmonds, M., Llewellyn, A., Owen, C. G., & Woolacott, N. (2016). Predicting adult obesity from childhood obesity: a systematic review and meta-analysis. *Obesity reviews* : an official journal of the International Association for the Study of Obesity, 17(2), 95–107. <https://doi.org/10.1111/obr.12334>.

¹¹⁷ Public Health England (2019) Press release: Physical activity helps children to deal with life’s challenges. Available at: <https://www.gov.uk/government/news/physical-activity-helps-children-to-deal-with-life-s-challenges>.

¹¹⁸ For more information see: <https://www.sneeics.org.uk/live-well/>.



Table 34: Meeting needs through the built environment by life stage using the NHS SNEE ICB’s ‘Live Well’ framework

Key life stage group(s)	NHS SNEE ICB’s Live Well framework domain	Key built environment interventions
Children Young people	<p>Start Well – Giving children and young people and the best start in life (pre-conception and up to age 18)</p>	<ul style="list-style-type: none"> <p>Play and green open space provision for children should be provided in adequate quantity, quality, and accessibility to meet the needs of the neighbourhood’s population of children inclusively.</p> <p>Play provision and open space provision that is connected via high-quality, safe active travel routes supports children and young people to move around independently and safely, and facilitates unstructured free play. This supports the development of their cognitive abilities, fitness, confidence, self-esteem, problem solving skills, independence, their appreciation of nature, and their relationships with other local children and young people. These benefits may also help to support their physical and mental health and abilities as adults, and help them to maintain healthy behaviours into adulthood (i.e. enjoying exploring green open spaces as a child may support enjoyment of leisure walks in nature in adulthood).</p> <p>Open space provision should be co-designed with families, be built to last, and be located equitably, with no one tenure group in the neighbourhood having greater access than another (tenure-blind design). Lighting, footfall and natural surveillance helps to support the safety of users.</p> <p>Youth/Casual provision is of enhanced importance to young people as their options for safe places where they feel welcome to congregate socially and at no cost/low cost, tends to be limited. Youth/Casual provision contributes towards meeting the physical activity, social and relaxation space needs for young people and adults. The design, particularly when aimed at young people, should be co-designed with them in order to help it feels ‘theirs’ and therefore ensure its use. Lighting, footfall and natural surveillance helps to support the safety of users.</p> <p>Community facilities, early years, primary and secondary education should be accessible via sustainable modes of transport; active travel routes and public transport routes are available between key origins and destinations; likely trip chains of parents travelling with children is recommended to be factored into routing and layouts.</p> <p>Healthcare infrastructure that provides services for children and young people is either directly provided in the neighbourhood or nearby provision is well connected to via high quality, accessible sustainable transport routes.</p>



Key life stage group(s)	NHS SNEE ICB's Live Well framework domain	Key built environment interventions
Children Young people Adults Older adults	Feel Well – Supporting the mental wellbeing of our population.	<ul style="list-style-type: none"> • Green open spaces should support time in nature for rest and relaxation, ideally with some provision of a quality that facilitates nature immersion experiences. • Healthcare infrastructure that includes mental health service is provided or nearby provision is well connected to via high quality, accessible sustainable transport routes.
Young people Adults Older adults	Be Well – Empowering young people and adults to make healthy lifestyle choices and prevent the development of health problems such as non-communicable diseases, supporting them to maintain healthy, productive, and fulfilling lives.	<ul style="list-style-type: none"> • Open space, indoor sports/leisure facilities and community facilities are either directly provided or are close by enough to be accessed by a short trip via sustainable modes of transport. In order to meet needs across all age groups, spaces that could facilitate a wide range of physical activity opportunities, including more social forms of physical activity (e.g. sport, fitness classes), formal and informal sport, and opportunities for informal and incidental day-to-day activity (e.g. use of parks for dog walking, active travel to work, etc.) should be considered. • Convenience retail space (e.g. greengrocers, supermarkets), allotments, community gardens/orchards, suitable private/semi-private external space, and/or markets space in centres should be provided in sufficient quantities, or nearby provision is accessible via accessible sustainable transport routes, to support healthier diets and healthier weight status within the community. • Healthy homes – kitchens should be designed with enough space to facilitate the preparation of healthy meals, homes include sufficient space for the household to eat together socially. Homes should be designed to have at least one suitable internal space to facilitate home exercise and socialising, particularly for the purposes of social eating (i.e. sufficient space for a dining table), even in smaller homes. • Accessible cycling and walking infrastructure and provide secure cycle parking for homes, schools, workplaces, centres and other key areas of the public realm to encourage people to walk and cycle more of their short journeys. • Walkable centres are pedestrianised in high activity areas, improving air quality and safety for residents and increasing the opportunities for incidental activity. Being walking distance from centres may also support access to healthier diets and less waste.



Key life stage group(s)	NHS SNEE ICB's Live Well framework domain	Key built environment interventions
	<p>Stay Well – Supporting people with existing health challenges and/or care needs to access healthcare services and maintain their independence as much as possible.</p>	<ul style="list-style-type: none"> • Healthcare infrastructure is provided in the neighbourhood or nearby provision is well connected to via high quality, accessible sustainable transport routes to help people access the medical, care and mental health services they need. • Accessible public realm: the neighbourhood is highly accessible throughout, including the active travel routes between key destinations and origins, buildings including homes, streets, open spaces, and connections into surrounding areas. • Where possible and appropriate, healthcare services are co-located (as per the Wellbeing Hub model – see Healthy Centres & Community Facilities chapter) or well connected to key locations for social prescribing activities (e.g. open spaces) and other services for addressing the wider determinants of health such as housing, employment and/or Citizen’s Advice services.
<p>Adults Older adults</p>	<p>Age Well – Supporting people to live safely and independently as they grow older.</p>	<ul style="list-style-type: none"> • Homes should be built to accessible and adaptable home standards (Building Regulations 2020, Part M4(2)) or wheelchair user standards (Building Regulations 2010, Part M4(3)) to at least policy minimum standards (50% as per Policy SCLP5.8 Housing Mix and 40% as per Policy WLP8.31 Lifetime Design). Homes can also exceed Building Regulation minimums and provide more space and flexibility, such as for intergenerational living or to facilitate older households to live together, where there is evident need for this type of housing. • Housing for older people without significant care needs can be designed in a more communal form of accommodation, through models such as extra care housing schemes or co-housing schemes with an older intentional community (see Healthy Homes, Schools & Workplaces chapter). • Housing for older people should be located in highly walkable and cyclable locations from centres or local shops, where possible – particularly where this gives them easy access to convenience retail, open space, community facilities and/or healthcare services. • Dementia-friendly design principles are used for the design of places, including streets, centres, open spaces and key buildings for housing or use by older adults such as sheltered and extra care housing and community buildings. Fundamentally this is to produce environments that feel familiar, legible, distinctive, accessible, comfortable and safe.
<p>Adults Older adults</p>	<p>Die Well – Giving individuals, nearing end of life,</p>	<ul style="list-style-type: none"> • Hospital care, nursing homes and hospice capacity is available in the area and appropriate contributions are made via S106/CIL.



Key life stage group(s)	NHS SNEE ICB's Live Well framework domain	Key built environment interventions
	choice around their care.	

Designing for all levels of ability

- 6.19 The planning and design of the built environment can significantly impact the day to day experience of disablement for people with impairments. Poor approaches may reduce people’s independence and freedom to travel and participate in activities or may risk excluding them completely (e.g. due to a lack of inclusive play equipment in a LEAP). Healthy environments are enabling environments, with the level of enablement used as a key design quality indicator.
- 6.20 The Equality Act 2010 defines what is considered in law to qualify as ‘disabled’. This can be summarised as “a physical or mental impairment that has a ‘substantial’ and ‘long-term’ negative effect on your ability to do normal daily activities”. This means that a broad range of impairments are covered by this definition; they can be physical or mental in origin and may occur in combination (multi-morbidity).
- 6.21 At East Suffolk level, the Census 2021 identified almost one in five of East Suffolk’s population lived with at least one type of disability (18.6%), which is slightly higher than the national average of 17.7%. As identified through the evidence base for both Local Plans, East Suffolk also has an ageing population, meaning that the population more generally would benefit from higher levels of accessibility and adaptability in their homes. The Local Plans therefore require that all specialist housing and a set proportion of all general housing (50% in the former Suffolk Coastal area and 40% in the former Waveney area) delivered through major residential development are to be delivered to the higher technical standard of M4(2) accessible and adaptable homes. The delivery of M4(3) wheelchair user homes is able to contribute towards this requirement or will be supported on a needs basis.
- 6.22 A non-exhaustive list of examples of how the design of built environments may interact with different types of disability are listed in the table below:

Table 35: Disability types and examples of negative impacts arising from inappropriate design of built environments

Disability type	Examples of conditions	Negative impacts arising from inappropriate design of built environments
Mobility	Paralysis, injury, chronic pain, progressive neurological conditions	<p>Streets and wider public realm:</p> <ul style="list-style-type: none"> • Footways undulate with drop kerbs (to allow vehicles easy access to driveways) causing discomfort and trip hazards for pedestrians. ‘Dutch entrance’ style kerbing could be used instead to keep the footway as flat as



Disability type	Examples of conditions	Negative impacts arising from inappropriate design of built environments
		<p>possible for pedestrians, and slow exit and entry to and from driveways for vehicles.</p> <ul style="list-style-type: none"> • Footway’s surface treatment is not smooth, bound, free-draining and/or flat (gradient) enough, which is difficult and uncomfortable for people with reduced mobility to use. • Formal crossings are not signalised. Formal crossings with refuge areas are not deep enough to accommodate waiting cyclists (particularly those using adapted cycles) and pedestrians. Formal crossings have turning angles that are too tight for people in wheelchairs (and cyclists) to use safely and comfortably. The design of formal crossings should be informed by use of the Suffolk design: Streets Guide and engagement with the Highways Authority. • Lack of facilities access – no/reduced access to enhanced public toilet facilities, such as Changing Places toilets. • Seating in public areas that does not have arm rests, does not provide back rests, is angled (for perching only), has anti-sleeping features that cause discomfort, has shallow seats, and/or is otherwise not appropriately designed for meeting the needs of a wide range of people. <p>Active travel routes:</p> <ul style="list-style-type: none"> • Routes are too narrow (3m wide is the minimum for accessibility), inappropriately surfaced, steep, indirect and/or do not have seating available at appropriate intervals. • Secure cycle parking suitable for non-standard cycles is not available or under-provided at key locations. <p>Homes</p> <ul style="list-style-type: none"> • Homes are not built to accessible or adaptable or wheelchair user standards (Building Regulations Part M4(2) and M4(3), as appropriate) to support occupants with changes to their mobility or reduced mobility.
Cognition	Learning disabilities, dementia	<ul style="list-style-type: none"> • Poor wayfinding signage due to not using clear text and/or iconography. • Poor morphological variety and distinctiveness in areas of the neighbourhood (e.g. lack variation in building styles, heights, masses, lack of character areas, etc.), making orientation more difficult.



Disability type	Examples of conditions	Negative impacts arising from inappropriate design of built environments
Sensory ability	Visual, auditory, sensory processing disorder	<ul style="list-style-type: none"> • Homes are in a setting with poor environmental quality, e.g. high levels background noise, may negatively impact these conditions. • Key community amenities and locations (e.g. centres) are not vehicle-free or low traffic, making those with sensory impairments more vulnerable when in these spaces. • Crossings are not signalised, making them harder to use for those with visual and auditory impairments. • Digitalised systems are difficult or unable to be used by people with visual impairments (e.g. Real Time Passenger Information screens that display small text).
Functionality	Chronic conditions that affect functionality, such as auto-immune diseases.	<ul style="list-style-type: none"> • Housing is not built to a high standard of sound insulation, inadequate natural light access, inadequate views of trees/natural spaces from windows, does not support privacy and autonomy in multi-person households, does not provide adequate kitchen space for meal preparation, no private external space provided, etc. Homes in a setting with poor environmental quality, e.g. high levels background noise, may negatively impact these types of conditions. • Seating is not provided at reasonable intervals. • Lack of facilities access: no access or reduced access to public toilets.
Mental health conditions	Depression, bipolar disorder, schizophrenia	<ul style="list-style-type: none"> • Housing is not built to a high standard of sound insulation, inadequate natural light access, inadequate views of trees/natural spaces from windows, does not support privacy and autonomy in multi-person households, does not provide adequate kitchen space for meal preparation, no private external space provided, etc. Homes in a setting with poor environmental quality, e.g. high levels background noise, may negatively impact these types of conditions.
Neurodiversity	Autism, ADHD, dyslexia	<ul style="list-style-type: none"> • Poor wayfinding signage due to not using clear text and/or iconography. • Homes in a setting with poor environmental quality, e.g. high levels background noise, may negatively impact these types of conditions. Homes that have poor sound proofing between walls and floors may increase the instances of people with these conditions to feel over-stimulated and overwhelmed and reduce opportunity to self-regulate.



Disability type	Examples of conditions	Negative impacts arising from inappropriate design of built environments
		<ul style="list-style-type: none"> Key destinations (e.g. workplaces, schools, retail) are only accessible via high-stimulation routes, e.g. busy road or town centre environment, causing over-stimulation or confusion.

Lifetime neighbourhoods: dementia-friendly design principles

6.23 The main guidance chapters of the SPD each cover dementia-friendly design principles from the perspective of the essential element (e.g. active travel infrastructure) it covers. This chapter provides guidance on key indicators for implementing dementia friendly design principles at a holistic, neighbourhood level, structured by each of the six dementia-friendly design principles.

Familiar

- Functions of spaces, uses of buildings and access points to and from them are obvious from their external appearance;
- for redevelopment schemes, existing buildings are retained and/or the overall scheme maintains key features of the existing development’s appearance (e.g. architectural style, colour and materials palette, etc.) and/or function (e.g. provided some green open space), where these buildings, spaces or other features are distinctive (e.g. act as a important landmark in local people’s ‘mental maps’); this is of particular value where they are of enhanced relevance to people with dementia or other mental health challenges due to use or historic value (continuity), and;
- for more strategic scale and long term redevelopment schemes, consideration is given to how change can be managed and delivered gradually.

Legible

- Provide a movement network with a clear hierarchy of street types and functions;
- keep streets relatively short (to allow clear views of the end and where they lead on to) and junctions into them fairly visible;
- ensure residential/mixed use streets are visually distinct from each other and creation of character areas (using design tools such as variance in building designs, heights, materials palette, etc.);



- clear signage should be provided at route decision points – text signs should be supported with clear iconography (e.g. the word ‘toilets’ on a finger post can be supplemented with easily recognisable symbols associated with toilets), and;
- text/icons should be made larger to be readable from a reasonable distance for someone with reduced vision, e.g. 15m. Where possible, accessible “you are here” style maps, which are oriented towards the direction of travel of the reader and that give a reliable indication of walking distances and times are recommended. A good example of this are Transport for London’s ‘Legible London’ maps¹¹⁹.

Distinctive

- A variety of landmark buildings and features (e.g. public art, distinctive landscaping, street furniture, etc.) are integrated into the public realm in prominent locations to support maintenance of reliable ‘mental maps’.

Accessible

- Land uses are mixed with shops and services within a 5-10 minute walk (400-800m by route, not radius) from housing.
- active travel routes are accessible, direct, convenient, and inclusively designed (see [Active Travel](#) chapter)
- high activity areas within centres should be pedestrianized wherever there is a clear opportunity for this to be achieved to enhance safety, accessibility, comfort and environmental quality;
- street furniture should be designed to add accessibility value and distinctiveness, whilst also being careful to manage the potential for physical obstruction and visual ‘clutter’, and;

Safe and comfortable

- Keep street widths reflective of human scale ratios with buildings to support users (of all ages and abilities) to feel comfortable, but in particular to help support orientation of those with dementia and mental health challenges;
- Centres and open spaces are well-defined, and are supported by public facilities such as toilets, seating, shelter, appropriate lighting and teamed with community facilities where this would mutually enhance use;

¹¹⁹ More information available at: <https://tfl.gov.uk/info-for/boroughs-and-communities/maps-and-signs>.



- background and traffic noise within the neighbourhood is minimised through approaches to landscaping and planting (e.g. natural buffers, acoustic bunds), design that reduces vehicle speed or access to some streets, etc.;
- consideration should be given to how the need for pedestrians to cross over junctions with vehicle routes can be reduced – junctions that give pedestrians priority (e.g. at-grade crossings) are still less safe and accessible than simply designing-out the need to cross vehicle routes.
- For mixed-use neighbourhoods, give consideration to likely trip chains – particularly those that older people may make – and make adjustments to layout and active travel route design (and the positioning of public transport stops, where applicable) to support this – primarily by keeping distances shorter, surfacing more accessible, and more accessible cycle parking provided.

Designing for groups with additional needs

6.24 Besides life stage and ability, there are other characteristics that may enhance a person’s need for a high quality, inclusive built environment. The below table provides some examples of key groups to give consideration to:

Table 36: Examples of groups with additional needs and how design approaches to built environments may impact them

Groups	Built environment design matters that may impact this group
Women and girls	<p>Open space: adjustments to open space designs could include¹²⁰:</p> <ul style="list-style-type: none"> • Ensuring good natural surveillance and footfall through positioning the open space within the layout/in relation to existing development so that it forms part of a route between a key origin and destination (e.g. homes and school), and (if appropriate) incorporating a mix of uses rather than just residential as this may help to increase local trips. • Provide multiple active travel routes to/from and through them, including circular routes for walking meetings, and have at least two entry/exit points (to support safety); • Pro-social seating is provided, i.e. seating designs that allow people to sit facing each other or perpendicular to each other rather than side to side, as this is better for conversations, particularly for small groups;

¹²⁰ For more information see Make Space for Girls (2023) Make Space for Girls: the research background 2023. Available at: https://assets.website-files.com/6398afa2ae5518732f04f791/63f60a5a2a28c570b35ce1b5_Make%20Space%20for%20Girls%20-%20Research%20Draft.pdf.



Groups	Built environment design matters that may impact this group
	<ul style="list-style-type: none"> • Seating is located in ‘primary’ positions – i.e. looking onto active travel routes and other high activity or other interest areas (e.g. onto play areas for child supervision) – allowing users to both be easily seen and contribute towards natural surveillance of the space; • Youth/Casual play provision is located away from play provision for children so that these groups are not ‘put off’ from using them (30m+ is recommended); similarly, some girls may feel more comfortable using Youth/Casual provision that is separate from and positioned away from other Youth/Casual provision that is typically used more by boys, such as skate parks. • Outdoor exercise equipment provision (‘outdoor gyms’) should be designed so that they provide the opportunity to work all major muscle groups, and offer a balance of equipment that includes body weight (e.g. pull up bars and open matted areas), resistance (e.g. weighted lat pull) and aerobic training (e.g. stationary bicycles) machines/spaces, so that groups with different training needs and preferences are accommodated; • Play and outdoor exercise equipment stations are set up so that some stations are in pairs (e.g. a pair of parallel rowing machines) or are otherwise able to be used by a small group (e.g. swings, roundabouts) so that exercise can be more social, and; • Play and outdoor gyms are split into smaller areas, helping to avoid the potential for the space to become ‘territorialised’ by a dominant group, and help support women and girls to feel ‘seen but not watched’ by other users. <p>Facilities access: women and girls have enhanced need for toilet facilities access.</p> <p>Seating: pregnancy and breastfeeding may increase the likelihood of needing to sit down more regularly whilst spending time in the public realm.</p>
Lower income households	<p>Walkability: lower income households may not have access to private vehicles or may limit their use due to fuel poverty, and because much of the district is rural in character, will often have limited public transport options as an alternative. Lower income households may therefore rely more heavily than other household types on being able to safely, conveniently and comfortably walk or cycle to meet their day to day needs (e.g. food shopping, school, employment, leisure activities, healthcare services).</p> <p>Tenure blind design: tenure blind design is achieved when the location and design of housing and a scheme’s amenities (e.g. open space, extent and quality of landscaping, parking provision, etc.) is such that the different tenures present on site are indistinguishable from each other. Making affordable homes smaller than equivalent capacity market homes (similar internal size for the number of bedrooms provided), significantly higher in density, concentrated in one location, in clusters of more than ten units, exclusively in one typology (e.g. the only flatted homes on site) and/or otherwise look different to the market tenure homes on site is therefore not acceptable. More information is available in the East Suffolk</p>



Groups	Built environment design matters that may impact this group
	<p>Affordable Housing SPD (2022)¹²¹. Similarly, it is not acceptable for amenities on site (e.g. open space and play provision, parking, etc.), to be disproportionately or exclusively accessible to the occupants of market tenure homes.</p> <p>It is also not acceptable for affordable homes to be disproportionately located in areas of the site most subject to potential sources of noise or poor air quality; environmental sources of stress are expected to be avoided or mitigated as much as reasonably possible for all tenures. The Council therefore expects tenure blind design on all mixed tenure sites, as per Policy SCLP 11.1 Design Quality (via endorsement of Building for a Healthy Life guidance) and Policy WLP8.2 - Affordable Housing.</p> <p>Higher resource efficiency homes: reduce pressure on financial resources by reducing energy and water bills, therefore allowing more money to be spent on healthier food, leisure, socialising, and other activities that support health and wellbeing.</p> <p>More space efficient homes: (e.g. designing for enhanced storage space, extra sound proofing to support maintaining privacy in a smaller space) help smaller homes to ‘work harder’ for households at their occupancy limit.</p>

The benefits of co-designing lifetime neighbourhoods

6.25 Wherever possible, lifetime neighbourhoods are planned and designed in consultation with and in response to the community. Measures should be taken to increase the typical participation rates of children, young people and younger adults and typically harder to reach groups so as to ensure the design’s inclusivity of the different groups within the communities the development will serve.

Key external guidance for lifetime neighbourhoods

6.26 The key guidance for each essential element chapter is covered in their respective overview tables and is not reproduced here. As this chapter focuses on bringing the essential elements together and further increasing functionality, relationship and inclusivity of overall (major) residential developments, the following high level guides are recommended:

- **Building for a Healthy Life guide:** a toolkit for informing the design process and assessing the quality of proposed designs of development proposals. Policy SCLP11.1 Design Quality and Policy WLP8.29 Design of the Local Plans require major residential developments to perform positively when assessed using the

¹²¹ Available at: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/>.



guide.

- **Public Health England (2017) Spatial planning for health:** an evidence resource for planning and designing healthier places – designed to be used for policy-making purposes, this document provides more in-depth information on how the design of built environments can create health impacts and how health-supportive design can be used to create positive health and wellbeing outcomes (i.e. health-net gain over pre-development health and wellbeing baselines in the communities local to the site).
- **Department for Levelling Up, Housing & Communities (2021) National Design Guide:** the National Design Guide details 10 characteristics of well-designed places, and has a brief that extends beyond protecting health and wellbeing through design. However, the majority of the high level guidance is relevant to the creation of healthy environments.
- **Sport England (2023) Active Design:** the Active Design Guide focuses on supporting health and wellbeing by designing-in opportunities for more and better incidental and session-based physical activity in built environments.

Healthy Environments: Design prompts

6.27 Does the design of the neighbourhood...

- ...ensure strong functional relationships between the different essential elements (green infrastructure, active travel infrastructure, buildings, centres, etc.)?
- ...ensure that the needs of people of different age groups are met?
- ...support people living with different forms of reduced ability to be included and as independent as possible?
- ...support groups with additional needs, e.g. people on lower incomes, to meet their health and wellbeing needs?
- ...support safety in the public realm?
- ...achieve tenure-blind design for both homes and the infrastructure that supports the development (e.g. equal open space access)

7 Health Impact Assessments





7 Health Impact Assessments (HIAs)

Introduction

- 7.1 The World Health Organization (WHO) defines Health Impact Assessment (HIA) as a “practical approach used to judge the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups”¹²². The essential purpose of HIAs is to identify and inform designers and decision makers of the key potential benefits or potential harm arising from the development. This information can then be used to ‘design out’ or adequately mitigate the potential harm and inform an improved iteration of the design.
- 7.2 The intention is that, if design refinement was necessary, the refined scheme can then better support the protection of health, wellbeing, accessibility, and inclusion of different groups within the population at different ages, levels of ability, and any key additional needs that can be addressed through the planning and design of built environments. Identified positive impacts can also be assessed in the context of their potential to secure health-net gain for the proposed development’s future community, in the context of identified local health challenges.
- 7.3 Some development proposals will require an HIA to be submitted as part of the planning application, either as per the requirements of the Local Validation List or because it has otherwise been requested as evidence by the Council or statutory consultees to support the decision making process. The Council’s Local Validation List¹²³ requires all planning applications for development proposals that meet/exceed any of the below thresholds for requiring an HIA to be supported by the submission of a completed HIA:
 - A housing development of 50 dwellings, or
 - A development of less than 50 dwellings but which is still deemed to potentially impact on health services significantly,
 - A development that includes care homes, care facility, housing for the elderly, or student accommodation,
 - A development that involves the significant loss of public open space,
 - Any other type of development that could have significant health implications.

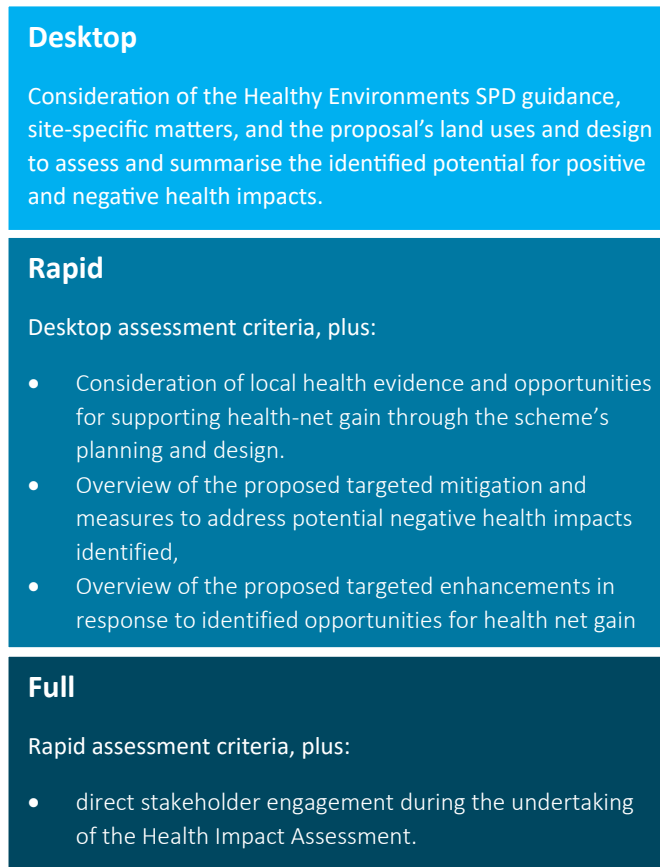
¹²² For the WHO guidance on the HIA process see: <https://www.who.int/tools/health-impact-assessments>.

¹²³ The Local Validation List is updated periodically and therefore should be checked for updates prior to the submission of planning applications.



Types of Health Impact Assessment

- 7.4 There is no single set way that HIAs must be undertaken, though the appropriate level of depth for the assessment will be determined by the scale, land uses, site-specific constraints/issues (e.g. contamination) and design details of the proposed development, as these variables determine the potential for adverse impacts on health.
- 7.5 As covered in The London Healthy Urban Development Unit (HUDU) Planning for Health: Rapid Health Impact Assessment Tool (2019)¹²⁴, HIAs are typically undertaken in three different forms, which range from least comprehensive to most comprehensive these are: ‘Desktop’, ‘Rapid’, or ‘Full’.
- 7.6 As noted above, the level of depth required for HIAs, and therefore the appropriate type of HIA to be undertaken, will vary depending on the potential for health impacts arising from the development. The HUDU Rapid HIA Tool describes the three different types as:
- A ‘Desktop’ assessment which draws on existing knowledge and evidence, often using checklists or templates which provide a broad overview of potential health impacts;
 - A ‘Rapid’ assessment, which is a more resource intensive process, involving a more focused investigation of health impacts and recommending mitigation and enhancement measures, or;
 - A ‘Full’ assessment which involves comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base, and community engagement.
- 7.7 In East Suffolk, the ‘Rapid’ or ‘Full’ HIA types will be required where HIA has been identified as required for validation purposes. ‘Desktop’ assessments can be submitted to support



HIA requirements are progressive as the depth of assessment required increases. requirements, and 'Full' HIAs inclusive of the 'Rapid' HIA requirements.

¹²⁴ The London Healthy Urban Development Unit (HUDU) Planning for Health: Rapid Health Impact Assessment Tool is available at: <https://www.healthyrbandevelopment.nhs.uk/our-services/delivering-healthy-urban-development/health-impact-assessment/>.





applications where HIA is not a requirement but is being used as a tool to demonstrate information about the proposed scheme on a voluntary basis.

- 7.8 The potential for both positive and negative health impacts can be assessed through qualitative, quantitative and/or stakeholder engagement techniques (as appropriate to the level of depth of the assessment).

Health Impact Assessment: process

- 7.9 The overall process for all types of HIAs for East Suffolk should follow the basic process flow of:

1. **Screening:** to determine whether an HIA is required for validation purposes (if it has not been directly requested by the case officer).
2. **Scoping:** to set the parameters for the assessment process, including:
 - **Setting the study area for the HIA:** this will usually be the development site plus all walking routes to/from the site, based on a 10 minute walk duration/800 metres (i.e. the area 'local to' the development site), though there may be instances where an expanded study area would be appropriate.
 - **Literature review identifying the existing community health and wellbeing 'baseline':** i.e. existing health and wellbeing challenges across different groups within the existing community within the geographic area – and therefore any potential opportunities for achieving health-net gain post-development or at least positive impacts on wellbeing. Health data (e.g. rates of overweight and obesity) will be available at various spatial scales, from very local (LSOAs/wards) up to national data.
Data at different scales can be used to demonstrate relative differences, e.g. higher levels of smoking than the national average. Identification of local data that shows acute health and wellbeing challenges (e.g. low adult weekly activity) is helpful for identifying clear objectives for use of scheme design to support local health-net gain, and in the 'Reporting' section demonstrating how the proposed design is intended to address the identified challenged (e.g. enhanced, inclusive open space offer to encourage more adult activity).
 - **Identifying the current environmental quality within the study area:** i.e. existing levels of noise, air quality, or residential amenity matters. In the 'Appraisal' section consideration should be given to the quality of both the baseline environment and post-development environment's quality.
3. **Appraisal:** appraisal of the proposed development's design's health and wellbeing impacts using [Table 36](#) (below), giving overall consideration to:
 - **The potential benefits of the scheme:** assessing whether the design is likely (and *how* likely) to be successful in providing an environment that:
 - supports people to access and engage in healthy lifestyles (healthy eating, exercising, play, socialising, opportunities for personal development, time in nature, etc.) at all ages and levels of ability,
 - contributes towards addressing identified existing health and wellbeing challenges for the population of the study area, and,



- reduces inequality through use of accessible and inclusive design such as tenure-blind design and dementia-friendly design, equal access to health and healthcare infrastructure and employment opportunities, etc.
 - **The potential harm arising from the scheme:** assessing whether the design is likely (and *how* likely) to have negative health and wellbeing impacts as a result of the current proposed design, including potential to worsen the baseline level of environmental quality (e.g. noise, air quality, odour, etc.) and/or worsen any existing identified health and wellbeing challenges and inequalities (e.g. through the poor execution of tenure blind-design) for the population of the study area.
 - **Overall balance:** assessing whether overall the development is likely to have a net-positive, neutral or net-negative impact on health and wellbeing for both the new communities and existing communities within the study area.
4. **Reporting:** reporting on the findings of the appraisal, and ideally a summary section.

Health Impact Assessment: recommended structure of report

7.10 It is recommended that the supporting text of the HUDU Rapid HIA Tool is used to inform the process of all types of HIA. The recommended structure and assessment framework for the HIA report includes¹²⁵:

- Context: key information about the existing site and proposed development;
- Literature review:
 - relevant national and local planning policy and practice guidance; relevant legislation to the proposed development;
 - an overview of local health evidence as a baseline/targeted areas for health-net gain (if 'Rapid' or 'Full' HIA – see **Introduction** chapter for key health challenges for East Suffolk¹²⁶);
- Methodology: key information on how the assessment has been undertaken and community consultation and co-design engagement activities (if 'Full' HIA)
- Summary of consequent design refinements that have been made following community consultation and co-design engagement activities (if 'Full' HIA);

¹²⁵ Some developments may justify a different or more comprehensive HIA structure, particularly where the HIA will not be a standalone assessment such as those part of an Environmental Impact Assessment/Environmental Statement or wider Integrated Impact Assessment; the appropriate structure can be discussed at pre-application stage.

¹²⁶ Local health evidence does not have to be limited to the key health and wellbeing challenges identified in this SPD, particularly if there are known challenges specific for the local area of the site, such as at ward or nearest settlement level. Health and wellbeing challenges should be inclusive of mental, physical, and social health and wellbeing matters, therefore including wider determinants such as incomes and affordability.



- Health impacts assessment: site and proposal specifics assessed against local health evidence (potential for supporting health-net gain in key health metrics for the district), SPD guidance and the SPD's 'design prompts', and any relevant key external guidance (e.g. Building for a Healthy Life, LTN 1/20, relevant British Standards, etc.) – see the suggested assessment criteria framework provided in [Table 36](#) (below).
- Reporting: summary of assessment of development's consistency with the vision and relevant strategic priorities and policies of the relevant Local Plan and with the guidance of any relevant SPDs to the proposed development (not limited to this SPD).
- Reporting: summary of the key changes to the proposal since earlier HIA, with commentary on what and why the design has been changed and what the anticipated health impacts of these changes are likely to be. on:
 - Whether the scheme would overall deliver positive, neutral or negative health benefits/impacts – considering site-specifics, baseline data and (if applicable and stakeholder engagement
 - Where potential negative impacts have been identified, how likely these impacts are, and whether adequate means of mitigation has been identified and can be delivered (schemes that cannot be adequately mitigated for potential harm will not be supported)
 - Where the need for mitigation for potential negative health impacts was identified through the HIA process, how the design was adjusted
 - Where further opportunities to improve the design for supporting positive health and wellbeing impacts, how the design was adjusted
 - (If applicable) where stakeholder engagement informed and precipitated changes to the design (e.g. community engagement with local young people on the appropriate design of the Youth/Casual offer on-site), how the design was adjusted.

7.11 The key assessment matters for consideration through HIAs to be considered are shown in [Table 37](#) (below), based on the SPD chapter structure. The key assessment matters listed are not necessarily an exhaustive list of all relevant matters to consider, particularly as this will vary from site to site:



Table 37: Key assessment areas for Health Impact Assessments by SPD chapter

Chapter of the SPD	Key topic areas for HIA	Key assessment matters
2. Green Infrastructure	<p>Green infrastructure: adequate access to a variety of high quality green open space, play provision, sport facilities and/or allotments/community gardens, as appropriate; ensuring living environments are supported by high quality landscaping (including SuDS) and wildlife (supports biodiversity).</p>	<ul style="list-style-type: none"> • SPD’s Green Infrastructure chapter’s ‘design prompts’ – overall design quality for supporting positive health outcomes • Environmental quality <ul style="list-style-type: none"> • Environmental protection: contribution towards improving air quality, reducing noise • Residential amenity: attractive residential setting, screening and privacy, supporting wildlife • Attractiveness: high quality materials, varied and biodiverse natural landscaping, etc. • Green open space and landscaping <ul style="list-style-type: none"> • Quality and variety of spaces • Tenure-blind design and inclusivity • Nature immersion opportunities (green open space) • Accessibility and inclusivity of green open space (including SuDS features) • Nutrition – allotments, community gardens, community gardens and/or suitable private external space for food production • Play provision <ul style="list-style-type: none"> • Variety of play experiences and sensory stimulation for children and/or Youth/Casual (if applicable) • Accessibility and inclusivity of play provision • Safety in open spaces <ul style="list-style-type: none"> • – open space (including SuDS) and wider public realm • Flood risk and sustainable drainage – appropriate and effective mitigation and multi-functionality • Shade, cooling, and prevention of overheating • Support active lifestyles through physical activity • Maintenance of open space and landscaping • Consistency with key guidance related to this topic area for supporting health and wellbeing through this element



Chapter of the SPD	Key topic areas for HIA	Key assessment matters
3. Active Travel	Active travel: ensuring active modes of transport are enabled through delivery of safe, direct, convenient and accessible infrastructure, and therefore made an attractive alternative to private vehicle use for shorter journeys.	<ul style="list-style-type: none">• SPD’s Active Travel chapter’s ‘design prompts’ – overall design quality for supporting positive health outcomes• Environmental quality<ul style="list-style-type: none">• Environmental protection: contribution towards improving air quality, reducing noise from vehicles, odour etc. arising from poor routes and street design• Residential amenity: routes contribute towards attractive residential setting, supporting wildlife, routes designed appropriately to not impact privacy/unacceptable noise• Attractiveness: high quality and location appropriate materials, leisure routes support high quality recreational experiences, routes are supported by natural landscaping, etc.• Support active lifestyles through physical activity – walkability for utility trips (and trip chains), walkability for leisure trips, cyclability for utility trips (and trip chains), cyclability for leisure trips, and secure cycle parking provision at key origins and destinations (e.g. homes and workplaces)• Accessibility and inclusivity – design, materials and inclusive secure cycle parking provision• Safety and security in public realm (streets) – designing out crime and designing in natural surveillance• Public transport provision/connectivity to (if applicable)• Consistency with key guidance related to this topic area for supporting health and wellbeing through this element



Chapter of the SPD	Key topic areas for HIA	Key assessment matters
4. Healthy Homes, Schools & Workplaces	<p>Healthy buildings: ensuring the design of homes, schools and workplaces support health and wellbeing, active lifestyles, safety and security, accessibility (e.g. M4(2) homes) and reduce inequalities by ensuring homes and amenities are tenure blind in provision, appearance and access.</p>	<ul style="list-style-type: none"> • SPD’s Healthy Homes, Schools & Workplaces chapter’s ‘design prompts’ – overall design quality for supporting positive health outcomes • Environmental quality: <ul style="list-style-type: none"> • Environmental protection – adequate protection from environmental sources of harm such as noise, indoor and outdoor air pollution, water pollution, odour, vibration, land contamination, etc. • Residential amenity – adequate access to daylight, privacy, safety, security, and generally function well. • Attractiveness: high quality materials, visual variation, pro-social setting and active frontages, incorporation of natural features, etc. • Accessibility and inclusivity – including adequately accessible and adaptable and/or wheelchair user homes, if applicable • Safety and security – designing out crime, designing in natural surveillance, health and safety matters, etc. • Warmth, cooling, overheating, ventilation, sunlight, natural light • Support active lifestyles through physical activity • Homes: appropriate mix of types, sizes and tenures to meet needs at different life stages, abilities and for affordability • Homes: tenure-blind design, including for parking provision • Homes: Space, layouts and features that support healthy behaviours and lifestyles (e.g. preparation of healthy meals, commensality, cycling to work, etc.) • Homes: Conservation • of water and energy to support reduced housing costs • Schools/education capacity – existing and proposed new capacity (if applicable) • Consistency with key guidance related to this topic area for supporting health and wellbeing through this element





Chapter of the SPD	Key topic areas for HIA	Key assessment matters
<p>5. Healthy Centres & Community Facilities</p>	<p>Healthy centres: centres are accessible and usable through being compact, connected, complete and inclusive in design (if applicable).</p> <p>Community facilities that meet identified needs within the communities it will serve (if applicable).</p>	<ul style="list-style-type: none"> • The SPD’s Healthy Centres & Community Facilities chapter’s ‘design prompts’ overall design quality for supporting positive health outcomes • Environmental quality – environmental protection, residential amenity and attractiveness matters (if applicable) • Support active lifestyles through physical activity – formal and informal spaces for physical activity, particularly group activities (e.g. community centre), and/or indoor built/formal outdoor sport facilities (e.g. leisure centres, artificial playing pitches) (if applicable) • Safety in public realm (centres) • Accessibility and inclusivity of facilities design • Relevance of centre or community facilities design in meeting needs at different life stages • Healthcare facilities capacity – existing and proposed new capacity (if applicable) • Play and recreation – integration of informal play opportunities for different age groups and abilities • Nutrition – convenience retail and/or suitable market spaces provision or access via active travel (if applicable) • Employment opportunities (if applicable) • Consistency with key guidance related to this topic area for supporting health and wellbeing through this element
<p>6. Lifetime neighbourhoods</p>	<p>Lifetime neighbourhoods: Increasing inclusivity, accessibility and the attractiveness of increased physical activity across all elements through adequate consideration of the needs and preferences of different groups – ages, abilities, genders, income, etc.</p>	<ul style="list-style-type: none"> • SPD’s Lifetime Neighbourhoods chapter’s ‘design prompts’ for overall design quality, functionality and inclusivity for supporting positive health outcomes • All of the above considerations plus consideration of extent to which groups with additional needs of built environments, such as women and girls and lower income households, are supported by the development. • Consistency with key guidance related to this topic area for supporting health and wellbeing through this element



7.12 HIAs can also include consideration of the findings of other types of assessment that support or overlap with health and wellbeing, such as management of waste collection and construction management (residential amenity impacts), historic environment impacts (impacts on wellbeing), flooding (risk to safety), etc. as appropriate to the proposed development.

- It should be noted that a Suffolk-wide Health Impact Assessment templates is intended to be produced in the future. It is recommended that this framework is used in the interim.

Health Impact Assessments: when to submit

- 7.14 HIAs can be submitted to support any application and at any stage in the planning application process. Where an HIA is submitted early in the process, an updated HIA may be required at a later stage to support consideration of the proposals detailed matters. Notwithstanding validation requirements, HIAs can be submitted on a voluntary basis as a tool for demonstrating the benefits of/challenges identified and being addressed by the design of the proposed scheme. As well as being useful to case officers, the relevant NHS Integrated Care Board or Suffolk County Council's Public Health team may find HIAs useful when reviewing and commenting on planning applications.
- 7.15 HIAs can be undertaken early in the process of designing the proposed development and then reviewed and updated once the proposed design has been finalised. Using HIAs early in the design process is strongly encouraged, so that issues and opportunities can be identified early, and the design of the scheme refined prior to submission of the application.
- 7.16 Late stage applications supported by an HIA are encouraged to demonstrate how undertaking the HIA process has helped to inform the proposed design of the final scheme. In these instances, the key points to include relate to how the design has been adjusted following the identification of these potential impacts so as to (a) further enhance the potential for positive health and wellbeing impacts, and (b) to avoid or adequately mitigate any identified potential sources of negative health and wellbeing impacts.



Appendix 1: Glossary of terms

A

Active travel

Journeys made in physically active ways, such as walking, wheeling (includes wheelchairs, skates, skateboards, push-scooters, etc.) or cycling. Active travel covers all journey types related to these modes of transport, including commuting, school runs, shopping trips, leisure cycling for fitness, etc.

Allotments

Small plots of land (of up to 250 square metres) used for growing fruit, vegetables, flowers, nuts, and other natural resources (e.g. willow for basket weaving, natural fibres, etc.). Allotment plots are grouped together to form allotment sites which vary from site to site in how many total plots are provided. Communal facilities and accessibility also varies from site to site. Allotments may also be used for keeping chickens and/or bees, depending on site rules.

Amenity green space

Principally intended for day-to-day community use such as for dog walking, running, and non-equipped play purposes, as well as to enhance the appearance of residential developments. Amenity green space is typically located immediately adjacent to homes, or within very short walking distances. Equipped play provision will often be situated within amenity green spaces.

Approved Documents

Approved documents are nationally published documents that provide guidance on meeting the standards required through the Building Regulations 2010 (as amended).

At-grade crossing (streets)

A carriageway junction where a pedestrian route continues from one side to the other of the junction, but rather than yielding to carriageway level (as is standard) the footway continues over the junction at the same level.

B

Biodiversity net gain (BNG)

A way to contribute to the recovery of nature while developing land. It is making sure the habitat for wildlife is in a better state than it was before development.

Biodiversity

The variety of living species on Earth, including plants, animals, bacteria, and fungi.



Biophilic design

Design that incorporates or mimics the features, textures, colours or patterns found in nature. Biophilic design therefore integrates 'green' and 'blue' features through soft landscaping, plantings, green roofs, green walls, building shapes and structures, or otherwise uses materials derived from nature or other methods of creating more natural environmental conditions.

Biophilic response

As the name suggests ('bio' = nature, 'philic' = fondness, inclination towards), a biophilic response is a positive mental and/or physical response to a natural environment, natural features, or design that effectively mimics natural features. An example of a biophilic response is feeling calmer and experiencing improved blood pressure after spending time in an area of natural greenspace.

Buffer landscaping

Use of plantings (trees, shrubs, grasses, etc.) or bunding/topographical features to create screening (for privacy), resistance to sound (to reduce noise pollution impacts) or a barrier to sources of air pollution, or, to create a transitional space at the edges and access points between two different types of space, e.g. to support the transition between a green open space and the surrounding residential streets.

Building for Life 12

A design toolkit for high quality neighbourhoods, streets, homes and public spaces. Building for life 12 was superseded by the Building for a Healthy Life guide in 2020 to incorporate lessons learned through early experiences of the COVID-19 pandemic.

C

Car-dominated environments

An environment such as a neighbourhood or street where cars have priority over other methods of travel.

Circular walk

A walking route that is circular rather than linear, returning the user to their starting point. Circular walks can have multiple access points, allowing them to also be used as a linear walk, where users want to walk only one section of the full circular walk.

Co-housing

A cooperative living arrangement in which people build a cluster of single-family houses around a common building for shared meals, childcare, guest rooms, etc.

Community facilities

Facilities and uses generally available to and used by the local community for the purposes of leisure, social interaction, health and well-being or learning. This will include, but not be confined to, community centres, public houses, sports venues, cultural buildings, places of worship, medical facilities, shops, post offices, libraries, schools and other training and educational facilities.



Community garden

Collective gardening undertaken for community development, food production, health promotion, horticultural therapy, collective action, and environmental and permaculture education.

Community Supported Agriculture (CSA)

A partnership between farmers and consumers in which the responsibilities, risks and rewards of farming are shared.

D

Dark Skies

A place where the night sky is relatively free of interference from artificial light. Under these conditions viewers should be able to see the Milky Way overhead and other astronomical features with the naked eye.

Dementia-friendly areas

Areas of the public realm, often centres or other green open spaces, that have been designed in accordance with dementia-friendly design principles.

Dementia-friendly design

A set of design principles that can be used to inform the design of places that support the needs of people with dementia.

Desire lines

Worn away areas of grass/landscaping from repeated trampling over time that has created informal pathways; desire lines are created as a result of people wanting to move in a different direction through spaces than the formal pathways have provided for, usually due to poor anticipation of how people are likely to want to move through the space

Disability-free life expectancy

An estimate of the number of years lived without a long-lasting physical or mental health condition that limits daily activities.

Durable surface

A surface that is not easily eroded, and can withstand use without being damaged, becoming muddy, flooded or otherwise unusable.

Dutch-style roundabouts

A form of roundabout first seen in the Netherlands that gives greater priority to cyclists. The cyclists are separated from other road users with orbital cycle tracks.



E

E-bike

A bike that can be powered by electricity to assist with pedalling.

Eco-anxiety

Stress and anxiety arising from concerns about current and future harm to the environment caused by human activity and climate change, and the impacts of this on matters such as food security; loss of biodiversity in nature and agriculture (variety of crops grown, plant and animal resilience to disease, etc.); drought; damage from extreme flooding (extreme storm and sea level rise); higher temperatures and risk of fires; costs of energy bills and of retrofitting, etc.

Environmental quality

Where environmental quality is high, this is due to a combination of high residential amenity and environmental protection being maintained, plus an overall attractive, high-quality built and natural environment.

Extra-care housing

Also referred to as assisted living, this offers more support than sheltered housing, but still allows the resident to live independently. Residents live in a self-contained flat and personal care and support services are generally available on-site 24 hours a day. Other services, including domestic help and meals may also be provided.

F

Footpath

A legally designated Public Right of Way for use on foot only.

Footway

Also referred to as pavement is a way adjacent to the highway for pedestrian use on foot only.

G

Green infrastructure

A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Green open space

Spaces that are provided for use by the public to meet their needs for outdoor recreation (forms of exercise and social interaction), time in nature, and for growing



food for their household's consumption, e.g. parks and gardens, amenity green space, natural and semi-natural greenspaces, allotments and community gardens, pocket parks, playing fields, etc.

Green roofs

A layer of vegetation (often using species of sedum or moss) planted over a waterproofing system that is installed on top of a flat or slightly sloped roof. Variations include blue roofs (where rainwater is harvested for use) and brown roofs (where the growing medium for the vegetation layer is left unplanted to instead be populated by the seeds of wild, wind-carried species).

Green routes

Cycling and walking routes set in a high quality, immersive natural setting, safely segregated from motorised vehicles.

Green walls

Also known as 'vertical gardens' are sections of wall that have been fitted/covered with plant species. Green walls can also be extensive, covering most or all of an elevation. A local example of a green wall is on the north-west elevation of the Norwich Marks & Spencer branch's building (off Rampant Horse Street).

H

Habitats Sites

Sites Protected under the Habitats Regulations and recognised in the Suffolk Coast RAMS as at risk of disturbance from recreational use.

Health Impact Assessments (HIA)

A combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on health of a population, and the distribution of those effects within the population.

Health inequalities

The preventable, unfair and unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental and economic conditions within societies.

Health infrastructure

Infrastructure to facilitate the mitigation and prevention of ill-health occurring at the first instance and the potential worsening of existing health issues through lifestyle factors known to improve health. Typical examples include open space, play provision, etc.

Health

A state of complete physical, mental, and social well-being and not merely the absence of disease or infirmity.



Healthcare infrastructure

Infrastructure that supports the NHS delivery of primary, secondary and tertiary medical services and facilities including land and buildings, equipment, technology, research and development, etc.

Healthy environment

An environment where the air, land and water are safe for human health, supportive of healthy lifestyles, and free of hazards such as toxic chemicals which can reduce quality of life and create health problems.

Healthy life expectancy

An estimate of the number of years lived in ‘very good’ or ‘good’ general health, based on how individuals perceive their general health.

I

Incidental physical activity/exercise

Exercise undertaken as secondarily to a more primary task, rather than for its own sake e.g. walking or cycling to school/work (where the primary task is to get to school/work) or walking with heavy food shopping bags (where the primary task is to purchase food for the household), etc.

Inclusive environments

Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone.

L

Landscape-first

The green infrastructure for a development is planned and designed in before other elements, and in more initial detail than other elements. Both existing and proposed green infrastructure is prioritised, where buildings and infrastructure are then designed to integrate successfully with the landscape.

Landscaping (hard, or hardscaping)

Refers to elements such as paths, fencing, steps, and walls within an open space for functional or decorative purposes. Also includes hardscape, non-natural drainage systems (e.g. culverts), water features, sculpture, and public art.

Landscaping (soft)

The layers of plantings (e.g. trees, hedges, shrubs, grasses, and flowers) or the formation of banks, terraces, or other earthworks (e.g. land contours, mounds, bunds, swales, etc.) added to a space for functional (e.g. visual or noise buffer) or decorative purposes.



Lifetime neighbourhoods

Major residential developments or mixed-use developments that are primarily in residential use (residential led) that provide a holistic healthy environment for residents and visitors. See [Chapter 6 Lifetime Neighbourhoods](#) for a more detailed definition.

M

M4(2) Accessible and adaptable dwellings

Guidance contained in Part M of the Building Regulations 2010 (as amended)

M4(3) Wheelchair user dwellings

Guidance contained in Part M of the Building Regulations 2010 (as amended)

Movement network

The routes and hierarchies (primary, secondary, tertiary, shared) of routes for different transportation users (e.g. pedestrians) within an area.

N

Natural green space

Land, water and geological features which have been naturally colonised by plants and animals and which are accessible on foot.

Non-standard cycles

Non-standard cycles include all cycle types other than typical upright, two-wheeled cycles. This includes adopted hand cycles, tandem cycles, passenger cycles (e.g. rickshaws, bicycle buses), cargo bikes, tricycles, and standard cycles when they have attached trailers.

Nursing homes

Care home facilities that have registered nurses on site at all times.

O

Off lead dog area

An area provided purely for the use of owners with dogs off lead, which may be used for any activity where the dog is off lead and can be a distance from the owner (e.g., training, play, walking).

Open space

Recreation spaces that are provided and maintained for use by the public. 'Open space' can be categorised into 'green open space' and 'play provision'. Open space



can therefore include natural/semi-natural greenspace, parks and gardens, amenity greenspace, play provision (for children and/or for young people and adults), allotments, playing fields, playing pitches, community gardens, community orchards, cemeteries and churchyards and green routes. 'Open space' does not include built/indoor sport recreational facilities, such as leisure centres.

Outdoor sports and recreational facilities

The term 'outdoor sports and recreational facilities' includes natural grass playing fields, artificially surfaced pitches, Multi Use Games Areas, and outdoor recreational facilities.

P

Passivhaus

A standard of energy efficiency for a building, for which thermal comfort can be achieved solely by post-heating or post-cooling of the fresh air.

Permeability (of a movement network)

An area that offers lots of options for moving within and in/out of the built environment.

Permitted Development

Rights that provide a national grant of planning permission which allow certain building works and changes of use to be carried out without the need to obtain planning permission.

Place Attachment / Pride of place

A person-place bond that creates a sense of belonging and connection to the area a person lives in. This is usually supported by strong community ties, as well as a sense of pride (pride of place) that arises from a high quality, well maintained and personally relevant physical environment (i.e. meets the person's needs and preferences).

Place identity

The characteristics of a place that distinguishes it from other places.

Placemaking

The process used to shape public spaces and buildings. Rooted in community-based participation, place-making involves planning, design, and management.

Planning Conditions

Contained within a planning permission that impose certain requirements in order to enhance the quality of development and enable development to proceed where it would otherwise be considered unsustainable.



Planting

Plants such as trees, shrubs and grasses that are planted in private gardens to improve residential amenity or that are planted in the public realm for the benefit of the public, i.e. street trees and streets within open spaces.

Play environment

The overall quality of access and provision of play provision.

Play experiences

This term refers to different movements and skills used in play that support people to enjoy and benefit from the process of play, and ultimately receive direct health and well benefits from engaging in play. Play experiences can include balancing, running, jumping and landing, spinning, rocking, tumbling, turning, rolling, throwing/catching, hitting (e.g. a tennis ball), kicking (e.g. a football ball), climbing, scrambling, traversing, pulling, swinging, sliding, brachiating (swinging by the arms, such as when using horizontal bars) and hanging (e.g. from horizontal bars). Play also helps to develop imagination, problem-solving skills, and risk management skills.

Play provision

This term is used in this document to relate to outdoor for-purpose spaces that have been designed and equipped for unstructured play and informal, smaller-scale sport activities (e.g. 5-a-side football). Play provision can be for children (LAPs and LEAPs), children and young people (LEAPS and NEAPs) or for young people and adults (Youth/Casual) as it can also include exercise equipment for outdoor gyms and outdoor structures for social gathering. Play infrastructure is usually delivered within or adjacent to a type of green open space and provided with a landscaped setting.

Playing field

A green field that includes and maintains at least one **playing pitch**.

Playing pitch

A delineated area of 0.2ha or more which is used for sports such as association football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, American football, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.

Primary care services

Are based in the community and provide the first point of contact in the health care system, acting as the ‘front door’ of the NHS. Primary care includes general practice, community pharmacy, dental services, and eye health services.

Protected Area

Sites recognised in the Suffolk Coast Recreational Disturbance Avoidance Mitigation Scheme (RAMS) as at risk of disturbance from recreational use.

Public art

Art that is in the public realm, regardless of whether it is situated on public or private property or whether it has been purchased with public or private money.



Public facilities

Include public toilets, bins, and benches.

Public Rights of Way (PROW)

A route over which the public have the right to pass and re-pass. Can include footpaths (walking); bridleways (walking, cycling or horse riding) and byways (walking, cycling, horse riding driving).

Public space

Parts of the built environment where the public can use and access, regardless of who owns or manages the space.

R

Rain garden

A type of sustainable drainage feature that includes a shallow depression or channel that is planted using species of plants that are tolerant to having their roots inundated with water occasionally, and ideally that can adapt well to periods of drought or generally dynamic root environment conditions.

Recreation

Includes any activity that is not work, undertaken for the purposes of enjoying the activity for its own sake. Popular recreational activities in the public realm includes walking, running, cycling, bird watching, photography, paddleboarding and kayaking.

Recreational facilities

These are built indoor or outdoor sport, leisure/fitness facilities that do not take the form of 'open space' (green open space or play provision). They typically include facilities such as tennis courts, swimming pools, squash courts, bowls lawns, etc. Recreational facilities may be provided separately, in combination outdoors (e.g. tennis courts included within a park), or within a built leisure centre facility.

Residential and residential-led development

Development where the only use on the site is residential (C2, C3 or C4 use as per the in the Town and Country Planning (Use Classes) Order 1987 (as amended)). Residential-led development is where there are a mix of uses within the development, but where residential uses form the most significant element.

S

Semi-natural greenspace

An area that is subject to some maintenance, but not intensively managed.



Session-based physical activity/exercise

Exercise undertaken intentionally for its own sake, often within a focused period of time or distance and in a specific place, e.g. a 90 minute football match, a 10km cycle ride, a 60 minute yoga class at the gym, three laps of running around the local park, etc.

Shared use path

A path provided for both pedestrians and cyclists to use, enabled through suitable surfacing for cycles and sufficient width for users to pass each other safely. They can be provided separate to or immediately adjacent to carriageways. They must be supported by signage.

Social determinants/wider determinants of health

The social, economic, environmental, political and cultural factors that shape the conditions in which people are born, grow, live, work and age.

Social prescribing

A means of enabling GPs, nurses and other primary care professionals to refer people to a range of non-clinical services, support or activities, often provided by local voluntary and community organisations such as volunteering, gardening and cookery. Recognising that people's health is determined primarily by a range of social, economic and environmental factors, social prescribing seeks to address people's needs in a holistic way. It also aims to support individuals to take greater control of their own health.

Solar gain/solar shade

The term used to identify a number of systems to control the amount of heat and light admitted from the sun into a building.

Sustainable Drainage System (SuDS)

A drainage system that is designed to manage stormwater locally (as close to its source as possible), to mimic natural drainage and encourage its infiltration, attenuation, and passive treatment.

T

Task-focused lighting

The lighting scheme is designed to illuminate the minimum area required to undertake a set task, e.g. for lighting a footpath, task-focused lighting would be tilted downwards to illuminate the path's surface throughout its length, rather than spill out horizontally (creating glare) or upwards, uplighting the above tree canopy and disturbing wildlife and experience of dark skies.

Tenure-blind design

An approach to design that features in no explicit external indicators of tenure type in the design and layout of a development.



Trip chain

A trip chain is a circular journey where multiple stops are made, e.g. home > primary school (morning drop off) > place of work > primary school (afternoon pick up) > supermarket > home. A trip chain can be in quick succession or over the course of a day. Trip chains are often discussed in the context of making it easier for people to walk and cycle more of their journeys. This is by ensuring that the identified as likely key destinations are delivered together or close by as this keeps their trip chains short, quick, and low effort. This supports walking and cycling by reducing people's need to drive between these key destinations and makes walking and cycling them more appealing and accessible.

W

Wellbeing

The state of feeling healthy and happy and enjoying one's life. Wellbeing is further supported by having a sense of control over, and making progress in, areas of one's life that feel meaningful and having an adequate social support network.

Wheeling

Pedestrians that are using push and electric wheelchairs, electric mobility scooters, rollators, users with push chairs, skateboards, rollerblades/skates and push and electric scooters; 'wheeling' does not cover powered two-wheeled vehicles (motorbikes, scooters, and mopeds).

Windfall Sites

Sites which have not been specifically identified for development in the Local Plan or a Neighbourhood Plan.

Y

Youth/Casual

Play provision for young people and adults (ages 11+). Youth/Casual provision includes a wide range of play infrastructure, such as (but not limited to) exercise equipment for outdoor gyms, smaller Multi-Use Games Areas (MUGAs), zip wires, adult swings, skate parks, outdoor performance spaces and outdoor structures for social gathering.



Appendix 2: Healthy Environments: Design Prompts (HEDP)

The Healthy Environments Supplementary Planning Document (SPD) provides design guidance on the implementation of the key policies determining the appropriate design of developments for supporting positive health and wellbeing outcomes for communities. The SPD's guidance can be used to guide development of all types and scales, as appropriate to the nature of the proposal. The SPD's guidance has been structured into topic chapters, which are provided in the general chronological order that each of these essential elements (green infrastructure, active travel, buildings, centres, etc.) are recommended to be designed into the layout of developments.

[Policy SCLP11.1 Design Quality](#) and [Policy WLP8.29 Design](#) of the East Suffolk Local Plans require all proposals for major residential development (10 or more homes or site area of 0.5 hectares or more) to perform positively when assessed against the [Building for a Healthy Life](#) (BfHL) guide's assessment criteria, and that developments should seek to avoid red outcomes unless there are exceptional circumstances.

At the end of each of the SPD's topic chapters there is a list helpful 'design prompts'. The design prompts are intended as helpful reflective questions to help designers consider whether the proposal could be further refined to support positive health and wellbeing outcomes through that element (e.g. green infrastructure). Use of the SPD's design prompts to refine designs is encouraged but is not directly required through policy.

For residential and mixed use (with residential) developments to be able to be considered 'lifetime neighbourhoods', they should perform positively both when considered against the design prompts of the SPD, and when assessed against the BfHL guide's assessment criteria. More information on the lifetime neighbourhoods concept is available in [Chapter 6 Lifetime neighbourhoods](#).

This appendix collates each of the topic chapters' design prompts for convenient reference.

Chapter 2: Green infrastructure

- Are the open space types on site well connected to each other and to homes/schools or other key locations?
- Has the proposal provided adequate opportunities for the community to grow food?
- Does the SuDS scheme provide amenity benefits and can therefore be considered to contribute towards the site's green open space requirement?
- Has the design of the green infrastructure (including tree plantings) adequately factored in resilience matters such as climate change adaptability, durability, ecological impacts and biosecurity?
- (If applicable) Is the SANG provision of a high enough overall quality to deter people away from recreational activities on sensitive sites?
- (If applicable) Does the equipped play provision cater to the needs of the intended age groups and is inclusive of groups with reduced ability or other additional needs?



- (If applicable) Does the outdoor exercise equipment offer provide the opportunity for a comprehensive body-weight and/or exercise machine-based workout, and can be used to provide an appropriate level of challenge at all levels of fitness and mobility?

Chapter 3: Active travel

- How does the design and layout of the active travel infrastructure for the proposed development support safe, accessible and inclusive active travel for pedestrians and cyclists?
- How does the design and layout of the active travel infrastructure for the proposed development facilitate all four key journey types?
- (If applicable) How does the design and layout of the active travel infrastructure for the proposed development meet the needs of equestrians?

Chapter 4: Healthy Homes, Schools & Workplaces

- (For residential development) have the qualities listed in the healthy homes design guidance been considered and, where appropriate, are able to be observed in the proposal's design?
- (For school development) has active travel infrastructure between schools and surrounding residential areas been provided to any appropriate standard?
- (For school development) has the provision of green infrastructure been used to help provide an active, natural and good air quality environment around the school?
- (For workplaces) has the design considered employee and visitor health and wellbeing through delivery of supporting amenities such as showers, staff rooms, or a staff garden area?

Chapter 5: Healthy Centres & Community Facilities

- Has the centre been planned to include an appropriate mix of centre uses?
- Has the centre been designed to be compact, connected and complete, as per the policy context and definitions given?
- Has the centre been designed using dementia-friendly design principles?
- Has the potential for high activity areas in the centre to be fully pedestrianised been considered?
- Have appropriate measures to increase the safety and security of people using the centre been used?
- Has an adequate and relevant range of community facilities been proposed to support the development?
- Where a Community Hub/Wellbeing Hub is proposed, does the design accord with the general design criteria included in this chapter?



Chapter 6: Lifetime neighbourhoods

- Does the design of the neighbourhood ensure that the needs of people of different age groups are met?
- Does the design of the neighbourhood support people living with different forms of reduced ability to be included and as independent as possible?
- Does design of the neighbourhood support groups with additional needs, e.g. people on lower incomes, to meet their health and wellbeing needs?
- Does the design of the neighbourhood support safety in the public realm?
- Does the design of the neighbourhood ensure strong functional relationships between the different essential elements (green infrastructure, active travel infrastructure, buildings, centres, etc.)?
- Does the design of the neighbourhood achieve tenure-blind design for both homes and the infrastructure that supports the development (e.g. equal open space access)?



Appendix 3: The Health Protocol

The Planning in Health: Health Protocol ('The Health Protocol') is an engagement protocol that has been agreed between the Norfolk and Waveney local planning authorities, the Norfolk & Waveney ICB, and the respective Public Health teams of Norfolk County Council and Suffolk County Council. The Health Protocol does not cover the engagement process for engaging with health partners on sites that fall within the former Suffolk Coastal area, as this area is under the purview of the NHS Suffolk and North East Essex Integrated Care Board (NHS SNEE ICB). The Health Protocol was originally agreed in 2017 and is reviewed and updated periodically.

The Health Protocol sets a process for engagement between the above listed parties in the Local Plan and decision making processes, agree the below listed thresholds for engagement, help all parties to ascertain any changes needed to planned healthcare infrastructure delivery arising from development, and generally inform planning and decision making for preventing negative impacts to health and wellbeing. Health partners should be consulted for pre-application advice and for applications that meet the following criteria:

- A housing development of 50 dwellings or more;
- A development of less than 50 dwellings but which is still deemed to potentially impact on health services significantly;
- A development that includes a care facility, housing for the elderly, or student accommodation;
- A development that involves the significant loss of public open space;
- Any other type of development that could have significant health implications, and/or;
- The consultation process on draft Local Plans.

The Healthy Environments SPD is intended to help further support engagement between officers and health partners by providing a shared resource that can be used to facilitate useful discussions and set the framework for assessments and responses to planning applications. The Health Protocol includes some design guidance, however for development in the East Suffolk district more planning weight should be given to the design guidance included in the Healthy Environments SPD. The Healthy Environments SPD covers the whole of the district area, is more tailored to the specific East Suffolk policy context and includes more in depth design guidance. The Protocol should therefore be used to support the engagement process on planning applications that meet the above listed criteria, and the Healthy Environments SPD should be used for the assessment and decision making processes. The Health Protocol¹²⁷ is expected to be used to support the plan making process for the next East Suffolk Local Plan(s).

¹²⁷ <https://www.gnlp.org.uk/sites/gnlp/files/2021-10/Planning%20in%20Health%20Protocol%20August%202019.pdf>



Appendix 4: Key External Guidance

This table collates all the key external guidance referenced in each of the SPD chapters.

SPD chapter / Essential element	Key guidance resources
<p>2. Green infrastructure, including green open space, play provision, outdoor sports/recreation facilities, sustainable drainage systems (SuDS), trees and landscaping, green routes, and SANG (if applicable)</p>	<ul style="list-style-type: none"> • Natural England (2023) Green Infrastructure Framework • Trees & Design Action Group (2019) Tree Species Selection for Green Infrastructure: A Guide for Specifiers • East Suffolk Council (2021) Open Space Report • East Suffolk Council (2021) Playing Pitch and Outdoor Sports Strategy • East Suffolk Council (2023) Play Area Strategy 2022-27 • Fields in Trust (2015) Guidance for Outdoor Sport and Play Beyond the Six Acre Standard (England) • CIRIA (2015) The SuDS Manual • Suffolk Flood Risk Management Partnership (2023) Suffolk Flood Risk Management Strategy – Appendix A Sustainable Drainage Systems (SuDS): A Local Design Guide •
<p>3. Active travel infrastructure and streets, including use of dementia-friendly design principles in the public realm</p>	<ul style="list-style-type: none"> • Department for Transport (2020) Local Transport Note 1/20: Cycle Infrastructure Design • Department for Transport (2021) Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure • BS 8300 2018 Design of an accessible and inclusive built environment – (Part 1) External environment – Code of practice and (Part 2) Buildings – Code of practice • Suffolk County Council (2022) Suffolk Design: Streets Guide • Suffolk County Council (2023) Suffolk Guidance for Parking • East Suffolk Council (2022) East Suffolk Cycling & Walking Strategy •
<p>4. Healthy homes, schools and workplaces, including dementia-friendly design and tenure blind design principles at building and plot level</p>	<ul style="list-style-type: none"> • Town and County Planning Association: Healthy Homes Principles • Building for a Healthy Life (2020) • National Design Guide (2021) • Royal Town Planning Institute (2020) Dementia and Town Planning • Royal Town Planning Institute (2022) Housing for Older People • East Suffolk Affordable Housing SPD (2022) • East Suffolk Sustainable Construction SPD (2022)



<p>5. Healthy centres and community facilities that meet community needs</p>	<ul style="list-style-type: none"> • The Town and County Planning Association’s 20-minute Neighbourhood Guide (2021)
<p>6. Lifetime neighbourhoods successfully combining the essential elements to create functionality, relationship and increased inclusivity</p>	<ul style="list-style-type: none"> • Public Health England (2017) Spatial planning for health: an evidence resource for planning and designing healthier places • Department for Levelling Up, Housing & Communities (2021) National Design Guide • Sport England (2023) Active Design

Chief Medical Officer’s 2019 recommendations for physical activity by age group

Age group	UK Chief Medical Officer’s Physical Activity Guidelines (summaries)
Toddlers (1-2 years)	At least 180 minutes/3 hours per day at any intensity spread out over the day; should include active and outdoor play.
Pre-schoolers (3-4 years)	As above, though at least 60 minutes per day should be moderate to vigorous intensity physical play.
Children and Young People (5-18 years)	At least 60 minutes per day across the week at moderate to vigorous activity, with variety in the activities to ensure movement skills, muscular fitness, and bone strength is developed. Active travel at this intensity level also counts.
Adults (19-64)	For good physical and mental health, adults should aim to be physically active every day. Each week, adults should accumulate at least 150 minutes/2.5 hours of moderate intensity activity (such as brisk walking or cycling), or 75 minutes of vigorous intensity activity (such as running), or even shorter durations of very vigorous intensity activity (such as sprinting or stair climbing), or any combination of these intensities.
Older adults (65+)	150 minutes (2.5 hours) of moderate intensity aerobic activity, building up gradually from current levels. Those who are already regularly active can achieve these benefits through 75 minutes of vigorous intensity activity, or a combination of moderate and vigorous activity, to achieve greater benefits. Weight-bearing activities help to maintain bone health.

Write to us



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

Call us



Planning Policy and Delivery Team (Local Plans)
01394 444557

Development Management (Planning Applications)
01394 444832

Email us



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

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

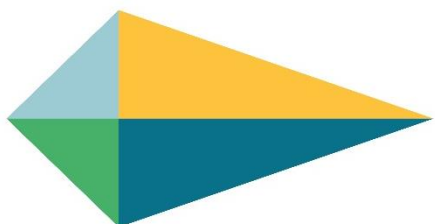
This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

www.eastsuffolk.gov.uk/Planning

Consultation Statement

Healthy Environments Supplementary Planning Document

April 2024



EASTSUFFOLK
COUNCIL

Contents

1 Introduction	3
2. Who was consulted?	4
2.1 Initial consultation.....	4
2.2 Consultation on the Draft SPD.....	4
3. How were they consulted?.....	5
Appendix 1: Initial Consultation – Social Media	8
Appendix 2: Initial Consultation Summary	9
Appendix 3: Initial Consultation Bodies	33
Appendix 4: Draft Consultation Bodies	34
Appendix 5: Draft Consultation Promotion Material	36
Appendix 6: Draft Consultation Responses	40

1 Introduction

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

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

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

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

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

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

SPDs expand upon policy and provide further detail to support the implementation of policies in Local Plans. Whilst not a part of the development plan, they are a material consideration in the determination of planning applications. The Local Plan policies, which this SPD provides guidance on, can be viewed on the Council’s website¹. The Council’s approach to engagement in the preparation of SPDs is set out in the Statement of Community Involvement².

2. Who was consulted?

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

2.1 Initial consultation

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

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

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

2.2 Consultation on the Draft SPD

Consultation on the Draft SPD was held between 15th November 2023 and 10th 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.

¹ Available at: www.eastsuffolk.gov.uk/localplan.

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

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

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

3. How were they consulted?

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

Initial consultation

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

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

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

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

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

Consultation on the Draft SPD

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

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

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

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

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

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

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

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

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

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

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

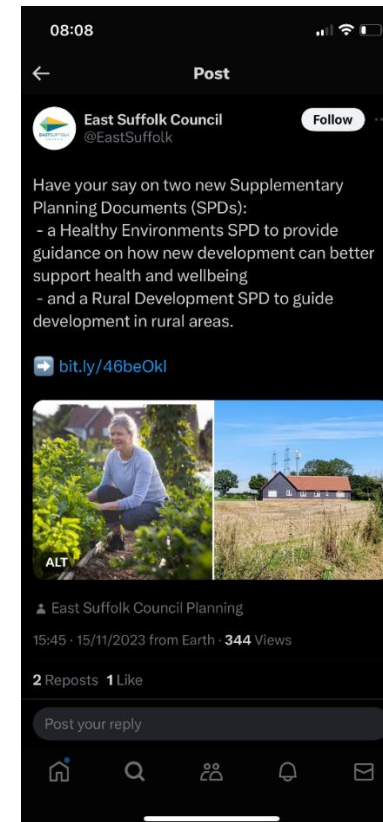
<https://eastsuffolk.inconsult.uk/DraftHESPD2023/listResponses>

Appendix 1: Initial Consultation – Social Media

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

Draft consultation – Nov 2023 – Jan 2024

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



Appendix 2: Initial Consultation Summary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix 3: Initial Consultation Bodies

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

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

Specific consultation bodies

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

Other individuals and organisations

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

Appendix 4: Draft Consultation Bodies

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

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

Specific consultation bodies

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

General consultation bodies


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

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

Other individuals and organisations

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

Appendix 5: Draft Consultation Promotion Material

Social media platform	Date	Image
X (formerly Twitter)	15 th November 2023	
	30 th November 2023	

<p>Facebook</p>	<p>15th 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"> - a Healthy Environments SPD to provide guidance on how new development can better support health and wellbeing - and a Rural Development SPD to guide development in rural areas. <p>View and comment: https://bit.ly/46beOkl</p> <p>2 🌟 12 📌</p> <p>Like Comment</p>	
	<p>30th 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"> ■ a Healthy Environments SPD to provide guidance on how new development can better support health and wellbeing ■ and a Rural Development SPD to guide development in rural areas. <p>... See more</p> <p>2 🌟 16 📌</p> <p>Like Comment</p>	
<p>LinkedIn</p>	<p>15th 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 – 15th November 2023

Have your say on two planning documents

Posted by on 15 November 2023 | Comments

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

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

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

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

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



Consultation period
15th November 2023 – 10th January 2024

Public Consultation on two Supplementary Planning Documents

Rural Development and Healthy Environments

What are we doing?

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

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

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

How can you get involved?



HIGHLIGHT ISSUES

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



SUGGEST SOLUTIONS

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

planningpolicy@eastsuffolk.gov.uk
 01394 444557 / 01502 523029

Appendix 6: Draft Consultation Responses

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

Chapter 1 - Introduction - The purpose of the SPD

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

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

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

Chapter 1 - Introduction - Key health challenges for East Suffolk

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

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

Chapter 1 – Introduction - What are healthy environments?

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

Chapter 1 – Introduction - Health Impact Assessments

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

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

Chapter 2 - Green Infrastructure – Introduction

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

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

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

Chapter 2 - Green Infrastructure – Policy context

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

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

Chapter 2 - Green Infrastructure - Types of open space

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

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

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

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

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

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

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

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

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

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

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

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

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

the Beccles Townlands Trust			
--------------------------------	--	--	--

Chapter 2 – Green Infrastructure - The benefits of open space - Outdoor sport and recreational facilities

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

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

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
-------------------	-----------------	-----------------	------------------	--------

Ingleton Wood LLP & DLP Planning Ltd on behalf of Larkfleet Group, Chenery's Farm Partnership and the Beccles Townlands Trust	64	Respondent supports flexibility in the 8 hectares of SANG provision per 1,000 people figure. Respondents agree that SANG should be planned and designed before other forms of green infrastructure.	Support noted.	None.
---	----	---	----------------	-------

Chapter 2 – Green Infrastructure – The benefits of open space – Open Space Methodology: determining quantity and typology requirements – Stage 1: Green open space – quantity

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

			policy context to justify their inclusion; the Green Infrastructure Framework standards and tools will be reviewed and considered as part of the future Local Plan planmaking process.	this comment.
--	--	--	--	---------------

Chapter 2 – Green Infrastructure - Design principles by green open space typology - Trees, landscaping, green routes and sustainable drainage systems - Street trees and trees in hardscape environments

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

		<p>The respondent advised that a tree should not be planted directly over sewers or where excavation onto the sewer would require removal of the tree.</p> <p>The respondent advised that to minimise the risk of root damage, tree planting should provide good growing conditions. The respondent supported the reference to the 'Trees in Hard Landscapes: A Guide for Delivery'.</p>		
--	--	--	--	--

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

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

		Development requires 20m distance between trees to avoid overhanging branches. This is to ensure air and light can reach the PRow and avoids leaf litter on the PRow.	
--	--	---	--

Chapter 2 – Green Infrastructure - Design principles by green open space typology - Trees, landscaping, green routes and sustainable drainage systems - Multi-functional, nature-led sustainable drainage systems (SuDS)

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

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

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

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

Infrastructure chapter.

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

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

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

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

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

Chapter 2 – Green Infrastructure - Maintenance agreements

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

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

Name/Organisation	Comment ID/Ref.	Comment Summary	Council Response	Action
-------------------	-----------------	-----------------	------------------	--------

Natural England	90	The respondent recommended that an additional design prompt be added to the Green Infrastructure chapter: "Is there an opportunity for the development to integrate with the aims of the Local Nature Recovery Strategy and contribute to the Nature Recovery Network?"	This has not been added into the SPD as the Suffolk Local Nature Recovery Strategy has not yet been produced.	None.
-----------------	----	---	---	-------

Chapter 3 - Active Travel - Key policies and guidance for active travel

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

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

Chapter 3 - Active Travel - Introduction

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

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

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

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

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

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

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

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

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

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

		The respondent identified an error where Section 278 agreement was stated in the guidance rather than Section 106 agreement.	
--	--	--	--

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

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

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

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

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

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

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

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

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

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

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

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

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

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

		relevant area of the Suffolk County Council website.	
--	--	--	--

Chapter 4 - Healthy Homes, Schools and Workplaces - Key Local Plan policies for Healthy Homes, Schools & Workplaces

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix 1 - Glossary of terms

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

		Order, and Sport England’s Playing Fields Policy and Guidance (2018).		playing pitches have been added to the Glossary.
--	--	---	--	--

Appendix 2 - Healthy Environments Master Checklist - What is the Healthy Environments Master Checklist?

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

Appendix 4 - Key External Guidance

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

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

Write to us



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

Call us



Planning Policy and Delivery Team (Local Plans)
01394 444557

Development Management (Planning Applications)
01394 444832

Email us



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

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

This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

www.eastsuffolk.gov.uk/Planning

East Suffolk - Equality Impact Analysis (EqIA) Agenda Item 5

ES/1967

EqIA reference: **EQIA604900069**

Service area/Team conducting EqIA: **Planning Policy and Delivery Planning and Coastal Management**

Officer conducting the EqIA: **Ian Johns**

Officer email address: **ian.johns@eastsuffolk.gov.uk**

Responsible Cabinet member: **Cllr Kay Yule**

Title of project/policy/initiative/action relating to this EqIA: **Healthy Environments Supplementary Planning Document**

Is this a new project, policy, initiative or action that directly impacts people: **Yes**

Date of EqIA: **11/04/2024**

Does the project/policy/initiative/action relating to this EqIA have the potential for positive or negative impact on any of the protected characteristics?

Characteristic - Impact

Age: **Positive**

Reason: **The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of people of all ages, as well as encouraging healthy lifestyles. It will therefore benefit those from different age groups.**

Disability: **Positive**

Reason: **The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of all residents. This includes providing disabled access and ensuring access to facilities and increased mobility. It will therefore benefit this those with a disability.**

Gender reassignment: **No impact**

Reason: **The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of all residents, as well as encouraging healthy lifestyles. It will therefore not impact upon this group.**

Marriage and civil partnership: **No impact**

Reason: **The Healthy Environments SPD includes guidance to help developers create high**

quality developments that benefit the physical and mental health of all residents, as well as encouraging healthy lifestyles. It will therefore not impact upon this group.

Pregnancy and maternity: No impact

Reason: The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of all residents, as well as encouraging healthy lifestyles. It will therefore not impact upon this group.

Race: No impact

Reason: The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of all residents, as well as encouraging healthy lifestyles. It will therefore not impact upon this group.

Religion or belief: No impact

Reason: The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of all residents, as well as encouraging healthy lifestyles. It will therefore not impact upon this group.

Sex: No impact

Reason: The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of all residents, as well as encouraging healthy lifestyles. It will therefore not impact upon this group.

Sexual orientation: No impact

Reason: The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of all residents, as well as encouraging healthy lifestyles. It will therefore not impact upon this group.

Deprivation/Socio-economic Disadvantage: Positive

Reason: The Healthy Environments SPD includes guidance to help developers create high quality developments that benefit the physical and mental health of people of all levels of income, as well as encouraging healthy lifestyles. This includes the provision exercise equipment and access to green space. It will therefore benefit those who are experiencing socio-economic deprivation.

What evidence or data has been collated or used to support the completion of this EqlAPublic consultations and engagement (stating any specific groups you engaged with or surveys referred to), Engagement with other internal teams/ departments

Details for public consultations: There was an initial process of consultation, which guided the preparation of the Healthy Environments Supplementary Planning Document (SPD). The consultation ran from 26th September to 7th November 2022 and the following groups were contacted:

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

The organisations listed above were contacted by email or post. The consultation was advertised on the Council’s website as well as on social media posts. A questionnaire was published on the Council’s website, which included background information about the SPD, as well as a series of questions to be completed. Hard copies were available on request by contacting the planning policy and delivery team. Comments received have been taken into account in the preparation of the draft SPD.

A formal public consultation took place from 15th November 2023 to 10th January 2024 on the Draft Healthy Environments SPD. This consultation lasted a total of eight weeks. An extra two weeks were added to the duration of the consultation to take account of the latter part of the consultation overlapping with the Christmas holidays. The purpose of this consultation was to enable respondents to comment on the draft Healthy Environments SPD.

The document was made available online on the Council’s website to enable people to comment. Consultation letters and emails were sent to consultees on the Council’s planning policy mailing list. A press release was released covering the consultation. The planning policy mailing list included Town and Parish Councils, Suffolk County Council, East Suffolk Councillors, neighbouring district Councils including the Broads Authority, developers, agents, landowners, business associations, civic societies, infrastructure providers, and members of the public.

Copies of consultation documents were available online, and hard copies made available for inspection in libraries and in the Council’s customer service centres.

Details for engagement: Preparation of the document was guided by a steering group, which met at regular intervals. This included colleagues from the development management, specialist services, environmental protection, leisure operations, economic development and communities teams. It also included employees from the NHS and Suffolk County Council.

There were also a number of focus groups, which were concerned with particular issues. Issues discussed included Suitable Alternative Natural Green Space, open space and play and wellbeing hubs. These were attended by Council officers and NHS employees.

Lastly, the document was presented to the Local Plan Working Group for discussion. This is

a group of elected members that meets to oversee the preparation of planning policy documents and provide input and guidance.

As a result of undertaking this EqlA do you need to provide information relating to the policy, project, initiative or action to the public in a different language or form and how do you propose to do this: **The initial consultation took place online, but hard copies of the consultation document could be made available by contacting the Planning Policy and Delivery Team. As part of the eight week period of formal consultation the document was published on the Council's website with hard copies available on request for those unable to access it online. The document could be requested in a different language. When such requests were received the Customer Services Team were involved in ensuring that this request was actioned. No requests were received for the document in a different language.**

As a result of completing this EqlA, has the Author, Service team, Project manager made any changes or adjustments to the policy/project/initiative/action: **No**

Is the policy/project/initiative/action subject to equality monitoring: **No**



Strategic Environmental Assessment Screening Opinion

Draft Healthy Environments Supplementary Planning Document

November 2023

Contents

1. Introduction	1
2. Legislative Background	1
3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC	2
4. Assessment	3
5. Conclusion.....	7
Appendix 1: Responses from Statutory Consultees.....	8

1. Introduction

The Healthy Environments Supplementary Planning Document (SPD) has been produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, excluding the parts of East Suffolk that are within the Broads National Park, for which the Broads Authority is the local planning authority.

In some circumstances a Supplementary Planning Document could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

This screening report is designed to test whether or not the contents of the Healthy Environments Supplementary Planning Document require a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the SPD and the need for a full SEA. This SEA report reviewed an early draft of the Healthy Environments Supplementary Planning Document (SPD).

2. Legislative Background

The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended, including through EU exit legislation), or SEA Regulations.

The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply. SEA requirements relate to plans or programmes which are subject to preparation or adoption by an authority at national, regional or local level, which includes those prepared for town and country planning and land use. SEA is required where the plan or programme is likely to have significant environmental effects. It is therefore necessary to screen the SPD

to identify whether significant environmental effects are likely. Where screening identifies significant environmental effects, a full Strategic Environmental Assessment is required.

3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The preparation of the SPD triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to the Regulations;
and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations. The opinions from the statutory consultation bodies: Historic England, the Environment Agency and Natural England, are therefore to be taken into account. All three consultation bodies were consulted on a draft screening opinion in September 2023. Responses were received from Historic England and Natural England, and these are appended to this report in Appendix 1.

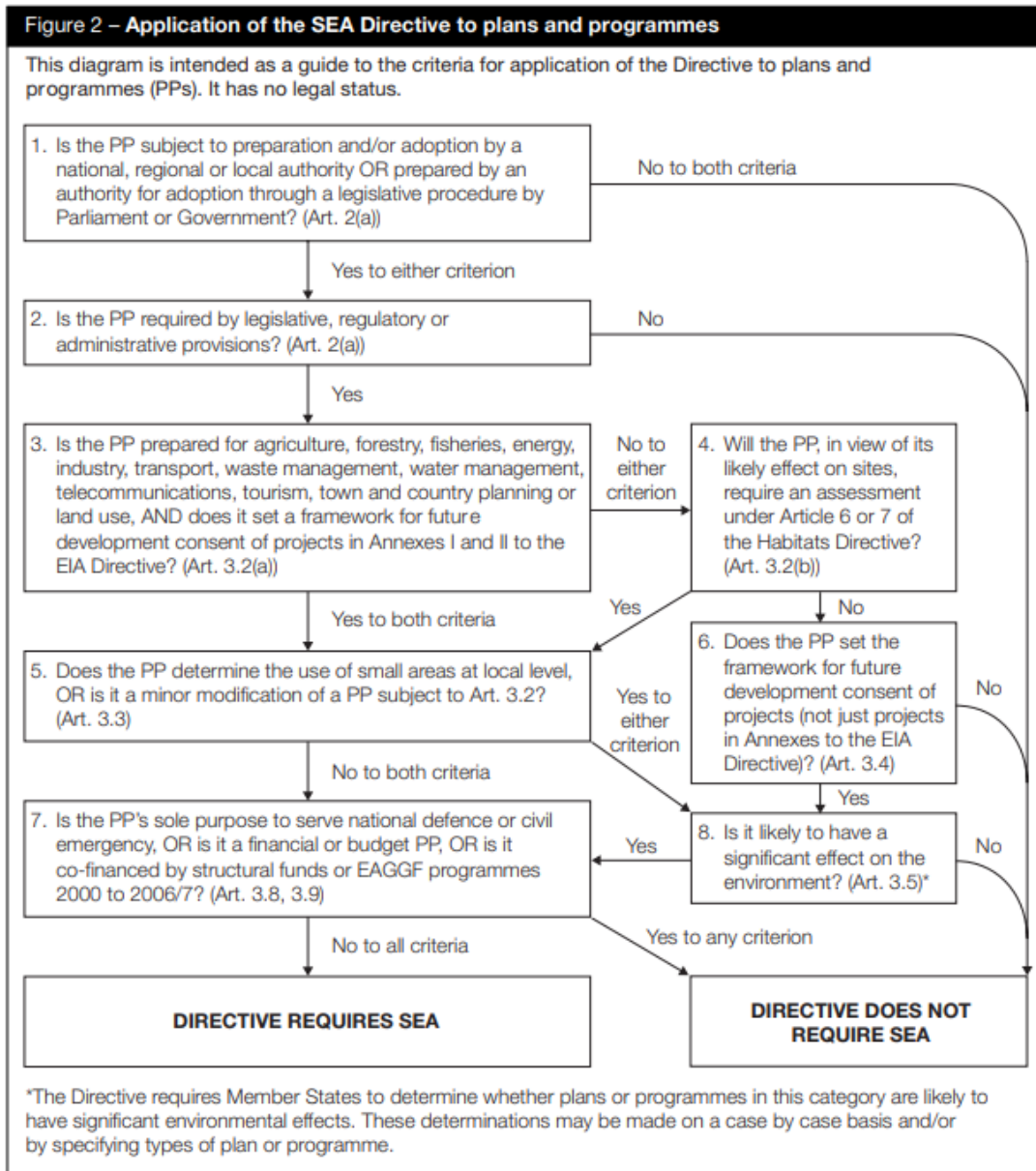
Schedule 1 of the SEA Regulations sets out the criteria for determining likely significant effects as follows:

- 1. The characteristics of plans and programmes, having regards, in particular to:
 - a. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.
 - b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.

- c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.
 - d. Environmental problems relevant to the plan or programme.
 - e. The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
- a. The probability, duration, frequency and reversibility of the effects.
 - b. The cumulative nature of the effects.
 - c. The trans boundary nature of the effects.
 - d. The risks to human health or the environment (e.g. due to accidents).
 - e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - f. the value and vulnerability of the area likely to be affected due to:
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values;
 - iii. intensive land-use; and
 - g. the effects on areas or landscapes which have a recognised national, community or international protection status.

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the Supplementary Planning Document will require a full Strategic Environmental Assessment.

1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. The preparation and adoption of the draft Healthy Environments Supplementary Planning Document (SPD) is being carried out by East Suffolk Council. The SPD is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

Yes. The production of the SPD forms part of the delivery of the statutory Development Plan and the process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and relates to the administration of the Council's planning service.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

The SPD has been prepared in support of the delivery of town and country planning and land use policies.

The SPD will not set a framework for the future consent of projects listed in Annexes I and II of the EIA Directive.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

A separate screening exercise has been carried out under the Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations (2017) (as amended). This has determined that a full Appropriate Assessment is not required.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Not applicable (based on the responses to questions 3 and 4 above).

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

Yes. The Healthy Environments Supplementary Planning Document will be a material consideration in the determination of planning applications and will be applied alongside the policy framework provided by the Local Plans.

7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

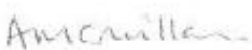
No. The guidance contained in the Healthy Environments Supplementary Planning Document will provide information and advice concerning the implementation of the Council's Local Plan policies. The SPD will provide background on the key health challenges for East Suffolk and provide planning and design guidance to ensure positive health and wellbeing outcomes. The SPD will include case study examples and tools and guidance for use during the design and appraisal process. Topics covered within the SPD include: green infrastructure, active travel, healthy homes, schools and workplaces, healthy centres and community facilities and lifetime homes. The SPD will provide guidance on policies within both the Suffolk Coastal Local Plan and the Waveney Local Plan. It is unlikely that the SPD will have a significant impact upon the environment. All policies within both Local Plans have been subject to a full Sustainability Appraisal, incorporating the requirements for Strategic Environmental Assessment.

5. Conclusion

The Healthy Environments Supplementary Planning Document will support the implementation of policies in the East Suffolk Council - Suffolk Coastal Local Plan (adopted September 2020) and the East Suffolk Council - Waveney Local Plan (adopted March 2019) which were both subject to Sustainability Appraisal including Strategic Environmental Assessment.

It is considered by East Suffolk Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Healthy Environments Supplementary Planning Document to ensure compliance with SEA legislation.

Historic England, the Environment Agency and Natural England were consulted on a draft screening opinion in September 2023. Responses were received from Historic England and Natural England, and these are appended to this report in Appendix 1. The responses received agreed with the conclusion that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Healthy Environments Supplementary Planning Document.

Signed: 

Dated: 13 November 2023

Andrea McMillan
Planning Manager (Policy, Delivery and Specialist Services)
East Suffolk Council

Appendix 1: Responses from Statutory Consultees

Historic England Response



Ms Laura Mundy
East Suffolk Council
Riverside
4 Canning Road
Lowestoft
Suffolk
NR33 0EQ

Direct Dial: [REDACTED]

Our ref: PL00794036

4 October 2023

Dear Ms Mundy

Re: draft SEA screening opinion- draft Healthy Environments SPD

Thank you for consulting us regarding the draft SEA screening opinion- draft Healthy Environments SPD. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and therefore welcome the opportunity to comment on this document. I can confirm that we agree with the draft screening opinion conclusion that no further SEA work is required. I would be grateful if you would confirm receipt of this email.

Yours sincerely,

Andrew Marsh
Historic Environment Planning Adviser, Planning Group
[REDACTED]

Natural England Response

Date: 09 November 2023
Our ref: 450802

Laura Mundy
East Suffolk Council

BY EMAIL ONLY



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Laura Mundy

East Suffolk Local Plan - draft Healthy Environments Supplementary Planning Document - draft Strategic Environmental Assessment screening opinion & HRA Screening Opinion

Thank you for your consultation on the above dated 15 September 2023 which was received by Natural England on the same date.

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 present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)

It is Natural England's advice, on the basis of the material supplied with the consultation, that:

- significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,
- significant effects on Habitats sites¹, either alone or in combination, are unlikely.

The proposed Supplementary Planning Document is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Natural England agrees with the conclusions of the report that it is not likely there will be significant environmental effects arising from the policies in the plan, which have not already been accounted for within the adopted local plan. Therefore, the Healthy Environments Supplementary Planning Document does not require further SEA work to be undertaken. Natural England also agrees that the SPD would be unlikely to result in significant effects to European Sites, either alone or in combination, and therefore an appropriate assessment under the Habitats Regulations is not required.

¹ Habitats sites are those referred to in the [National Planning Policy Framework](#) (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites".

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Please send any new consultations, or further information on this consultation to



Yours sincerely

Alejandra Hart
Norfolk & Suffolk Team



Habitats Regulations Assessment Screening Statement

**Draft Healthy Environments
Supplementary Planning Document**

November 2023

Contents

1. Introduction.....	1
2. Protected sites covered by this report	3
3. Healthy Environments Supplementary Planning Document	4
4. Other Plans and Projects.....	5
5. Assessment of likely significant effects of the Draft Healthy Environments Supplementary Planning Document (SPD) on Habitat sites.....	7
6. Summary and conclusions	14
Appendix 1: Sources of background information	15
Appendix 2: Locations of Habitat sites	16
Habitat sites within 20km of the East Suffolk Council- Waveney Local Plan Area	16
Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area	20
Appendix 3: Relevant Habitat sites	24
Appendix 4: Natural England Consultation Response.....	37

1. Introduction

1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as ‘Habitat Sites’.

1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).

1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:

‘Where a land use plan:

(a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) Is not directly connected with or necessary to the management of the site, The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.’

1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.

Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European

Union¹, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

1.5 The draft Healthy Environments Supplementary Planning Document (SPD) is being produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, outside of the Broads. This report considers whether there are likely to be significant effects on protected Habitat sites and where a full Appropriate Assessment may be required.

1.6 East Suffolk (outside of the Broads) is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the East Suffolk Council - Waveney Local Plan adopted March 2019.

1.7 Both Local Plans were subject to Habitats Regulations Assessment as part of their production. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts. Both Appropriate Assessments identified recreational disturbance particularly from dog walkers as a significant effect. The Council has subsequently produced a Recreational Avoidance and Mitigation Strategy and requires payment towards mitigation from residential developments within 13km of the protected Habitat sites.

¹ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

2. Protected sites covered by this report

2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of East Suffolk. The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3, along with a summary of the pressures and threats as documented in the Appropriate Assessments for the Local Plans.

Table 1: Relevant Habitat sites

Name
Alde-Ore and Butley Estuaries SAC,
Alde-Ore Estuary SPA, Ramsar
Benacre to Easton Barents SPA
Benacre to Easton Barents Lagoons SAC
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Deben Estuary SPA, Ramsar
Dew's Ponds SAC
Great Yarmouth North Denes SPA
Haisborough, Hammond and Winterton SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Norfolk Valley Fens SAC
Outer Thames Estuary SPA
Orfordness – Shingle Street SAC
Sandlings SPA
Southern North Sea SAC
Staverton Park and The Thicks, Wantisden SAC
Stour and Orwell Estuaries SPA, Ramsar
The Broads SAC
Winterton-Horsey Dunes SAC

3. Healthy Environments Supplementary Planning Document

- 3.1 This HRA report reviews the draft Healthy Environments Supplementary Planning Document (SPD).
- 3.2 The draft Healthy Environments SPD provides information and advice to inform the consideration health and wellbeing in new developments. The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for East Suffolk. The SPD, when adopted, will be a material consideration in the determination of applications for planning permission. The SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
- 3.3 The introduction and background chapters of the SPD explain the policy context, the purpose of the SPD, provide definitions of key terms and set out health and wellbeing data for East Suffolk. These sections are factual and descriptive and have therefore not been included in the screening table in section 5 of this report. The SPD will also contain information in a number of appendices including a glossary, a healthy environment master checklist, health and wellbeing indicators and a health inequalities matrix. Again, as these sections are mostly descriptive and do not include new guidance they have not been included in the screening table in section 5 of this report.
- 3.4 Other chapters in the SPD provide detailed information and advice concerning the implementation of the Council's Local Plan policies. Topics covered within the SPD include: green infrastructure, active travel, healthy homes, schools and workplaces, healthy centres and community facilities and lifetime homes. These chapters are considered in the screening table in section 5 of this report.

4. Other Plans and Projects

- 4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District and Waveney District.
- 4.3 The draft Healthy Environments Supplementary Planning Document (SPD) adds further detail and guidance to a wide range of policies within the Suffolk Coastal Local Plan and the Waveney Local Plan to ensure positive health and wellbeing outcomes from new development. Specifically the following Local Plan policies are supported by the SPD.

Key policies – Suffolk Coastal Local Plan	Key policies – Waveney Local Plan
Policy SCLP7.1 Sustainable Transport	Policy WLP8.21 Sustainable Transport
Policy SCLP7.2 Parking Proposals and Standards	Policy WLP8.22 Built Community Services and Facilities
Policy SCLP8.1 Community Facilities and Assets	Policy WLP8.29 Design
Policy SCLP8.2 Open Space	Policy WLP8.30 Design of Open Spaces
Policy SCLP10.1 Biodiversity and Geodiversity	Policy WLP8.31 Lifetime Design
Policy SCLP11.1 Design Quality	Policy WLP8.34 Biodiversity and Geodiversity

- 4.4 A screening process considered each policy in the Suffolk Coastal and Waveney Local Plans and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. The Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans considered the following themes:

- Recreation pressure,
- Air quality and traffic emissions,
- Biodiversity net gain,
- Urbanisation,
- Water quality, resources and treatment, and
- Flood risk and coastal erosion.

- 4.5 Mitigation measures were identified within the Appropriate Assessments and incorporated within both Local Plans, resulting in a conclusion that neither plan would lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts.

5. Assessment of likely significant effects of the Draft Healthy Environments Supplementary Planning Document (SPD) on Habitat sites

- 5.1 Table 3 below considers each relevant section of the draft Healthy Environments Supplementary Planning Document (SPD) in relation to whether there is potential for a likely significant effect on protected Habitat sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Table 3: Likely significant effects of the Draft Healthy Environments Supplementary Planning Document

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Green Infrastructure	<p>This chapter sets out guidance on green open space and play provision, including detailed guidance on the calculation of required quantities. Open space design is also considered with design principles for different typologies which includes the consideration of accessibility and inclusivity; location; resilience; flexibility of use; safety and security; sensory stimulation. Further guidance is given relating to trees, landscaping, green routes and multi-functional sustainable drainage systems.</p> <p>Within this chapter there is specific guidance on Suitable Alternative Natural Greenspace (SANG) requirements associated with new developments. This covers requirements for different scales of development and give guidance on both quantity and quality.</p> <p>The guidance in this chapter refers back to the Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk</p>	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>Councils ('RAMS') and draws upon the guidance in the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Habitat Regulation Assessment (HRA) Record which was developed with Natural England to support the determination of planning applications.</p> <p>The guidance in this chapter seeks to actively deliver alternative recreation opportunities as part of new developments to ensure that new development coming forward does not lead to adverse impacts on the natural environment of East Suffolk, including protected habitat sites. The guidance also seeks to ensure that new development contributes positively to health and wellbeing of future occupiers and existing uses and residents.</p> <p>The guidance in this chapter does not in itself promote new development beyond what will be delivered under other Local Plan policies and will therefore not lead to likely significant effects on Habitat Sites.</p>			

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Active Travel	<p>This chapter sets out guidance in relation to active travel infrastructure design to encourage walking, cycling and other ‘wheeling’ such as wheelchairs, electric mobility scooters, electric scooters, skateboards etc. It also includes detailed guidance on the key journey types to design for to ensure walkability and cyclability; design standards for accessible and inclusive public rights of way; and cycle parking design.</p> <p>The guidance contained here does not in itself promote new development beyond what is required by Local Plan policy and will therefore not lead to likely significant effects on Habitat Sites.</p>	None	None	No
Healthy Homes, School & Workplaces	<p>This chapter provides guidance on the consideration of health and wellbeing within the design on homes, schools and workplaces. The guidance here covers:</p> <ul style="list-style-type: none"> • Environmental protection • Residential amenity • Lifetime design of homes • Sustainably constructed homes • Tenure-blind homes 	None	None	No

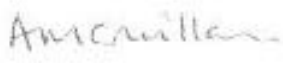
Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<ul style="list-style-type: none"> • Access to natural green space • Sustainable school travel options • BREEAM health and wellbeing assessment criteria <p>The guidance in this chapter seeks to ensure that new development coming forward in East Suffolk contributes positively to health and wellbeing of future occupiers and existing uses and residents. The guidance in this chapter does not in itself promote new development beyond what will be delivered under other Local Plan policies and will therefore not lead to likely significant effects on Habitat Sites.</p>			
Healthy Centres & Community Facilities	This chapter provides guidance on creating Sustainable communities through the provision of compact, connected and complete local, district and town centres. The guidance encourages high environmental quality, which is inclusive, incorporates legible design and is dementia friendly.	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	<p>This chapter also provides specific guidance on the design and provision of Wellbeing Hubs based around the One Public Estate model to co-locate services that meet community needs for leisure, education and medical facilities and increase their visibility and use.</p> <p>The guidance in this chapter seeks to ensure that new development coming forward in East Suffolk contributes positively to health and wellbeing of future occupiers and existing uses and residents. The guidance in this chapter does not in itself promote new development beyond what will be delivered under other Local Plan policies and will therefore not lead to likely significant effects on Habitat Sites.</p>			

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
Lifetime Neighbourhoods	<p>This chapter sets out guidance on design and consideration of ‘lifetime neighbourhoods’ to ensure that places are inclusive, and designed so that people of all ages and levels of ability can meet their day-to-day needs. It covers street design, active travel, housing mix, energy efficiency of dwellings, open/ play space provision, education provision. Specific guidance is provided for neighbourhoods that meet the needs of older people.</p> <p>The guidance in this chapter seeks to ensure that new development coming forward in East Suffolk contributes positively to health and wellbeing of future occupiers and existing uses and residents. The guidance in this chapter does not in itself promote new development beyond what will be delivered under other Local Plan policies and will therefore not lead to likely significant effects on Habitat Sites.</p>	None	None	No

6. Summary and conclusions

- 6.1 The draft Healthy Environments Supplementary Planning Document (SPD) provides additional guidance to inform the determination of planning applications alongside the Waveney and Suffolk Coastal Local Plans. The draft Healthy Environments SPD provides information and advice to inform the consideration health and wellbeing in new developments. The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for East Suffolk. The SPD, when adopted, will be a material consideration in the determination of applications for planning permission.
- 6.2 Implementation of the Healthy Environments Supplementary Planning Document will not lead to likely significant effects on protected Habitat sites.
- 6.3 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body. Their response is contained in Appendix 4. Natural England agreed with the conclusion that the Healthy Environments Supplementary Planning Document will not lead to likely significant effects on protected Habitat sites.

Signed: 

Dated: 13 November 2023

Andrea McMillan
Planning Manager (Policy, Delivery and Specialist Services)
East Suffolk Council

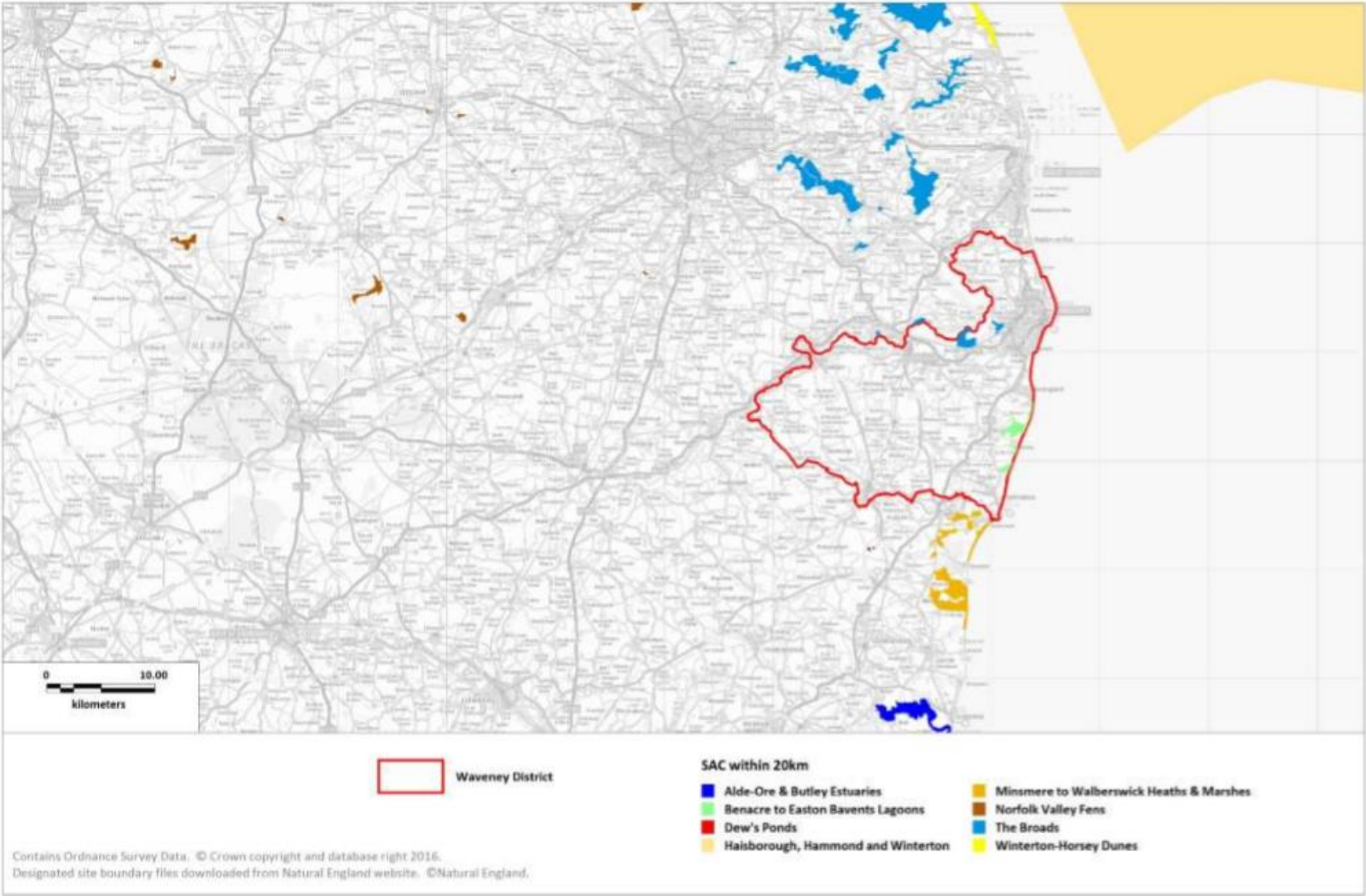
Appendix 1: Sources of background information

- East Suffolk Council – Suffolk Coastal Local Plan (September 2020)
- East Suffolk Council – Waveney Local Plan (March 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018)
- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)

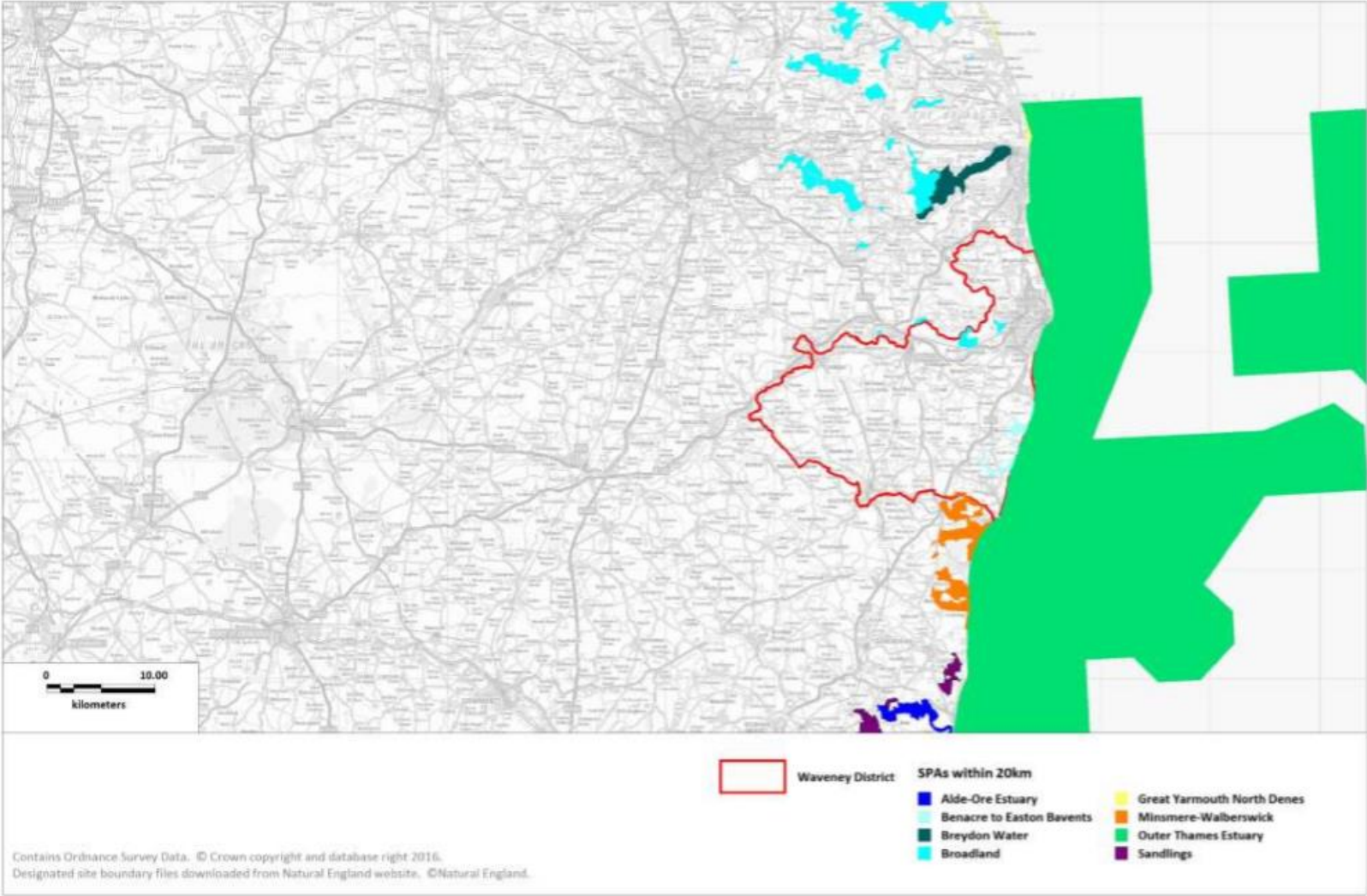
Appendix 2: Locations of Habitat sites

Habitat sites within 20km of the East Suffolk Council-
Waveney Local Plan Area

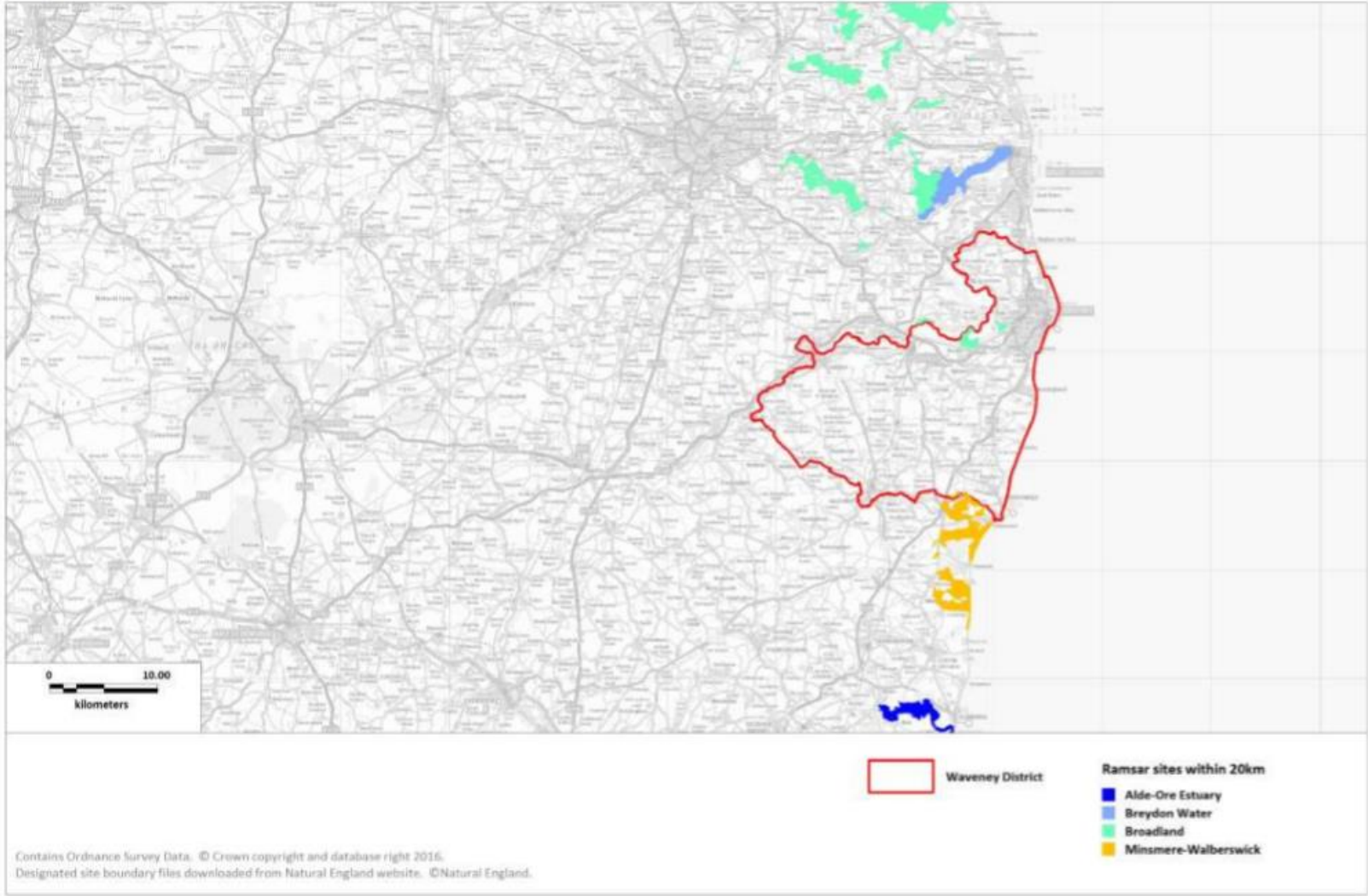
Map 1: SACs



Map 2: SPAs

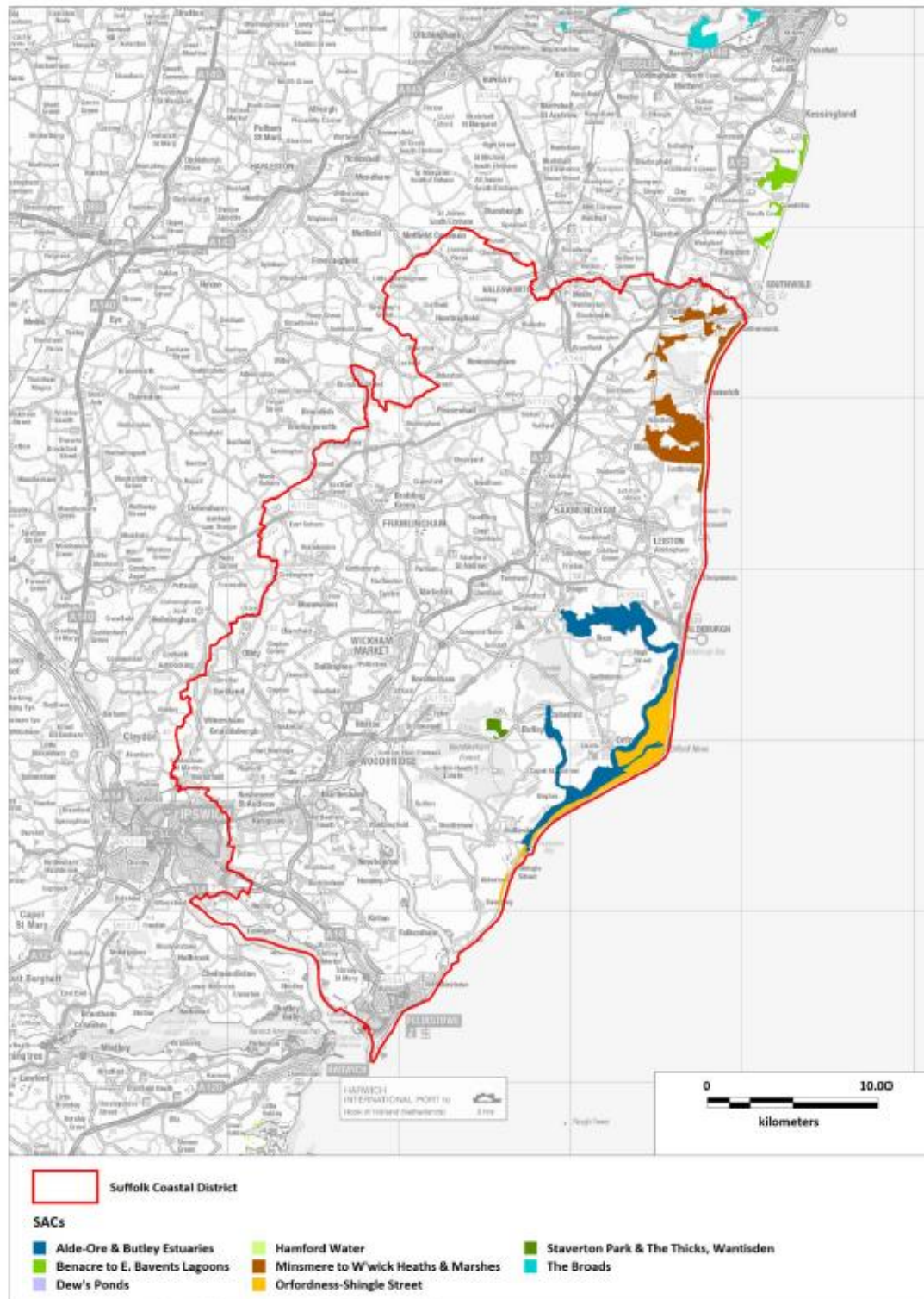


Map 3: Ramsar Sites



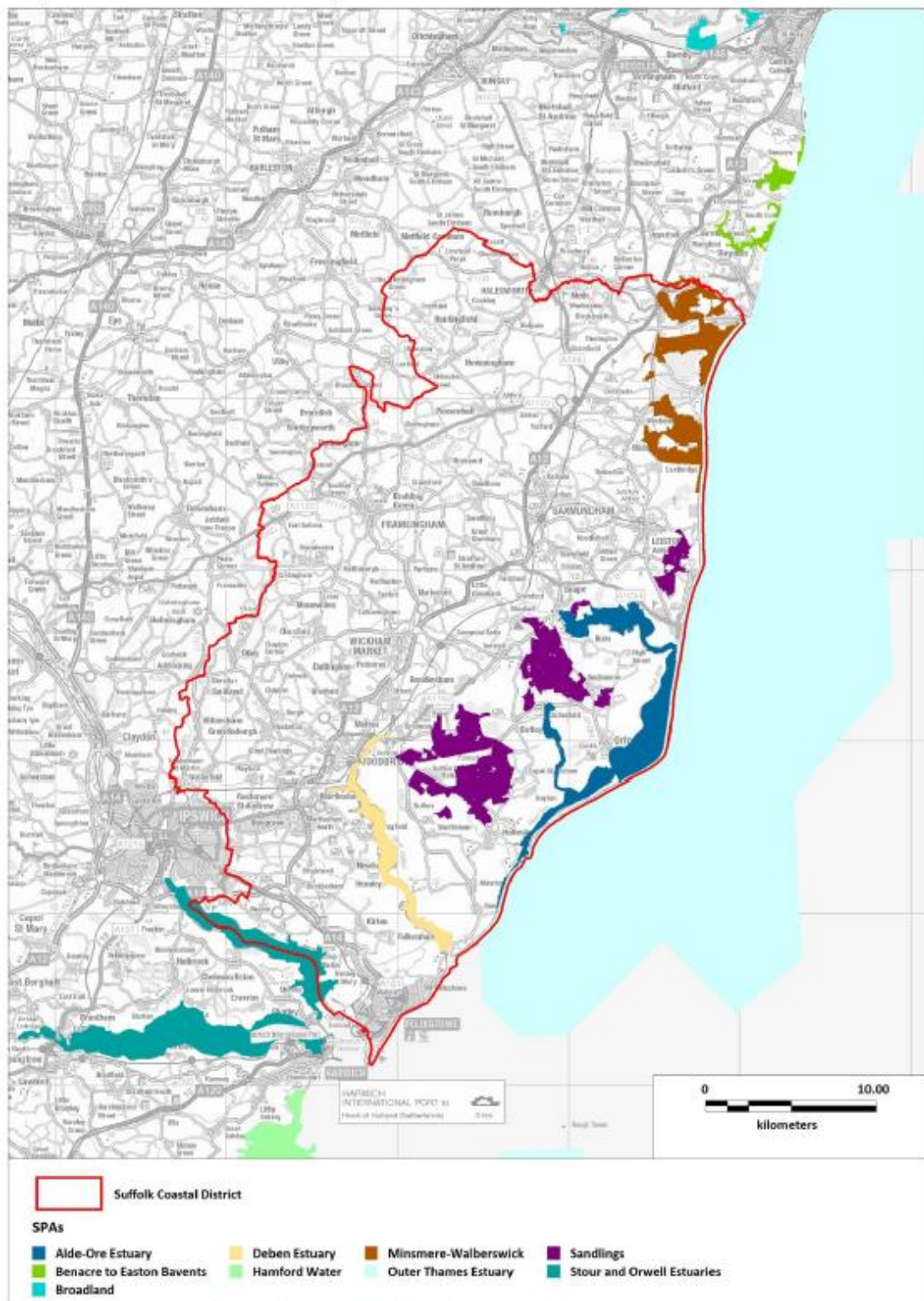
Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

Map 1: SAC sites where boundary within 20km of Suffolk Coastal District



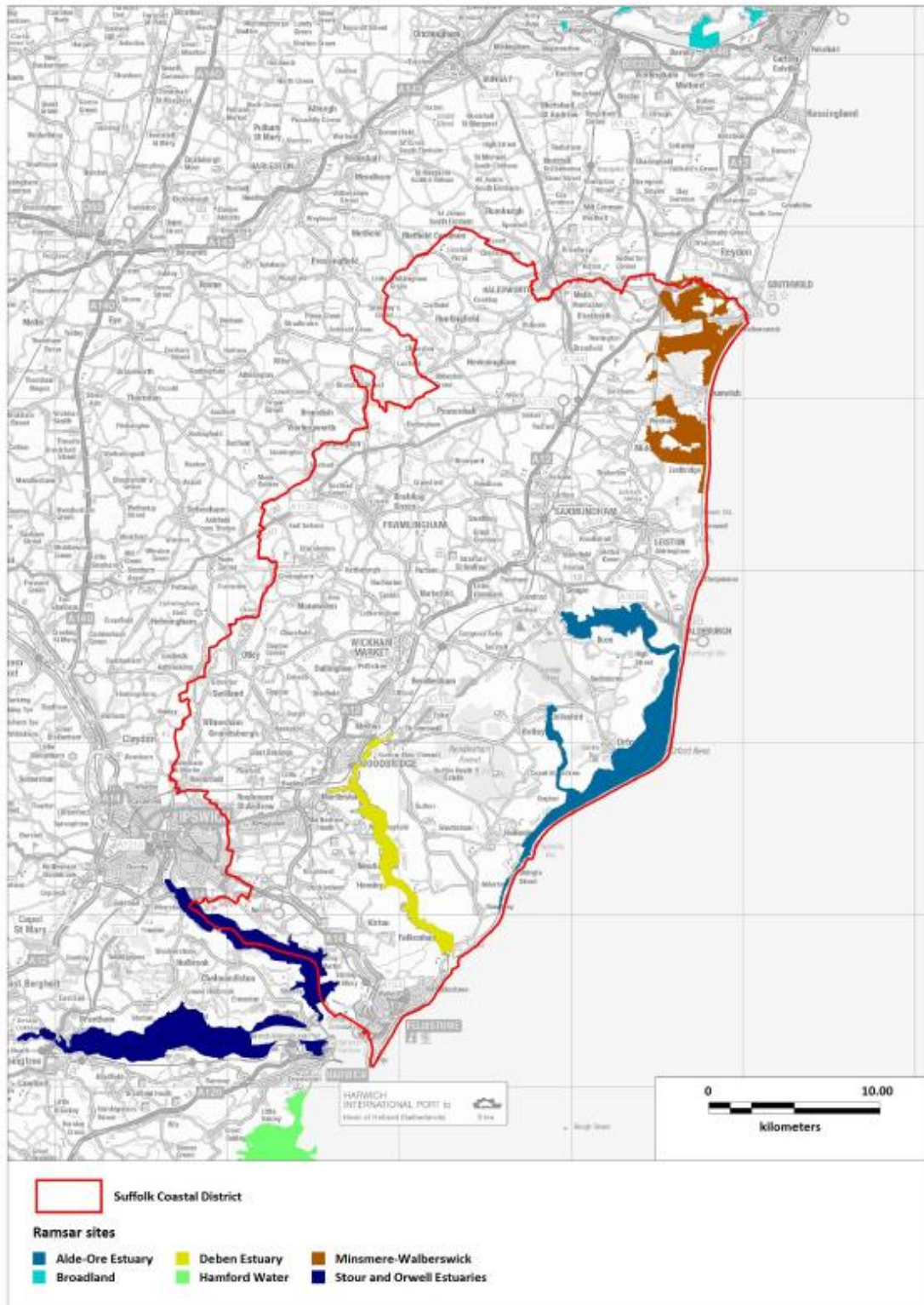
Contains Ordnance Survey Data. © Crown copyright and database right 2017.
 Contains Natural England information © Natural England and Database Right. All rights Reserved.

Map 2: SPA sites where boundary within 20km of Suffolk Coastal District



Contains Ordnance Survey Data. © Crown copyright and database right 2017.
 Contains Natural England Information © Natural England and Database Right. All rights Reserved.

Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District



Contains Ordnance Survey Data, © Crown copyright and database right 2017.
Contains Natural England Information © Natural England and Database Right. All rights Reserved.

Appendix 3: Relevant Habitat sites

Name	Qualifying features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan Stage (December 2018))
Special Areas of Conservation			
Alde-Ore and Butley Estuaries	H1130: Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)
Benacre to Easton Barents Lagoons	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats,	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

		The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	
Dew's Ponds	S1166 Triturus cristatus: Great crested newt	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	None identified.
Haisborough, Hammond and Winterton	H1110 Sandbanks which are slightly covered by sea water all the time H1170 Reefs	The Conservation Objective for the Haisborough, Hammond and Winterton cSAC is to maintain the Annex I Sandbanks which are slightly covered by seawater all the time in Favourable Condition, and maintain or restore the Annex I reefs in Favourable Condition.	Feature location/extent/condition unknown, fisheries (commercial marine and estuarine)
Minsmere to Walberswick Heaths and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species,

	<p>H1220 Perennial vegetation of stony banks A052(B) <i>Anas crecca</i>: Eurasian teal A021(B) <i>Botaurus stellaris</i>: Great bittern A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier A082(NB) <i>Circus cyaneus</i>: Hen harrier A224(B) <i>Caprimulgus europaeus</i>: European nightjar A056(B) <i>Anas clypeata</i>: Northern shoveler A056(NB) <i>Anas clypeata</i>: Northern shoveler A051(B) <i>Anas strepera</i>: Gadwall A051(NB) <i>Anas strepera</i>: Gadwall A132(B) <i>Recurvirostra avosetta</i>: Pied avocet A195(B) <i>Sterna albifrons</i>: Little tern A394(NB) <i>Anser albifrons albifrons</i>: Greater white-fronted goose</p>	<p>achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.</p>	<p>inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)</p>
<p>Norfolk Valley Fens</p>	<p>H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1014 <i>Vertigo angustior</i>: Narrow-mouthed whorl snail</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by</p>	<p>Inappropriate water levels, inappropriate scrub control, hydrological changes, water pollution, inappropriate cutting/mowing, water abstraction, undergrazing, overgrazing, invasive species, change in</p>

	<p>H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) S1016 Vertigo moulinsiana: Desmoulin's whorl snail H4030 European dry heaths H7230 Alkaline fens H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) H91E0# Alluvial forests with Alnus glutinosa and Fraxinus excelsior (AlnoPadion, Alnion incanae, Salicion albae) H4010 Northern Atlantic wet heaths with Erica tetralix</p>	<p>maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying Species; The structure and function (including typical species) of qualifying natural habitats; The structure and function of the habitats of qualifying species; The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; The populations of qualifying species, and, The distribution of qualifying species within the site.</p>	<p>land management, changes in species distributions, air pollution.</p>
<p>Orfordness – Shingle Street</p>	<p>H1150: Coastal Lagoons H1210: Annual vegetation of drift lines H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA.</p>

Southern North Sea	Harbour Porpoise (<i>phocoena phocoena</i>)	To ensure that the integrity of the site is maintained and that it makes an appropriate contribution to maintaining Favourable Conservation Status (FCS) for harbour porpoise in UK waters.	N/A
Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.	Woodland management, disease, atmospheric pollution.
The Broads	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i> : Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats,	Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party

	(Alno-Padion, Alnion incanae, Salicion albae) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail	The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	
Winterton - Horsey Dunes	H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with Ammophila arenaria ("white dunes") H2150# Atlantic decalcified fixed dunes (Calluno-Ulicetea) H2190 Humid dune slacks, A195(B) Sterna albifrons: Little Tern	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.	Inappropriate coastal management, coastal squeeze, public access/ disturbance, hydrological changes, inappropriate scrub control, inappropriate pest control, invasive species, undergrazing, air pollution.
Special Protection Areas			
Alde-Ore Estuary (also Ramsar site)	A081: Eurasian marsh harrier (breeding)	Ensure that the integrity of the site is maintained or restored as appropriate,	Hydrological changes, public access/disturbance, inappropriate coastal

	<p>A132: Pied avocet (non-breeding) A132: Pied avocet (breeding) A151: Ruff (non-breeding) A162: Common redshank (non-breeding) A183: Lesser black-backed gull (breeding) A191: Sandwich tern (breeding) A195: Little tern (breeding)</p>	<p>and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	<p>management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)</p>
<p>Benacre to Easton Barents</p>	<p>H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i>: Little tern A021(B) <i>Botaurus stellaris</i>: Great bittern A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>	<p>Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).</p>

<p>Breydon Water (also Ramsar Site)</p>	<p>Waterbird assemblage A037(NB) Cygnus columbianus bewickii: Bewick swan A132(NB) Recurvirostra avosetta: Pied avocet A140(NB) Pluvialis apricaria : European golden plover A142(NB) Vanellus vanellus: Northern lapwing A151(NB) Philomachus pugnax: Ruff A193(B) Sterna hirundo: Common tern</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>	<p>Shooting/scaring, change in land management, public access/disturbance, hydrological changes, fisheries (marine and estuarine).</p>
<p>Broadlands (also Ramsar site)</p>	<p>H7210# Calcareous fens with Cladium mariscus and species of the Caricion davallianae S1016 Vertigo moulinsiana: Desmoulin`s whorl snail H7230 Alkaline fens H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) H91E0# Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) H7140 Transition mires and quaking bogs</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species,</p>	<p>Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party</p>

	<p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail</p>	<p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.</p>	
<p>Deben Estuary (also Ramsar site)</p>	<p>A046a: Dark bellied brent goose (non-breeding) A132: Pied avocet (non-breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze, disturbance to birds, water and air pollution.</p>
<p>Great Yarmouth North Denes</p>	<p>A195 Sterna albifrons; Little tern (Breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to</p>	<p>Inappropriate coastal management, coastal squeeze, public access/disturbance, hydrological changes, inappropriate scrub control, inappropriate</p>

		<p>achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>	<p>pest control, invasive species, undergrazing, air pollution.</p>
Outer Thames Estuary	<p>A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.</p>
Minsmere to Walberswick (also Ramsar site)	<p>H4030 European dry heaths H1210 Annual vegetation of drift lines</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to</p>	<p>Coastal squeeze, public access/disturbance, changes in species distributions, invasive species,</p>

	<p>H1220 Perennial vegetation of stony banks A052(B) <i>Anas crecca</i>: Eurasian teal A021(B) <i>Botaurus stellaris</i>: Great bittern A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier A082(NB) <i>Circus cyaneus</i>: Hen harrier A224(B) <i>Caprimulgus europaeus</i>: European nightjar A056(B) <i>Anas clypeata</i>: Northern shoveler A056(NB) <i>Anas clypeata</i>: Northern shoveler A051(B) <i>Anas strepera</i>: Gadwall A051(NB) <i>Anas strepera</i>: Gadwall A132(B) <i>Recurvirostra avosetta</i>: Pied avocet A195(B) <i>Sterna albifrons</i>: Little tern A394(NB) <i>Anser albifrons albifrons</i>: Greater white-fronted goose</p>	<p>achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.</p>	<p>inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)</p>
<p>Outer Thames Estuary</p>	<p>A001 (W) <i>Gavia stellate</i> Red-throated Diver A195 (B) <i>Sterna hirundo</i> Common Tern</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p>	<p>Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.</p>

	A193 (B) <i>Sternula albifrons</i> Little Tern	The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.	
Sandlings	A224: European nightjar (breeding) A246: Woodlark (breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.	Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.
Stour and Orwell Estuaries (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A054: Northern pintail (non-breeding) A132: Pied avocet (non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:	Coastal squeeze, disturbance to birds, air pollution and new development.

	<p>A141: Grey plover (non-breeding) A143: Red knot (non-breeding) A149: Dunlin (non-breeding) A156: Black-tailed godwit (non-breeding) A162: Common redshank (non-breeding) Waterbird assemblage</p>	<p>The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.</p>	
--	---	---	--

Appendix 4: Natural England Consultation Response

Date: 09 November 2023
Our ref: 450802



Laura Mundy
East Suffolk Council

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Laura Mundy

East Suffolk Local Plan - draft Healthy Environments Supplementary Planning Document - draft Strategic Environmental Assessment screening opinion & HRA Screening Opinion

Thank you for your consultation on the above dated 15 September 2023 which was received by Natural England on the same date.

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 present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)

It is Natural England's advice, on the basis of the material supplied with the consultation, that:

- **significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,**
- **significant effects on Habitats sites¹, either alone or in combination, are unlikely.**

The proposed Supplementary Planning Document is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Natural England agrees with the conclusions of the report that it is not likely there will be significant environmental effects arising from the policies in the plan, which have not already been accounted for within the adopted local plan. Therefore, the Healthy Environments Supplementary Planning Document does not require further SEA work to be undertaken. Natural England also agrees that the SPD would be unlikely to result in significant effects to European Sites, either alone or in combination, and therefore an appropriate assessment under the Habitats Regulations is not required.

¹ Habitats sites are those referred to in the [National Planning Policy Framework](#) (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites".

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Please send any new consultations, or further information on this consultation to



Yours sincerely

Alejandra Hart
Norfolk & Suffolk Team



Committee	Cabinet
Date	04/06/2024
Subject	Revised ESC Local Discretionary Rate Relief Policy
Cabinet Member	Councillor Toby Hammond Cabinet member with responsibility for Economic Development & Transport
Report Author(s)	Paul Wood Head of Economic Development & Regeneration paul.wood@eastsoffolk.gov.uk
Head of Service	Paul Wood Head of Economic Development & Regeneration paul.wood@eastsoffolk.gov.uk
Director	Andrew Jarvis Strategic Director andrew.jarvis@eastsoffolk.gov.uk

Key Decision?	Yes
Is the report Open or Exempt?	OPEN

Purpose/Summary

This report sets out ESC’s revised Local Discretionary Rate Relief (LDRR) policy. The purpose of the policy is to provide the Council with a flexible incentive when encouraging business investment into the district. The policy was originally adopted in 2016 and this revision reflects the priorities within the Council’s new Strategic Plan – Our Direction 2028 and particularly the Thriving Economy theme. Specifically, the amended policy seeks to more explicitly encourage investment from businesses engaged in environmentally positive activities e.g. clean energy investment, whilst discouraging those actively involved in the oil and gas sector.

The report sets out the revised criteria for considering LDRR applications and the governance in place to ensure robust decision making which supports the delivery of the Council’s strategic plan ambitions.

Recommendation(s)

That Cabinet

1. Approve the revised Local Discretionary Rate Relief policy which more strongly aligns with Our Direction 2028.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact	<p>Continued commitment to net zero by 2030 By focussing more strongly on encouraging business investment from businesses engaged in environmentally positive activity this will support the Council’s wider ambition to achieve net zero across the district and Suffolk.</p> <p>Support, promote and implement green tech The revised policy will provide significant financial incentives for businesses which invest in green tech in the district and therefore encourage greater adoption within the local economy.</p>
Sustainable Housing	<p>Not applicable</p>
Tackling Inequalities	<p>Not applicable</p>
Thriving Economy	<p>Encourage investment in East Suffolk’s key sectors The LDRR policy has been specifically designed to attract investment which supports the district’s key economic sectors. The revised policy includes additional criteria which more explicitly supports investment in sector’s which support the Council’s net zero ambitions e.g. clean energy including offshore wind and green hydrogen.</p>

	<p>Encourage creativity, enterprise and support start-ups A business investment incentive of this nature fully supports the Council’s objective to support creativity, enterprise and start-ups by reducing the financial challenges to the establishment this type of economic activity.</p>
<p>Our Foundations / governance of the organisation</p>	<p>Not applicable</p>

Justification for recommendations

1. Background

- 1.1 The former Waveney District Council's Cabinet adopted the LDRR policy in November 2016. This was principally initiated to enable significant inward investment into strategic employment sites in Lowestoft in support of the Council's then regeneration and development programme for the town. Following the creation of East Suffolk Council in April 2019, the policy was extended to cover the whole new district.
- 1.2 The adoption of LDRR represented an addition to the Council's existing guidance on Non-Domestic Rates. LDRR provides local authorities with the ability to award rate relief to all types of businesses, provided it is in the interests of the Council Tax payer. The ability for local authorities to award such rate relief is derived from section 69 of the Localism Act 2011, which amended section 47 of the Local Government Finance Act 1988. This additional guidance does not change the Council's approach to those organisations and businesses covered by the 1988 Act.
- 1.3 Prior to this amendment, the types of business rate relief which Councils were able to award were prescribed centrally and relatively narrow in their range. They typically focussed on particular types (e.g. non-profit making, charities) or small businesses in specific locations. LDRR provides Councils with much greater flexibility in awarding rate relief and critically is based on locally determined criteria which will support the Council's local sustainable economic objectives.

2. Introduction

- 2.1 In broad terms, LDRR should be applied where a business relocation decision supports the Council's Strategic Plan and specifically, Thriving Economy priorities. Further strategic context is provided in the Council's East Suffolk Economic Strategy which provides a framework for enabling a sustainable and inclusive local economy. Delivering sustainable and inclusive economic growth is central to the Council's strategic objectives and forms one of the 4 themes which underpin Our Direction 2028.
- 2.2 The East Suffolk Economic Strategy identifies the key sectors and areas for sustainable economic development. The LDRR policy has been designed as a further lever to enable the Council's ambitions to ensure we are supporting appropriate business investment in these sectors and areas.

3. Proposal

- 3.1 The revised LDRR policy (see appendix) sets out a range of criteria which applicant businesses should demonstrate how they meet to be eligible for consideration of this rate relief, these include:
 - i. **Does the investment benefit local people and/ or the local economy?**

Applications will be considered favourably where they provide significant employment opportunities, benefit the local supply chain and align with East Suffolk's key sectors. The Council is particularly keen to encourage investment from businesses with a low/ zero carbon focus and/ or engaged in substantial environmentally positive activities. Businesses actively engaged in the oil and gas sector will not be eligible for rate relief. This is the key revision to the existing LDRR policy and ensures that this investment incentive is now explicitly aligned with the net zero aspirations of the Council's strategic plan.

Additional consideration will also be given to businesses that can demonstrate that their presence would act as an anchor for attracting similar businesses. This may be related to their size, status and the particular sector they are operating within. Further consideration will also be given to applicants who propose to locate in one of East Suffolk's strategic employment sites e.g. the Power park in Lowestoft where the Council is encouraging investment from the clean energy sector.

ii. Does the business create or support opportunities for education or training?

A core objective of both the Council's Strategic Plan and East Suffolk Economic Strategy is to improve the level of workforce skills in the district since a highly skilled local workforce is a foundation of a successful local economy and supports ESC's inclusive growth agenda, where all residents can benefit from economic investment. In order for a business investment decision to be considered under this criteria it should demonstrate a commitment to upskilling its current and future workforce.

iii. Will the premises be occupied?

No relief will be granted for premises where there is no intention for them to be occupied immediately.

iv. Is the ratepayer eligible for any other mandatory or discretionary relief?

LDRR is unlikely to be granted other than in exceptional circumstances if the ratepayers entitled to other mandatory or discretionary rate relief.

If it is more appropriate that a new business investment should take place on the Freeport, where in addition to rate relief, many other tax incentives apply, applicants will be advised of this. It is not the intention of LDRR to compete with business benefits offered on the Freeport East Tax Sites.

3.2 If an applicant meets the above criteria, it does not automatically follow that they will be awarded LDRR. This will be judged on the extent to which a business investment can demonstrate it will deliver against the criteria and therefore align with ESC's sustainable and inclusive economic growth objectives. All applications will be assessed by the LDRR panel which will comprise:

- Cabinet members for Economic Development and Finance
- Strategic Director with responsibility for Economic Development

- Heads of Service for Finance and Economic Development

3.3 A report will be compiled for the panel setting out how the applicant does or does not meet the agreed criteria. A recommendation will also be provided proposing the level of LDRR award and the duration this will be applied for subject to Minimal Financial Assistance (MFA) public authority subsidy control rules.

3.4 In addition to the LDRR application, applicants will also be required to provide:

- Business plan with a 12 month financial forecast
- Last 2 years audited accounts
- Purpose and use of the property
- Details of the nature of the business
- What steps have been taken to meet or mitigate their Business Rates liability (i.e. any other discounts or reductions awarded)
- Evidence of other reliefs, grants, benefits etc which may be deemed as state aid within the current and previous two financial years

3.5 Applications will be determined by the panel with reference to the above criteria and The Council will notify the applicant in writing of the outcome of their request. Where the application is unsuccessful the Council will explain the reasons why the decision was made.

3.6 Section 47 awards are administered under The Local Government Finance Act 1988 and awards are not subject to a statutory appeals process. Appeals will therefore be decided by the Council.

3.7 The Council will operate the following policy for dealing with appeals:

- An applicant who disagrees with a decision may ask for the decision to be reviewed.
- The request must be made in writing within one calendar month of the original decision.
- Where possible the Council will resolve the matter and provide reasons of the decision to the applicant either verbally or in writing.

3.8 Decisions will be reviewed by the panel and the applicant will be notified of the outcome within 14 working days with full written reasons for the decision.

4. Financial Implications

4.1 The maximum amount that an applicant can be awarded will be subject to the Minimal Financial Assistance (MFA) subsidy control rules which have replaced the previous EU state aid rules. A public authority can only award a subsidy of up to £315k over a three-year period as MFA.

4.2 Clearly, awarding rate relief will have implications for Council income derived from non-domestic rates, so a balance will continue to be struck between awarding such an incentive and the impact on Council finances. This will largely be driven by the criteria (i) above i.e. a focus on incentivising significant inward investment which in the long-term will generate business rates income far in excess of the initial rate relief award and

further act as an attractor for additional business investment and an expansion of the business rates base.

5. Legal Implications

- 5.1 Section 69 of the Localism Act 2011 amends Section 47 of the Local Government Finance Act 1988 and allows the Council to grant discretionary reliefs to any ratepayer, subject to the Subsidy Control Act 2022 and the requirements/thresholds therein.

6. Risk Implications

- 6.1. The award of Section 69 rate relief is a discretionary power. The Council will determine the outcome of each application on its own merits after applying the guidance detailed in the policy document (Appendix A).

7. Options

- 7.1 The Council has a choice on whether to continue offering LDRR as a business investment incentive and if not would default to the mandatory non-domestic rate relief which all Councils offer. As described above, these are centrally prescribed and do not offer flexibility in using such incentives to meet strategic plan objectives. By revising the existing LDRR policy, the Council can provide a business investment incentive which it has complete control over and can support the delivery of its Thriving Economy and Environmental Impact priorities.

8. Recommendations

- 8.1 That Cabinet approves the revised Local Discretionary Rate Relief policy which more strongly aligns with Our Direction 2028.

9. Reasons for Recommendations

- 9.1 The Council's existing LDRR policy reflects the priorities of the previous strategic plan and therefore required a revision and refresh to fully align with the updated priorities, specifically those within the Thriving Economy and Environmental Impact themes. Through this revision the Council will have a powerful incentive to attract environmentally positive business investment across the district and also within specific strategic employment sites.

10. Conclusions/Next Steps

- 10.1 Approval of the revised policy will allow the Council's ED&R team and our inward investment partners to use this incentive when negotiating with potential inward investors. It will make clear the Councils investment priorities with a renewed environmentally positive approach to investment support and better complement the existing regeneration and development programmes across the district.

Areas of consideration comments

Section 151 Officer comments:

As referenced in the finance section of the report, the Council will need to fund its share of any award under the local discretionary rate relief scheme. The Council's share is 40% with the remainder shared between Central Government (50%) and Suffolk County Council (10%). The exception is for renewable energy projects, where the Council receives 100% of the business rates income. The Government introduced a new exempt from business rates from April 2023 until 2035 for eligible plant and machinery used in onsite renewable energy generation and storage (a tangible rateable part of a building) and the Council is compensated for this adjustment to rateable values.

Monitoring Officer comments:

Section 69 of the Localism Act 2011 allows local authorities to reduce non-domestic rates ('business rates') for any local ratepayer for any reason. However, the local authority may only grant the discount if it would be reasonable to do so having regard to the interests of council taxpayers in its area.

Under the Subsidy Control Act 2022, public authorities can award subsidies of up to £315,000 as Minimal Financial Assistance. However, £315,000 is a cumulative total. In applying for and accepting any subsidy award, applicants should be required to declare that the financial assistance they are seeking/accepting will not cause them to exceed the Minimal Financial Assistance threshold.

Equality, Diversity and Inclusion/EQIA:

Equality Impact Assessment EQIA577622562 undertaken which shows a positive impact on the socio-economic protected characteristic.

Safeguarding:

N/A

Crime and Disorder:

N/A

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

Due to the level of LDRR awards anticipated (based on previous experience) there will be a minimal impact on corporate services.

Residents and Businesses consultation/consideration:

Consultation has taken place with businesses likely to be impacted by this revision

Appendices:

Appendix A	East Suffolk Local Discretionary Rate Relief Policy June 2024
-------------------	---

Background reference papers:

Date	Type	Available From



East Suffolk Council

LOCAL DISCRETIONARY RATE RELIEF POLICY

Contents

1.	Introduction	Page 2
2.	Aims and Objectives	Page 2
3.	Criteria	Page 2
4.	Process	Page 4
5.	Roles and Responsibilities	Page 6
6.	Communication	Page 6
7.	External Considerations	Page 6
8.	Related Documents	Page 7

1.	Introduction
1.1	<p>Under the 2011 Localism Act, local authorities can award business rate relief to any type of organisation within their boundary, rather than a nationally pre-defined, relatively narrow range of organisations as was the case prior to this Act. This is known as Local Discretionary Rate Relief (LDRR).</p> <p>This policy applies to the administrative area of East Suffolk Council (ESC) only.</p>
2.	Aims and Objectives
2.1	<p>The aim of the LDRR policy and guidance is to support potential inward investors locating within the district, as well as encourage businesses seeking to expand and remain.</p> <p>LDRR provides an additional tool that supports and incentivises businesses, complementing existing mandatory and discretionary business rate reliefs including the tax and customs site incentives offered by Freeport East.</p> <p>Together, these support the vision and the Thriving Economy Theme of the Council’s Strategic Plan – Our Direction 2028, as well as supporting specific actions relating to business support and training.</p>
2.2	<p>These proposals also support the Council’s financial sustainability objectives through sustainably growing the district’s business base and in the medium to long-term this will increase overall business rate receipts.</p>
3.	Criteria
3.1	<p>The key criteria for awarding LDRR is that it should be applied where a business relocation/ growth decision supports ESC’s Thriving Economy objectives. The strategic context for these objectives is set out in the Strategic Plan (Our Direction 2028) and also within the East Suffolk Economic Strategy (ESES).</p>
3.2	<p>The following will be considered when determining an award for LDRR:</p>
<i>a.</i>	<p><i>Does the investment benefit local people and/or the local economy?</i></p>
	<p>Any application received will be considered favourably where a business can provide significant employment opportunities, benefit the local supply chain and align with the districts key economic sectors identified within the ESES:</p> <ul style="list-style-type: none"> • Clean Energy • Tourism • Ports & Logistics • ICT and digital creative

	<ul style="list-style-type: none"> • Manufacturing and engineering • Marine and maritime • Visitor economy and culture <p>The Council is particularly keen to encourage investment from businesses with a low/ zero carbon focus and/ or engaged in substantial environmentally positive activities. Businesses actively engaged in the oil and gas sector will not be eligible for rate relief.</p> <p>Additional consideration will also be given to businesses that can demonstrate that their presence would act as an anchor for attracting similar businesses. This may be related to their size, status and the particular sector they are operating within. Further consideration will also be given to applicants who propose to locate in one of east Suffolk’s strategic employment sites e.g. the Power park in Lowestoft where the Council is encouraging investment from the clean energy sector.</p>
b.	<i>Does the business create or support opportunities for education or training?</i>
	<p>A core objective of both the Strategic Plan and ESES is to improve the level of workforce skills in the district since a highly skilled local workforce is a foundation of a successful local economy and supports ESC’s inclusive growth agenda. For a business investment decision to be considered under these criteria it should demonstrate a commitment to upskilling its current and future workforce.</p>
c.	<i>Will the premises be occupied?</i>
	<p>No relief will be granted for premises where there is no intention for them to be occupied immediately.</p>
d.	<i>Is the ratepayer eligible for any other mandatory or discretionary relief?</i>
	<p>LDRR is unlikely to be granted other than in exceptional circumstances if the ratepayers entitled to other mandatory or discretionary rate relief.</p>
3.3	<p>It is important to note that meeting the above criteria does not automatically mean that LDRR will be awarded. Furthermore, if a decision to award LDRR is made the level of relief awarded should relate to the extent to which the above criteria are met. In addition to demonstrating how the above criteria will be met any application for LDRR will need to be accompanied by:</p> <ul style="list-style-type: none"> • Business plan with a 12 month financial forecast • Last 2 years audited accounts

- | | |
|--|---|
| | <ul style="list-style-type: none">• Purpose and use of the property• Details of the nature of the business• What steps have been taken to meet or mitigate their Business Rates liability (i.e. any other discounts or reductions awarded)• Evidence of other reliefs, grants, benefits etc which may be deemed as state aid within the current and previous two financial years |
|--|---|

4.0	Process
4.1	Any business wishing to apply for LDRR should contact the Economic Development team to discuss their requirements in the first instance: economicdevelopment@eastsoffolk.gov.uk .
4.2	Applications will be determined by a panel with reference to the above criteria and the Council will notify the applicant in writing of the outcome of their request. Where the application is unsuccessful, the Council will explain the reasons why the decision was made.
4.3	<p>Under Section 47 of the Local Government Finance Act 1988 through which awards are administered, awards are not subject to a statutory appeals process. Appeals will, therefore, be decided by the Council and the Council operate the following policy for dealing with appeals:</p> <ul style="list-style-type: none"> • An applicant who disagrees with a decision may ask for the decision to be reviewed. • The request must be made in writing within one calendar month of the original decision. • Where possible the Council will resolve the matter and provide reasons of the decision to the applicant either verbally or in writing.

5.0	Roles and Responsibilities
5.1	<p>A panel of Cabinet members and senior officers will determine applications for LDRR. This will include:</p> <ul style="list-style-type: none"> • Cabinet member for Economic Development and Transport • Cabinet member for Resources and Value for Money • Strategic Director with responsibility for Economic Development • Head of Economic Development and Regeneration • Chief Financial Officer
6.0	Communication
6.1	The applicant will be notified of the outcome of their application within 14 working days with full written reasons for the decision.
6.2	The officers from the Economic Development and Regeneration Team will be responsible for ensuring that any prospective applicants are fully aware of the scheme and its guidelines during any business engagement activity.
7.0	External Considerations
7.1	<p>Subsidy</p> <p>Please be aware that all applicants for LDRR are expected to complete a subsidy declaration within the application process.</p> <p>The EU State aid rules no longer apply to subsidies granted in the UK following the end of the transition period, which ended on 31 December 2020. This does not impact the limited circumstances in which State aid rules still apply under the Withdrawal Agreement, specifically Article 10 of the Northern Ireland Protocol. The United Kingdom remains bound by its international commitments, including subsidy obligations set out in the Trade and Cooperation Agreement (TCA) with the EU.</p> <p>East Suffolk Council will be providing LDRR to the applicant business or organisation as a Minimum Financial Assistance (MFA) subsidy under the Subsidy Control Act (2022).</p> <p>MFA subsidy limit is £315,000 over a three-year period (including your current financial year and the previous two financial years).</p>

8.0	Related Documents
8.1	<p>Any application received for LDDR will need to demonstrate clear linkages to the aims, objectives, priority locations and sectors contained within the following key East Suffolk Council documents:</p> <ul style="list-style-type: none">i. Strategic Plan 'Our Direction 2028'ii. East Suffolk Economic Strategy 2022-2027

Committee	Cabinet
Date	07/05/2024
Subject	Supplementary Housing Statement and Suffolk Landlords Booklet (Houses in Multiple Occupation)
Cabinet Member	Councillor David Beavan, Deputy Leader and Cabinet Member with responsibility for Housing
Report Author(s)	Victoria Cotterill Team Leader (Private Sector Housing) victoria.cotterill@east Suffolk.gov.uk
Head of Service	Heather Fisk Head of Service (Housing) heather.fisk@east Suffolk.gov.uk
Director	Andrew Jarvis Strategic Director andrew.jarvis@east Suffolk.gov.uk

Key Decision?	Yes
Is the report Open or Exempt?	OPEN

Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	N/A
---	-----

Purpose/Summary

This report proposes that the joint *Suffolk Handbook for Landlords* guidance document for Houses in Multiple Occupation (HMOs) is adopted to provide guidance to applicants seeking to invest in multiple occupied dwellings in the East Suffolk area. It is also proposed that the Supplementary Housing Statement (Houses in Multiple Occupation) is adopted to support existing guidance and inform Planning decisions affecting the creation of HMOs within East Suffolk Council's area, taking into consideration the appropriate factors contained within the Statement.

Recommendation(s)

That Cabinet:

1. Adopt the Supplementary Housing Statement (Houses in Multiple Occupation)
2. Adopt the joint Suffolk Landlords Booklet for Houses in Multiple Occupation
3. Delegate authority to the Head of Housing, in consultation with the Cabinet Member for Housing, to update the Supplementary Housing Statement (Houses in Multiple Occupation) as necessary to reflect changing information (on rental prices and availability of rental rooms, for example)

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact	Supporting the creation of multiple-occupied dwellings, which are of a good standard, thus reducing the environmental effects (such as noise, littering etc), that can occur at such properties.
Sustainable Housing	East Suffolk, much like the rest of the country, is in the middle of a housing crisis. The provision and management of multiply occupied properties using the proposed Guidance Document, could assist in helping to meet the local demand for good quality single-room accommodation.
Tackling Inequalities	Residents living, or hoping to live, within the East Suffolk area, who are only able to do so by claiming housing-related benefits at the single room rate because of their age and/or status, will benefit from enhanced guidance on local housing need being provided to officers and developers to support planning decisions which help create single-room HMO accommodation.
Thriving Economy	Providing additional affordable single room accommodation will help support the Council's aim of ensuring adequate affordable accommodation is available in East Suffolk. It also has the potential to support, and/or offset at least to a degree the impact of, nationally significant infrastructure projects, such as Sizewell C, without having a significant impact on the local housing market. It could also help support the tourism and service economy, whose employees are typically on comparatively low wages, and who can struggle to find affordable accommodation, particularly in areas where property prices are high.

**Our Foundations /
governance of the
organisation**

No direct relevance

Justification for recommendations

1. Background

- 1.1. There is currently a national housing crisis, with a high demand for single occupancy accommodation. This is driven by a lack of supply coupled with the disparity between market rents and Local Housing Allowance (LHA) rates for single people under 35. On 04 April 2024, there were 514 people aged between 18-34 on the East Suffolk housing waiting list, seeking one-bedroom accommodation.
- 1.2. The LHA rate for single occupancy at this time was approximately £150 per month less than the average one-bedroom monthly rent in East Suffolk, according to the Office of National Statistics. This means most one-bedroom accommodation would be unaffordable for applicants under 35 years old who are seeking housing, despite their being able to seek support with housing related benefits.
- 1.3. The previous Waveney District Council area has an [Article 4 Direction](#), which removes the ability for conversions from ‘small’ dwellinghouses to Houses in Multiple Occupation (HMOs) to be made without planning consent (permitted development). This means all such proposals must be made through a planning application. Conversions to ‘large’ HMOs (6 or more people) always require planning permission.
- 1.4. Separate to this in parts of the former Waveney area are areas known as ‘Flat and HMO Saturation areas’ (identified through Waveney Local Plan Policy WLP8.4) which effectively precludes conversion of houses into flats or HMOs in these discrete areas (which are only in parts of Lowestoft). In addition, Policy WLP8.4 also states that “exceptional circumstances” will be required for the conversion of houses to HMOs, and this applies across the whole of the Waveney Local Plan area. What potential “exceptional circumstances” might be are not detailed in WLP8.4, nor in the supporting text to WLP8.4.
- 1.5. In combination, these restrictions make it very hard to bring forward new HMO conversions (from current/former guest houses, for example).
- 1.6. Currently, the Private Sector Housing (PSH) team uses statutory housing legislation to control the licensing and amenity standards within HMOs, of which there are some 44 licensed HMOs in the district. Whilst all local authority PSH teams use the same regulatory tools, there is no consensus of approach as to how these are applied across Suffolk. A Government Pathfinder scheme, Safe Suffolk Renters, hosted by East Suffolk Council is currently undertaking work to review teams’ policies, procedures and regularise housing guidance used by Suffolk authorities.

2. Introduction

- 2.1. Supplementary Housing Statement

- 2.1.1. PSH teams have a statutory responsibility to licence properties classed as ‘large’ HMOs (properties with 5 or more people, forming 3 or more households).
- 2.1.2. Demand for single occupancy accommodation far exceeds the supply, with hundreds of people applying for this size of accommodation via the Housing Gateway at any one time. The steep increase in rental prices in recent years – caused by a variety of factors, including the loss of some long-term rental stock to short-term rentals, like AirBNB – has made the situation worse. This puts pressure on emergency housing/homelessness services and has a range of other negative effects, such as making it difficult for tourism and service sector employers to recruit and retain employees in traditionally lower-wage jobs.
- 2.1.3. The Article 4 Direction in the former Waveney District Council area adds further to the pressure on the local housing market.
- 2.1.4. Developers looking to convert an existing dwelling to HMO accommodation have to demonstrate “exceptional circumstances”, and as stated in paragraph 1.4 above, there is currently no guidance, either within the Waveney Local Plan, or elsewhere, as to what potential “exceptional circumstances” might be.
- 2.1.5. The Council's Planning team will be bringing forward a paper in summer 2024 proposing to review the existing Article 4 Direction and set out what potential “exceptional circumstances” might be.
- 2.1.6. The significant shortage of available and affordable HMO accommodation might be one such circumstance (amongst others). There is therefore value in a Supplementary Housing Statement setting out – and updating regularly – basic information on, for example, demand for single occupancy accommodation, local rental prices, typical availability of such accommodation and the like, so this information does not have to be compiled by individual applicants for planning applications for HMO as part of the “needs” case. This will also save work for the PSH team if they are not asked to compile such information on an ad-hoc basis (through Freedom of Information requests, for example).

2.2. Joint Landlord’s Handbook for HMOs guidance document

- 2.2.1. Guidance on the licensing requirements and amenity standards for HMOs is currently inconsistent across Suffolk, which has created a ‘postcode lottery’ for landlords who may have portfolios straddling one or more local authority areas.

2.3. Consultation between Planning Policy and Enforcement officers in relation to specific casework, and more general aspects of HMO development, has already been undertaken and is on-going to ensure that the approach detailed in this document is mutually agreeable between them, to help support the preparation of additional guidance on “exceptional circumstances” (as set out in paragraph 2.1.5 above).

3. Proposal

- 3.1. To adopt the guidance documents attached at Appendices A and B to inform regulatory work by the Private Sector Housing team and to update basic rental information in the Supplementary Housing Statement on a six-monthly basis.

4. Financial Implications

- 4.1. There are no anticipated financial implications for the Council following the adoption of these documents.

5. Legal Implications

- 5.1. The adoption of consistent HMO-related guidance across Suffolk should ensure that there is less likelihood of inconsistencies in approach and advice given to prospective HMO owners and managers. This in turn should result in an improvement in property standards, and less opportunity for legal challenge.
- 5.2. The information and advice contained within the guidance document has been collated by subject experts, RHE Global, and reviewed and approved by all Suffolk Local Authorities.

6. Risk Implications

- 6.1. The guidance document has been created on the basis that it provides generic advice applicable to all HMOs, with caveats that owners should still make the necessary enquiries with the relevant statutory agencies (such as Building Control, Planning and the Fire Service) to ensure they have the correct information for their specific premises/situation.
- 6.2. The Supplementary Housing Statement has been created to reduce the risk of multiple occupancy properties being created with a disparity in statutory consents i.e. a property owner may obtain a mandatory HMO Licence, but not have the relevant planning consent, or vice versa.

7. Options

- 7.1. Do nothing – there is no requirement for either of these documents to be produced.
- 7.2. Produce an East Suffolk specific Guidance Document, (rather than adopt a Suffolk-wide document) – for the reasons stated above in Sections 5 and 6, this is not deemed to be appropriate.
- 7.3. Adopt the documents as written.

8. Recommendations

- 8.1. Adopt the Supplementary Housing Statement (Houses in Multiple Occupation)
- 8.2. Adopt the joint Suffolk Landlords Booklet for Houses in Multiple Occupation

- 8.3. Delegate authority to the Head of Housing, in consultation with the Cabinet Member for Housing, to update the Supplementary Housing Statement (Houses in Multiple Occupation) as necessary to reflect changing information (on rental prices and availability of rental rooms, for example)

9. Reasons for Recommendations

- 9.1. To provide guidance to enable a consistent delivery of HMO accommodation by private developers.
- 9.2. To assist in the assessment of “exceptional circumstances” for new HMO conversions requiring planning permission.
- 9.3. To be part of a Suffolk-wide move to align policies and practices across Private Sector Housing for consistency.

10. Conclusions/Next Steps

- 10.1. To publicise adoption of these documents on the ESC and Safe Suffolk Renters websites.

Areas of consideration comments

Section 151 Officer comments:

There are no financial matters to be considered for the report recommendations.

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

Attached as Appendix C

Safeguarding:

There are no safeguarding issues raised or created by the adoption of these documents

Crime and Disorder:

Rachel Tucker – Senior Anti-social Behaviour Officer

A duty is placed, under section 17 of the Crime and Disorder Act 1998, upon Local Authorities to do all that it reasonably can to prevent (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and (b) the misuse of drugs, alcohol, and other substances in its area; and (c) re-offending in its area; and (d) serious violence in its area. Consideration of the above should be given to developments created using proposed guidance in this report, regarding the development of accommodation for single occupancy, particularly in areas of high crime, or anti-social behaviour hotspots, before developments are agreed.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

Finance – there are no perceived financial implications from the proposals in this report.

Legal – there are no perceived legal implications from the proposals in this report.

Residents and Businesses consultation/consideration:

Consultation about the private rented sector, and how it is regulated, has been carried out with landlords via Safe Suffolk Renters conferences.

Liaison with current applicants for planning applications is on-going, and both the Private Sector Housing and Planning teams have open dialogues with these developers.

Appendices:

Appendix A Supplementary Housing Statement (Houses in Multiple Occupation)

Appendix B Joint Suffolk Landlord's Handbook for Houses in Multiple Occupation

Appendix C Equality Impact Analysis

Background reference papers:

Date	Type	Available From
21 May 2024	Article 4 Direction (Town and Country Planning (General	https://www.legislation.gov.uk/uksi/2015/596/article/4/made

	Permitted Development) (England) Order 2015	
--	--	--

Supplementary Housing Statement

Introduction

The Private Sector Housing team is responsible for controlling the standards of all, and licensing the largest, Houses in Multiple Occupation (HMOs).

In the East Suffolk area, the conversion of single-family houses 'dwellinghouses' (use class C3) is restricted across the previous Waveney District Council area, removing permitted development rights to convert to 'small' HMOs (use class C4), with planning permission required in all cases across the entire district for all conversions to (or construction of new) 'large' HMOs.

Applications for the creation of new conversions to HMOs in the Waveney Local Plan area, of any size, require the applicant to demonstrate "exceptional circumstances" for the development. The significant demand for, and shortage of, such accommodation is largely uncontested, as also is the significant increase in rental prices in recent years. The Planning team will be preparing, in summer/autumn 2024, a guidance note setting out what potential "exceptional circumstances" might be but the evidence is likely to include those matters of need/demand and affordability is likely to form at least part of the case for such. The Council producing – and updating regularly – basic information on single-occupancy accommodation, such as typical rental prices, the current demand (waiting list) and the availability of such accommodation would be helpful in demonstrating and enumerating that need. This information could therefore be used by potential applicants to help demonstrate potential "exceptional circumstances" for new HMOs.

Current situation

Historically, in the early 1990s, and prior to the current of legislation applicable to HMOs, the creation of new HMOs was actively discouraged, with discretionary grants having been made available to owners of HMOs to convert their premises to make them self-contained.

Over-saturation of discrete areas of the former Waveney district, which had led to amenity issues, issues with anti-social behaviour, parking and increased levels of activity and nuisance was addressed by creating what are referred to as 'Flat Saturation Zones' in the Waveney Local Plan 2019 (Policy WLP8.4). Applications for further conversion to flats or HMOs here are not permitted, but applications for self-contained flats outside these zones will be permitted, provided various conditions are met. Any applications for the conversion of buildings to new HMOs must demonstrate "exceptional circumstances" (also Policy WLP8.4).

The Suffolk Coastal Local Plan does not have such a strict approach to conversions of buildings to HMOs (Policy SCLP5.12), instead simply requiring the character, design, parking and accessibility to services and employment centres to be appropriate.

Affordability

HMOs represent some of the smallest and cheapest accommodation within the East Suffolk area. However the accommodation available is limited, and with little-to-no single room accommodation in the social housing sector, there is a significant need for this size accommodation in the private rented sector.

Since [2012](#), single people under the age of 35 have only been able to claim housing-related benefits at what is known as the single room rate. In February 2024, DirectGov confirms that the Local Housing Allowance rate for a property in the North Lowestoft urban area was £81.50 per week, equating to approximately £353 per month, a shortfall of £153 against an average rent of about £510 for a one-bedroom privately rented property, according to the Office of National Statistics. This example is in an area where the rents are the lowest, with disparity only increasing elsewhere in the district, where market rents are higher.

Housing Need

Housing need within the local area is gauged by the number of active applications on the local housing register. East Suffolk Council is a member of the Gateway to Homechoice, which manages the register for seven Local Authority areas.

In February 2024 (as at 16/02/2024), in the North and South Lowestoft urban areas alone, there were 286 new applications for housing by people under 35, requiring single-room accommodation. In April 2024, the total number of people under 35 applying for one-bedroom accommodation across the East Suffolk district was 514. With Lowestoft representing approximately a quarter of the population of the district, this is a disproportionate number of applications, reflecting the relative deprivation of the town. In total across the district, approximately 2124 are on the local housing register seeking single-room accommodation.

Other specific local needs

Student accommodation

East Suffolk College (which has a Lowestoft campus) delivers three cohorts of maritime training students every year, with an intake of twenty foreign students per cohort, studying for three months at a time. These students generally come from the Indian subcontinent, and culturally look to share accommodation both for religious, camaraderie and cost reasons.

Anecdotally, the PSH team has, on multiple occasions, found that the accommodation available to these students is in poor condition, having been converted without the relevant statutory consents and permissions and presents a real danger to the health and safety of the occupiers.

Being able to secure good quality HMO accommodation would provide much needed bedspaces for these students, which can be managed well and continue to encourage further cohorts for future training cycles. This is supported by a direct enquiry by the College in 2021, seeking advice on availability of properties in the private rented sector, due to the lack of landlords / properties available in the immediate area.

Supported accommodation

East Suffolk hosts a number of large premises that are run by not-for-profit organisations such as Access Community Trust, who accommodate residents who require support for a variety of different reasons. These premises, because they are not run by a local authority, the Ministry of Defence, or other exempted organisation, are obliged to operate as HMOs within the statutory definition and in most cases, require licensing.

It is not clear that all of these premises have appropriate planning consents in place, as commonly they are in buildings which have been used for other purposes in the past, such as care homes, etc. Should a building of this type require to make an application to regularise their planning use, there is the risk that refusal could displace a number of hard-to-house residents.

Risk of reliance on short-term accommodation

Where applicants may not be able to find suitable accommodation in the private rented sector, they may choose to seek shared lodgings by way of websites such as [Spare Room](#). These methods of letting are largely unregulated, with Suffolk Fire and Rescue Service recently introducing these types of property into their audit regime, following the recognition not all tenants/lodgers are aware of the regulatory requirements incumbent on their landlord in relation to health and safety, licensing etc.

The attraction of these properties is convenience and cost. On 28 March 2024, [Spare Room](#) was advertising properties in the Lowestoft area for between £100-£165 per week (£433-£715 per month), inclusive of all bills. Whilst many arrangements will be successful, there is a substantial risk that tenants will not be provided appropriate tenancy agreements, and will put themselves at risk of becoming homeless without the relevant legal protection a tenancy agreement can provide.

Appendix A – Key Single Bed Accommodation Housing Information

Information last updated May 2024

Housing register numbers (source: East Suffolk Council Gateway to Homechoice team)

	Total number of applicants	Applicants under 35 years of age
East Suffolk District area	4579	840
Lowestoft	1212 with a local connection	226
Felixstowe	479 with a local connection	84
Southwold	38 with a local connection	6

Typical rental costs (sources: spareroom.co.uk, rightmove.co.uk)

Rightmove.co.uk

Whole of Suffolk: £87.00 to £462.00 per week

Spare room.co.uk

Lowestoft: £110.00 - £253.00 per week

Felixstowe: £110.00 - £150.00 per week

Other areas or sources (*include as relevant*):

Southwold: No rooms advertised

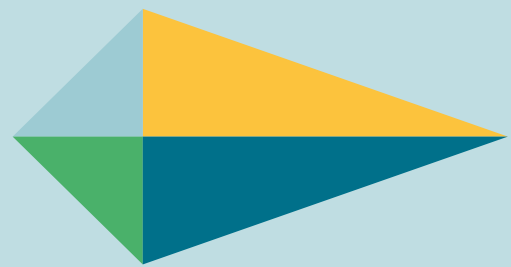
Local Housing Allowance rates

[Lowestoft and Great Yarmouth Broad Rental Market Area](#): £86.61 per week

[Ipswich Broad Rental Market Area](#): £84.35 per week

Other areas (*include as relevant*):

None



EASTSUFFOLK
C O U N C I L

Houses In Multiple Occupation Suffolk Landlord's Handbook

This handbook is a guide to the legal requirements for landlords of HMOs to ensure that their property meets an acceptable standard developed in partnership by Babergh and Mid Suffolk District, East Suffolk, Ipswich Borough and West Suffolk Councils in consultation with Suffolk Fire and Rescue Service. In addition, it has information about which HMOs must be licensed and gives details of the student housing accreditation scheme.

Houses In Multiple Occupation Suffolk Landlord’s Handbook

Contents

Contents	2
Introduction	4
Guidance Overview	4
What is a House in Multiple Occupation (HMO)?.....	4
What is a Household?.....	4
Mandatory Licensing of HMOs.....	5
University of Suffolk (UoS) Student Accreditation Scheme.....	6
Councils Rights of Entry	6
Guidance on Fire Precautions and Fire Safety	7
Overview	7
Premises Specific Guidance on Fire Precautions and Fire Safety.....	8
Fire detection and alarm systems grades and categories.....	8
Shared house scenario – no more than 2 storeys	8
Shared house scenario – 3 storeys	9
Shared house scenario – 4 storeys	9
Shared house scenario – 5 or 6 storeys.....	10
Bedsit scenario – no more than 2 storeys	10
Bedsit scenario – 3 or 4 storeys	11
Bedsit HMO scenario – 5 or 6 storeys	11
Purpose-built flats and buildings converted into flats.....	12
Inner rooms	12
Mixed commercial and residential use.....	13
Automatic Fire Suppression Systems	13
Guidance on Amenities	14
Kitchen and Bathroom Facilities	14
Additional Guidance on Kitchen Requirements	15
Guidance on Space Standards.....	15
Guidance on Adequate Means of Heating, Ventilation, and Carbon Monoxide Detection in Licensed HMOs .	16
Waste Disposal and Management in Licensed HMOs.....	17
Management of Houses in Multiple Occupation	18
Overview	18
Duties of Manager	18
Duties of Occupier.....	19
Fire Precautions and Alarm Systems Testing and Maintenance	20

Houses In Multiple Occupation Suffolk Landlord’s Handbook

Fire Alarm Systems.....	20
Emergency Lighting System	20
Fire Fighting Equipment	21
Fire Doors and Structural Means of Escape	23
Fire Safety (England) Regulations 2022: Fire Door Guidance	24
Fire Instructions to Occupiers	24
Fire Risk Assessment and Responsible Persons.....	25
Local Authority and Fire Rescue Service Responsibilities	26
Installations and Safety Requirements	27
Electrical Safety	27
Gas Safety.....	27
Fire Safety: Furniture and Furnishings.....	28
Building Control	28
Planning	29
Article 4 Directions and HMOs	29
HMO Inspection Program and HHSRS	30
The Health and Housing Safety Rating System (HHSRS)	30
HMO Inspection Programme	31
Useful Contacts Details:	32
References and sources of useful information	33
Testing, Maintenance Records and Tenant Information Leaflets.....	34
Table 1 - Fire Alarm System – Record of Tests	34
Table 2 – Emergency Lighting System – Record of Tests.....	35
Table 3 – Fire Extinguishers – Record of Tests	36
Table 4 – Fire Doors and Structural Means of Escape – Record of Defects, Obstructions etc.....	37
Leaflet 1 - ADVICE TO OCCUPANTS OF HOUSES IN MULTIPLE OCCUPATION.....	38
Leaflet 2 - FIRE! NOTICE TO ALL TENANTS.....	39

Guidance Overview

1. Many privately-rented houses are let to people from several different families, either as flats, bedsits or shared houses. Such houses are known as houses in multiple occupation (HMOs).
2. This handbook is a guide to the legal requirements for landlords of HMOs to ensure that their property meets an acceptable standard developed in partnership by Babergh and Mid Suffolk District, East Suffolk, Ipswich Borough and West Suffolk Councils in consultation with Suffolk Fire and Rescue Service. In addition, it has information about which HMOs must be licensed and gives details of the student housing accreditation scheme. It also provides some useful contact information in Section 0.

What is a House in Multiple Occupation (HMO)?

3. Under the Housing Act 2004, a house in multiple occupation (HMO) is a building, or part of a building, occupied by three or more persons who do not form a single household (see below for the definition of household). Examples of HMOs include the following:
 - a. A house converted into three or more bedsits.
 - b. A house or flat rented out on a room-by-room basis to three or more unrelated persons.
 - c. A house converted into self-contained flats where less than two-thirds of the flats are owner occupied and the flats are not converted in accordance with the 1991 Building Regulations.
 - d. A house occupied by three or more unrelated friends who rent from a private landlord.
 - e. A house let to a group of three or more unrelated students.
 - f. A flat with two or more bedsits, with three or more occupiers (even if the flats were converted in accordance with the 1991 Building Regulations and more than two thirds of the flats in the building are owner occupied).
 - g. A privately rented house occupied by a married couple and a friend.

If you are not sure whether your property is classified as an HMO or if you want more information, please contact the HMO licensing representatives of your local council; their contacts can be found in Section 0.

What is a Household?

4. A household is a group of people who live together, and who are connected by marriage, civil partnership. They must be a recognised couple (same sex or opposite sex), be related – a child, parent, sister, brother, nephew, niece or in-law for instance – or have another recognised connection such as fostering or adoption.
5. People who live in the same place, but are not connected in this way, do not count as a single household. For example, a group of five unrelated students or adult friends counts as five households, even if they live at the same address and share facilities.

Mandatory Licensing of HMOs

6. The Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 has revised the criteria for HMO licensing. Since 1 October 2018, any HMO occupied by five or more people forming two or more separate households requires a license, regardless of the number of storeys.
7. If you own or manage an HMO, answer these questions to find out if you need a license:
 - a. Is the property occupied by five or more people?
 - b. Do they live as two or more households?
 - c. Do they share any amenities such as the bathroom, toilet or cooking facilities?
8. If you answer 'yes' to all of these questions you must apply for a licence with the local authority as soon as possible. The licensing process requires evidence of responsible management and lettings practices. This includes:
 - a. Satisfactory and up to date Gas Safe certificate if the HMO has a gas supply.
 - b. Provision of smoke alarms on each storey containing living accommodations and maintaining them in working order.
 - c. Providing the authority, on demand, with declarations about the safety of electrical appliances and furniture supplied by the landlord, and the condition and positioning of smoke and carbon monoxide alarms.
 - d. Providing each occupant with a written statement (tenancy agreement) of the terms of occupancy.
 - e. Ensuring that every electrical installation in the house is in proper working order and safe for continued use and supplying the local authority with a declaration confirming the safety of the electrical installation if requested.
 - f. Meeting minimum room size standards and adhering to occupancy limits (see Paragraph 9 below).
 - g. Complying with the local authority's scheme for storing and disposal of household waste generated by HMOs.
9. If you apply for an HMO licence after 1 October 2018 and your property does not meet the newly introduced room size standards, you will be granted up to 18 months to make necessary adjustments. During this adjustment period, your licence remains valid, and you will not face any legal penalties for this specific non-compliance. Full guidance on the applicable minimum room standards including for sleeping areas is provided in Section 0.
10. Operating a licensable HMO without a licence could result in heavy penalties including an unlimited fine or a civil penalty of up to £30,000. A tenant living in a property that should have been licensed, but was not, can apply to the First-tier Tribunal (Property Chamber) to claim any rent they have paid during the unlicensed period (up to a limit of 12 months). The Council can also reclaim any housing benefit paid during the time the property was operating without a licence.
11. The Council charges a fee to cover the administration costs of the licence procedure, as well as inspection costs.
12. For further information and to obtain a licence application form, please contact HMO licensing representatives of your local council; contacts are detailed in Section 0.

13. If you are the landlord of a student property, you may consider renting your property through the UoS Accreditation Scheme.
14. The UoS Accreditation Scheme has been developed by Ipswich Borough Council with our partners, University Campus Suffolk, Suffolk County Council, Suffolk Fire and Rescue and Suffolk Constabulary.
15. This is a voluntary scheme that aims to promote good management practice and high standards amongst student landlords. If you want to join the scheme you must sign up to a code of conduct and pay a fee to register. Your property must meet all necessary health and safety requirements, and the university or the Council will conduct spot checks to ensure that accredited houses are up to standard. Once accredited, landlords can advertise on the universities accommodation list.
16. For further information please contact the UoS Accommodation Office on 01473 338833 or email accommodation@uos.ac.uk.

Councils Rights of Entry

17. The Council's authorised officers are empowered by the Housing Act 2004 to enter premises at any reasonable time, on giving 24 hours written notice of their intentions to the occupier and owner if the owner is known.
18. For certain specific reasons such as, checking whether a property is an HMO, officers may enter at any reasonable time without giving 24 hours written notice.
19. Legal powers of entry are only used where difficulty is anticipated and, in most cases, officers will enter premises, where invited by occupier or tenant.
20. The reasons for entry may include inspections of the property to check compliance with housing legislation, to assist tenants in securing necessary repairs or improvements by the landlord, to advise the landlord on the standards required and enforcement of fire safety and management standards.

Guidance on Fire Precautions and Fire Safety

Overview

1. For landlords and managers of HMOs (Houses in Multiple Occupation), it is crucial to prioritise fire safety as a hazard that can be a significant risk to life and severe injury as residents in HMOs face a higher risk of fire-related incidents compared to standard family homes.
2. **The actual fire safety precautions including fire alarm specifications will be dependent on the buildings fire risk assessment.**
3. Where reference is made to a specific standard e.g. a British Standard (BS), then it is the latest version of that standard that should be followed. The current British Standard relating to the Installation of fire alarm systems is BS 5839-6:2019. Application of a comparable standard will have to be provided with evidence to demonstrate an equal, if not better standard, is achieved. When assessing an HMO for fire risk, the level of fire precautions will be determined with reference to national guidance. The type, size and layout of the HMO, and how it is occupied are the two main factors that influence the standard of fire protection. There are typically two occupancy scenarios that are followed.
4. The guidance specifications below refer to shared houses and bedsit-type properties:
 - a. A shared house is one where all tenants share the same tenancy agreement and have exclusive access to all areas of the property, for example, a group of friends who know each other and arrived in the property at the same time.
 - b. A bedsit-type property is one where the tenants rent a bedroom and have shared use of a kitchen, bathroom and lounge. The tenants will not always know each other and will have locks on their bedroom doors.
5. The standards are set out with the following themes clearly defined for varying sizes and property types:
 - a. **Fire doors and structural means of escape:** For ensuring tenant safety in HMOs, it is imperative to establish clearly defined escape routes and robust fire separation measures, adhering to the appropriate guidance documents, building regulations and fire safety standards.
 - b. **Fire detection and alarm system:** A comprehensive fire detection and alarm system, compliant with legal requirements, is crucial in HMOs for early fire detection, safeguarding residents by providing prompt alerts in case of fire emergencies.
 - c. **Fire fighting equipment:** In HMOs, especially larger ones, the provision of appropriate fire fighting equipment like fire extinguishers and fire blankets maybe required. These should be installed without obstructing escape routes. They should only attempt to extinguish a fire if it is safe and they feel competent to do so, primarily to clear escape routes. Landlords are responsible for training tenants on the safe use of fire extinguishers.
6. Please see Section 0 for more information on fire precautions and alarm systems in HMOs, including requirements for testing and maintenance. Section 0 of this Handbook also contains useful sources of reference and other information on fire safety and management in HMOs.

Premises Specific Guidance on Fire Precautions and Fire Safety

7. Below is a summary of the requirements for structural means of escape, fire detection and alarm systems, and fire fighting equipment to ensure fire safety in buildings. The standards are provided for a selection of common HMO style residential premises. For detailed guidance, please refer to the main set of guidance documents listed in Section 0 of this Handbook for the particular type of premises you are responsible for under licensing and fire safety legislation.

Fire detection and alarm systems grades and categories

8. Fire detection and fire alarm systems are classified into different grades and categories based on their functionality and installation locations. The system should be installed to the requirements of BS 5839-6: 2019.¹ The system 'grades' are as follows:
 - a. **Grade A:** This system includes equipment for receiving, indicating, controlling, and relaying signals from fire detectors and manual call points, as well as activating fire alarm devices. Comparable to systems used in non-domestic premises, they feature a Control and Indicating Equipment (CIE) and a battery backup capable of operating the system for 72 hours during a mains power failure.
 - b. **Grade D:** This grade is divided into:
 - i. **D1:** With a tamper-proof battery.
 - ii. **D2:** With a user-replaceable battery.
 - c. **Grade F:** This is a battery-only system, further divided into:
 - i. **F1:** With a tamper-proof primary battery.
 - ii. **F2:** With a user-replaceable battery.
9. The system 'categories' determine the areas where detectors are installed, with detectors sited in accordance with the recommendations BS 5839-6: 2019:
 - a. **Category LD1:** Detectors are installed throughout the premises, including all circulation areas, escape routes, and rooms except for those with negligible ignition sources like bathrooms.
 - b. **Category LD2:** Detectors are located in all circulation areas, escape routes, and in high-risk rooms or areas, such as kitchens and principal habitable rooms.
 - c. **Category LD3:** This system features detectors in circulation areas forming part of escape routes.

Shared house scenario – no more than 2 storeys

10. Fire Doors and Structural Means of Escape

- a. Partition walls and ceilings must be of sound general construction.
- b. Escape windows, where required, must comply with the current building regulations, as outlined in Approved Document B, Volume 1, for dwelling houses.
- c. 30-minute fire separation is required between the basement/cellar and the ground floor.

¹ BS 5839-6: 2019+A1:2020. Fire detection and fire alarm systems for buildings - Code of practice for the design, installation, commissioning and maintenance of fire detection and fire alarm systems in domestic premises

Houses In Multiple Occupation Suffolk Landlord's Handbook

- d. Doors should be close-fitting to minimise gaps through which fire and smoke can spread.

11. Fire Detection and Alarm System

- a. Grade D1, Category LD2 automatic fire detection and alarm system.

12. Fire Fighting Equipment

- a. Kitchen Equipment: Provision of a fire blanket and dry powder fire extinguisher in the kitchen.

Shared house scenario – 3 storeys

13. Fire Doors and Structural Means of Escape

- a. The property should have a 30-minute fire-protected route, usually the main staircase.
- b. 30-minute fire-resisting doors to all habitable rooms and the kitchen required. Fire doors must be self-closing and fitted with intumescent strips and smoke seals. Doors to letting rooms and final exit doors should be openable without a key.
- c. 30-minute fire separation between basement and ground floor required.
- d. 30-minute fire-resisting structure to partition walls and ceilings must separate habitable rooms from other habitable rooms (e.g. bedrooms/ living rooms/ dining rooms), kitchens and the common escape route.

14. Fire detection and alarm system

- a. Grade D1, Category LD2 automatic fire detection and alarm system.

15. Fire fighting equipment

- a. Provision of a fire blanket and dry powder fire extinguisher in the kitchen.

Shared house scenario – 4 storeys

16. Fire Doors and Structural Means of Escape

- a. The property should have a 30-minute fire-protected route, usually the main staircase.
- b. 30-minute fire-resisting doors to all habitable rooms and the kitchen required. Fire doors must be self-closing and fitted with intumescent strips and smoke seals. Doors to letting rooms and final exit doors should be openable without a key.
- c. 30-minute fire separation between the basement and ground floor required.
- d. 30-minute fire-resisting structure to partition walls and ceilings must separate habitable rooms from other habitable rooms (e.g. bedrooms/ living rooms/ dining rooms), kitchens and the common escape route.

17. Fire detection and alarm system

- a. Grade D1, Category LD1 automatic fire detection and alarm system.

18. Fire fighting equipment

- a. Provision of a fire blanket and dry powder fire extinguisher in the kitchen.

Shared house scenario – 5 or 6 storeys

19. Fire Doors and Structural Means of Escape

- a. 30-minute fire resisting structure to walls and ceilings separating habitable rooms kitchens and the common escape route.
 - i. Fire separation is needed for the top floor in five-storey buildings and top two floors in six-storey buildings.
 - ii. For 5-storey buildings, lobby protection is required on all floors except the top, while 6-storey buildings need lobby protection on all but the top floor and a secondary escape route from the top two floors.
- b. 30-minute protected route is required to communal escape route.
- c. 30-minutes fire separation between basement/cellar and ground floor is required.
- d. Fire doors with 30-minute fire-resistance complete with intumescent fire and cold smoke seals (FD30S) and an overhead self-closing device (BS EN 1154) to common escape routes. FD30S fire doors to letting rooms and final exit doors should be openable without a key.
- e. Emergency lighting to common parts (BS 5266-1) where the escape route is long , dark or complex.
- f. Fire escape signage (BS 5499) where the escape route is long or complex.

20. Fire detection and alarm system

- a. Grade A, Category LD1 automatic fire detection and alarm system (new or materially altered premises)
- b. Grade D, Category LD1 automatic fire detection and alarm system (existing premises)

21. Fire fighting equipment

- a. Provision of a fire blanket and dry powder fire extinguisher in the kitchen and a simple multi purpose extinguisher to each floor level.

Bedsit scenario – no more than 2 storeys

22. Fire Doors and Structural Means of Escape

- a. 30-minute fire-resisting structure to walls and ceilings separating habitable rooms, kitchens and the common escape route.
- b. Fire doors with 30-minute fire-resistance complete with intumescent fire and cold smoke seals (FD30S) and an overhead self-closing device (BS EN 1154) to common escape routes. FD30S fire doors to letting rooms and final exit doors should be openable without a key.
- c. Emergency lighting to common parts (BS 5266-1) where the escape route is long, dark or complex.
- d. Fire escape signage (BS 5499) where the escape route is long or complex.

23. Fire Detection and Alarm System

- a. Individual dwelling units or bedsits comprising a single room including cooking facilities:
 - i. Grade D1, Category LD2 automatic fire detection and alarm system.
- b. Individual dwelling units, within the HMO, comprising two or more rooms:
 - i. Grade D1, Category LD2 automatic fire detection and alarm system.
- c. Communal areas of the HMO:
 - i. Grade A, Category LD2 automatic fire detection and alarm system.

Houses In Multiple Occupation Suffolk Landlord's Handbook

24. Fire fighting equipment

- a. Provision of a fire blanket and dry powder fire extinguisher in the kitchen and a simple multi purpose extinguisher to each floor level.

Bedsit scenario – 3 or 4 storeys

25. Fire Doors and Structural Means of Escape

- a. 30-minute fire-resisting structure to walls and ceilings separating habitable rooms from other habitable rooms, kitchens and the common escape route.
- b. Fire doors with 30-minute fire-resistance complete with intumescent fire and cold smoke seals (FD30S) and an overhead self-closing device (BS EN 1154) to common escape routes. FD30S fire doors to letting rooms and final exit doors should be openable without a key.
- c. Emergency lighting to common parts (BS 5266-1) where the escape route is long or complex.
- d. Fire escape signage (BS 5499) where escape route is long or complex.

26. Fire Detection and Alarm System

- a. Individual dwelling units or bedsits comprising a single room including cooking facilities:
 - i. Grade D1, Category LD1 automatic fire detection and alarm system.
- b. Individual dwelling units, within the HMO, comprising two or more rooms:
 - i. Grade A, Category LD2 automatic fire detection and alarm system.
- c. Communal areas of the HMO:
 - i. Grade A, Category LD2 automatic fire detection and alarm system.

27. Fire fighting equipment

- a. Provision of a fire blanket and dry powder fire extinguisher in the kitchen and a simple multi purpose extinguisher to each floor level.

Bedsit HMO scenario – 5 or 6 storeys

28. Fire Doors and Structural Means of Escape

- a. 30-minute fire-resisting structure to walls and ceilings separating habitable rooms kitchens and the common escape route.
 - i. Fire-resistant separation is needed for the top floor in five-storey buildings and top two floors in six-storey buildings.
 - ii. For 5-storey buildings, lobby protection is required on all floors except the top, while 6-storey buildings need lobby protection on all but the top floor and a secondary escape route from the top two floors.
- b. 30-minute protected route is required to communal escape route.
- c. 30-minutes fire separation between basement/cellar and ground floor is required.
- d. Fire doors with 30-minute fire-resistance complete with intumescent fire and cold smoke seals (FD30S) and an overhead self-closing device (BS EN 1154) to common escape routes. FD30S fire doors to letting rooms and final exit doors should be openable without a key.
- e. Emergency lighting to common parts (BS 5266-1) where the escape route is long , dark or complex.
- f. Fire escape signage (BS 5499) where the escape route is long or complex.

Houses In Multiple Occupation Suffolk Landlord's Handbook

29. Fire Detection and Alarm System

- a. Individual dwelling units or bedsits comprising a single room including cooking facilities:
 - i. Grade D1, Category LD1 automatic fire detection and alarm system.
- b. Individual dwelling units, within the HMO, comprising two or more rooms:
 - i. Grade A, Category LD2 automatic fire detection and alarm system.
- c. Communal areas of the HMO:
 - i. Grade A, Category LD2 automatic fire detection and alarm system.

30. Fire fighting equipment

- a. Provision of a fire blanket and dry powder fire extinguisher in the kitchen and a simple multi-purpose extinguisher for each floor level.

Purpose-built flats and buildings converted into flats

31. The Home Office Guidance published in March 2023, '[A guide to making your small block of flats safe from fire](#)' provides comprehensive advice for those responsible for fire safety in small blocks of flats, specifically those limited to 3 storeys.
32. The guide focuses on fire safety responsibilities in the common parts of small blocks of flats, including the building's structure, external walls, and the doors between flats and communal areas. It is designed as a support tool to apply fire safety legislation effectively and includes advice on completing a fire safety risk assessment. Published under Article 50 of the Regulatory Reform (Fire Safety) Order 2005 (FSO), the guide assists responsible persons in meeting their duties under the FSO.
33. The guide not only assists 'responsible persons' in complying with legal requirements but also encourages the adoption of best practices in fire safety management. This includes regular fire risk assessments, maintenance of fire safety equipment, and ensuring clear evacuation routes and procedures. It is crucial to refer to this guidance to understand your responsibilities and ensure compliance with fire safety laws.
34. If your block of flats falls outside the scope of this specific guide (i.e., larger than 3 storeys or not a small block of flats), it is recommended that you instead refer to the guidance provided in '[Fire safety in purpose-built blocks of flats](#).' Where any doubt exists, this must be discussed with the Authority Having Jurisdiction (AHJ) on a case-by-case basis who will advise on the measures that may need to be taken.
35. Please note that purpose-built flats and buildings converted into flats that can demonstrate compliance with the 1991 Building Regulations or Building Regulations, thereafter, will usually be considered sufficient and may not require additional fire safety measures as described above.

Inner rooms

36. An 'inner room' in fire safety terms is a room where the only escape route is through another, known as an 'access room'. This configuration presents an unacceptable fire safety risk to occupants and should be avoided wherever possible. However, where unavoidable it may be accepted where the inner room is a kitchen, laundry or utility room, a dressing room, bathroom, WC or shower room. For habitable spaces like living rooms, bedrooms, or studies, specific criteria must be met:
 - The room must have either an alternate escape route or an escape window that meets safety standards if it is within 4.5m of the ground level.
 - The rooms must have an effective fire detection system and a fire-resisting door (usually of FD30S standard).
 - Escape windows must meet relevant building and fire safety standards.

Houses In Multiple Occupation Suffolk Landlord's Handbook

37. In every case, the same person should control both the inner and outer access rooms, and escaping should not require passing through more than one outer room. Ideally, the outer room should not be a high fire risk area. However, if it is, having an escape window as an alternative exit might be acceptable.

Mixed commercial and residential use

38. Residential spaces above or within commercial premises face a heightened fire risk, especially at night. Fire risk assessments evaluate the threat level, which can be significantly higher in such mixed-use buildings, particularly when residential areas are over establishments like pubs, restaurants, or dry cleaners.
39. A 60-minute fire-resistant barrier is typically required between residential and commercial areas. However, this can be reduced to 30 minutes in lower-risk commercial spaces if there's an automatic fire detection system linked to the residential system. In higher-risk areas, even with a 60-minute barrier, it's advisable to have a linked fire detection system.
40. Where creating a fire-resistant separation is impractical, such as in some accommodations above pubs, alternative safety measures like fire-protected lobbies, secondary escape routes, or water suppression systems in high-risk commercial areas should be considered.
41. Mixed-use buildings necessitate careful planning of shared staircases for escape and access. Current design guidelines offer advice for new buildings, but it's not implied that older buildings must retroactively meet these standards.
42. The fire risk in mixed-use buildings escalates with the building's height, size, and number of flats. Shared staircases may be acceptable in smaller, low-rise buildings, depending on other factors like adequate escape routes and enhanced fire warnings. Such buildings might require simultaneous evacuation plans.
43. In mixed-use buildings, areas occupied for different uses should be fire separated. For example, a mixed-use building might have commercial spaces like shops or restaurants on the lower floors, while the upper floors are used for residential purposes. Doors between these areas are usually only allowed as escape routes.

Automatic Fire Suppression Systems

44. This authority is committed to protecting the community of Suffolk by ensuring suitable and sufficient fire safety measures are in place. We proactively endorse the installation of suitable suppression systems e.g. sprinklers and water mist systems, and believe that they save lives and improve safety. Where installed they reduce the environmental, social and economic impact of fires in domestic, and other premises.
45. Automatic fire suppression systems may provide an alternative compensatory measure as part of an overall fire safety solution to ensure an appropriate means of escape from fire from a building or residence. As such, this authority recognises there may be relaxations in some fire safety measures where a suitable suppression system is installed, this should be discussed with the Authority Having Jurisdiction (AHJ) on a case-by-case basis.
46. For residential landlords, it is crucial to understand the updated fire safety standards and regulations for both new and existing buildings, including Houses in Multiple Occupation (HMOs). Where required,

Houses In Multiple Occupation Suffolk Landlord's Handbook

sprinkler systems in these buildings must comply with BS 9251, and water mist systems should follow the BS 8458: 2015 standard. Recent amendments to the Building Regulations (Approved Document B) have lowered the mandatory sprinkler system installation height in flats from 11 metres to 30 metres.

Guidance on Amenities

Kitchen and Bathroom Facilities

1. The kitchen and bathroom facilities that you are expected to provide depend on the type of HMO and the number of occupants sharing the accommodation. The following table indicates the level of amenities that must be provided regardless of the level of risk [table]:

- a. 1 – 5 Persons:

- i. At least 1 kitchen, not more than 1 floor distance from furthest bedroom. Where there is more than 1 floor distance an additional kitchen should be provided, or a dining room provided on the same floor as the kitchen.
- ii. At least 1 bathroom and 1 WC. Where there are 5 persons the bathroom and WC must be separate, although the bathroom may also contain a WC.

- b. 6 – 10 Persons

- i. At least 2 kitchens, not more than 1 floor distance from the furthest bedroom. Where there is more than 1 floor distance a dining room should be provided on the same floor as the kitchen.

OR

1 large kitchen with dining room, with 2 sets of facilities - dependant upon the actual number of tenants.

- ii. 2 bathrooms

AND

2 separate WCs with WHBs (but one of the WCs can be contained within one of the bathrooms).

- c. 10 + Persons

- i. At least 2 kitchens, not more than 1 floor distance from the furthest bedroom. Where there is more than 1 floor distance a dining room should be provided on the same floor as the kitchen.

OR

1 large kitchen with dining room, with 2 sets of facilities - dependant upon the actual number of tenants.

- ii. 3 bathrooms

Houses In Multiple Occupation Suffolk Landlord's Handbook

AND

3 separate WCs with WHBs (but two of the WCs can be contained within the bathrooms).

Additional Guidance on Kitchen Requirements

2. Minimum floor area of the kitchen
 - 1—5 persons—7m²
 - 10 persons—10m²
3. Kitchens shall be provided no more than one floor away from any occupied rooms unless a dining area is available.
4. Each kitchen for up to 5 persons shall be provided with the following:
 - 1 cooker with 4 rings, oven and grill
 - 1 sink with hot water, cold drinking water, base unit and drainer
 - 1 single wall or floor cupboard per person for food storage (min size 500mm wide and of standard height and depth)
 - 1 double wall cupboard for food storage per person (min size 1000mm wide and of standard height and depth)
 - 1000mm x 600mm worktop for food preparation per 3 persons or
 - 2000mm x 600mm worktop for food preparation per 5 persons plus an additional worktop for the safe storage of kitchen appliances
 - 1 standard fridge with a freezer compartment per 3 persons (with a separate shelf for each person) or
 - 1 large fridge/freezer per 5 persons (with a separate shelf for each person)
 - 1 dedicated electrical socket per fixed appliance (such as a fridge)
 - A minimum of 2 undedicated double electrical sockets above an area of worktop
 - Separate cooker panel for electric cookers.
5. The kitchen shall be of sufficient area for the safe provision of all necessary facilities.
6. Cookers shall not be placed adjacent to doorways and there shall be sufficient floor space for the safe retrieval of items from the oven and for the safe circulation of occupants.

Guidance on Space Standards

7. All licensable HMOs have to comply with the National minimum room size. The following space standards will be required in HMOs. We recommend that you consider these standards when buying houses to let or when improving existing HMOs.
8. If a room is smaller than the minimum acceptable size, a legal notice shall be served on the landlord, either prohibiting the use of the room or limiting the number of people who may occupy it. This does not mean that the tenant who currently occupies the room has to leave, but when they do leave the landlord must not re-let the room.

Houses In Multiple Occupation Suffolk Landlord's Handbook

Bedrooms

9. The following space standards will be required in all HMOs:
 - a. Minimum bedroom size with separate living room (11m²):
 - i. 1 Person—6.51m²
 - ii. 2 Persons—10.22m²
 - b. Minimum bedroom size study/living room where there is no separate living room:
 - i. 1 person—10m²
 - ii. 2 persons—15m²
10. Bed-sitting room containing cooking facilities.
 - a. One person 13.0 m²
 - b. Two person 18.0 m²

Living room

11. The following space standards will be required in all HMOs:
 - a. Minimum living space:
 - i. 1—5 persons—11m² OR 13m² combined kitchen/dining room
 - ii. 6—10 persons—14m² OR 16.5m² combined kitchen/dining room
12. Unless related, people should not be required to share bedrooms. It is accepted, however, that some groups may wish to share rooms.

Dining room

13. To be provided as an alternative to a living room or where a bed-sitting room is provided which is more than one-floor distance away from a kitchen:
 - a. 1 - 5 persons 11.0m²
 - b. 6 - 10 persons 16.5m²
 - c. 11-15 persons 21.5m²
 - d. 16 + persons 25.0m²
14. Kitchen/diners are acceptable, where the dining area is separate from the cooking and sink areas and is of the above dimensions.

Guidance on Adequate Means of Heating, Ventilation, and Carbon Monoxide Detection in Licensed HMOs

15. Prescribed standards for licensed HMOs require each unit of accommodation to have adequate means of heating. Sufficient ventilation is also recommended for cooking areas to avoid hazards from condensation and related dampness and mould growth. Washing facility requirements also stipulate that all bathrooms in an HMO must be suitably and adequately heated and ventilated.

Heating

16. In order to achieve adequate means of space heating within a licensed HMO adherence to the following guidance is recommended.
17. The heating system should be maintained in good and safe working condition capable of heating all habitable rooms, bathrooms, and toilet rooms. The main living room should reach 21°C, and other rooms 18°C, at an external temperature of -1°C, without exceeding 25°C. Occupiers should be able to effectively control and time the heating and hot water systems. Fuel-burning devices must vent outside in

Houses In Multiple Occupation Suffolk Landlord's Handbook

accordance with manufacturer specifications and standards. Chimneys should be maintained as per manufacturer guidelines.

Ventilation

18. It is recommended that ventilation in the kitchen and bathrooms is provided by mechanical extraction ducted to the outside of the building. Habitable rooms such as bedrooms, living rooms and studies must have a window or skylight opening to the outside, which can be securely fixed open. The minimum total openable area in each room should be 5% of its floor space. All means of ventilation within a building should be well-maintained and functional.

Carbon monoxide detection

19. Rooms with gas, oil, or solid fuel appliances, or an associated flue, require a well-maintained and properly functioning hard-wired CO detector with battery backup. Detectors must meet BS EN 50291 standards, be battery-powered for their lifespan, and have an end-of-life warning. Mains-operated detectors are acceptable if they have a sensor failure warning.
20. Carbon monoxide detection and fuel combustion appliance regulations are governed by The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 and its 2022 amendment. Under the regulations all relevant landlords must:
 - a. Ensure that at least one smoke alarm is installed on each storey of their properties where there is a room used as living accommodation.
 - b. Ensure a carbon monoxide alarm is installed in any room used as living accommodation that contains a fixed combustion appliance (excluding gas cookers).
 - c. Ensure smoke alarms and carbon monoxide alarms are repaired or replaced once it is informed and found that they are faulty.
21. The requirements are enforced by local authorities, who can impose a fine of up to £5,000 if a landlord fails to comply with a remedial notice.

Waste Disposal and Management in Licensed HMOs

22. From 1 October 2018, local authorities are required to regulate a condition on the provision of suitable refuse storage facilities in HMOs. This is due to the recognition that HMOs, with multiple and separate households, typically generate more waste than single-family homes. Accordingly, all licensed HMOs are required to adhere to local authority schemes for the storage and disposal of domestic refuse where such schemes exist. One of the biggest complaints from people living close to HMOs is the problems caused by tenants not putting their household waste out on the right day/in the right place or in the right bag.
23. Non-compliance by a licence holder is considered a breach of the licence and a criminal offence. For further information on waste and recycling in your district, please contact HMO licensing representatives of your local council detailed in Section 0.

Management of Houses in Multiple Occupation

Overview

24. A well-managed HMO leads to reduced issues for the owner, manager, residents, neighbours, and the local Council. We aim to ensure that all HMOs in the district are managed in a proper manner so that tenants can live in safe conditions. The Management of Houses in Multiple Occupation (England) Regulations 2006 and The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 place legal duties on both managers and tenants to ensure that the property is maintained to a good standard. The Management Regulations are summarised below.

Duties of Manager

25. The regulations require the person managing an HMO:
- a. to display his or her name, address and phone number prominently in the house.
 - b. to keep the premises safe, but in particular:
 - i. keep the means of escape from fire in good order and free from obstruction.
 - ii. make any unsafe roofs or balconies safe or inaccessible.
 - iii. fit bars or alternatives to low windows to prevent accidents.
 - c. to keep water supply and drainage in proper working order and fit covers to all water tanks.
 - d. to supply to the Council the latest Gas Safety Certificate and the latest Electrical Safety Certificate within seven days of being asked to do so (Gas appliances must be tested annually and electrical testing must be conducted every five years.)
 - e. to maintain in good repair, clean condition and proper working order all stairs, banisters, carpets, lights and any other parts that are used in common by two or more households.
 - f. to maintain in good repair, clean condition and good order any outbuildings, yards, forecourts, boundary walls, fences and railings.
 - g. to keep the garden safe and in a tidy condition.
 - h. to make sure every letting room and any furniture supplied with it is clean at the beginning of every tenancy.
 - i. to make sure all fixtures, fittings or appliances are in good repair and in proper working order and maintain them in this condition.
 - j. to make proper arrangements for the storage of refuse and litter pending their disposal.
 - k. to make appropriate additional refuse disposal arrangements for occasions when the local authority's collection service is insufficient (for example at the end of term or when furniture has been replaced).
26. The Council may request certificates which should be provided within seven days of the request.

Duties of Occupier

27. The regulations impose duties on occupiers of an HMO to allow the person managing the HMO to effectively perform their duties as detailed above by:
 - a. taking reasonable care to avoid causing damage and disrepair.
 - b. co-operating in a reasonable way with the manager and providing information to allow the manager to conduct his/her duties.
 - c. complying with any reasonable arrangement made by the manager regarding means of escape from fire, refuse storage and disposal.
 - d. allowing the manager access to their rooms at all reasonable times to perform their duties.

28. Failure to comply with the Management Regulations is an offence for which you may be prosecuted. If taken to Court and found guilty, you could receive an unlimited fine or civil penalty of up to £30,000 for each offence.

Fire Alarm Systems

1. If you have a fire alarm and detection system, it is crucial that this is maintained in full and good working condition.
2. You should regularly document all regular inspections, testing and maintenance in a fire safety logbook. Table 1 at the back of this handbook is offered as a model 'logbook' for recording purposes.
3. It is important to be aware of the two most common types of fire alarm and detection system found in HMOs, Grade A (A system of electrically operated interlinked smoke/heat detectors linked to a control panel and call points), and Grade D (a system of interlinked mains powered smoke/ heat detectors).
4. **Grade A** systems must be tested **weekly**, using a different call point on a rotating basis, to ensure they are working satisfactorily. In addition to this test, which can be carried out by the manager, **six monthly** inspections and service of the system must be carried out by a suitably qualified fire alarm engineer with specialist knowledge of fire detection and alarm systems. The service certificate must be retained by the HMO manager and made available to the Council within 7 days of a request being made.
5. **Grade D** systems must also be tested **weekly** to ensure they are working satisfactorily. In addition, all the detectors must be **cleaned annually** in accordance with the manufacturer's instructions, this must be recorded in the fire safety logbook.
6. **It is strongly recommended that you enter into a maintenance contract with a suitably qualified fire safety professional to undertake maintenance of the system on your behalf.**
7. The inspection and testing frequency of fire alarm systems may differ based on the system and property type. A judgment therefore needs to be made in each case as to what frequency is necessary, considering the specific risks associated with the building, as identified in the fire risk assessment.
8. For instance, a landlord managing a large 4-storey, 15-bed hostel accommodating vulnerable individuals is expected to adhere strictly to safety regulations. For a smaller HMO, such as a 3-storey house occupied by five young professionals, less frequent inspections might suffice.
9. It is important to ensure a proactive rather than reactive approach to the maintenance and good working condition of the alarm system.

Emergency Lighting System

1. If your property is fitted with emergency lighting (EL), the light must be maintained and tested in accordance with BS 5266, Part 1. As the landlord, you have a responsibility to ensure it is maintained in working order.
2. You should keep a logbook to record the regular inspections of the system. Table 2 at the back of this handbook is offered as a model 'logbook' for recording purposes.
3. **It is strongly recommended that you take out a maintenance contract with a suitably qualified person to undertake maintenance of the system on your behalf.**

Houses In Multiple Occupation Suffolk Landlord's Handbook

4. You are required to ensure the following tests are undertaken:
 - **Weekly** - The EL system must be checked to ensure it is operating correctly, including the luminaries (ensuring they are lit), general cleanliness and for disrepair by a designated responsible person.
 - **Monthly** - Each EL must be activated from its battery by simulating a failure in the normal supply and an inspection made of each luminaire (emergency light) to ensure that it is functioning properly; the outcome of each test must be recorded in the fire safety logbook.
 - **6-monthly** - Each EL must be activated as before but left on for a prolonged period. In the case of lights with batteries rated at 3-hours the light must be left on for 1-hour, and in the case of lights with batteries rated at 1-hour, these must be left on for 15-minutes. An inspection must be made of each luminaire to ensure that they are functioning correctly.
 - **Annually** – The EL system shall be subject to a full discharge test and service by a suitably qualified person to ensure that the emergency lighting system is functioning correctly. Testing requirements are the same as for the 6-monthly test, but the batteries must be tested to their full duration, i.e. luminaires with batteries rated at three hours should remain lit for that period.
5. A service certificate shall be issued by the person undertaking the test. The certificate shall be retained by the HMO manager and made available to the Council within 7 days of such a request being made.

Fire Fighting Equipment

Fire Extinguishers

6. The need to install fire extinguishers, the type of extinguisher and the location, depend on the fire risk assessment undertaken for the building. Different types of fire extinguisher are only suitable to be used on certain types of fire. Therefore, it is of the utmost importance that the correct extinguisher is installed.
7. If extinguishers are provided, they must be installed safely to ensure that they do not obstruct to the escape route. As a general rule, no tenant should put themselves at risk by attempting to return to a property to attempt to extinguish a fire. The advice should be to 'get out and stay out.' A tenant should only attempt to extinguish a fire if they feel competent to do so in a safe and controlled manner in order to free up the means of escape. It will be your responsibility to ensure all tenants are trained on how to use a fire extinguisher safely.
8. Generally, HMOs of a conventional layout and low-risk premises will not require fire extinguishers to be installed in the escape routes. Only those HMO properties that have a large and complex layout will likely require fire extinguishers within the escape route. In most cases, a small multi-purpose extinguisher will be required only in the kitchen areas.
9. You should ensure that any fire extinguishers within the premises are serviced by a competent engineer at least annually to ensure that the extinguishers are safe and will function in an emergency. They must be maintained and tested by a competent engineer at least annually in accordance with the relevant British Standard. Competent engineers are usually registered by the British Approvals for Fire Equipment (B.A.F.E.) and are members of the Fire Industry Association (F.I.A).
10. A service certificate shall be issued by the person undertaking the test. The certificate shall be retained by the HMO manager and made available to the Council on request.
11. You should also conduct an 'in house' examination of your fire extinguishers at least monthly to check for any signs of tampering, missing or used extinguishers. You must also document any issues found and ensure that suitable remedial action is taken (e.g. ensure tamper tags are replaced and the extinguisher is refilled). Table 3 (Section 0) at the back of this handbook is offered as a model 'logbook' for recording purposes.

Houses In Multiple Occupation Suffolk Landlord's Handbook

12. You should follow the simple guidelines below when siting fire-fighting equipment, as the appliances provided must be positioned in the correct locations i.e.:
- Hung on brackets with handles approximately 1m from the floor (or 1.5m for extinguishers of less than 2kg).
 - Away from heaters.
 - Not obstructing escape routes.
 - Not in recesses or out of direct sight.
 - Sited with the appropriate instruction signage.
13. The following table is a useful guide regarding different types of fire extinguisher and how to use them:
- Type of Extinguisher – Red Water
 - Best used for:
 - Wood, cloth, paper, plastics etc.
 - Fire involving solids.
 - DANGER: Do not use on live electrical appliances or on burning fat or oil such as chip pan fires.
 - How to use:
 - Point the jet at the base of the flame and keep it moving across the area of the fire. Seek out any hotspots after the fire is out.
 - Type of Extinguisher – Blue – Dry Powder
 - Best used for:
 - Fires involving solids and fires involving liquids, i.e. paint and petrol. Safe on live electrical equipment, although it does not penetrate the spaces in equipment easily and the fire may flare up again.
 - DANGER: Do not use on chip pan fires.
 - How to use:
 - Point the jet or discharge horn at the base of the flames and with a rapid sweeping motion drive the flames towards the far edge until all the flames are out. If the extinguisher has a shut-off control, wait until the air clears. If you can still see the flames, attack the fire again.
 - Type of Extinguisher – Cream Foam
 - Best used for:
 - Fires involving liquids.
 - Warning: Not suitable for all liquids – check instructions.
 - DANGER: Do not use on chip pan fires. These extinguishers are generally not recommended for home use.
 - How to use:
 - Do not aim the jet straight at the liquid. Where the liquid on fire is in a container, point the jet at the inside edge of the container or on a nearby surface above the burning liquid. Allow the foam to build up and flow across the liquid.
 - Type of Extinguisher - Black – Carbon Dioxide
 - Best used for:
 - Fires involving liquids. Clean, effective and safe on live electrical equipment.
 - DANGER: Do not use on chip pan fires.
 - How to use:
 - Warning: This type of extinguisher does not cool the fire very well and you will need to watch out that the fire does not start up again.
 - Danger: Fumes from CO2 extinguishers can be harmful to users in confined spaces; therefore, ventilate the area as soon as the fire has been controlled.

Houses In Multiple Occupation Suffolk Landlord's Handbook

Fire Blankets

14. Ensure that only the fire blankets that conform to the current British Standard (BS EN 1869:1997) are provided in each kitchen, and are wall mounted so that the base of the container is about 1.5m above floor level. The fire blanket should be sited at an accessible point away from the cooker position but in close proximity to the exit door.

15. The summary guidance below shows the different types of Extinguishers/Fire Blankets:
 - Fire Blanket
 - Best used for:
 - Fires involving solids and fires involving liquids. Good for small fires in clothing and chip pan fires provided the blanket completely covers the fire.
 - If it is safe to attempt to extinguish a fire using a fire blanket the following instructions should be followed:
 - Turn off the gas or electricity supply.
 - Remove the fire blanket from its container and hold it by the fabric straps.
 - To prevent burns on the hands and arms, make sure you wrap the top edges of the blanket around your hands to protect them.
 - Roll up your sleeves so they do not catch in the flames.
 - Carefully cover the flames with the fire blanket, making sure that you cover the whole area so that you can effectively cut off the airflow and extinguish the flames.
 - However, if the fire is larger than the blanket, do not attempt to put it out. GET OUT and call the fire brigade immediately.
 - DO NOT touch the fire blanket or anything underneath it until at least an hour has passed since the fire was extinguished.

Fire Doors and Structural Means of Escape

16. Regular inspections of the property are essential to check that passive fire safety measures (fire-resisting doors, walls and ceilings) are in a well-maintained condition. Fire doors should be regularly checked for damage to surfaces or intumescent strips and cold smoke seals, as well as to ensure that they are self-closing and self-latching.

17. Check that the main final exit door and doors to individual bedsit rooms do not require the use of a key to escape. Any lock requiring the use of a key to exit must be removed.

18. Check that partitions around the staircase are complete and undamaged. Check that walls and ceilings are complete and undamaged. Check that no items are stored in or obstruct the escape route.

19. The frequency of inspection is a matter of judgement in each case. It is accepted that access to lettings may be difficult in some cases and that landlords should not intrude unduly on their tenants' privacy. However, most of the 'fire escape' provision in an HMO should be visible from the communal areas and there should be no difficulty in gaining access to such areas regularly.

20. It is advisable that you record any issues found and the action that you take to rectify any problem. Table 4 at the back of this handbook is offered as a model 'logbook' for recording purposes.

Fire Safety (England) Regulations 2022: Fire Door Guidance

21. The Fire Safety (England) Regulations 2022, effective from 23 January 2023, implemented key recommendations from the Grenfell Tower Inquiry Phase 1 report. These regulations are particularly relevant to building owners and managing agents (Responsible Persons), who must comply to avoid criminal offenses in the event of fire-related risks.
22. Regulation 10 focuses on fire doors in buildings with two or more domestic premises and communal areas used for evacuation during fires. The guide assumes your fire risk assessment has already evaluated the fire doors' suitability, with ongoing checks ensuring they remain effective. This applies to all blocks of flats with common parts, including both purpose-built blocks and conversions. It requires the Responsible Person to:
 - Inform residents about flat entrance doors.
 - Routinely check fire doors in buildings where the top storey is over 11 metres high (typically more than 4-storeys). These checks include all flat entrance fire doors (every 12 months) and fire doors in communal areas (every 3 months).
23. A fire risk assessment should already be in place to identify and evaluate fire doors. These doors are crucial for preventing fire and smoke spread and must be maintained and, if necessary, replaced by a competent person. Routine checks are straightforward and do not require specialists. However, any issues or repairs identified during these inspections must be addressed by a competent contractor as soon as practicable. Maintaining fire doors is not just a regulatory requirement; it is a crucial step in ensuring the safety of occupants in case of fire.

Fire Instructions to Occupiers

24. All occupiers must be familiarised with the routine to be followed in the event of fire and advised how the fire alarm system works. It is advisable to incorporate such fire safety information in the tenancy agreement paperwork.
25. Advise the occupiers that in the event of a fire they should:
 - Sound the alarm/alert the other residents.
 - Get out of the building as quickly as possible and close all doors.
 - Telephone the Fire Service (999).
 - Do not go back into the building for any reason.
26. You should also advise occupiers of the following:
 - DO NOT block corridors, landings etc, which are an escape route.
 - DO NOT tamper with self-closing devices on fire doors.
 - DO NOT prop open fire doors.
 - DO NOT tamper with fire equipment, e.g., smoke detectors and fire extinguishers.
 - DO know where fire exits are located.
 - DO report any damage to fire equipment to the landlord immediately.
27. **It is recommended that a copy of Leaflets 1 and 2 at the back of this handbook be displayed in the house and given to each occupant at the start of their tenancy.**

Fire Risk Assessment and Responsible Persons

28. The Regulatory Reform (Fire Safety) Order 2005 (FSO) imposes a duty on individuals who have control over premises, such as landlords or managers, to significantly reduce fire risks and ensure safe evacuation in the event of a fire. The designated 'responsible person' or those in control are required to undertake specific fire safety obligations, including confirming that general fire precautions are adequate for conducting a thorough fire risk assessment.
29. The FSO is broadly applicable, encompassing almost all premises and a wide range of buildings and structures. This includes shared areas or common parts of Houses in Multiple Occupation (HMOs). All buildings containing more than one dwelling (regardless of whether they also contain common parts) must have a current and up-to-date fire risk assessment for identifying and undertaking 'general fire precautions' to comply with the appropriate and current fire and building safety requirements.
30. For premises governed by the FSO, adherence to the principles of the Fire Safety Order fire risk assessment typically involves the following five steps:
 - a. **Identify Fire Hazards:** Recognising potential fire sources, combustible materials, and other elements that could contribute to a fire outbreak.
 - b. **Identify People at Risk:** Determining who may be at risk in the event of a fire, including employees, visitors, residents, and particularly vulnerable groups such as children or the elderly.
 - c. **Evaluate and Mitigate Risks Identified:** Assessing the likelihood and potential impact of identified hazards and implementing measures to mitigate these risks, such as installing fire detection systems, ensuring clear evacuation routes, and providing fire safety training.
 - d. **Record, Plan, and Train:** Keeping a detailed record of identified hazards, risk assessments, and precautionary measures. Developing an emergency fire response plan and ensuring that staff or occupants receive adequate fire safety training.
 - e. **Review and Update:** Regularly reviewing the fire risk assessment and updating it as necessary, particularly in the event of significant changes to the premises or its use.
31. For comprehensive understanding and compliance, it is crucial to read this guide in conjunction with the detailed provisions of the Fire Safety Order 2005 and the associated Fire Safety Order Guidance. This five-step process is distinct from a Housing Health and Safety Rating System (HHSRS) risk assessment undertaken by local authority officers, which determines whether any significant hazards, including fire, exist in a dwelling of the 29 listed hazards.
32. While it is often possible for an informed lay person to conduct such an assessment, if there is any doubt about the fire safety requirements, or if an assessment is required for a large and complex premises, it is advisable to engage a qualified fire engineer or fire safety consultant.² The National Fire Chiefs Council has published [guidance](#) on finding a suitable assessor.
33. The Fire Safety Act 2021 updates the rules for buildings with two or more domestic dwellings, like flats. It clarifies that the Fire Safety Order applies to:
 - The building's structure and external parts, including walls, windows, balconies, cladding, insulation, and attachments.
 - All doors leading to shared areas, such as flat entrance doors.

² See also Building Safety Act 2022

Houses In Multiple Occupation Suffolk Landlord's Handbook

34. This Act makes it clear that both the doors of each flat and the building's external structure are covered by the Fire Safety Order. This Order demands that the fire risk assessment of the building must be thorough and appropriate. Additional rules and advice about fire doors were also drafted following the first phase of the Grenfell Tower Inquiry. These are detailed in Section 0.

Local Authority and Fire Rescue Service Responsibilities

1. The [LACoRS Guidance](#) on fire safety, published in 2008, established a 'Protocol' between local housing authorities (LHAs) and fire and rescue authorities (FRAs) to improve fire safety in residential dwellings and to avoid duplication and potential conflicts in working arrangements. A generic version of the Protocol is included in Appendix 2 of the LACoRS Guide. As a landlord, understanding the key elements of the guidance is crucial, especially given the responsibilities outlined in the Housing Act 2004 and the Regulatory Reform (Fire Safety) Order 2005.
2. LHAs primarily use the Housing Health and Safety Rating System (HHSRS) for assessing risks in dwellings, focusing on identifying and addressing significant hazards, including fire, in all types of housing. You can find more information on the HHSRS in Section 0. LHAs are also responsible for implementing various licensing requirements under the Housing Act 2004 also described in this handbook. In premises occupied by single households, only the HHSRS will apply.
3. Alongside the Housing Act 2004, the Regulatory Reform (Fire Safety) Order 2005 ("the Fire Safety Order") introduced duties in relation to fire safety in the communal areas of some HMOs, flats, maisonettes and sheltered accommodations in which personal care is not provided. The requirements of the Fire Safety Order are enforced by fire and rescue authorities. You can find more information on the Fire Safety Order in Section 0 of this handbook.
4. The authority, expected to take the lead in inspection, advice and enforcement action in different types of residential property, are as follows:
 - Single dwellings, including shared housing - LHA.
 - All House in Multiple Occupation (HMO) - LHA
 - All self-contained flats, whether purpose built or converted - LHA.
 - Premises with mixed commercial and associated residential accommodation and sheltered housing - FRA.
 - Hostels/B&B/Hotels - FRA
 - All multiple-occupied accommodation owned or managed by the LHA – FRA
5. The lead authorities outlined serve as a general guideline; however, they do not encompass every scenario, and some premises may belong to multiple categories. Buildings with unique challenges, such as tall structures, necessitate a coordinated effort from multiple agencies. Additionally, in cases of fire hazards within HMOs or communal areas of buildings with flats, local authorities typically consult with fire and rescue authorities.
6. In Suffolk, the Fire and Rescue Service and Local Housing Authorities have developed collaborative strategies to enhance fire safety in high-risk buildings and situations. This ensures a uniform approach to enforcing fire safety regulations. Establishing clear protocols between fire and rescue authorities and local housing authorities is essential. These protocols define best practices and establish reliable communication channels, ensuring effective and coordinated fire safety management.

Installations and Safety Requirements

Electrical Safety

1. The Management of Houses in Multiple Occupation (England) Regulations 2006 requires landlords to ensure that the wiring within HMOs is maintained in a safe condition and in good working order.
2. The wiring must be inspected periodically (at least every 5 years) and you must get a certificate that shows the test results and confirms that the installation is safe for continued use. Someone registered with one of the following organisations is regarded as competent:
 - ECA (Electrical Contractors Association)
 - ELECSA (part of the ECA group)
 - NICEIC (National Inspection Council for Electrical Installation Contracting)
 - NAPIT (National Association of Professional Inspectors and Testers)
3. An electrical installation condition report shall be issued by the person undertaking the inspection. The report shall be retained by the HMO manager and made available to the Council within 7 days of such a request being made.
4. If the electrical installation in your HMO is found to be in a defective condition, you should arrange repairs without delay. The Council can serve notices on landlords requiring remedial works to remove the risk of injury to tenants.
5. You should also arrange, at least once a year, for a qualified electrician to conduct portable appliance testing (PAT) for safety checks on any portable electrical equipment (that is over 1 year old) you provide for tenants, such as kettles, fridges and toasters. The PAT tester will give you a dated certificate and stickers placed on the plugs of appliances to denote their safety.

Gas Safety

6. Under the Gas Safety (Installation and Use) Regulations 1998, all landlords must ensure that gas appliances provided within rented accommodation are properly maintained. The regulations are enforced by the Health and Safety Executive (HSE), but the Council can also ask to see the latest certificate.
7. Landlords must:
 - Ensure that all gas appliance or pipework in houses let by them are maintained in a safe condition by a GAS SAFE registered gas installer.
 - Ensure all appliances (i.e. gas boiler, fire, cooker, water heater and flues) are checked for safety at intervals of not more than 12 months by a Gas Safe registered gas installer.
 - Keep a record of such safety checks, for at least 2 years.
 - Provide evidence to all tenants within 28 days of gas safety inspection that annual safety checks of gas appliances and flues have been conducted.
 - Provide new tenants with a copy of the gas safety record when the Tenancy Agreement is signed.

Houses In Multiple Occupation Suffolk Landlord's Handbook

8. These regulations are principally designed to prevent death or injury to tenants from carbon monoxide poisoning. Any breach of these regulations is an offence and you risk being prosecuted; this could result in imprisonment or a fine of up to £20,000, or both, for each offence.
9. A service certificate must be issued by the person undertaking the test. The certificate shall be retained by the HMO manager and made available to the Council within 7 days of such a request.

If you suspect a gas leak in your building, call the National Grid gas emergency immediately on 0800 111 999.

Fire Safety: Furniture and Furnishings

10. If you let furnished accommodation, all furniture you provide must be fire resistant. The Furniture and Furnishings (Fire) (Safety) Regulations 1988 set levels of fire resistance for domestic upholstered furnishings. These regulations are enforced by Trading Standards Officers from Suffolk County Council.
11. Upholstered furniture filled with polyurethane foam tends to burn quickly and gives off substantial amounts of smoke and poisonous fumes. Older or second-hand furniture may only be used if it has the appropriate label showing that it is cigarette and match resistant.
12. The regulations apply to:
 - beds, mattresses, headboards and pillows.
 - sofa beds, futons, scatter cushions and seat pads.
 - loose and stretch covers for furniture.
13. The regulations do not apply to:
 - sleeping bags or loose covers for mattresses.
 - bed clothes, duvets, pillowcases, carpets and curtains.
14. New furniture that complies with the regulations is sold with a permanent label stating that it is cigarette and match-resistant. Landlords should ensure that they do not let accommodation with furniture that is not fire resistant.

Building Control

15. Building regulations are designed to protect the health and safety of people living in or near a building, as well as control structural stability, drainage, and fire escape routes among other things.
16. Building regulations approval is required for:
 - New building work.
 - Conversion of a building into flats.
 - Installation of toilets, sinks, baths, showers etc.
 - Replacement of windows.
 - Replacement of heating systems.
 - Structural alterations including removing load bearing walls; and most electrical work within a building.

Houses In Multiple Occupation Suffolk Landlord's Handbook

17. If you intend to carry out works that may require Building Control's approval, you must contact a Building Control Officer on the Council; the contact details for the representatives of your local council can be found in Section 0. Any significant works or changes are known as 'material alterations' and may require approval from a building control body or approved inspector. Understanding how current Building Regulations apply to alterations is crucial as making changes to a building without proper approval can compromise its fire safety.

Planning

18. If you wish to change the use of a property into an HMO for more than six people you will need planning permission. However, no planning is required if you wish to revert your property to a single dwelling. If you wish to make any external alterations or extensions to a building, you will usually require planning permission. If you wish to make alterations to a listed building, or your property is located in a conservation area, you must also contact the Conservation Officer. Contact details for the representatives of your local council can be found in Section 0.

Article 4 Directions and HMOs

19. Article 4 is a direction under planning law in England which allows local planning authorities to remove certain permitted development rights. Permitted development rights allow property owners to make specific changes to a building without the need to apply for planning permission.
20. For Houses in Multiple Occupation (HMOs), Article 4 is particularly significant. Normally, smaller, shared houses or flats occupied by between 3 to 6 unrelated individuals can be classified as small HMOs and do not require planning permission to change from a family home (C3 class) to a small HMO (C4 class). However, under Article 4, this right can be deemed invalid in certain areas. In such cases, landlords must seek planning permission to convert such properties into small HMOs.
21. Within the Suffolk region, different districts have directions in place that affect the operation of HMOs in those areas. To find out if your area is affected, please navigate to your local council's website to find out more. Alternatively, you can contact your local council to query this information.

HMO Inspection Program and HHSRS

The Health and Housing Safety Rating System (HHSRS)

7. The Housing Health and Safety Rating System (HHSRS) under Part 1 of the Housing Act 2004 empowers local authorities to address poor housing conditions. When inspecting a property, officers assess potential risks to occupants due to any deficiencies that might lead to hazards. The severity of the risk is evaluated based on the likelihood of harmful incidents occurring within the next year and the potential seriousness of harm.
8. Officers make these assessments with reference to the most vulnerable age groups, ensuring that if a dwelling is safe for these groups, it is safe for all. This approach allows for the assessment of even vacant properties. Officers use the formal scoring system of HHSRS to indicate the seriousness of the hazards identified. This scoring system is outlined in the Housing Health and Safety Rating System (England) Regulations 2005 and the statutory HHSRS Operating Guidance.
9. The Housing Health and Safety Rating System (HHSRS) applies to all housing types, including Houses in Multiple Occupation (HMOs), which are considered to pose a higher risk to health and safety. In HMOs, each accommodation unit and shared area is evaluated for potential hazards. The assessments consider the state of common parts, using the same enforcement tools used as in other housing.
10. There are 29 potential hazards, including fire, which may be identified using the HHSRS assessment process. For a full understanding of the HHSRS hazards, it is recommended that landlords refer to the [HHSRS Landlords Guide and Housing Health and Safety Rating System Operating Guidance](#).
11. If any hazards are found, the property owners and landlords must address them. Serious hazards, classified as Category 1 (scoring bands A-C), require local authorities to act. For less severe Category 2 hazards (scoring bands D-J), authorities have the discretion to intervene if deemed necessary.

Houses In Multiple Occupation Suffolk Landlord's Handbook

HMO Inspection Programme

12. HMOs on our database are inspected regularly. The frequency is determined on a risk assessment basis and programmed inspections are carried out, every 1, 2, 3 or 5 years. Higher-risk properties are inspected annually and the lower-risk properties 5 years.
13. Risk factors include the number of storeys, fire precautions, the housing health and safety rating system, amenities, and management.
14. All newly identified HMOs will be inspected within six months and incorporated into the inspection program.

Risk factor	Category	Score
Number of storeys	1	5
	2	10
	3	15
	4+	30
Fire Precautions HHSRS hazard (24)	Full fire protection	0
	Partial fire protection	20
	No fire protection	40
Amenities HHSRS hazards (16), (17) and (18)	Satisfactory	0
	Unsatisfactory minor	5
	Unsatisfactory major	10
HHSRS Other hazards	No hazards	0
	Lower score category 2 (F-J)	5
	Category 2 hazards (D & E)	10
	Category 1 hazards (A-C)	20
Management	Confident	0
	Reasonably confident	15
	Little confidence	30
	No confidence	60
	HMO check	160

15. Inspection frequency

Score	Inspection frequency
5-10	Five yearly
15-55	Three yearly
60-80	Two yearly
85-160	Yearly
165+	Six monthly

Useful Contacts Details:

1. Customer Services & HMO Licensing

- a. Babergh & Mid Suffolk District Councils: 0300 1234000
- b. East Suffolk Council: 03330 162 000
- c. Ipswich Borough Council 01473 432000
- d. West Suffolk Council 01284 763233

2. Housing Options (Tenancy Rights and Regulations)

- a. Babergh & Mid Suffolk District Councils: 0300 123 4000
- b. East Suffolk Council: 03330 162 000
- c. Ipswich Borough Council: 01473 433003
- d. West Suffolk Council: customerservices@westsuffolk.gov.uk or telephone 01284 757053

3. Private Sector Housing

- a. Babergh & Mid Suffolk District Councils: 0300 123 4000
- b. East Suffolk Council: 03330 162 000
- c. Ipswich Borough Council: 01473 433003
- d. West Suffolk Council: customerservices@westsuffolk.gov.uk or telephone 01284 757053

4. Waste and Recycling

- a. Babergh & Mid Suffolk District Councils: recycling@baberghmidsuffolk.gov.uk / 0300 123 4000
- b. East Suffolk Council: 01394 444000 / 01502 527100
- c. Ipswich Borough Council: 01473 432090
- d. West Suffolk Council: customer.services@westsuffolk.gov.uk or telephone on 01284 757069

5. Building Control

- a. Babergh & Mid Suffolk District Councils: 01449 724506
- b. East Suffolk Council: 01394 444219
- c. Ipswich Borough Council: 01473 432951
- d. West Suffolk Council: 01284 757393 / building.control@westsuffolk.gov.uk

6. Planning

- a. Babergh & Mid Suffolk District Councils: 0300 123 4000
- b. East Suffolk Council: 01394 444557 / 01502 523029 / planningpolicy@east Suffolk.gov.uk
- c. Ipswich Borough Council: 01473 432913
- d. West Suffolk Council: 01284 763233 / planning.technical@westsuffolk.gov.uk

7. Other Agencies

- a. Anglian Water (reporting a leak) 0800 771 881
- b. Gas Safe Register www.gassaferegister.co.uk / 0800 408 5500
- c. National Grid Emergency 0800 111 999
- d. ECA (Finding a registered electrician) 020 7351 5000
- e. NICEIC (Finding a registered electrician) www.niceic.com / 0333 015 6625
- f. Suffolk Fire and Rescue Service 01473 260588
- g. UoS (University of Suffolk) Accommodations accommodation@u0s.ac.uk / Team 01473 338833

1. [Approved Document B: Fire Safety Volume 1: Dwellings \(2019\)](#)
Issued by the Ministry of Housing, Communities and Local Government, this document is relevant to new or newly converted buildings.
2. [Fire Safety in Specialised Housing \(National Fire Chiefs Council, 2017\)](#)
Published by the National Fire Chiefs Council, it covers sheltered housing, extra care housing, and supported housing, focusing on person centered risk assessment, including advice on hoarding.
3. [Fire safety in purpose-built blocks of flats \(Local Government Association, 2011\)](#)
Originally drafted in 2011, this guide applies to existing purpose-built flats and is currently under revision.
4. [Fire Safety - Guidance on Fire Safety Provisions for Certain Types of Existing Housing \(LACoRS, 2008\)](#)
Published by the Local Authority Coordinators of Regulatory Services (LACoRS), the guide targets various types of existing residential premises. **LACoRS was published in 2008 and some of its content is becoming dated, with particular regard to the provision of domestic fire detection and the provision of firefighting equipment, which are updated within the relevant sections of the Handbook.** However, it remains the most current and appropriate guidance for a range of existing residential premises including the following:
 - single household properties;
 - shared houses;
 - bedsit HMOs;
 - buildings converted into self-contained flats, to a standard not in compliance with the Building Regulations 1991;
 - small hostels for which the HM Government Sleeping Accommodation Guide is inappropriate.
5. [Fire safety risk assessment: Sleeping accommodation \(DCLG, 2006\)](#)
This covers student halls of residence and seminaries. It is due for an update by the Home Office.
6. [Fire safety risk assessment: Sleeping accommodation](#)
This is a proposed guide for small blocks of flats, expected to be published in 2022.
7. [Housing health and Safety Rating System \(HHSRS\) including Guidance for Landlords and Property-related Professionals](#)
The Housing Health and Safety Rating System (HHSRS) is a risk-based evaluation tool to help local authorities protect residents against potential risks and hazards to health and safety from any deficiencies identified in dwellings. In 2018, the government commissioned a review of the HHSRS to update and enhance the enforcement of housing standards. The two-year review was conducted by RH Environmental Ltd., which concluded in 2022. New regulations, necessitated by the review's conclusions, will eventually replace the existing guides referenced above.

Houses In Multiple Occupation Suffolk Landlord’s Handbook

Testing, Maintenance Records and Tenant Information Leaflets

Table 1 - Fire Alarm System – Record of Tests

Automatic fire detection systems (AFDs) must be maintained in accordance with BS 5839: Part 1 (L2 Systems); Part 6 (LD2 and LD3 Systems). It is important that occupiers and fire alarm receiving centres (where applicable) are contacted before and after fire detection and alarms testing to avoid false alarms.

Weekly/Monthly

Visual checks and testing of the call points must be conducted by a designated ‘Responsible Person’ during reasonable hours. Inspection must include visual inspection of detectors for damage, disrepair and other conditions likely to interfere with the correct operation of the detector. Frequency is dependent on risk.

Annually

(LD3 and LD2 AFDs)

Inspection and testing undertaken by a competent person, or an approved contractor or engineer.

Date	Call Point Location/ No.	Satisfactory (Y/N)	Remedial Action Taken	Date Completed	Signed

Houses In Multiple Occupation Suffolk Landlord’s Handbook

Table 3 – Fire Extinguishers – Record of Tests

The maintenance of various types of fire extinguishers, including those filled with water, foam, carbon dioxide, and powder, is necessary to adhere to the specifications laid out in BS 5306: Part 3. This standard outlines the necessary procedures and frequency for maintaining these essential fire safety tools.

Monthly

A ‘Responsible person’ must check that fire extinguishers are correctly positioned, have not been discharged or have lost pressure, and have not suffered any obvious damage. The inspections should be more frequent if circumstances require them.

Annually

The annual testing by competent persons or approved contractors/engineers is also a requirement of BS 5306-3. It should follow the manufacturer's recommended procedures and instructions. This is to ensure that the extinguishers are in an efficient working state, in working order, in good repair, and suitable for the fire safety hazards.

Date	Extinguisher Type/ Loc.	Satisfactory (Y/N)	Remedial Action Taken	Date Completed	Signed

Table 4 – Fire Doors and Structural Means of Escape – Record of Defects, Obstructions etc.

Regular checks are essential for all fire safety installations. The responsible person must conduct these checks, including a thorough visual inspection to ensure that all components are in good repair and functioning effectively. Key areas to focus on include:

Fire Doors:

- **Closure:** Ensure that fire doors close fully and securely against their rebates.
- **Condition:** Check that doors and frames, including any glazing, are in good condition, with no signs of damage or wear.
- **Signage:** Verify that fire doors are clearly marked with appropriate signage, which is a crucial aspect for all doors except those leading to bedrooms.
- **Self-Closing Devices:** Confirm that self-closing devices are operational and not removed or tampered with.
- **Gaps and Seals:** Inspect for appropriate gap sizes and intact intumescent seals.

Fire Exit Doors:

- **Accessibility:** Ensure that exit doors can be easily and fully opened.
- **Signage:** Confirm that exit doors are correctly marked with clear signage.
- **Locking Mechanisms:** Check that locks and mechanisms function properly without sticking or jamming.

Fire Protective Walls, Floors, and Ceilings:

- **Integrity:** Maintain these structures to at least a 30-minute fire protective standard.
- **Condition:** Regularly inspect for signs of disrepair, such as cracking, holes, or poor surface finishes, which can compromise fire resistance.
- **Modifications:** Any alterations to these structures should be reviewed for their impact on fire resistance and compliance with safety standards.

It is important to log all inspections, findings, and corrective actions in the Record of Defects, Obstructions etc., logbook. You must ensure that any identified issues are addressed promptly to maintain the effectiveness of fire safety measures. Regular updates to this logbook will serve as a record of proactive fire safety management.

Date	Item	Obstruction/ Defect etc.	Remedial Action Taken	Date Completed	Signed

FIRE KILLS

ADVICE TO OCCUPANTS OF HOUSES IN MULTIPLE OCCUPATION

If you live in a house in multiple occupation, you are more at risk from fire than if you live in a single-family dwelling house. In order to reduce the likelihood of fire:

REMEMBER:

- **NEVER** wedge open fire doors!
- **NEVER** remove door closing devices!
- **NEVER** tamper with fire alarms or equipment!
- **NEVER** overfill chip pans!
- **NEVER** leave children alone with matches or in rooms with cooking or heating appliances!
- **NEVER** smoke in bed!
- **NEVER** block halls and stairways!
- **DO** become familiar with escape routes and exits from the building!
- **DO** unplug electrical appliances at night!
- **DO CLOSE** room doors!
- **DO CHECK** for burning cigarettes before going to bed!
- **DO NOT** use paraffin or bottled gas heaters!
- **DO** report any damage to fire equipment to the landlord immediately!

FIRE!

NOTICE TO ALL TENANTS

The stairway in this building is designed to provide a safe route in the event of a fire. This safety measure depends on how you and other occupants follow basic rules:

Fire-resisting, self-closing doors are located throughout the building, including the entrance doors to all rooms/flats. These doors prevent the spread of smoke and fire and must always be kept closed.

AS TENANTS, YOU MUST NOT

- Remove any doors.
- Tamper with any self-closing devices.
- Wedge open doors.
- Block or obstruct any doors, corridors, or passageways.

IN THE EVENT OF A FIRE

- Immediately leave the building and operate the nearest call point to activate the alarm if it has not already been triggered.
- Call the Fire Service on 999.

Please report any problems or defects related to fire escape routes in your house to:

[appropriate contact details]

East Suffolk - Equality Impact Analysis (EqIA) Agenda Item 7

ES/1969

EqIA reference: **EQIA604519844**

Service area/Team conducting EqIA: **Private Sector Housing Housing**

Officer conducting the EqIA: **Victoria Cotterill**

Officer email address: **victoria.cotterill@eastsuffolk.gov.uk**

Responsible Cabinet member: **David Beavan**

Name of project/policy/initiative or action:

Is this a new project, policy, initiative or action that directly impacts people: **Yes**

Date of EqIA: **10/04/2024**

Does the project/policy/initiative/action relating to this EqIA have the potential for positive or negative impact on any of the protected characteristics?

Characteristic - Impact

Age: **Positive**

Reason: **The adoption of these documents will have no adverse impact on any particular age group. It is hopeful that the adoption of this guidance will support those persons under 35 in securing additional accommodation.**

Disability: **No impact**

Reason: **It is not anticipated that the adoption of these documents will have an impact on anybody with a disability, specifically.**

Gender reassignment: **No impact**

Reason: **It is not anticipated that the adoption of these documents will have an impact on anybody who has undergone, proposing to undergo or has undergone reassignment of their sex/gender.**

Marriage and civil partnership: **No impact**

Reason: **It is not anticipated that the adoption of these documents will have an impact on married persons or civil partners.**

Pregnancy and maternity: **No impact**

Reason: **It is not anticipated that the adoption of these documents will have an impact on anybody who is pregnant, or who has recently given birth.**

Race: **No impact**

Reason: **It is not anticipated that the adoption of these documents will have an impact on any racial group. Guidance documents will be available to be translated to any language required, if necessary.**

Religion or belief: **No impact**

Reason: **It is not anticipated that the adoption of these documents will have an impact on any religious or philosophical group.**

Sex: **No impact**

Reason: **It is not anticipated that the adoption of these documents will have an impact on a person of any particular sex.**

Sexual orientation: **No impact**

Reason: **It is not anticipated that the adoption of these documents will have an impact on a person of any particular sexual orientation.**

Deprivation/Socio-economic Disadvantage: **Positive**

Reason: **The adoption of these documents is likely to support securing additional accommodation which is likely to be 'affordable' and of a better standard. This will benefit those who are unable to secure additional housing-related benefits, due to their age, and those seeking single-person accommodation, which is perceived as higher-risk accommodation.**

What evidence or data has been collated or used to support the completion of this EqIA:

Engagement with other internal teams/ departments, Engagement with or information from statutory partner organisations, Published documents/reports/data

Details for engagement: **Liaison with Planning Policy, Housing Needs and Communities teams - discussion and active input into the content of the report, and content of the documents to be adopted.**

Details for published documents:

As a result of undertaking this EqIA do you need to provide information relating to the policy, project, initiative or action to the public in a different language or form and how do you propose to do this: **Not at present - if we develop a situation where there is a need to produce the report or the associated documents in any particular language (potentially due to the needs of a**

developer, prospective landlord or tenant, etc), these will be produced and uploaded alongside the English version. If we find that any particular region in the District has a large demographic of a particular culture or country of origin, alternative versions of the documents will be produced in readiness.

As a result of completing this EqIA, has the Author, Service team, Project manager made any changes or adjustments to the policy/project/initiative/action: **No**

Committee	Cabinet
Date	04/06/2024
Subject	East Suffolk Council UK100 membership
Cabinet Member	Councillor Sally Noble, Cabinet Member with responsibility for the Environment Councillor Tom Daly, Cabinet Member with responsibility for Climate Change & Energy
Report Author(s)	Paul Mackie Lead Officer, Climate Change & Sustainability paul.mackie@eastsuffolk.gov.uk
Head of Service	Fiona Quinn Head of Environmental Services and Port Health fiona.quinn@eastsuffolk.gov.uk
Director	Nick Khan Strategic Director Nick.Khan@eastsuffolk.gov.uk

Key Decision?	No
Is the report Open or Exempt?	OPEN

Purpose/Summary

The purpose of this report is to:

Provide information to assist Members in deciding whether to join the UK100 network by signing the UK100 pledge.

Recommendation(s)

That Cabinet:

Agree to join the UK100 network and sign East Suffolk Council up to the UK100 pledge.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact	This report relates to the delivery of the environmental impact theme of Our Direction 2028.
Sustainable Housing	This report indirectly relates to the delivery of priorities within the Sustainable Housing theme of Our Direction 2028.
Tackling Inequalities	This report indirectly relates to the delivery of priorities within the Tackling Inequalities theme of Our Direction 2028.
Thriving Economy	This report indirectly relates to the delivery of priorities within the Thriving Economy theme of Our Direction 2028.
Our Foundations / governance of the organisation	This report indirectly relates to governance for the delivery of Our Direction 2028.

Justification for recommendations

1. Background

1.1. Our Direction 2028 is the key document for the Council in setting the direction of East Suffolk Council. Following on from significant consultation and further development and finalisation of Our Direction 2028, the Strategic Plan was presented to Council for its approval at Full Council on 22 November 2023.

1.2. The Our Direction 2028 vision is 'Our aim is to promote a bright, green, open, free, and fair future for all East Suffolk'. Our Direction 2028 has four core themes which includes an 'Environmental Impact theme' which set its vision as 'delivering positive climate, nature, and environmental impacts through the decisions we make and actions we take'.

1.3. Within the Environmental Impact Theme there are eight priority topics:

- a. Continued commitment to net zero by 2030.
- b. Supporting sustainable transport.
- c. Restoring ecosystems and biodiversity.
- d. Support, promote and implement green tech.
- e. Work in partnership to manage coastal adaptation and resilience.
- f. Focus on reduction, re-use and recycling of materials.
- g. Encourage food self-sufficiency.
- h. Preserve and maintain the district's beauty and heritage.

1.4. ESC's ongoing net zero commitment

On 24 July 2019 (Full Council agenda item 9(a)), the Council resolved unanimously to:

- Declare a climate emergency
- Set up a Cross Party Task Group, commencing by October 2019, to investigate ways to cut East Suffolk Council's carbon and harmful emissions on a spend to save basis, with ambition to make East Suffolk Council (including all buildings and services) carbon neutral by 2030.
- To work with Suffolk County Council and other partners across the county and region, including the LEP and the Public Sector Leaders, towards the aspiration of making the county of Suffolk carbon neutral by 2030.
- To work with the government to:

- a) deliver its 25-year Environmental Plan, and
- b) increase the powers and resources available to local authorities in order to make the 2030 target easier to achieve. The Environment Task Group was formed as a cross-party Task Group

- 1.5.** As we have pledged to become a carbon neutral council by 2030 – which also means we will look for environmental benefit in everything we do – this includes radical changes to our vehicle fleets, business mileage usage plus energy used by council buildings and leisure centres to ensure they contribute to our carbon neutral aims. We have also implemented digital solutions to further minimise our carbon footprint.

ESC declared a climate emergency to reinforce our commitment to the environment. This commitment was reinforced by the environment being a key principle of the previous and current strategic plans, underpinning our work as an authority.

As ESC produces less than 1% of Suffolk’s carbon emissions, our focus has been on our most powerful role – engaging with the public and using our powers, duties and networks to encourage climate positive behaviours.

Our focus on restoring nature and increasing biodiversity has also been a key area of work, as this plays a fundamental role in the response to climate change, so is closely interlinked.

1.6. Legislation related to this theme

There are a number of pieces of Government legislation and policy in place to support the delivery of East Suffolk's climate aspirations and objectives, which are:

- UK Climate Change Act 2008: Legally binding 2050 net zero target.
- Biodiversity Net Gain: mandatory 10% Biodiversity Net Gain (BNG) to be delivered by all development, introduced through the 2021 Environment Act and came into force in January 2024 and phasing through stages of implementation starting with smaller developments.
- Local Nature Recovery Strategies: Associated with Biodiversity Net Gain (BNG) delivery to be prepared by Suffolk County Council with a supporting role for district councils.
- Building Regulations: Part L changes deliver a 30% improvement on energy efficiency above previous 2013 standards. Future Homes Standard would represent 75-80% improvement.
- Transport: Ban on combustion engines in new cars from 2035. ‘Decarbonising Transport’ (2021) understood that decarbonisation will be informing next round of Local Transport Plans (prepared by SCC).

- 1.7.** There are further pieces of Government legislation and policy in place to support the delivery of East Suffolk's climate aspirations and objectives, key examples of which are:

- Natural Environment & Rural Communities Act 2006.
- Environmental Protection Act 1990.
- Potential 2023 Procurement Act secondary legislation.
- Habitats regulations 2010.
- Water Resources Regulations 2015.
- Environmental Permitting Regulations 2016.
- 25 Year Environment Plan.

1.8. Collaborations and partnerships with other organisations: As an ambitious council, despite limits to the resources, funding and powers available to District Authorities, East Suffolk Council publicly committed to collaborate with other local and national organisations to urgently address climate change.

Examples include working with partners to address important national issues such as low carbon transport and decarbonising private homes.

East Suffolk Council publicly supports the 2030 net zero target for Suffolk as a whole by tackling emissions from the wider sectors of transport, business, industry and households. To do this we are an active partner in the delivery of the Suffolk Climate Emergency Plan, such as by helping households install energy reduction measure use through the 'Warmer Homes' programme, co-funding the Solar Together scheme and supporting business to decarbonise through our net zero grant programme. East Suffolk Council is also committed supporting the delivery of HM Government's 25 year Environment Plan

Delivering the Suffolk Climate Emergency Plan

East Suffolk Council has been working with other authorities since 2007 as part of the Suffolk Climate Change Partnership.

In 2019, all Suffolk authorities declared a climate emergency and a net zero target of 2030 was set. The Suffolk Public Sector Leaders Group (SPSL) gave approval to develop the Suffolk Climate Emergency Plan, which was published in 2021. SPSL then approve annual funding for projects to deliver a programme of work to tackle the climate emergency in Suffolk, which is now being delivered.

The Suffolk Climate Change Energy & Environment Board (SCCEEB) and its subgroups were formed to deliver the Suffolk Climate Emergency Plan and report to Suffolk Public Sector Leaders (SPSL) via the portfolio holders and Suffolk Chief Officers Leadership Team (SCOLT) groups.

2. Proposal

- 2.1. UK100 is a network of local government leaders focused on tackling the climate emergency through the promotion of rapid action across a spectrum of climate change mitigation and adaptation work. Further detail can be found at www.uk100.org.
- 2.2. Joining the network will enable the Council to work directly with other Councils facing the same climate challenges. It will also enable the Council to become part of the Countryside Climate Network which amplifies the rural voice in advocating national policy to tackle climate change. It will also enable the Council direct access to climate research, campaigns, publications, innovative funding models and private sector expertise.
- 2.3. In order to join the UK100 and the Countryside Climate Network (CCN), the Leader of the Council to sign the Net Zero pledge (see appendix). The Net Zero pledge entails committing to a 2030 target for Council emissions and a target for 2050 (or before) for area wide emissions **but it should be noted as highlighted above that ESC has previously publicly committed to these targets.**
- 2.4. Once membership is completed, the Council's Leader, or designated portfolio holder responsible for climate change, join UK100's quarterly meetings and other networking events, supported by officers.
- 2.5. UK100 would publicise the Council's membership.

3. Financial Implications

- 3.1. Signing-up to the UK100 pledge will not have any additional financial implications in addition to those already committed to publicly, such as the ESC 2030 target. There is no fee for UK100 membership.

4. Legal Implications

- 4.1. There are no additional legal implications from signing-up to the UK100 pledge.

5. Risk Implications

- 5.1. There are no additional legal implications from signing-up to the UK100 pledge.

6. Options

- a. Sign-up to the UK100 pledge.
- b. Don't sign-up to the UK100 pledge.

7. Recommendation

That Cabinet gives approval for the Council to join UK100 by signing up to the UK100 pledge.

8. Reasons for Recommendation

Responding to the climate and nature emergencies continues to be a key pillar of the Council's strategic direction. As set out in Our Direction 2028, 'We are committed to achieving net zero as Council by 2030 and working collaboratively to deliver this for Suffolk, focussing and investing in the transition while protecting our core services'.

Climate change is a broad and significant challenge for all Local Authorities, which can only be addressed through open, proactive collaboration, both internally and with key partner organisations, such as through the UK100 network. On its own, East Suffolk cannot solve the challenge but can play an important role in finding solutions and leading by example.

The proposal in this report reaffirms the Council's commitment to clear action on climate change and is a demonstration of the Council's leadership.

Areas of consideration comments

Section 151 Officer comments:

No additional comment

Monitoring Officer comments:

No additional comment

Equality, Diversity and Inclusion/EQIA:

No implications

Safeguarding:

No implications

Crime and Disorder:

No implications

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

No additional implications to Corporate Services beyond those to outlined in the Our Direction 2028 strategy.

Residents and Businesses consultation/consideration:

A public consultation for the Our Direction 2028 strategy was carried out, which included ESC's continued commitment to net zero as an organisation and County.

Appendices:

Appendix A	UK100 Membership Pledge
-------------------	-------------------------

Background reference papers:

None

Membership Pledge

As local leaders across the UK, we recognise our responsibility to tackle the climate emergency and take bold action towards Net Zero.

We will continue to lead the UK’s response to climate change, acting sooner than the government’s goal by making substantial progress within the next decade to deliver Net Zero. We will use our experience and achievements to advocate to the UK government in order to accelerate the delivery of ambitious local climate action. **With greater powers and funding, we would go further.**

We commit to do everything within our power and influence to rapidly reduce our greenhouse gas emissions and work with our residents and businesses to bring our wider communities’ emissions in line with Net Zero as soon as possible.

We pledge to understand our impact on climate change, prioritise where action needs to be taken and monitor progress towards our goals. We will reduce our emissions at source and limit the use of carbon offsets as part of the global effort to avoid the worst impacts of climate change.

We are closer to the people who live and work in our communities, so we have a better understanding of their needs. This means we can collaborate with them to build consensus for the solutions we need to transition to a Net Zero society that delivers multiple benefits and is fair, just and works for everyone.

.....

Leader of

Date:

Committee	Cabinet
Date	04/06/2024
Subject	Tenant Engagement Strategy Consultation Launch
Cabinet Member	Councillor David Beavan, Deputy Leader and Cabinet Member with Responsibility for Housing
Report Author(s)	Marlon Bruce Interim Strategic Lead for Housing Services Marlon.bruce@eastsoffolk.gov.uk
Head of Service	Heather Fisk Head of Housing Heather.fisk@eastsoffolk.gov.uk
Director	Andrew Jarvis Strategic Director Andrew.jarvis@eastsoffolk.gov.uk

Key Decision?	Yes
Is the report Open or Exempt?	OPEN

Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	This report is to be considered during the OPEN part of the Agenda.
---	--

Purpose/Summary

The purpose of the Tenant Engagement Strategy 2024-2027 is to solidify our commitment to nurturing inclusive and vibrant communities.

- The strategy is aligned to 'Our Direction 2028', ESC's strategic plan, focusing on tackling equalities, fostering thriving economies, and developing sustainable housing and communities.
- The strategy also responds and encompasses legislative changes and enhancements stipulated in the Social Housing (Regulation) Act 2023. The regulatory standards we must adhere to are, inclusive tenant consultation, tenant involvement, access to information, tenant empowerment and obligations to promote transparency, accountability across Housing and broader ESC.

The strategy aims to facilitate / demonstrate meaningful interactions, transparency, and collaborative decision-making with residents, partners, businesses, and the community and voluntary sector. By understanding diverse perspectives and empowering every voice.

This approach is crucial in addressing key challenges such as rapid population growth, ageing populations, increased service demands, persistent high levels of deprivation, and declining local government resources over the next five years. Through leveraging technology and innovative approaches, the expectation is to aspire to strengthen community connections and enhance well-being through targeted initiatives, partnerships, and inclusive events.

Recommendation(s)

That Cabinet:

1. Approves the draft Tenant Engagement Strategy 2024-2027, subject to consultation.
2. Approves the commencement of a 12-week consultation period on the draft Tenant Engagement Strategy with any amendments proposed to the Strategy resulting from the consultation to be reviewed and, where considered appropriate, made by the Strategic Director with Responsibility for Housing and the Head of Housing, in consultation with the Cabinet Member for Housing.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact

The Tenant Engagement Strategy plays a crucial role in supporting the ESC Strategic Plan (Our Direction 2028) concerning environmental impact by fostering a culture of sustainable practices and environmental stewardship among tenants. Through proactive engagement initiatives, the strategy can educate and empower tenants to adopt eco-friendly behaviours, such as energy conservation, waste reduction, and sustainable transportation choices

Sustainable Housing

By actively involving tenants in the decision-making process, the strategy will help to deliver housing solutions that are tailored to the diverse needs of our communities, ensuring that homes meet safety standards, are environmentally sustainable, and align with residents' preferences. Through collaborative initiatives and engagement programs, tenants will be

	empowered to contribute to the enhancement of their homes and neighbourhood's / localities fostering a sense of ownership, belonging, and civic pride. This approach not only improves housing quality but also strengthens community cohesion and creates vibrant, sustainable living environments across East Suffolk.
Tackling Inequalities	Through co-creation and collaborative involving our tenants in decision-making processes and engagement initiatives, the strategy will ensure that housing / service solutions are equitable and responsive to the diverse needs of our communities. Through targeted outreach, feedback mechanisms, and inclusive participation, the strategy promotes fairness, accessibility, and inclusivity. It will also ensure our services, policies and procedures do not disadvantage our tenants, on the basis of the characteristics defined in the Equality Act 2010
Thriving Economy	The strategy will provide opportunities for tenants to upskill and actively participate in resident associations, panels, and recognised groups / bodies in the ESC governance processes. The strategy ensures that tenant voices are heard and considered in key decisions impacting their communities. Through partnerships with ESC, tenants can contribute valuable insights and perspectives, fostering collaborative decision-making and impacting inclusive economic development initiatives.
Our Foundations / governance of the organisation	The strategy will support East Suffolk to ensure tenants are involved in the good governance of the organisation.

Justification for recommendations

1. Background

- 1.1. This will be the first Tenant Engagement Strategy for East Suffolk Council.
- 1.2. Community engagement across the landlord service is not integrated effectively, especially concerning the nuances for housing approaches.
- 1.3. While various ESC services engage the community, a comprehensive approach is needed to cater for tenants.
- 1.4. The new legislative changes set out in the Social Housing (Regulation) Act 2023, mandates local authorities and Registered Providers to produce a tenant engagement strategy covering pathways for tenant involvement, access to information, tenant empowerment and obligations to promote transparency, accountability across Housing and broader ESC.
- 1.5. This new strategy outlines ESC's proactive and inclusive approach to engaging tenants across all services and functions.

2. Introduction

- 2.1. The strategy seeks to create an environment where every tenant feels valued, heard, and involved in shaping the future. By fostering open dialogue, leveraging technology, and implementing innovative approaches, we aspire to build stronger connections and enhance community well-being for our tenants.
- 2.2. Through targeted initiatives, partnerships, and inclusive events, we understand the important role the community can play in:
 - Empowering tenants by developing comprehensive training, skills and techniques to significantly influence the shaping and delivery of services.
 - Becoming an equal partner with our tenants through ESC governance, tenant scrutiny, equal partnerships and regular communication processes to shape policies and services that directly impact their lives.
 - Creating a culture where tenants work with ESC through co-design to measure performance, hold us accountable so we can better respond to challenges faced by our tenants.
 - Cultivate a sense of belonging and ownership among tenants where ESC Listen, measure, and implement the right metrics that improve the lives of our tenants.

3. Proposal

- 3.1. The proposal is through four detailed guiding principles, ESC will create a more inclusive, fair and accessible service for tenants – this extends to the activities of our contractors, suppliers, partners and volunteers.

Outcome 1: Tenants possess the capacity, educational resources, and structured governance systems to exert influence on matters that significantly affect their daily existence.

Outcome 2: Establish open communication by engaging in two-way dialogue, responding to concerns, and sharing information promptly.

Outcome 3: Tenants are at the helm of co-creation, co design of solutions, initiatives, and resources to address identified community needs.

Outcome 4: Creating a culture where tenants support ESC to measure performance using data to understand the diverse make up of our housing communities.

4. Financial Implications

4.1. None specific.

5. Legal Implications

5.1. It is a legal requirement under the Social Housing Regulation Act 2023, that landlords actively engage with their tenants and provide mechanisms for their voices to be heard, provide transparency as to how services are delivered and allow tenants to be part of decision making and holding their landlords to account.

6. Risk Implications

6.1. Miscommunication or Misunderstanding: Ineffective communication channels or methods could lead to misunderstandings or misinterpretations of tenant feedback or priorities. This can result in misaligned strategies or initiatives that do not meet tenant expectations or needs.

6.2. Negative perceptions from ineffective engagement practices could damage the council's reputation and hinder future engagement endeavours.

6.3. Compliance with legal and ethical standards needs to be considered e.g., completing EQIA's and reflecting how the strategy responds to the equalities act.

6.4. Limited participation from tenants: especially those from marginalised or hard-to-reach groups. This could result incomplete data or insights that do not accurately represent the diverse needs and perspectives of all tenants.

6.5. Limited Impact or actionable Insights: Engaging tenants without a clear plan for acting on feedback or implementing changes based on insights would result in disillusionment, frustration and distrust among tenants. It may also lead to missed opportunities for improving services or addressing key concerns.

- 6.6. Privacy and Data Protection Concerns: place considerations for collecting personal data or sensitive information during the consultation. Failure to handle this data securely or in compliance with data protection regulations will lead to breaches, legal issues, and erosion of trust among tenants.

7. Options

- 7.1. Option 1: Do Nothing - The council maintains the status quo regarding tenant engagement without implementing a formal strategy. The current ad-hoc approach may involve occasional interactions with tenants through routine communications, surveys, or ad-hoc feedback mechanisms. However, there is no structured framework or defined processes for consistent and meaningful engagement across all housing services. The absence of a formal strategy may result in missed opportunities to proactively addressing tenant concerns, limited channels for gathering comprehensive feedback, and challenges in ensuring equitable participation from all tenant groups.
- 7.2. While this option may require minimal immediate resources or changes, it will lead to non-compliance and a failure to meet tenant expectations of the legislative changes set out in the Social Housing (Regulation) Act 2023, which mandates local authorities and Registered Providers to produce a tenant engagement strategy covering paths ways for, tenant involvement, access to information, tenant empowerment and obligations to promote transparency, accountability across Housing and broader ESC.
- 7.3. Option 2: Implement a Tenant Engagement Strategy to enhance communication, collaboration, and responsiveness between the council and tenants. The strategy will yield long-term benefits in terms of tenant satisfaction, trust, transparency and the overall quality of housing services provided by the ESC.

8. Recommendations

- 8.1. Approves the draft Tenant Engagement Strategy 2024-2027, subject to consultation.
- 8.2. Approves the commencement of a 12-week consultation period on the draft Tenant Engagement Strategy with any amendments proposed to the Strategy resulting from the consultation to be reviewed and, where considered appropriate, made by the Strategic Director with Responsibility for Housing and the Head of Housing, in consultation with the Cabinet Member for Housing.

9. Reasons for Recommendations

- 9.1. The recommendations to Cabinet outline a strategic approach to tenant engagement, aimed at enhancing communication, collaboration, and empowerment within our housing / tenant communities. By approving the draft Tenant Engagement Strategy 2024-2027 and initiating a comprehensive 12-week consultation period, the Cabinet demonstrates a commitment to inclusivity and responsiveness to tenant needs and preferences. The consultation period allows for valuable feedback from tenants, ensuring that their voices are heard, and their perspectives are considered in shaping the final version of the strategy. Any amendments resulting from the consultation will be

carefully reviewed by key stakeholders, including Strategic Director, and Head of Housing, in consultation with the Cabinet Member for Housing. This collaborative approach ensures that the final strategy reflects a community incorporated vision that aligns with the priorities and aspirations of both tenants and the council.

10. Conclusions/Next Steps

- 10.1. Strategy Development: Initiate the development of the Tenant Engagement Strategy, outlining clear objectives, key principles, and actionable steps for implementation.
- 10.2. Internal ESC approval – Cabinet sign off on initial tenant engagement draft.
- 10.3. Consultation and Feedback: Conduct a 12-week consultation process with tenants, stakeholders, and internal teams to gather feedback, insights, and suggestions for refining the strategy.
- 10.4. Review and Amendments: Review consultation outcomes and make necessary amendments to the draft strategy.
- 10.5. Finalisation and Approval: Finalise the Tenant Engagement Strategy based on consultation feedback and stakeholder input. Seek approval from relevant officers including the Cabinet Member Housing

Areas of consideration comments

Section 151 Officer comments:

There are no financial implications arising from this report.

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

Included as Appendix B

Safeguarding:

The Tenant Engagement Strategy prioritises safeguarding by implementing robust measures to protect vulnerable tenants. Regular staff training on safeguarding protocols ensures awareness and prompt action.

Crime and Disorder:

The strategy addresses crime and disorder by fostering community cohesion. Through improved communication channels between tenants and ESC and wider partners. The engagement elements / training could provide strong platforms for other agencies (Police/ social services) to listen engage and enhance trust.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

The tenant engagement strategy encompasses various considerations to ensure it is effective and aligns legal, financial operational standards. The strategy has an EQIA and addresses the equalities act. The services will build in regular reviews to ensure compliance with any changes in laws.

No formal Housing tenant engagement budget has been set (outside 1FTE), but there are ongoing rigorous / robust reviews of budget allocation in the interim for any additional spend.

No current implications for procurement at present.

In terms of digital engagement, the primary focus is on encouraging customers to utilise digital communication channels whenever feasible. However, alternative feedback methods will be available for tenants without internet access during the consultation process to prevent bias in feedback collection. This approach ensures quicker responses and improved accessibility. Additionally, enhancing customer services will facilitate more responsive tenant engagement, further supporting the effectiveness of the overall strategy.

Residents and Businesses consultation/consideration:

The consultation of the strategy will be circulated to all Housing tenants, catering for language barriers and disabilities this will ensure the strategy reflects community needs, and includes their priorities. Through a variety of methods (surveys, focus groups, and public meetings) we will gather input and feedback, ensuring this shapes delivery and final outcomes.

Appendices:

Appendix A	Tenant Engagement strategy
Appendix B	Equality Impact Analysis

Background reference papers:

None

East Suffolk (DRAFT) Tenant Engagement Strategy 2024- 2027



Table of Contents

1. Overview and Vision	3
2. What does tenant engagement mean?	6
3. Why is tenant engagement important at ESC?	7
4. Defining our community	9
5. How we will engage our tenants.....	11
6. Embedding tenant engagement at the heart of ESC	12
7. ESC Approach to delivering tenant engagement.....	12
8. What does success look like and how will we measure it?	19
9. What's next?	23

1. Overview and Vision

Our Tenant Engagement Strategy 2024 - 2027 embodies East Suffolk Council's commitment to fostering vibrant, inclusive communities. At the heart of our strategy lies a dedication to meaningful interactions, transparency, and collaborative decision-making with our tenants. We aim to bridge gaps, understand diverse perspectives, and empower every voice within our community.

Guided by 'Our Direction 2028' ESC's strategic plan and its overarching priority focused on tackling inequalities, creating thriving economies and developing sustainable housing and communities. Our tenant engagement strategy will aim to create an environment where strong resilient communities can emerge and work in partnership with ESC to address some of the key challenges over the next five years. These include rapid population growth, ageing population, increased service demands, persistent high levels of deprivation, and rapidly declining local government resources.

This strategy seeks to create an environment where every tenant feels valued, heard, and involved in shaping the future. By fostering open dialogue, leveraging technology, and implementing innovative approaches, we aspire to build stronger connections and enhance community well-being.

Through targeted initiatives, partnerships, and inclusive events, we understand the important role the community can play in:

- Empowering tenants by developing comprehensive training, skills and techniques to significantly influence the shaping and delivery of services.
- Becoming an equal partner with our communities through ESC governance, tenant scrutiny, equal partnerships and regular communication processes to shape policies and services that directly impact their lives.
- Creating a culture where tenants work with ESC through co-design to measure performance, hold us accountable so we can better respond to challenges faced by our communities.
- Cultivate a sense of belonging and ownership among tenants where ESC Listen, measure and implement the right metrics that improve the lives of our tenants.

To help turn our vision into a reality, we have drawn up four priority outcomes that will shape our approach to achieve what has been set out above.

Outcome 1

Communities have the **power, training and governance mechanisms** to influence issues that impact their lives



Outcome 2

Establish open **communication** by engaging in **dialogue**, responding to **concerns**, and sharing **information** promptly.



Outcome 3

Communities are at the helm of **co-creation, co design** of solutions, initiatives and resources to address identified community needs



Outcome 4

Creating a culture where residents support ESC to measure performance using data to understand the diverse make up of our communities



2. What does tenant engagement mean?

The definition of 'Tenant engagement' varies, encompassing diverse approaches based on intended outcomes. At ESC we define community engagement as the process for working collaboratively with our tenants to foster their active involvement in community decision-making. Engaging with our tenants to respond to their needs through social activities and providing opportunities to develop trusted relationships. We will provide a cohesive approach to delivering effective and transparent two-way dialogue, with those impacted by change to their locality.

3. Why is tenant engagement important at ESC?

Community engagement is a crucial element at ESC, fostering trust and transparency between ESC and its tenants. This dynamic interaction ensures that a diverse range of voices contribute to the decision-making processes. It's this engagement that tailors services to address specific community needs, empowering tenants to actively participate or scrutinize decisions that directly impact their lives. As a result of this collaboration, both ESC and the tenants gain valuable insights, leading to innovative problem-solving and effective solutions for community issues.

Our commitment extends beyond engagement; it aims to address inequalities, promote thriving economies, and ensure sustainable housing. To achieve these goals, we will co-design strategies, capture diverse perspectives, understand our communities, and create pathways towards a shared vision.

This tenant engagement strategy will develop a consistent community engagement narrative and concise answers to the questions below.

- What issue or service requires tenant/ communities' views
- When is their participation needed?
- Specifically, how can they submit their views?
- What is the anticipated time commitment?
- What outcomes can they expect because of their involvement?

This structured approach ensures that tenants understand the purpose, process, and potential impact of their engagement, creating a more inclusive and effective decision-making environment.

4. Defining our community

In East Suffolk, communities are typically characterised by shared characteristics, falling into two main categories: 'communities of place', based on geographical location (like street, ward, borough, or region), and 'communities of interest', united by common traits such as ethnicity, age, occupation, shared interests, faith, or other bonds, like student or business communities.

East Suffolk has a range of diverse communities, hosting a wide array of groups with distinct characteristics. There is a large population of over 250k, with nearly 16% aged under 19 and almost 30% aged over 65. We are in the midst of experiencing a rapid population growth, projected to outpace other regions in England and Wales over the next decade.

East Suffolk is the landlord of almost 4,500 homes and wants to ensure that all tenants feel engaged, valued and have the opportunity to genuinely collaborate in the decision making of the housing service.

The area thrives with a vibrant voluntary and community sector, encompassing over 1400 groups and organizations, including faith-based groups. These entities provide valuable support and services to tenants, especially through numerous smaller neighborhood organisations focusing on specific areas such as employment support and youth activities.

East Suffolk acknowledges that individuals are part of various 'communities', and certain groups might encounter greater challenges in making their voices heard. This might be due to belonging to marginalised groups or exclusion from inclusive engagement. As a council, the aim is to proactively engage all tenants in a purposeful and inclusive manner, ensuring representation and involvement across diverse segments of the population.

5. How we will engage our tenants

Engaging communities lies at the heart of our commitment to inclusive decision-making and fostering a vibrant, participatory environment. Our approach to community engagement is multifaceted, guided by the principles of inform, consult, involve, collaborate, and empower. Each of these stages represents a spectrum of engagement, allowing us to tailor our strategies to meet the diverse needs and preferences of the communities we serve.

	Inform	Consult	Involve	Collaborate	Empower
Engagement goal	We provide clear and informative information using transparent diverse methods and communication channels.	ESC ask you for your opinions and perspective on policies and services and your feedback contributes to shaping and bettering our delivery	Provide opportunities to influence decisions, access training and be meaningfully involved with a variety of mechanisms to share your views and opinions	ESC and the communities work in collaboration through a trusted partnership, where you feel included in decisions that affect and impact you	Your voice is heard, you see the impact of your feedback and you are confident in your abilities influence change at the highest levels of the decision-making process in ESC
Engagement tool	<ul style="list-style-type: none"> Digital engagement Surveys Flyers Website Newsletters Social media Helpline services 	<ul style="list-style-type: none"> Stakeholder mapping Focus groups Workshops Drop in sessions 1-2-1 interviews Pop up events Public meetings Public exhibitions Vox box chats Walk & talk tours 	<ul style="list-style-type: none"> Community meetings Public exhibition events and pop-ups Work shops and training session Events / fundays Resident associations /partnership boards 	<ul style="list-style-type: none"> Design Charrettes Focus groups on specific areas of interest Digital storytelling Community projects Public art projects Use of Community space 	<ul style="list-style-type: none"> Participatory decision-making tools Co-create programs Community projects Community forums Asset management

6. Embedding tenant engagement at the heart of ESC's Landlord Service

This Tenant Engagement Strategy is aligned with Our Direction 2028 corporate plan and other key strategies, policies and procedures which include:

- Enabling communities
- Equality, Diversity and Inclusion Policy.

7. ESC Approach to delivering tenant engagement

Our approach to tenant engagement is detailed below via a set of guiding principles that set out how ESC will create a more inclusive, fair and accessible service for tenants – this extends to the activities of our contractors, suppliers, partners and volunteers.

It will also ensure our services, policies and procedures do not disadvantage our tenants, on the basis of the characteristics defined in the Equality Act.

Outcome 1:

Tenants possess the capacity, educational resources, and structured governance systems to exert influence on matters that significantly affect their daily existence.

Overview

Empowering tenants involves recognising their inherent strength, equipping them with necessary skills, training and space to develop and establish effective governance structures. This approach amplifies their ability to shape decisions that directly affect their lives. We aim to enable tenants to leverage their power, and establish robust governance mechanisms. This will allow our tenants to become more involved in the services they access, living spaces and environments they frequent and use. This way of working will present a method that distributes power equally among ESC professionals / staff, tenants, their families, and wider communities, allowing them to collectively design and implement public services.

What we will do

Objective	What we will do	Outcome
Empower our tenants and communities.	<p>Transform the way tenants groups are perceived at ESC so that they are seen not as bystanders to programs but as equal partners in designing and delivering them</p> <p>Champion tenant engagement at the most senior officer and member levels acknowledging the tenant governance mechanisms as significant players in</p>	<p>Tenant governance structures are recognised across ESC and valued as experts and an integral part of deciding priorities for services</p> <p>Senior politicians and Officers work in tandem to collectively decide of issues in the locality At the point of tenant groups being established, they will form an integral part of ESC governance and decision making structures having the ability to influence and change decision making</p>

	decision making	
Provide training to our tenants	Reach into our communities and include nontraditional voices - Providing the necessary resources, skills, knowledge exchange, and training programs to equip tenant representatives with the tools to address challenges, participate in decision-making processes, and enhance their overall well-being.	Improvement in the quality of life and navigation of challenges in the community Tenants use their transferrable skills to meet their personal goals and aspirations and achieve their full potential.
Create flexible tenant focused governance structures.	ESC will the facilitate the setup of a variety of tenant governance mechanisms to ensure all voices especially those marginalised have a voice	ESC will co-design and implement a variety of tenant governance mechanisms. We will ensure tenants voices are heard, especially those marginalised, and will consist of Steering groups, tenant associations, partnership boards and scrutiny panels. We will use both formal and informal structures around the locality to ensure people are heard

Outcome 2:

Establish open communication by engaging in two-way dialogue, responding to concerns, and sharing information promptly.

Overview

Open communication stands as the cornerstone of our commitment to engaging with tenants. We recognise the significance of transparent dialogue, actively listening, and promptly addressing concerns raised by tenants. Our

approach is rooted in an environment where individuals feel heard, respected, and valued. We strive to establish accessible channels through which concerns can be voiced and responded to promptly, ensuring that each query or issue is acknowledged and addressed with diligence and care.

Moreover, our pledge extends beyond addressing concerns; we proactively share information relevant to community matters. By disseminating updates, project developments, and decision-making processes, we empower tenants with the knowledge necessary to participate actively in community affairs. We prioritise clarity in our communications, ensuring that information is easily accessible and comprehensible to all, fostering a more informed and engaged community.

Our dedication to open communication, coupled with responsive engagement, aims to build trust and cultivate collaborative relationships with our tenants. We believe that by fostering transparent communication channels and promptly addressing concerns, we not only uphold accountability but also create a foundation for mutual respect and shared responsibility in shaping the collective future of our community.

Objective	What we will do	Outcome
Facilitate regular Two-Way Dialogue (Digitally / online and in person)	Ensure that there are multiple communications channels (digital and in-person) where tenants and stakeholders can express their thoughts, ideas, and concerns, fostering meaningful two-way dialogues.	ESC is recognised by tenants as a landlord that is accessible and listens to concerns
Prompt Response to Concerns:	Ensure a responsive system to address and acknowledge concerns raised by tenants, demonstrating a commitment to resolving issues first time and maintaining	Reduction in stage one escalated stage two complaints

	trust with them.	
Timely Information Sharing:	Implement a strategy for the prompt and transparent sharing of relevant information, ensuring tenants are well-informed about community matters, initiatives, and decisions	The tenant survey reflects over 75% of Tenants feel well-informed about community developments, initiatives, and decisions. Resulting in a firm understanding of local matters, which empowers tenants to make informed decisions and participate more effectively in community affairs.

Outcome 3:

Tenants are at the helm of co-creation, co design of solutions, initiatives and resources to address identified community needs.

Overview

In our tenant engagement strategy, we champion the vital role of communities as architects of their own well-being. Tenants take the lead in co-creating and co-designing solutions, initiatives, and resource allocation to address their specific needs. Through inclusive workshops, tenant surveys, and collaborative decision-making processes, we empower individuals to contribute to the enhancement of their community. This approach not only fosters a sense of ownership but also ensures that solutions are tailor-made, reflecting the diverse perspectives within the community. By placing communities at the forefront of these endeavors, we aim to strengthen bonds, encourage active participation, and create sustainable positive impacts that resonate with the unique identity and aspirations of each neighbourhood. Together, we coalesce around shared goals, forming a collaborative force that propels our community toward greater

resilience, unity, and prosperity.

Objective	What we will do	Outcome
Communities are at the helm of co-creation	<p>Establish iterative co-design processes that allow for ongoing refinement based on tenants input.</p> <p>Create platforms for idea exchange and feedback loops, ensuring continuous communication and collaboration among community members during co-creation process.</p>	<p>Ensuring the final co-design structures / processes truly reflect the collective vision and needs of ESC's tenants. In relation to cultural activations / community events and programmes.</p>
	<p>As part of procuring new contracts for tenants facing work, ensure that tenants are involved in designing the specification, providing insight into selection, and have an enduring voice across the lifetime of the contract</p>	<p>Higher degrees of satisfaction of, and loyalty from, tenants and service users. Increased levels of support and enthusiasm for innovation and change in ESC.</p>
	<p>Involving tenants in existing processes such as recruitment, procurement and building/safety programmes.</p>	<p>Tenants more confident and trust relationships between ESC and the service they receive.</p>

Outcome 4:

Creating a culture where tenants support ESC to measure performance using data to understand the diverse make up of our housing communities.

Overview

Our tenant engagement strategy revolves around cultivating a culture where tenants actively support the council's efforts to measure performance using data. By harnessing the power of data analysis, we aspire to gain a comprehensive understanding of the diverse makeup of our housing communities. Tenants are pivotal partners in this endeavor, providing crucial insights that inform performance metrics and shape council services. This collaborative approach ensures that our initiatives and resources are finely tuned to meet the unique needs of each neighbourhood. Emphasizing transparency and inclusivity, we empower tenants to actively contribute to local governance, fostering a resilient and united community. Through data-driven decision-making, we not only enhance the effectiveness of council services but also build a collective sense of ownership and pride, reflecting the rich tapestry of our diverse and vibrant communities.

Objective	What we will do	Outcome
Understanding our tenants	Implement a data-driven tenant engagement approach using surveys, demographic analysis, and technology to understand our communities. Regularly gather tenant insights through feedback loops and stakeholder interactions. Leverage data to map community assets, analyse external factors, and inform iterative strategy refinement,	ESC agreed approach to 6 monthly tenant surveys, and other data driven insights. Creation of bespoke programmes / events to address community needs
Foster a Data-Driven Informed Culture to strengthen	Conduct awareness campaigns to educate tenants about the importance of data in shaping community initiatives and encourage their active participation in data-sharing processes.	Tenants recognise the importance of data, engaging proactively in local initiatives, showcasing heightened

decision making.	Building capacity to interpreting and utilising data, fostering a shared understanding of how data can inform strategic decisions for the benefit of the community.	awareness of how data shapes and influences the development of their neighborhood
Enhance Data Collection Mechanisms	Implement user-friendly data collection tools and methods, such as surveys and digital platforms, to streamline tenant input and ensure a comprehensive understanding of community dynamics.	Improved data collection tools resulting in higher tenant engagement, more accurate insights, providing a comprehensive understanding of tenant dynamics and needs.
Strengthen Data-Driven Decision-Making	Provide training sessions for council members and tenants on interpreting and utilising data, fostering a shared understanding of how data can inform strategic decisions for the benefit of the community	ESC housing services are more responsive and customised, directly addressing the diverse needs identified through data analysis, thereby enhancing the overall quality and effectiveness delivery and services
Tailor Services to Community Diversity	Analyse collected data to identify specific needs and preferences within each community segment, enabling the customisation of council services to better align with the diverse makeup of neighborhoods.	

8. What does success look like and how will we measure it?

We are committed to measuring tenant engagement performance across our three-year strategy. Delivering this in tandem with a purpose facilitated tenant Strategy Group to build, shape and assess the measures.

Successful tenant engagement at ESC will demonstrate;

- Empowered Tenants: Tenants possess enhanced skills and knowledge, actively influencing service development. They engage in shaping and delivering services, contributing to a community where individuals are empowered to actively participate in decision-making.
- Equal Partnerships with Tenants: ESC establishes equitable partnerships with tenants through governance structures, scrutiny processes, and regular communication. Policies and services are collaboratively shaped, directly impacting tenants' lives and fostering a sense of shared responsibility.
- Co-Design, communication and Performance Measurement: A culture is cultivated where tenants collaborate with ESC through co-design and trusted two way dialogue particularly to measure performance. This ensures accountability, responsiveness to challenges faced by communities, and continuous improvement based on shared insights and feedback.
- Sense of Belonging and Ownership: Tenants experience a deep sense of belonging and ownership. ESC actively listens, measures, and implements metrics that genuinely improve tenants' lives, creating a community where individuals feel connected, valued, and integral to the betterment of their collective well-being.

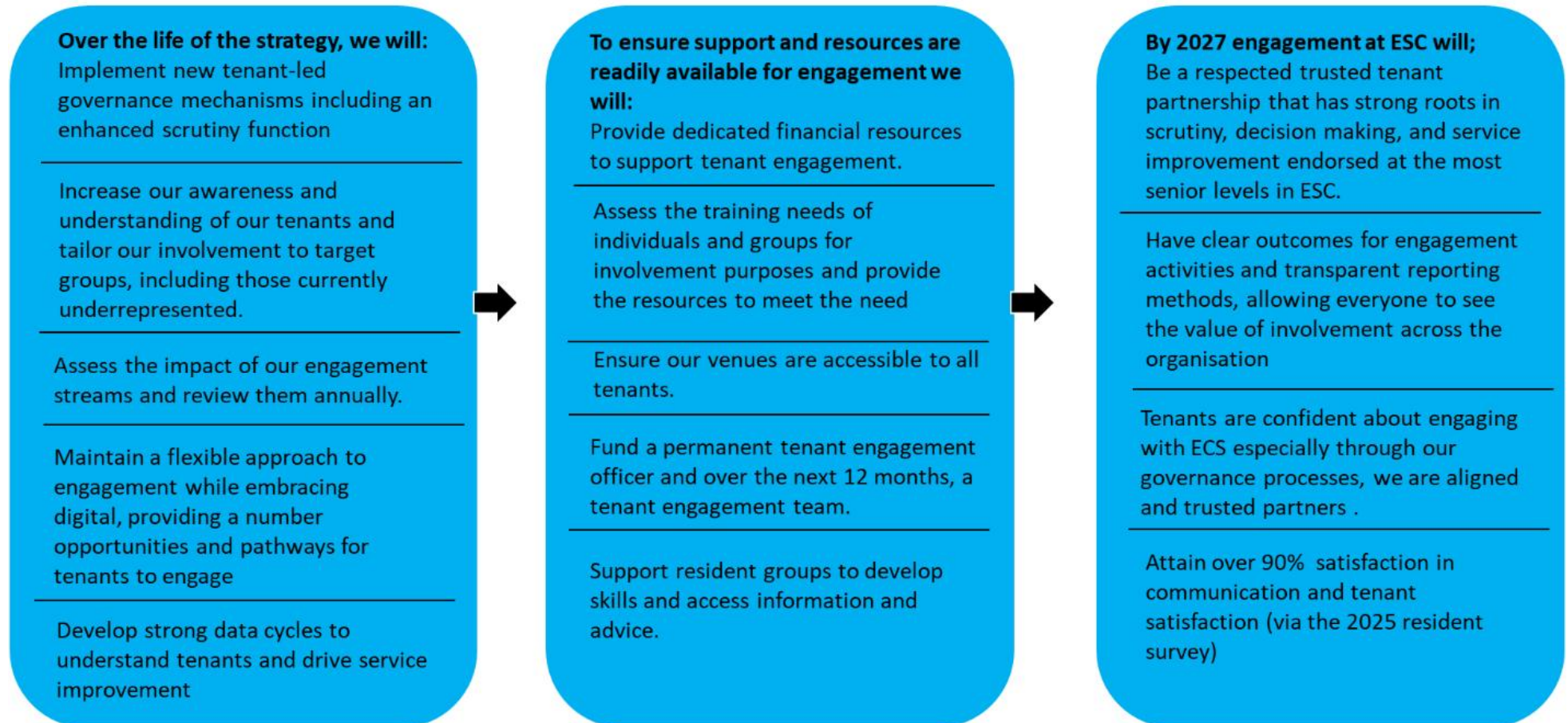
Throughout this strategy we have maintained tenant feedback guides improvements. Through collaboration with stakeholders, we will actively involve more tenants in engagement activities, enhancing satisfaction levels. Annual updates will showcase successes and lessons learned. Our focus is exceeding Tenant Satisfaction Measures, ensuring

tenants feel heard, informed, and satisfied with our responsive actions.

KPI Themes	Potential KPI's
Engagement process	<ul style="list-style-type: none"> • The levels of participation opportunities offered • Consultation, decision-making, discussions, or surveys • People involved in the design process • The variety of engagement methods and tools used • The number of channels used for outreach • Response rate: the number of people reached vs the number of respondents. • The depth of engagement: the number of people who landed on the webpage vs completed the survey • Engagement satisfaction
Tenant and Stakeholders	<ul style="list-style-type: none"> • Variety in age groups • Gender balance • Geographic reach • Variety in income classes • Variety in education and working status • Diversity of cultural and linguistic backgrounds
Overall satisfaction Perception questions	<ul style="list-style-type: none"> • TP02 Satisfaction with repairs • TP03 Satisfaction with time taken to complete most recent repair • TP04 Satisfaction that the home is well maintained • TP05 Satisfaction that the home is safe • TP06 Satisfaction that the landlord listens to tenant views and acts upon them • TP07 Satisfaction that the landlord keeps tenants informed about things that matter to them • TP08 Agreement that the landlord treats tenants fairly and with respect • TP09 Satisfaction with the landlord's approach to handling complaints • TP10 Satisfaction that the landlord keeps communal areas clean and well maintained • TP11 Satisfaction that the landlord makes a positive

	<p>contribution to neighbourhoods</p> <ul style="list-style-type: none"> • TP12 Satisfaction with the landlord's approach to handling anti-social behaviour
<ul style="list-style-type: none"> • Internal KPI's 	<ul style="list-style-type: none"> • Number of groups / tenant governance mechanisms started. • Number of tenants trained. • Scores on confidence and trust in the ESC

9. What's next?



East Suffolk - Equality Impact Analysis (EqIA)

Agenda Item 9

ES/1971

EqIA reference: **EQIA616133394**

Service area/Team conducting EqIA: **Tenant Services Housing**

Officer conducting the EqIA: **Marlon Bruce**

Officer email address: **marlon.bruce@eastsoffolk.gov.uk**

Responsible Cabinet member: **Cllr Beaven**

Name of project/policy/initiative or action: **Tenant Engagement Strategy 2024 - 2027**

Is this a new project, policy, initiative or action that directly impacts people: **Yes**

Date of EqIA: **20/05/2024**

Does the project/policy/initiative/action relating to this EqIA have the potential for positive or negative impact on any of the protected characteristics?

Characteristic - Impact

Age: **Positive**

Reason: **The Tenant Engagement Strategy positively impacts various age groups by designing activities and support systems that cater to both younger and older Tenants. For the elderly, the strategy includes initiatives, community events, and digital literacy programs to ensure they remain engaged and informed. For younger Tenants, it offers upskilling opportunities, youth focused partnerships, and activities that foster leadership and community involvement. Negative impacts, such as potential exclusion due to physical accessibility issues or digital divide, are minimized by ensuring all events and communications are accessible in multiple formats (e.g., in-person, online, large print). The strategy will also promote intergenerational activities to build bridges between different age groups, fostering a more inclusive community.**

Disability: **Positive**

Reason: **The strategy positively impacts Tenants with disabilities by incorporating accessibility into all aspects of tenant engagement. This includes providing sign language interpreters, accessible venues, and materials in Braille or large print. Efforts are made to ensure that digital content is compatible with screen readers and other assistive technologies. Negative impacts, such as potential physical barriers or communication challenges, are minimized by conducting accessibility audits and continuously consulting with disabled Tenants to identify and address any issues. Additionally, training is provided to staff on disability awareness and inclusive practices, ensuring that engagement activities are accessible and welcoming to all.**

Gender reassignment: **Positive**

Reason: **The strategy fosters a positive impact by promoting an inclusive and respectful environment for Tenants undergoing gender reassignment. This includes using preferred names and pronouns, offering gender-neutral facilities (where possible), and ensuring that policies and communication are sensitive to the needs of transgender individuals. Negative impacts, such as inadvertent misgendering or exclusion, are minimized through staff training on gender diversity and inclusion. The strategy also provides platforms for transgender Tenants to voice their concerns and participate in decision-making processes, ensuring their needs and perspectives are considered in all engagement activities.**

Marriage and civil partnership: **Positive**

Reason: **While the strategy may have a neutral impact on marriage and civil partnership, it still ensures that all forms of relationships are respected and acknowledged. Engagement activities and policies are designed to be inclusive, reflecting the diversity of modern relationships. Any negative impacts, such as unintentional exclusion of certain relationship statuses, are minimized by promoting an inclusive approach that considers the needs of all couples, regardless of their marital status. The strategy also provides support for Tenants in civil partnerships, ensuring they have equal access to all engagement opportunities and resources.**

Pregnancy and maternity: **Positive**

Reason: **The strategy positively impacts pregnant people and new parents by providing tailored support and ensuring engagement activities are accessible and family-friendly. This includes offering childcare during events, flexible scheduling, and resources specifically for new parents. Potential negative impacts, such as accessibility issues for pregnant people or new parents, are minimized by ensuring venues are accessible and by providing remote participation options. The strategy also includes targeted outreach to ensure that pregnant people and new parents are aware, and can participate in engagement activities, helping to build a supportive community network.**

Race: **Positive**

Reason: **The strategy positively impacts racial and ethnic minorities by promoting culturally sensitive engagement and ensuring representation in decision-making processes. This includes providing translation services, culturally appropriate outreach, and celebrating cultural diversity through community events. Negative impacts, such as language barriers or cultural misunderstandings, are minimized by actively involving diverse communities in the planning and execution of engagement activities.**

Religion or belief: **Positive**

Reason: **The strategy supports positive impacts by accommodating the diverse religious practices of tenants, ensuring that engagement activities respect and incorporate various religious beliefs and observances. This includes scheduling events around major religious holidays, providing spaces for prayer, and ensuring dietary requirements are met at community gatherings. Negative impacts, such as scheduling conflicts or exclusion of certain religious groups, are minimized through continuous consultation with religious leaders and Tenants.**

Sex: **Positive**

Reason: **The strategy positively impacts Tenants of all genders by ensuring equal participation opportunities in engagement activities. This includes addressing any gender-specific barriers and promoting gender equality in all aspects of tenant engagement. Potential negative impacts, such as gender biases or unequal access, are minimized by implementing gender-sensitive policies and practices. The strategy also includes targeted outreach to ensure that people and intersections can equally benefit from and contribute to engagement activities.**

Sexual orientation: **Positive**

Reason: **The strategy fosters a positive impact by creating a welcoming and inclusive environment for LGBTQ+ Tenants. This includes ensuring that all engagement activities and communications are free from discrimination and bias. Negative impacts, such as potential exclusion or harassment, are minimized through staff / tenant training on LGBTQ+ issues and by promoting a culture of respect and inclusion. The strategy also provides platforms for LGBTQ+ Tenants to share their experiences and participate in decision-making processes, ensuring their needs and perspectives are represented.**

Deprivation/Socio-economic Disadvantage: **Positive**

Reason: **The strategy positively impacts Tenants facing socio-economic disadvantages by focusing on engagement in deprived areas and considerations for providing support services to remove barriers to participation (subject to budget approval). This could include offering financial assistance for event participation, providing free or low-cost community activities, and ensuring access to essential services. Negative impacts, such as financial barriers or lack of access to information, are minimized through targeted outreach and support programs.**

What evidence or data has been collated or used to support the completion of this EqIA:
Engagement with other East Suffolk Council teams/departments, Published documents/reports/data

Details for published documents:

As a result of undertaking this EqIA do you need to provide information relating to the policy, project, initiative or action to the public in a different language or form and how do you propose to do this: **It is essential the Tenant Engagement Strategy is accessible, including those needing different languages or formats. We will provide translations of key documents in commonly spoken languages, and produce materials in Braille, large print, and audio formats for those with visual impairments. Our website will meet accessibility standards,**

and we will offer videos with subtitles and sign language. Additionally, during the consultation phase we will engage with Tenants to disseminate information and gather feedback, ensuring inclusive participation.

As a result of completing this EqlA, has the Author, Service team, Project manager made any changes or adjustments to the policy/project/initiative/action: **No**



Committee	Cabinet
Date	04/06/2024
Subject	Appointments to Outside Bodies for 2024/25 (Executive)
Cabinet Member	Councillor Caroline Topping Leader of the Council
Report Author(s)	Lorraine Fitch Democratic Services Manager Lorraine.fitch@eastsoffolk.gov.uk
Head of Service	Chris Bing Head of Legal and Democratic Services and Monitoring Officer Chris.bing@eastsoffolk.gov.uk
Director	Kate Blakemore Strategic Director Kate.blakemore@eastsoffolk.gov.uk

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
---	----------------

Purpose/Summary

Council is asked to consider Appointments to Outside Bodies (Executive) for the 2024/25 Municipal Year, as outlined at Appendix A of this report.

Recommendation(s)

That Cabinet approves:

1. That Councillors be appointed to those (Executive) Outside Bodies listed in Appendix A for the 2024/25 Municipal Year.
2. That the Leader of the Council be authorised to fill any outstanding vacancies left unfilled by the Cabinet.
3. That the Leader be granted delegated authority to make any necessary changes to the membership of the (Executive) Outside Bodies for the remainder of the 2024/25 Municipal Year.

Strategic plan

How does this proposal support Our Direction 2028?

Environmental Impact	Delivering positive climate, nature and environmental impacts through the decisions we make and actions we take.
Sustainable Housing	All homes in East Suffolk are safe, suitable and sustainable, in communities where residents are proud to live.
Tackling Inequalities	Improving quality of life across the district by tackling financial, social and health inequalities.
Thriving Economy	Enabling residents to benefit from, and contribute to, a thriving economy.
Our Foundations / governance of the organisation	<p>Appointments to Outside Bodies may be made under the general power in Section 2 of the Local Government Act 2000 – to do anything which is likely to promote the economic, social or environmental wellbeing of the area, unless specifically prohibited.</p> <p>The process of Cabinet approving appointments to Outside Bodies, where the role relates to an Executive function of the Council, adheres to the requirements of the Council's Constitution.</p> <p>Details of the Council's representation on Outside Bodies are included on the Council's website.</p> <p>Members appointed to Outside Bodies will be asked to present a short report to Full Council, at least once per year, on the work of the Outside Body.</p>

Justification for recommendations

1. Background

- 1.1 The Cabinet appoints annually to a wide range of diverse Outside Bodies. The Cabinet considers member representation on Outside Bodies when the role relates to an Executive function carried out by the local authority; the Council considers representation on Outside Bodies where the role relates to a Non-Executive function of the local authority; and the Scrutiny Committee considers representation on Outside Bodies where the role relates to a Scrutiny function of the local authority.
- 1.2 Some appointments to Outside Bodies are made because of a statutory requirement to appoint one or more members to them. Most appointments to Outside Bodies are discretionary, taking into consideration how representation on them adds value.
- 1.3 Appointment of members to Outside Bodies provides support to the organisation concerned and enables members to fulfil their community leadership roles.
- 1.4 Members appointed to Outside Bodies are able to work with and alongside local community groups, helping to empower them in terms of addressing local issues and delivering sustainable solutions.

2. Introduction

- 2.1. Members were last appointed to Outside Bodies (Executive) in 2023/24 by Cabinet at its meeting in June 2023.
- 2.2. An extensive review of all the Outside Bodies appointments was undertaken during March 2024.
- 2.3. The following Outside Bodies (Executive) have been removed from the list, as they no longer meet or it has been agreed that East Suffolk Councillors will no longer be appointed to them:
 - A47 Alliance
 - Suffolk Growth Portfolio Holders

3. Proposal

- 3.1 Outside Bodies can gain a number of benefits from having a Council representative on them, which include:
 - To represent the interests of the Council and to promote the strategic aims of its Strategic Plan;
 - To provide knowledge, skills and expertise which may not otherwise be available;
 - To provide local accountability or democratic legitimacy through the appointment of an elected representative;
 - To ensure that good relationships can be maintained with the body;
 - To deliver a partnership project that requires the input of other organisations or community groups;
 - To protect the Council's investments or assets i.e., if the Council has provided grant funding or provides funding for service delivery;
 - To lever in external funding which is not available to the Council on its own.
- 3.2 Taking account of all information provided within the report, Cabinet Members are asked to consider the content of Appendix A.

4 Financial Implications

4.1 Those Councillors formally appointed to external organisations as the Council's representative are able to claim travel expenses in accordance with the Members Allowance Scheme. These costs can be met from existing resources.

5 Legal Implications

5.1 Appointments to Outside Bodies may be made under the general power in Section 2 of the Local Government Act 2000 – to do anything which is likely to promote the economic, social or environmental wellbeing of the area, unless specifically prohibited.

5.2 The process of Cabinet approving appointments to Outside Bodies, where the role relates to an Executive function of the Council, adheres to the requirements of the Council's Constitution.

6 Risk Implications

6.1 Members must consider the implications and responsibilities of being involved with Outside Bodies as they must continue to comply with the District Council's Code of Conduct when they are acting as a representative of the Council; comply with the Code of Conduct of the Outside Body they are appointed to if one exists; and declare a personal interest in any business of the District Council, as necessary.

7 Options

7.1 The Council needs and wishes to engage and work with external organisations, including the Outside Bodies listed in Appendix A, to continue to deliver the priorities identified in the East Suffolk Strategic Plan.

8 Recommendations

- That Councillors be appointed to those Outside Bodies listed in Appendix A for the 2024/25 Municipal Year.
- That the Leader of the Council be authorised to fill any outstanding vacancies left unfilled by Council.
- That the Leader be granted delegated authority to make any necessary changes to the membership of the Outside Bodies for the remainder of the 2024/25 Municipal Year.

9 Reasons for Recommendations

9.1 To ensure that Members are appointed to Outside Bodies (Executive) for 2024/25.

10 Conclusions/Next Steps

10.1 That the appointments to the Outside Bodies (Executive) be approved as per Appendix A to this report.

Areas of consideration comments

Section 151 Officer comments:

Those Councillors formally appointed to external organisations as the Council's representative are able to claim travel expenses in accordance with the Members' Allowance Scheme. These costs can be met from existing resources.

Monitoring Officer comments:

Appointments to Outside Bodies may be made under the general power in Section 2 of the Local Government Act 2000 – to do anything which is likely to promote the economic, social or environmental wellbeing of the area, unless specifically prohibited.

The process of Cabinet approving appointments to Outside Bodies, where the role relates to an Executive function of the Council, adheres to the requirements of the Council's Constitution.

Equality, Diversity and Inclusion/EQIA:

Not applicable

Safeguarding:

Not applicable

Crime and Disorder:

Not applicable

Corporate Services implications:

Not applicable

Residents and Businesses consultation/consideration:

Not applicable

Appendices:

Appendix A	Proposed list of appointments to Outside Bodies (Executive) for 2024/25 TO FOLLOW
-------------------	---

Background reference papers:

None

APPOINTMENT TO OUTSIDE BODIES 2024/25 (EXECUTIVE FUNCTIONS)

OUTSIDE BODY	NUMBER OF MEETINGS PER YEAR (If known)	NUMBER OF MEMBERS TO BE APPOINTED	MEMBERS APPOINTED
Benacre and Kessingland Flood Project	1 or 2 per year	2	Cabinet Member with responsibility for Planning & Coastal Management Deputy Leader and Cabinet Member with responsibility for Housing
Coastal Partnership East	Quarterly	2	Cabinet Member with responsibility for Planning & Coastal Management Deputy Leader and Cabinet Member with responsibility for Housing
Community Safety Partnership	Quarterly	1	Assistant Cabinet Member with responsibility for Community Health
District Councils' Network	1 or 2 per year	1	The Leader Deputy Leader and Cabinet Member with responsibility for Housing (Substitute)
East Suffolk and North East Essex NHS Foundation Trust Note - Membership rotates with Ipswich Borough Council (IBC) every 3 years. IBC have the role June 2024 – May 2027	Quarterly	1	No appointment needed for 2024/25 Cabinet Member with responsibility for Community Health Assistant Cabinet Member with responsibility for Community Health (Substitute)

OUTSIDE BODY	NUMBER OF MEETINGS PER YEAR (If known)	NUMBER OF MEMBERS TO BE APPOINTED	MEMBERS APPOINTED
East West Rail	TBC	1	Assistant Cabinet Member with responsibility for Economic Development and Transport
Everyone Active Partnership Board	Quarterly	2	Cabinet Member with responsibility for Communities, Culture, Leisure & Tourism Assistant Cabinet Member with responsibility for Communities, Culture, Leisure & Tourism
Freeport East (Supervisory) Board	6 per year	1	Deputy Leader of the Council and Cabinet Member with responsibility for Housing
Galloper Wind Farm Fund Panel	Annually	1	Cabinet Member with responsibility for Energy and Climate Change
Greater Anglia Integrated Transport Forum	Quarterly	1	Assistant Cabinet Member with responsibility for Economic Development and Transport
Heritage Action Zone Project Board	Quarterly	1	Cabinet Member with responsibility for Economic Development and Transport
Ipswich Strategic Planning Area Board	6 monthly	1	Cabinet Member with responsibility for Planning & Coastal Management

OUTSIDE BODY	NUMBER OF MEETINGS PER YEAR (If known)	NUMBER OF MEMBERS TO BE APPOINTED	MEMBERS APPOINTED
James Paget University Hospital NHS Foundation Trust Governors' Council	5 per year	1	Deputy Leader and Cabinet Member with responsibility for Housing
Landguard and Felixstowe Conservation Trust	Monthly	1	Cabinet Member with responsibility for Community Health
Leiston Place Board	Quarterly	2	Cabinet Member with responsibility for Communities, Culture, Leisure and Tourism Assistant Cabinet Member with responsibility for Communities, Culture, Leisure and Tourism (Substitute)
Local Government Association: Special Interest Group on Coastal Issues	Quarterly	1	Deputy Leader and Cabinet Member with responsibility for Housing
Local Government Association: Special Interest Group Nuclear Legacy Advisory Forum (NuLeAF)	Quarterly	1	Cabinet Member with responsibility for Energy and Climate Change

OUTSIDE BODY	NUMBER OF MEETINGS PER YEAR (If known)	NUMBER OF MEMBERS TO BE APPOINTED	MEMBERS APPOINTED
Lowestoft Flood Risk Management Scheme Board	Quarterly	3	Deputy Leader and Cabinet Member with responsibility for Housing (Chair) Leader of the Council Cabinet Member with responsibility for Planning and Coastal Management
Lowestoft Place Board	Quarterly	2	Cabinet Member with responsibility for Economic Development and Transport Lowestoft and Northern Parishes Community Partnership Community Partnership Chair
Lowestoft Cultural Leadership Group	Quarterly	1	Cabinet Member with responsibility for Economic Development and Transport
Norfolk Health & Well-being Board	Quarterly	1	Deputy Leader and Cabinet Member with responsibility for Housing Cabinet Member with responsibility for Community Health (Substitute)
Norfolk and Waveney Integrated Care Partnership	6 per year	1	Deputy Leader and Cabinet Member with responsibility for Housing

OUTSIDE BODY	NUMBER OF MEETINGS PER YEAR (If known)	NUMBER OF MEMBERS TO BE APPOINTED	MEMBERS APPOINTED
Places Leisure Partnership Board	Quarterly	2	Cabinet Member with responsibility for Communities, Culture, Leisure & Tourism Assistant Cabinet Member with responsibility for Communities, Culture, Leisure & Tourism
Resilient Coasts Project Board	Quarterly	1	Assistant Cabinet Member with responsibility for Planning and Coastal Management
Safer Suffolk Foundation Grant Fund Panel	Quarterly	Dependant on number of CSPs	Assistant Cabinet Member with responsibility for Community Health
Sizewell Site Stakeholder Group	3 per year	1	Cabinet Member with responsibility for Energy and Climate Change
Southwold to Walberswick Project Board	Quarterly	2	Cabinet Member with responsibility for Planning & Coastal Management Deputy Leader and Cabinet Member with responsibility for Housing
Suffolk Coast and Heaths Areas of Outstanding Natural Beauty Joint Advisory Committee	3 per year	2	Cabinet Member with responsibility for Communities, Culture, Leisure & Tourism Cabinet Member with responsibility for the Environment

OUTSIDE BODY	NUMBER OF MEETINGS PER YEAR (If known)	NUMBER OF MEMBERS TO BE APPOINTED	MEMBERS APPOINTED
Suffolk Environment Portfolio Holders	Quarterly	1	Cabinet Member with responsibility for the Environment
Suffolk Health & Well-being Board	6 per year	1	Cabinet Member with responsibility for Community Health Cabinet Member with responsibility for Corporate Services – Digital, Customer Services, HR and Assets (Substitute)
Suffolk Housing Member Board	TBC	1	Deputy Leader and Cabinet Member with responsibility for Housing
Suffolk Local Access Forum (Footpaths)	Quarterly	1	Councillor Ed Thompson Cabinet Member with responsibility for Communities, Culture, Leisure & Tourism (Substitute)
Suffolk Public Sector Leaders	Quarterly	1	Leader of the Council
Suffolk Waste Partnership Members' Group	Quarterly	1	Cabinet Member with responsibility for the Environment